

January 18, 2024

ELECTRONIC DELIVERY

President

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

School #M073192
Withdrawal of Accreditation

Dear [REDACTED]

At the November 2023 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered the previous decision to place East West College of Natural Medicine (“EWCNM”) located in Sarasota, Florida on Probation in relation to the school’s Application for Renewal of Accreditation, Application for a Change of Control, and complaint responses.

Upon review of the history of these matters, the June 14, 2023 Probation Order, and the school’s response, the Commission found that EWCNM failed to demonstrate that the school has adequate management and administrative capacity in place that includes full-time on-site supervision by an individual or team with the appropriate combination of education, experience, and demonstrated ability to lead and manage a post-secondary educational institution in compliance with accrediting standards (*Section I (A)(1)(a), Substantive Standards, Standards of Accreditation*).

Based on the foregoing ground, the Commission voted to withdraw EWCNM’s accreditation and to remove the school from the list of ACCSC-accredited institutions. The history of the Commission’s review and bases for the Commission’s decision to withdraw EWCNM’s accreditation are set forth below.¹

History of the Commission’s Review:

- In April 2020, the Commission approved the transfer of accreditation for the school that resulted from the change of ownership and control. The Commission understood the new ownership structure to be as follows:
 - Level 1: Acupuncture and Alternative Medicine Clinic, LLC (100% owner of the school)
 - Level 2: [REDACTED] (50% owner of Level 1)
[REDACTED] (50% owner of Level 1)
- At the August 2022 meeting, the Commission reviewed the school’s Renewal of Accreditation and Change of Control On-Site Evaluation response. Upon review of the June 12, 2022 On-Site Evaluation Report and the school’s response to that report, the Commission voted to **defer** final action on EWCNM’s Application for Renewal of Accreditation and Change of Control until the February 2023 meeting in order to provide the school with an additional opportunity to demonstrate compliance with accrediting standards.
- At the August 2022 meeting, the Commission considered the Application for Renewal of Accreditation and Application for a Change of Control. The Commission determined that additional information was necessary in order to continue review of the school’s applications.

¹ The Commission noted that although only one item is included as the ground for withdrawal, the school did not fully resolve the Commission’s compliance concerns in the areas of integrity and faculty working relationship with students, in addition to multiple areas of on-going concern.

- Upon review of the on-site evaluation team's observations that "multiple student and faculty groups confided grievances against EWCNM and feared retaliation," the Commission expressed concern and seriously questioned EWCNM's assertion that "no student has ever complained" and that the "school did not have any grievance documentation in light of what transpired during the on-site evaluation" (August 12, 2022 Commission Letter, p. 1). The Commission remained concerned with the nature of the response as the Commission also became aware of a Title IX investigation initiated by student complaints. Moreover, the Commission noted that the student's written comments in the surveys conducted at the time of the on-site evaluation included multiple allegations of the school's non-compliance with accrediting standards as well as state and federal laws and/or regulations. Upon consideration of the totality of the record of student satisfaction and safety concerns, the Commission determined that additional information was required ahead of the Commission's review of EWCNM's Application for Renewal of Accreditation and Application for a Change of Control.
- Pursuant to *Section III (C)(2)(c), Rules of Process and Procedure, Standards of Accreditation*, the Commission determined that EWCNM's response to the additional information request would supplement the school's response in the ongoing review of EWCNM's Application for Renewal of Accreditation, Application for a Change of Control and all other information received including the Title IX complaints under investigation, at the time.
- At the September 2022 meeting, the Commission considered the August 12, 2022 Additional Information letter regarding the student survey comments and the school's response and voted to defer final action until the February 2023 meeting. Upon review of the two named complaints submitted on February 4, 2022 and February 18, 2022, the Commission voted to continue review of the complaints in conjunction with the deferral.
- At the February 2023 meeting, the Commission considered the Application for Renewal of Accreditation, Application for a Change of Control, complaints, and the school's responses and voted to direct EWCNM to receive a Commission-Directed Unannounced On-Site Evaluation as part of the continued deferral action. The Commission determined to review the On-Site Evaluation Report and EWCNM's response at its May 2023 meeting.
- At the May 2023 meeting, the Commission considered the previous decision to direct the school to receive a Commission-Directed Unannounced On-Site Evaluation as part of the continued deferral status with regard to the Application for a Renewal of Accreditation, Application for a Change of Control, and complaints. Upon review of the March 29, 2023 On-Site Evaluation Report and the school's response to that report, the Commission voted to place EWCNM on Probation with a subsequent review scheduled for the November 2023 meeting. The Commission found the school to be out of compliance in the following three areas, with nine additional areas of on-going concerns (see the June 14, 2023 Probation):
 - EWCNM failed to demonstrate that a high level of reliance may be placed upon information, data, and statements provided to the Commission by the school (*Introduction, Standards of Accreditation*). The Commission noted that the *Standards of Accreditation* state that integrity and honesty of a school are fundamental and critical to the accreditation process and that a compromise of integrity is considered to be an extreme offense. As part of the basis for decisions, *Section VII (C)(2), Rules of Process and Procedure of the Standards of Accreditation* states that "the Commission meets regularly to review the materials of each school on the agenda. It is concerned with the totality of each school and views each school in accordance with all of the available information gathered through the accreditation process and other authoritative data contained in the school's file."

- EWCNM failed to demonstrate that the school has adequate management and administrative capacity in place that includes full-time, on-site supervision by an individual or team with the appropriate combination of education, experience, and demonstrated ability to lead and manage a post-secondary educational institution in compliance with accreditation standards (*Section I (A)(1)(a), Substantive Standards, Standards of Accreditation*).
- EWCNM failed to demonstrate that the faculty maintain a satisfactory working relationship with students (*Section III (B)(1), Substantive Standards, Standards of Accreditation*). The Commission has previously questioned the faculty's working relationship with students as a result of two student complaints submitted in February 2022, containing allegations of the school's compliance with Title IX regulations. The Commission continues to question the appropriateness of the faculty's working relationship with students as a result of the CDUOER's finding regarding the institution's utilization of its complaint policy and procedure for handling student complaints (*Section VI (D)(1), Substantive Standards, Standards of Accreditation*).

November 2023 Review:

At the November 2023 meeting, the Commission considered the history of EWCNM's compliance over the course of the Probation and found that the school, under the new ownership, failed to meet the burden of demonstrating continuous compliance with the *Standards of Accreditation* as described below and accordingly voted to withdraw accreditation pursuant to *Section IV (E)(2)(p)(iv) & VII (P)(1)(b), Rules of Process and Procedure, Standards of Accreditation*. Specifically, the Commission determined that EWCNM failed to demonstrate adequate management and administrative capacity necessary to operate the school in compliance with accrediting standards since the change of control (*Section I (A)(1)(a), IV (E)(2)(p)(iv), Rules of Process of Procedures, Substantive Standards, Standards of Accreditation*). The Commission based its decision on the scope, nature, and quantity of:

- The findings identified by the on-site evaluation team set forth in the March 7-8, 2022 On-Site Evaluation for the Application for Renewal of Accreditation and Application for a Change of Control;
- The unresolved compliance issues brought to the Commission's attention in the February 4, 2022 and February 18, 2022 named complaints, as well as the student survey comments collected during the school's renewal of accreditation and change of control process;
- The unresolved compliance issues identified in the August 12, 2022 additional information Commission letter;
- The unresolved compliance issues identified in the December 19, 2022 Commission Deferral;
- The findings identified by the on-site evaluation team identified in the March 9, 2023 Commission-Directed Unannounced On-Site Evaluation report²; and
- The unresolved compliance issues set forth in the June 14, 2023 Probation Order.

The totality of these issues is outlined in Table 1 below.

² This evaluation was in conjunction with the school's Application for Renewal of Accreditation, Application for a Change of Control and complaints received.

Table 1: Commission Action and Compliance History

Commission Action and Compliance History	
August 2020 Change of Control Action: Approve Letter Date: November 8, 2019	<p>On March 4, 2020, Acupuncture and Alternative Medicine Clinic, LLC, in accordance with the corporate structure identified below, acquired all assets necessary to operate the above referenced school. The Commission understands the new ownership structure to be as follows:</p> <p>Level 1: Acupuncture and Alternative Medicine Clinic, LLC (100% owner of the school)</p> <p>Level 2: [REDACTED] (50% owner of Level 1) [REDACTED] (50% owner of Level 1)</p> <p>ACCSC approved the transfer of accreditation for the school that resulted from this change of ownership and control.</p>
March 2022 On-Site Evaluation Renewal of Accreditation Change of Control	<p>Team Findings</p> <ol style="list-style-type: none"> 1. Management and administrative capacity 2. Institutional assessment and improvement activities 3. Student satisfaction 4. Administrative qualifications 5. Faculty qualifications 6. Refund policy 7. Response submissions/disclosures 8. Faculty development 9. Program Advisory Committee 10. Student complaints
August 2022 Commission Meeting Renewal of Accreditation Change of Control Action: Defer Letter Date: December 19, 2022	<p>Areas of Concern</p> <ol style="list-style-type: none"> 1. Management and administrative capacity 2. Student satisfaction 3. Institutional assessment and improvement activities 4. Faculty qualifications 5. Refund policy 6. Response submissions/disclosures 7. Faculty development and assessment 8. Program Advisory Committee 9. Student complaints
August 2022 Commission Meeting Renewal of Accreditation Change of Control (Student Survey Comments) Action: Defer for Additional Information Letter Date: August 12, 2022	<p>At the August 2022 meeting, the Commission considered the Application for Renewal of Accreditation and Application for a Change of Control. Upon review of the June 12, 2022 On-Site Evaluation Report and the school's response to that report, the Commission determined that additional information is necessary in order to continue the review of the school's applications. The student survey comments allege that EWCNM may not be in compliance with the Commission's standards in the areas of institutional eligibility requirements; ownership, management and administrative capacity; physical facilities and emergency preparedness; general program requirements; educational administration; faculty qualifications; general admissions requirements; advising and counseling; student records; student learning; and student assessment.</p>
September 2022 Commission Meeting Complaints Student Survey Comments	<p>At the September 2022 meeting, the Commission reviewed the August 12, 2022 additional information letter regarding student survey comments. The Commission voted to defer final action until the February 2023 meeting. The Commission also considered the two named complaints submitted in February 2022, upon review of the school's response, the</p>

Upon review of EWCNM's October 17, 2023 response to the Probation, and the totality of the school's record as outlined in Table 1, the Commission determined that EWCNM failed to demonstrate that the school has adequate management and administrative capacity in place that includes full-time, on-site supervision by an individual or team with the appropriate combination of education, experience, and

demonstrated ability to lead and manage a post-secondary educational institution in compliance with accrediting standards (*Section I (A)(1)(a), Substantive Standards, Standards of Accreditation*). The Commission noted, that although the individuals within the school's management team have changed roles during the Commission's review of this matter, the management team failed to demonstrate that these changes have led to significant improvement towards achieving compliance in multiple areas. As a result, the Commission determined that the school leadership, in any configuration, has not demonstrated the administrative capacity sufficient to ensure operation of the school in compliance with accrediting standards, as evidenced by the continued unresolved compliance issues and multiple complaints³.

Regarding the school's change of control, *Section IV (E)(2)(p)(iv), Rules of Process and Procedure, Standards of Accreditation* states the following:

If a school fails to demonstrate that it is operating in compliance with accrediting standards under the new control structure, the Commission may vote to remove the school from the list of ACCSC-accredited schools or take other appropriate action in accordance with these Rules.

The Commission found that EWCNM has failed to meet this burden. Since the time of the Commission's March 2022 On-Site Evaluation resulting from the consummation of the change in control in conjunction with the school's renewal of accreditation process, the new [REDACTED]—have consistently identified as the primary managers and administrators of the school. During the renewal of accreditation and change of control on-site evaluation, the team identified multiple areas of concern to include overt shortcomings in the management and administrative capacity. Specifically, the on-site evaluation team expressed concern, as "[REDACTED] were not prepared for all the facets that campus ownership/leadership required and failed to understand the intricacies of compliance" (June 12, 2022 On-Site Evaluation Report, p. 7). This concern remained pervasive throughout the school's review at every level and juncture, and despite multiple opportunities to correct the areas as highlighted by the Commission through its Deferral and Probation actions, the school proved incapable of rectifying the identified issues, namely that "[REDACTED] did not demonstrate the ability required and involved in owning, leading, and operating an accredited school in compliance with accrediting standards" (March 29, 2023, On-Site Evaluation Report, p. 7).

Though the Commission provided the school multiple opportunities to demonstrate compliance and improvement in this regard, the Commission determined that the school's management and administration has been ineffective and that its efforts to shift the same personnel to different roles within the management structure in lieu of demonstrating meaningful and effective corrective action has failed to assuage the Commission's lack of confidence. The Commission remains unconvinced that the individuals who comprise the management team are capable of operating EWCNM in compliance with accrediting standards (see Table 2 below).

Table 2: Management Personnel

(2.1) Pre-Transaction Management	November 8, 2019	Proposed management personnel: <ul style="list-style-type: none"> • [REDACTED] Owner, Chief Executive Officer, Department Chair, Faculty member • [REDACTED], Faculty member • [REDACTED]: President
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³ The Commission noted that although only one item is included as the ground for withdrawal, the school did not fully resolve the Commission's compliance concerns in the areas of integrity and faculty working relationship with students, in addition to multiple areas of on-going concern. Additionally, the two named complaints submitted on February 4, 2022 and February 18, 2022 were not resolved as a result of the action taken at the November 2023 Commission meeting.

(2.2) Post-Transaction Management	April 30, 2020	<ul style="list-style-type: none"> • [REDACTED] Owner, Chief Executive Officer, Interim Campus President, Department Chair, Faculty member • [REDACTED] Owner, Faculty member
(2.3) August 2022 Commission Meeting	July 5, 2022	<ul style="list-style-type: none"> • [REDACTED]: Owner, President, Clinical Director, Biomedicine Department Head, Acupuncture Department Head, Academic Acceptance Chair, Faculty member • [REDACTED]: Owner, Vice President, Academic Dean, Herbal Department Head, Faculty member • [REDACTED]: Director of Financial Aid
(2.4) February 2023 Commission Meeting	January 15, 2023	<ul style="list-style-type: none"> • [REDACTED], President, Clinical Director, Academic Acceptance Chair, Faculty member • [REDACTED] Owner, Vice President, Academic Dean • [REDACTED]: Chief Operations & Compliance Officer • [REDACTED]: Director of Financial Aid.
(2.5) May 2023 Commission Meeting	April 17, 2023	<ul style="list-style-type: none"> • [REDACTED]: Owner, President, Clinical Director, Academic Acceptance Chair, Faculty member • [REDACTED] Vice President, Academic Dean, Faculty member • [REDACTED]: Chief Compliance & Operations Officer • [REDACTED]: Director of Financial Aid
(2.6) November 2023 Commission Meeting	October 12, 2023	<ul style="list-style-type: none"> • [REDACTED]: Chief Academic Officer/Academic Acceptance Chair, Clinical Director, Academic Dean, Faculty member • [REDACTED]: President, Faculty member • [REDACTED]: Chief Compliance & Operations Officer • [REDACTED]: Director of Administrative Services, Director of Financial Aid

June 12, 2022 On-Site Evaluation Report

The June 12, 2022 On-Site Evaluation Report (“OER”) states that the evaluation team noted that “[REDACTED] and [REDACTED] were not prepared for all facets that campus ownership/leadership required...the school did not produce evidence of appropriate administrative and operational policies and procedures to which the school adheres and reviews...additionally, the team noted that the school’s employee handbook states that no faculty or administrative member should speak to a member of the accreditation team” (June 12, 2022 On-Site Evaluation Report, p. 5). In response to the OER finding relative to adequate management and administrative capacity of the new owners, [REDACTED], EWCNM noted that the school planned to restructure and hire a Chief Compliance & Operations Officer (“CCOO”) that would “strategize, lead, and manage all policies, procedures, goals, and initiatives for the institution [and that the] CCOO will also oversee all academic, financial, compliance, and operational functions” (July 5, 2022 EWCNM response, p. 6). In the Commission’s estimation, the school’s response to that report, however, does not appear to contemplate the significance or urgency of the team’s concern and solely addresses the school’s plan to create a new executive role with responsibilities to oversee functionally all areas of school operations and asserts the school has “an excellent team of executive officers, advisory board members, and directors to lead and manage this post-secondary educational institution that is in compliance with accrediting standards” (July 5, 2022 EWCNM response, p. 6) with insufficient evidence to buttress the school’s claims of excellence within the management.

Included in the July 5, 2022 response, the Commission noted that the organizational chart provided continued to show both [REDACTED] assuming multiple consequential roles within the management of the school, as noted in Table 2, 2.3. Additionally, the job descriptions provided showed overlapping duties, which appeared to contradict the school’s plans for the scope and breadth of

responsibilities of the CCOO. These contradictions appeared to intimate that though the ownership intended to incorporate additional resources and expertise into the management structure, [REDACTED] appeared to have no intention of relinquishing management responsibilities to the CCOO. The response also did not demonstrate that [REDACTED] had developed the skills and expertise necessary to functionally lead and participate in the management of the school. Further, the Commission determined that “EWCNM did not address or resolve many of the findings recorded by the evaluation team beyond the management concern, and as such, “the question [remained] as to whether EWCNM [had] adequate management and administrative capacity in place with a demonstrated ability to lead and manage a post-secondary educational institution in compliance with accrediting standards” (December 19, 2022 Commission Deferral, p. 2). In consideration of the on-site evaluation report, and the school’s response the Commission deferred action to the February 2023 meeting for continued review.

December 19, 2022 Commission Deferral

The Commission’s December 19, 2022 Deferral states that the school’s response to the June 12, 2022 OER did not address or resolve many of the findings recorded by the evaluation team. In addition, the school provided revised job descriptions that contained overlapping duties, and a revised policy that raised concerns regarding compliance with federal regulations. In the school’s January 13, 2023 response to the Commission’s concern relative to management and administrative capacity, as expressed in the December 19, 2022 Deferral, as well as the issues pertaining to the complaints received by the Commission, the school stated that:

Since the restructuring of East West College of Natural Medicine adding the new role of the Chief Compliance/Operations Officer and hiring [REDACTED] on July 15, 2022...School operations is running increasingly more efficient and effective [sic]. EWCNM has been able to improve on effectively [sic] plan, organize, and execute its educational program, as well as provide increased support for students, teachers, and staff (January 13, 2023 EWCNM response, p. 1).

The Commission noted that the school’s determination of increased efficiency and effectiveness did not sufficiently address the Commission’s concerns regarding [REDACTED] continued participation and performance in the management of the school, as demonstrated in Table 2, 2.4, and did not justify the panoptic determination of increased efficiency in all operational areas of the institution. Further, the school’s response does not sufficiently demonstrate compliance in the other areas of concern noted in the Commission’s December 19, 2022 letter, which lead the Commission to question the school management’s ability to rectify those issues, where necessary, and demonstrate compliance in those areas going forward. Overall, the school’s response does not adequately demonstrate the efficacy of the shifts in the management structure or the addition of the CCOO role, in light of the persistent and unresolved compliance issues, and, in fact, served to heighten the Commission’s concerns regarding the ***overall*** (emphasis added) management and administrative capacity of the school. As such, the Commission determined that an unannounced on-site evaluation was necessary to determine the breadth and scope of the unresolved compliance issues and to evaluate the efficacy of the changes made to the school’s management structure.

March 9, 2023 Commission-Directed Unannounced On-Site Evaluation and March 29, 2023 On-Site Evaluation Report

The Commission-Directed Unannounced On-Site Evaluation was conducted on March 9, 2023 and resulted in ten findings, with one request for additional information. Specifically, the evaluation team determined that, upon review of the information gathered and the documentation reviewed during the visit, the school did not demonstrate compliance in accrediting standards relative to management and administrative capacity. Specifically, the school did not demonstrate that it has adequate management and administrative capacity in place that includes full-time, on-site supervision by an individual or team, and the school did

not demonstrate that it has appropriate administrative and operational policies and procedures to which the school adheres, and reviews and updates as needed (*Section I (A)(1)(a) & (d), Substantive Standards, Standards of Accreditation*).

The team found that the on-site oversight and management remained predominantly the responsibility of [REDACTED], the CCOO, “is not on-site during regular daytime school hours except as needed on an ad-hoc basis and is on-site evenings and weekends” (March 29, 2023 On-Site Evaluation Report, p. 7). The team questioned the sustainability and functionality of this arrangement, as in [REDACTED] physical absence from campus, [REDACTED] could not access the online record system, and as such, the team could not review documentation relative to the grounds for the visit. In response to the Commission Directed Unannounced On-Site Evaluation Report and management finding noted therein, the school provided a narrative detailing the management group’s ability to lead and manage a post-secondary educational institution in compliance with accrediting standards, which again failed to address the efficacy of the management team in totality. Additionally, the school again changed the titles of [REDACTED]:

... [the school] reorganized the management structure of our two executive members to fill roles that better suit their strengths. Starting July 1, 2023 [REDACTED] will serve as the President of East West College of Natural Medicine and [REDACTED] will serve as the Chief Academic Officer/Academic Acceptance Chair. [REDACTED] new role as Chief Academic Officer will absorb the roles of Clinical Director & Academic Dean into one. The purpose of job title change & combination of positions to one role is due to the size of our institution, which this new role in turn will allow better flow of internal processes as well as a clearer chain of command through management structure (April 17, 2023 EWCNM response, p. 6).

Upon review of the school’s response, the Commission found [REDACTED] continued presence in the management team—regardless of their roles—to be insufficient, as they had yet to adequately demonstrate effectiveness in their abilities to effectively lead and manage the school in compliance with accreditation standards. Despite the Commission’s concerns regarding the adequacy of the management, as expressed since the initial On-Site Evaluation of March 2022, the school has consistently omitted sufficient narrative explanations or documentation regarding [REDACTED] contributions to the demonstrated ability to lead the institution; the school has removed various job titles from [REDACTED] without a justification for how these actions will improve the institution’s leadership team. Although the school notes the changes in titles will allow for “better organizational efficiency” (April 17, 2023 EWCNM response, p. 6), the responses contain no evidence to support this claim.

In addition, in response to the on-site evaluation team’s and Commission’s continued concerns regarding management, EWCNM promoted the Director of Financial Aid, [REDACTED], to serve as the Director of Administrative Services. However, the school did not provide sufficient information to demonstrate that [REDACTED] is qualified for this shift in responsibilities. Further, the Commission found that the response does not provide a satisfactory argument for the effectiveness of [REDACTED] participation in the management of the school, particularly considering his ad-hoc availability during school hours and limited on-campus schedule during evenings and on weekends.

Upon consideration of the lingering and pervasive questions regarding management capacity, and the other unresolved issues, the Commission determined that the school demonstrated non-compliance in three areas, as outlined in Table 1, chief among them management and administrative capacity, and identified nine of areas of continued concern. In light of this, the Commission voted to place the school on Probation at its May 2023 meeting.

June 14, 2023 Probation Order and November 2023 Review

The Commission's June 14, 2023 Probation Order requires the school to submit a detailed description of the impact and effectiveness of EWCNM's management and administrative changes addressing minimally the new Department Heads, the promotion of the Director of Financial Aid to the Director Administrative Services, and the changes to the President and Chief Academic Officer roles, to include documentation to evidence the impact and effectiveness of the aforementioned changes. The school's response emphasizes the new owners' expansive practical experience in their respective fields; however, the Commission noted that extensive practical, in-field, and in-classroom experience are not adequate indicators of an individual's ability to own and *operate* (emphasis added) the school in compliance with accrediting standards.

Additionally, the school's response to the June 14, 2023 Probation Order notes that, despite earlier assertions that the school intended to hire a new Director of Financial Aid, as part of the process to promote [REDACTED] in the Director of Administrative Services role, the school ultimately combined both roles and expanded [REDACTED] responsibilities. The Commission found that the school's response does not adequately address the impact or effectiveness of the changes made to the Director of Financial Aid/Director of Administrative Services role, or explicitly identify how these changes contribute to the overall ability of the management team to lead the institution. The response also does not adequately discuss [REDACTED] qualifications related to this new combined role.

Further, the June 14, 2023 Probation Order required the school to submit additional information and documentation relative to the President and Chief Academic Officer roles. In response, the school indicated that [REDACTED] had switched roles, resulting in [REDACTED] assuming the responsibilities of the school President, and [REDACTED] returning to the academic operations. Ultimately, upon consideration of the totality of the record since the school's change of control, the Commission noted that previous shifts to [REDACTED] roles have proved ineffective, and the Commission determined that the school's response to the Probation Order does not sufficiently present how this most recent shift would successfully address the Commission concerns. The school's response, once again, fails to demonstrate how the individuals are sufficiently qualified to operate the school, particularly considering the ongoing areas of non-compliance and additional areas of concern.

Moreover, the Commission took note of the multiple areas of ongoing concern that have remained unresolved since the initial March 2022 on-site evaluation visit, and acknowledged them as a demonstration of the management team's inability to identify and rectify compliance concerns. For example, faculty qualifications have remained an unresolved area of concern. Yet through the school's various responses intended to satisfy this concern, the responses brought about additional concern regarding the school's verification of prior work experience for faculty, prompting the Commission to require additional information. In response to the Commission's most recent request for documentation demonstrating adequate training and verification of prior work experience for faculty, the school provided faculty files that do not contain all information and documentation necessary to demonstrate conformance with the *Standards of Accreditation*. Moreover, the accompanying narrative does not provide any detail that justifies or stands in lieu of the incomplete faculty records. The school's responses to the other items appear to follow suit—insufficient detail to support the documentation or to make an adequate demonstration of compliance with accrediting standards. As outlined in Table 1, the Commission's areas of ongoing concern not only remained unresolved, but also expanded from the time of the initial on-site evaluation in March 2022.

Ultimately, since the March 2022 on-site evaluation, the school management has not demonstrated the ability to functionally lead and manage a post-secondary institution in compliance with accrediting standards, as is evidenced by the school's inability to justify [REDACTED] remaining in significant

management roles, or to resolve the majority of other concerns, as noted in Table 1. Regarding the school's most recent response, as has been exhibited in prior submissions to the Commission, the school's narrative is not supported by clear evidence, and lacks sufficient assessment and detail for the Commission to make a determination regarding compliance on the other areas identified in the Probation Order. As such, the Commission could not make a determination regarding the remaining areas of non-compliance and concerns.

The Commission found that the school's inability to demonstrate sufficient improvement across the range of issues supports its finding that EWCNM school does not possess and cannot demonstrate that the school has sufficient management and administrative capacity with a demonstrated ability to lead and manage a post-secondary educational institution in compliance with accrediting standards as required by *Section I (A)(1)(a), Substantive Standards, Standards of Accreditation*. Moreover, the totality of the record does not demonstrate that the school has made significant progress towards resolving issues included in the June 14, 2023 Probation Order. As such, the Commission determined, upon consideration of the totality of the school's record, that the new ownership's ability to operate the school in compliance with accrediting standards failed to materialize as expected by *Section IV (E)(2)(p)(iv), Rules of Process and Procedure, Standards of Accreditation*.

Based on the foregoing, the Commission voted to withdraw EWCNM's accreditation and to remove the school from the list of ACCSC-accredited schools.

Teach-Out Plan and Teach-Out Agreement

The Commission directs the school to provide an [Institutional Teach-Out Agreement Approval Form and Teach-Out Agreement Approval Form](#), which must be submitted as part of the response for the items listed above (*Section IV (F)(2)(b) Rules of Process and Procedure, Standards of Accreditation*). EWCNM must demonstrate how it will ensure the opportunity for students to complete their program of study either by EWCNM or through an agreement with another accredited institution(s) approved to offer a program comparative to EWCNM's. The teach-out plan/agreement must contemplate the loss of accreditation and concordant loss of state or federal funding. The school's [Institutional Teach-Out Agreement Approval Form and Teach-Out Agreement Approval Form](#) should be submitted **on or before January 29, 2024.**

Appeal and Reapplication Process and Procedure

EWCNM may opt to appeal the Commission's decision to withdraw accreditation or may elect to reapply for accreditation. Details regarding the reapplication and appeal procedures are outlined in the *ACCSC Rules of Process and Procedures, Standards of Accreditation*.

- If EWCNM elects to appeal this decision, the school must sign and return the enclosed Letter of Intent to Appeal a Commission Decision, along with the Appeal Expense Fee of \$8,000.00, **on or before January 29, 2024.**
- If EWCNM elects to appeal this decision, the school's Application for Appeal of a Commission Decision and Grounds for Appeal must be submitted **on or before February 19, 2024.**
- If EWCNM elects not to appeal this decision, the Commission's decision will become effective **January 29, 2024.** The school may submit comments **on or before January 29, 2024** in accordance with the enclosed Public Comment Disclosure Form. Comments submitted by the school will accompany any public disclosure of a final Commission action pursuant to *Section X (D)(4), Rules of Process and Procedure, Standards of Accreditation*.

- In accordance with *Section VII (N)(3) Rules of Process and Procedure, Standards of Accreditation*, the school may reapply no sooner than nine months from the date on which the withdrawal of accreditation becomes effective.

For additional information regarding the Commission's decision, please contact me directly at

[REDACTED]

Sincerely,

[REDACTED]

Michale S. McComis, Ed.D.
Executive Director

Encls: Letter of Intent to Appeal a Commission Decision
ACCSC Standing Appeal Panel Members
Public Comment Disclosure Form

LETTER OF INTENT TO APPEAL A COMMISSION DECISION

To Be Submitted No Later Than January 29, 2024

Michale S. McComis, Ed.D.
Executive Director
ACCSC
2101 Wilson Boulevard, Suite #302
Arlington, Virginia 22201

Dear Dr. McComis:

This letter serves to provide notice that East West College of Natural Medicine located in Sarasota, Florida, intends to appeal the recent decision of the Commission to deny the school's application for initial accreditation. Attached is a check in the amount of \$8,000 as required by accreditation procedures. I understand that this fee is non-refundable.

I understand that an ACCSC Sitting Appeals Panel will meet to consider the appeal of the school and that I will receive final confirmation of the hearing at a later date. I have reviewed *Section VIII, Rules of Process and Procedure* of the *Standards of Accreditation* pertaining to appeals and noted that I am entitled to a transcript of the proceedings and to have representatives, including legal counsel, present with advance notification to ACCSC.

I understand that it is the right of a school to appeal an adverse accrediting decision taken by the Commission on the grounds that the decision was arbitrary, capricious, or otherwise in disregard of the criteria or procedures of the Commission, or not supported by substantial evidence in the record on which the Commission took the action (*Section VIII (B), Rules of Process and Procedures, Standards of Accreditation*). I understand that because the appeal must be based on evidence in the record at the time that the Commission took the adverse action, no new evidence may be submitted during the appeal process, except as allowed for under *Section VIII (C)(2)(c), Rules of Process and Procedure, Standards of Accreditation*.

I understand that it is the right of a school intending to appeal a Commission decision to indicate whether there is good cause as to why any member of the Commission's Standing Appeals Panel should not hear the appeal. I have reviewed the list of Standing Appeals Panel members and have included with this notice any objections to any member of the Standing Appeals Panel with the reasons and cause why I believe that member should not hear the school's appeal. I understand the absence of a submission with this notice indicates my approval to allow any member of the Standing Appeals Panel to sit for the school's appeal.

I understand that the Application for Appeal of Commission Decision along with the school's Grounds for Appeal are due to ACCSC **on or before February 19, 2024**, and I agree to submit that material on or before that date. I understand that failure to submit these required documents by the due date could prevent consideration of the school's appeal.

Signature

Date

Name/Title



2101 Wilson Boulevard, Suite 302
Arlington, Virginia 22201
703.247.4212
703.247.4533 fax
www.accsc.org

ACCSC Standing Appeals Panel Members

A large black rectangular redaction box covers the majority of the page content, leaving only the header and footer areas visible. The header area at the top contains a light blue bar with a white grid pattern. The footer area at the bottom is white with a black grid pattern.

PUBLIC COMMENT DISCLOSURE FORM

To Be Submitted No Later Than January 29, 2024

Michale S. McComis, Ed.D.
Executive Director
ACCSC
2101 Wilson Boulevard, Suite #302
Arlington, Virginia 22201

RE: East West College of Natural Medicine
3808 North Tamiami Trail
Sarasota, Florida 34234

I understand and agree that the Commission, pursuant to *Section X (C)(4)&(D)(4), Rules of Process and Procedure, Standards of Accreditation*, will make public the reasons for the decision together with any comments submitted by the school. I further understand that the summary will be accompanied by the attached comments.

I understand and agree that the attached comments constitute East West College of Natural Medicine's public comments on the adverse accreditation action that are to be disseminated with the public notice of the Commission's adverse accreditation decision including, but not limited to, dissemination to appropriate federal, state and other accrediting agencies and posting to the ACCSC website (*Section X (C)(4)&(D)(4), Rules of Process and Procedure, Standards of Accreditation*).

I understand and agree that the school is not obligated to submit public comments and acknowledge that the attached comments are provided voluntarily.

I understand and agree that the school's public comments must be in summary format, professional in tone, and free of profanity and calumnious statements and limited to two type written pages. I acknowledge that any comments which do not meet these requirements will not be disseminated or posted along with the summary of the reasons for the adverse accreditation decision.

I understand and agree that the Commission will release the adverse accreditation decision to the public pursuant to *Section X (D)(3), Rules of Process and Procedure, Standards of Accreditation* and that the school's written comments will not be added to this disclosure if this form and the comments are not submitted in the required format **on or January 29, 2024.**

I understand and agree that the Commission has no responsibility for how the school's comments may be used once put into the public domain.

Signature

Date

Name/Title