

July 14, 2025

ELECTRONIC DELIVERY

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

School #M073192
Withdrawal of Accreditation

Dear [REDACTED]

At the May 2025 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered the previous decision to continue East West College of Natural Medicine (“EWCNM”) located in Sarasota, Florida on Probation. Upon review of the March 28, 2025 Continued Probation and the school’s response, 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 the basis for the Commission’s decision to withdraw EWCNM’s accreditation are set forth the below.¹

History of the Commission’s Review:

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

¹ The Commission noted that although only three items are included as the grounds for withdrawal, the school did not fully resolve the Commission’s on-going concern in multiple areas to include: satisfactory working relationship with students, distance education (multiple areas), and Program Advisory Committee.

response, and voted to place the school on Probation, citing the school as out of compliance in the following areas: integrity of the record, management and administrative capacity, and faculty maintaining a satisfactory working relationship with students. The Commission also determined that additional information was necessary in the following areas: student satisfaction, IAIA, prior work experience of faculty members and administrators, refund policy, PAC, student complaint policy, financial soundness, verifiable records of graduate employment, and distance education delivery (see the June 14, 2023 Probation).

- At the November 2023 meeting, the Commission considered the October 12, 2023 Probation response and determined that EWCNM failed to demonstrate that the school had adequate management and administrative capacity in place that includes full-time on-site supervision by an individual or team with the appropriate combination of education, experience, and ability to lead and manage a post-secondary educational institution in compliance with accrediting standards (*Section I (A)(1)(a), Substantive Standards, Standards of Accreditation*). As such, the Commission voted to withdraw the school's accreditation. The withdrawal of accreditation letter was issued and effective January 18, 2024.
- On January 29, 2024 and February 19, 2024, EWCNM submitted its Intent to Appeal a Commission's Decision and Grounds for Appeal, respectively.
- On June 11, 2024, an independent Appeals Panel issued a decision remanding the withdrawal of accreditation decision back to the Commission for further consideration and another opportunity to demonstrate compliance with accrediting standards as cited in the January 18, 2024 decision letter.
- At the August 2024 meeting, the Commission considered the decision of the ACCSC independent Appeal Panel to remand for further consideration, the Commission's January 18, 2024 action to withdraw the accreditation of EWCNM and voted to vacate the withdrawal of accreditation action and re-instate the school's accreditation.² Additionally, upon the review of the Commission's June 14, 2023 Probation and the school's response, the Commission voted to continue the school on Probation citing the school as out of compliance in the following areas: management and administrative capacity, integrity of the record, and faculty maintaining a satisfactory working relationship with students. The Commission also determined that additional information was necessary in the following areas: student satisfaction, verifiable records of graduate employment, prior work experience of faculty and administration, refund policy, financial soundness, and distance education delivery (see the October 4, 2024 Continued Probation).
- On November 22, 2024, ACCSC conducted a Commission Directed On-Site Evaluation in conjunction with the school's Application for Initial Distance Education. The December 11, 2024 On-Site Evaluation Report yielded findings in the areas of advertising, program organization and length, content and length of distance education courses comparable to residential programs, Program Advisory Committee, timely interaction between faculty and students, faculty teaching load, and admissions/online readiness assessment.
- At the February 2025 meeting, the Commission considered the October 4, 2024 Continued Probation, the November 22, 2024 Commission Directed Distance Education on-site evaluation, and the school's responses and voted to continue EWCNM on Probation, citing the school as out of compliance in the following areas: management and administrative capacity, integrity of the record, faculty working relationships with students, and verifiable records of graduate employment. The Commission also determined that additional information was necessary in the following areas: financial soundness, faculty prior work experience, program organization and length, distance education delivery, program

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

advisory committee, timely interaction between faculty and students, faculty teaching load, and externship/clinicals (see the March 28 2025 Continued Probation).

- On March 12, 2025 ACCSC was notified of an action taken by the Accreditation Commission for Acupuncture and Herbal Medicine or “ACAHM” to terminate the accreditation of EWCNM’s Master of Acupuncture with a Chinese herbal medicine specialization program effective February 12, 2025. As such, ACCSC requested additional information in the March 28, 2025 letter specific to the programmatic action taken by ACAHM.

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

Commission Action and Compliance History	
November 2019 Application for a Change of Control – Part I Letter Date: November 8, 2019 April 2020 Application for a Change of Control – Part II Letter Date: April 30, 2020	<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]</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 Letter Date: June 12, 2022:	<p style="text-align: center;">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 style="text-align: center;">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)	<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</p>

Commission Action and Compliance History	
Action: Defer for Additional Information Letter Date: August 12, 2022	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.
September 2022 Commission Meeting: Complaints Student Survey Comments Action: Defer for Additional Information Letter Date: December 19, 2022	At the September 2022 meeting, the Commission reviewed the August 12, 2022 additional information letter regarding student survey comments. The Commission voted to defer final action until the February 2023 meeting. The Commission also considered the two named complaints submitted in February 2022. Upon review of the school's response, the Commission voted to continue review of the complaints in conjunction with the above deferral. The accrediting standards in question include institutional eligibility requirements; ownership, management and administrative capacity; institutional assessment and improvement activities; physical facilities and emergency preparedness; general program requirements; educational administration; faculty qualifications and retention; non-discrimination; student satisfaction; student records; transcripts; and student academic progress.
February 2023 Commission Meeting : Renewal of Accreditation Change of Control Complaints Action: Commission-Directed Unannounced On-Site Evaluation Letter Date: March 9, 2023	<p style="text-align: center;">Areas of On-Going Concern</p> <ol style="list-style-type: none"> 1. Management and administrative capacity 2. Student services 3. Institutional assessment and improvement activities 4. Faculty qualifications 5. Refund policy 6. Disclosures 7. Program Advisory Committee 8. Complaints 9. Student achievement rates and financials
March 2023 Commission-Directed On-Site Evaluation (Unannounced)	<p style="text-align: center;">Team Findings</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. Disclosures 7. Program Advisory Committee 8. Complaints 9. Financials 10. Student achievement rates
May 2023 Commission Meeting: Renewal of Accreditation Change of Control Complaints	<p style="text-align: center;">Areas of Non-Compliance</p> <ol style="list-style-type: none"> 1. Integrity 2. Management and administrative capacity 3. Faculty working relationship with students <p style="text-align: center;">Areas of On-Going Concern</p> <ol style="list-style-type: none"> 4. Student satisfaction 5. Institutional assessment and improvement activities 6. Faculty prior work experience and qualifications 7. Refund policy

Commission Action and Compliance History	
Action: Probation Letter Date: June 14, 2023	8. Program Advisory Committee 9. Student complaints 10. Financials 11. Graduate employment verification 12. Distance education
November 2023 Commission Meeting: Probation Renewal of Accreditation Change of Control Complaints Action: Withdrawal of Accreditation Letter Date: January 18, 2024	Areas of Non-Compliance 1. Management and administrative capacity *Although only one item was included as the ground for withdrawal, the Commission noted that the school did not resolve the Commission's compliance concerns in the areas of integrity and faculty working relationships, in addition to multiple areas of on-going concern.
August 2024 Commission Meeting: Appeals Panel Remand For Further Consideration (Withdrawal of Accreditation) Action: Vacate Withdrawal of Accreditation Continue Probation Letter Date: October 4, 2024	Areas of Non-Compliance 1. Management and administrative capacity 2. Reliance on information, data, and statements provided to the Commission 3. Faculty working relationship with students Areas of On-Going Concern 4. Student satisfaction 5. Graduate employment verification 6. Faculty prior work experience and qualifications 7. Refund policy 8. Financials 9. Distance education
November 22, 2024 Distance Education On-Site Evaluation On-Site Evaluation Report Date: December 11, 2024	Team Findings 1. Advertising 2. Program organization and length/ Outside work 3. Content and length of distance education courses comparable to residential programs 4. Program advisory committee 5. Timely interactions between faculty and students 6. Teaching load 7. Online readiness assessment/Admissions Additional Information 1. Externships/Clinical
February 2025 Meeting: Continue Probation Renewal of Accreditation Change of Control Complaints Distance Education On-Site Evaluation	Areas of Non-Compliance 1. Management and administrative capacity 2. Reliance on information, data, and statements provided to the Commission 3. Faculty working relationship with students 4. Graduate employment verification Areas of On-Going Concern 5. Financials 6. Faculty prior work experience and qualifications 7. Program organization and length/ Outside work

Commission Action and Compliance History	
Action: Continue Probation Letter Date: March 28, 2025	8. Content and length of distance education courses comparable to residential programs 9. Program advisory committee 10. Timely interaction between students and faculty / teaching load 11. Externships/Clinicals 12. Programmatic Accreditation Status

May 2025 Meeting – Withdrawal of Accreditation

At the May 2025 meeting, the Commission considered the totality of the record in this matter and the previous decision to continue EWCNM on Probation. Upon review of the Commission’s March 28, 2025 Continued Probation and the school’s response, the Commission found that the school once again failed to demonstrate continuous compliance with the *Standards of Accreditation* in the areas cited below (*Preamble, Standards of Accreditation*).³

1. 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 *Section I (A)(1)(a), Substantive Standards, Standards of Accreditation*. Moreover, the school has failed to make this demonstration subsequent to the change of control (*Section IV (E)(2)(q)(iv), Rules of Process and Procedure, Standards of Accreditation*).

As the history in this matter shows, the Commission has continuously expressed its concern that, following the change of control, EWCNM’s ownership and management team has not demonstrated an ability to operate the school in compliance with accrediting standards as required by *Section IV (E)(2)(q)(iv), Rules of Process and Procedure, Standards of Accreditation*. In its June 14, 2023 Probation, the Commission found that despite the school’s attempts to reorganize the leadership structure and incorporate additional personnel resources to support efforts to bring school operations into compliance with accrediting standards, the school’s leadership had failed to demonstrate an ability to lead and manage a postsecondary institution in compliance with accrediting standards. In the school’s October 17, 2023 response to this finding of non-compliance, the school again outlined plans to reorganize the current management team, to make changes to allow for daytime managerial presence, and to redistribute responsibilities; however, the Commission noted, that although the individuals within the school’s management team changed roles during the Commission’s review of this matter, those same individuals, in any iteration of the management structure, did not demonstrate an ability to lead and manage a post-secondary educational institution in compliance with accrediting standards. Further, the Commission noted that the redistribution of roles and responsibilities did not lead to significant improvement towards achieving compliance. As such, the Commission found that EWCNM failed to demonstrate that the school had adequate management and administrative capacity in place, and as a result the Commission voted to withdraw the accreditation of the school effective January 18, 2024.

Upon appeal, an independent Appeals Panel reviewed the matter and voted to remand the matter back to the Commission. Specifically, in the June 11, 2024 letter the Appeals Panel noted that EWCNM stated in its Probation response that the school had developed an internal Quality Assurance Committee and hired external resources to address the compliance issues and as such, should be allotted an

³ Although the Panel is recommending this withdrawal action based on the grounds as set forth herein, as previously stated, several other compliance issues from the Continued Probation remain unresolved.

additional opportunity to demonstrate the efficacy of the efforts made by the Quality Assurance Committee and the external resources.

Upon review and in consideration of the Appeals Panel remand at its August 2024 meeting, the Commission voted to vacate the withdrawal of accreditation action and continue the school on Probation in an effort to provide EWCNM with an additional opportunity to definitively show, with evidence, that EWCNM's leadership has the ability to lead and manage the school in compliance with accrediting standards. In the October 4, 2024 Probation, the Commission explicitly highlighted that EWCNM reported that the school had been working with the external resource team since July 2023, and that the intervening year was ample time to implement the necessary changes. Therefore, the Commission stated that it was imperative that the school take the opportunity to show the "sufficiency, adequacy, and effectiveness of the school's management and administrative capacity to operate EWCNM in compliance with accrediting standards" (October 4, 2024 Continued Probation, pg. 6). The Commission further stated that any continued failure to demonstrate compliance across the range of concerns outlined in the Commission's June 14, 2023 Probation and again in the October 4, 2024 Continued Probation letters might lead the Commission to withdraw the school's accreditation.

At the February 2025 meeting, the Commission reviewed the school's response to the October 4, 2024 Continued Probation, the December 11, 2024 Distance Education On-site Evaluation Report ("OER") and the school's response to that report, and found that, once again, the school failed to demonstrate compliance with standards in several areas. As noted in the Commission's October 4, 2024 Continued Probation, one of the factors that led to the Appeal Panel's recommendation and the Commission's decision to vacate the withdrawal action was that the school claimed in its October 12, 2023 Probation response that EWCNM had drawn on external management resources by using a consulting and legal team that includes one individual with experience working with ACCSC. The Commission noted, however, in that letter that the school did not provide any description of the individuals involved, the extent and nature of the relationship with the external team, the results of the team's evaluation, or steps taken as a result of the feedback (*Id.*, pg. 6). Despite these failures, the Commission took the Appeals Panel's recommendation and provided the school with additional time and opportunity. However, the Commission determined during the February 2025 review that EWCNM again failed to provide a complete and reliable response, demonstrating an understanding of the accreditation process and the requirements of accrediting standards. In the March 28, 2025 Continued Probation, the Commission expressed concern about the school's ability to not only come into compliance with accrediting standards but to remain in compliance on a go-forward basis. Specifically, as part of the March 28, 2025 Continued Probation, the Commission directed the school to provide the following information:

- A current, complete, and accurate list of all management and administrative personnel at the school along with their respective job duties, to include those individuals identified throughout the school's response as the Career Services Coordinator, Chief Compliance Officer, and Director of Education;
- A current, complete, and accurate organizational chart listing all management and administrative personnel;
- Information regarding the individual identified as the school's "Compliant officer (consultant)" in the school's organization chart, to include when this person was retained, how often the individual is on campus, and how long this person will be assisting the school;
- If the individual identified in (c.) is not a full-time employee of the school, provide a narrative description of the school's plans for ongoing compliance should the individual leave;

- A narrative explanation and documentation to demonstrate that the management and administration of the school have sufficient experience in managing an institution. This experience should not include academic teaching experience;
- A description of how the identified Campus Director (██████████) is on campus for a sufficient amount of time to serve in the role as Campus Director;
- A description of the day-to-day roles and responsibilities of the campus contact identified in the school's College360 profile as the Academic Dean; and
- Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.

In response to the Commission's March 28, 2025 Continued Probation, EWCNM submitted two responses, each containing a different number of pages (Response #1 with 988 pages and Response #2 with 329 pages). EWCNM did not provide information on why the school submitted two responses or the differences between the two. Upon review, the Commission noted that Response #1 contains information pertaining to course syllabi that was requested as part of the March 28, 2025 Continued Probation but that the response lacks the requested financial information. Response #2 includes the financial information but does not contain the course syllabi. This specific example is just one of the ways in which the school failed to compile an organized, complete, understandable, and thorough response. The state of the response notwithstanding, the Commission made a significant and concerted effort to thoroughly review the information and to attempt to discern the school's compliance with accrediting standards.

Specific to the Commission's request in Item #1(a) for a "current, complete, and accurate list of all management and administrative personnel at the school along with their respective job duties...", the school stated on page 2 of Response #1 that a list was attached and "includes the individuals identified as the Career Services Coordinator as requested." In review of the response, however, the Commission could find no such list embedded in the narrative response or attached as an exhibit. The school did provide an Organization Chart in response to Item #1(b); however, this chart does not match the information provided in the narrative. In response to the Commission's directive to provide an update on the school's management and administrative team, the school stated that the Chief Compliance Officer position no longer exists and that the duties have been taken over by a new president, ██████████. The Commission noted, however, that the school did not provide additional information regarding the new President, such as when this individual started, where he is located, his time allocated to on-campus management, or a description of his roles and responsibilities in the overall aspect of campus leadership.

The school also stated that ██████████ has assumed the role of Compliance Officer within his role of Campus Director and listed ██████████ as the Campus Director/Compliance Officer in the school's organizational chart. In response to the Commission's question regarding the individual identified as the Campus Director (██████████) in the previous response and how that individual is on campus for a sufficient amount of time to serve as the Campus Director, EWCNM stated, "[a]t present, the Campus Director is ██████████" and that "██████████ is on campus five days a week" (EWCNM's April 28, 2025 Continued Probation Response #1, pg. 4). These statements are contradicted by the following statement that appears on page 2 of the same response: "[i]t's also important to note that the Campus Director is an independent contractor working part-time, not a full-time employee." In addition to the conflicting statements regarding the Campus Director, the Commission determined that taking into account the totality of the multiple reviews, findings and actions taken by the Commission over a

lengthy period, [REDACTED] has not demonstrated an ability to operate the school in compliance with ACCSC accrediting standards.

Regarding the Commission's questions about the individual listed as "Compliance Officer (Consultant)" in the school's previous response and the school's plan for ongoing compliance should that individual leave, the school stated that the consultant is assisting [REDACTED] with compliance and that the consultant's involvement will continue for an undetermined amount of time with the goal of transitioning the responsibilities to [REDACTED]. The response does not describe the consultant's role or responsibilities in the management of the institution, nor does it include documentation of engagement or a contract for such services as evidence that these services are in fact in place and being used.

In response to the Commission's questions regarding the day-to-day roles and responsibilities of the campus contact identified in the school's College360 profile as the Academic Dean ([REDACTED]), the school stated that the Chief Academic Officer has "day-to-day responsibilities, including key duties such as overseeing academic programs, supporting faculty, ensuring curriculum alignment, etc." which are "essential for maintaining the school's academic integrity and success" (*Id.*, pg. 4). The Commission noted that the school uploaded two Change in Director/CEO Information forms to the College 360 database on April 24, 2025 (both with effective dates of March 31, 2025) changing the School Director from "[REDACTED] (Liaison)" to [REDACTED] and changing the CEO information from "[REDACTED]" to "[REDACTED]" with the title of President. Given the conflicting information provided by the school multiple times, the Commission found that the school has not clearly articulated the individuals responsible for managing the institution and the roles fulfilled by each. In the absence of such information, the Commission found that once again EWCNM has failed to clearly demonstrate who is responsible and that the school has adequate management and administrative capacity.

The Commission noted that the ongoing shifts in roles and responsibilities within the school's management and leadership structure since the change of control have failed to address the Commission's over-arching concern in this area. In fact, the Commission determined that each response represents additional changes to the extent that, upon consideration of the totality of the school's responses over the period of this review, it remains unclear who is ultimately responsible for the management and administration of the school. Although the school states on page 3 of Response #1 that a President "has joined the school," the lack of information regarding this person's background, experience, and preparation to lead and manage the school in compliance with accrediting standards, coupled with the conflicting information provided in the responses about who is ultimately responsible for the school and the school's compliance with accrediting standards, does not engender confidence that the school's efforts in this regard will lead to positive outcomes. Further, on page 4 of Response #1, EWCNM stated that the management and administrative team brings "substantial experience in institutional management, including expertise in operations, policy enforcement, and institutional development" and that "this expertise has been essential to the school's effective operation" and that documentation supporting the experience is included in the submission (*Id.*, p. 4). The Commission noted, however, that the school did not provide any specific supporting documentation in reference to this response item. As such, the Commission's concerns remain. Ultimately, it is not the Commission's responsibility to determine the school's compliance based on conflicting information or assumptions; rather, it is the school's responsibility to clearly demonstrate compliance.

The Commission's ongoing concern with the composition of the management and administration team, the qualifications of the members of the team, and said team's capacity to lead and manage the institution is further compounded by the leadership's apparent lack of comprehension and understanding of the *Standards*. The number of ongoing areas of concern highlighted throughout the

history of review and the school's inability to provide consistent, accurate, and reliable information and data in response to those concerns only further supports the Commission's determination of noncompliance in this area.

In addition to the foregoing, the Commission's concern in this regard is further highlighted by the school's inability to curate and submit a coherent response to the issues identified by the on-site evaluation team relative to the school's Application for Initial Distance Education Approval. Specifically, in response to the March 28, 2025 Continued Probation in which the Commission directed the school to provide evidence that the individual designated as the school's distance education PAC member, EWCNM indicated that [REDACTED], is qualified to review distance education. Specifically, EWCNM stated that "[REDACTED] is responsible for overseeing the distance education platform including its methods, processes, procedures, and infrastructure in alignment with the program's content and objectives" and although [REDACTED] serves as a PAC member providing oversight for distance education, [REDACTED] retains full responsibility for its implementation" (*Id.*, pg. 19). The school, however, did not provide any additional information or evidence to support the supposition that [REDACTED] is indeed qualified to act in this role. Further, in response to the Commission's directive to provide a list of all individuals currently serving on the school's PAC, the school pointed to an exhibit that the school neglected to provide. While this concern stemmed from a more recent on-site evaluation (November 2024), the school was given two opportunities to demonstrate to the Commission that the school can review and provide a complete and accurate response to the Commission to demonstrate that the school is operating in compliance with accrediting standards. That these issues remain yet unresolved gives the Commission concern as to the school's distance education methodology.

Further, the school's inability to follow notification requirements set forth in the *Standards of Accreditation* again highlights the management's inability to comprehend and comply with accrediting standards. Specifically, the school failed to notify the Commission of the programmatic action taken by ACAHM to withdraw the accreditation of the school's sole program, the Master of Science in Acupuncture and Herbal Medicine, as well as the U.S. Department of Education's action to place the school on Heightened Cash Monitoring 2 ("HCM2") (*Section V (E)(2)(e & i), (Rules of Process and Procedure, Standards of Accreditation)*).

Overall, the Commission found—just as it had previously—that EWCNM has failed to show sufficient management and administrative capacity that includes a demonstrated ability to lead and manage a post-secondary education institution in compliance with accrediting standards. The on-going shift in responsibilities of the management/administration team, the inaccuracies and conflicting information in submissions provided to the Commission, the school's repeated inability to prepare and submit a cogent response, and a demonstrated and fundamental lack of understanding of ACCSC accreditation and requirements has culminated in Commission's determination that the school has failed to meet accrediting standards in the area of management and administrative capacity.

2. 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*). In the June 14, 2023, January 18, 2024, October 4, 2024 and March 28, 2025 letters, the Commission expressed concern regarding discrepant and inaccurate information provided by EWCNM within the totality of the written record before the Commission. Examples include student satisfaction survey results, conflicting information provided in school responses, and inaccuracies in data submitted to the Commission. The Commission patiently yet specifically reminded the school in both Continued Probation letters that the Commission's deliberations and decisions are made on the basis of the written record and, therefore, a school must supply the Commission with complete, truthful, and accurate information and documentation showing the school's compliance with all accrediting standards. The

Commission stated in the letters that the totality of the school's response would be taken into consideration when making a decision on the school's compliance in this regard. The Commission also requested that the school submit a description of the school's internal data validation process and a justification as to how the process is sufficient to ensure the submission of accurate information to the Commission.

In response to the October 4, 2024 Continued Probation, EWCNM described measures the school implemented in order to ensure the accuracy of the school's records, which include regular self-assessments, weekly audits for student files conducted by the Chief Compliance Officer and Chief Academic Officer, comprehensive training sessions, and student surveys. EWCNM also stated that the school has created an "Internal Data Validation Processes" which includes processes for documentation verification, independent auditing, external validation, and improved communication protocols. According to the response, when deficiencies are identified during the process, the school develops a corrective action plan that is overseen by the school's Quality Assurance Committee. Upon review of the backup documentation presented in response to this item, the Commission noted that the school appeared to have a number of different oversight and review committees to include a Governing Oversight Committee ("GOC"), Program Advisory Committee ("PAC"), Governing Board, and Advisory Committee/Panel. The Commission also noted that the school provided the same list of meetings in response to the December 11, 2024 OER; however, instead of being identified as a "GOC Meeting list" the document was identified as a "PAC Meeting list" with the same dates and backup documentation as the "GOC Meeting list." In the school's Continued Probation response specifically, the school made a claim that there are Quality Assurance Committee meetings and then proceeded to provide minutes of other different committee meetings as evidence of the Quality Assurance Committee's work. From the materials provided, it is unclear how many committees the school has formed, what each committee is responsible for monitoring, and whether the school is, in fact, conducting Quality Assurance Committee meetings as described. Despite the multitude of meeting minutes (i.e. PAC meeting minutes, GOC Committee Meeting minutes, Program Oversight Committee Meeting minutes, Governing Board meeting minutes, Advisory Committee meeting minutes, Advisory Panel meeting minutes), in some cases dating back to 2022, the school did not demonstrate that the Quality Assurance Committee is in fact meeting and carrying out the work described in the school's narrative.

As part of the March 28, 2025 Continued Probation, the Commission directed EWCNM to provide a list of the school's oversight and review committees along with a description of the responsibilities, composition, and the frequency of meetings for each committee; the name of the individual serving as the school's Chief Compliance Officer along with a description of the individual's duties and responsibilities. In response, EWCNM stated that the school enclosed a list of the oversight and review committees along with a statement that "[t]hese committees play a critical role in ensuring the effective governance and operation of the school" (*Id.*, pg. 4). However, upon review of the response, the Commission found that the enclosure was omitted and there is no other information provided regarding oversight committees.

In response to the Commission's questions regarding the Chief Compliance Officer, EWCNM stated that the role has been assumed by [REDACTED] and that in this position, he will be responsible for providing training to staff and faculty using the ACCSC *Standards of Accreditation* and monographs and tutorials made available on the ACCSC website. Further the school stated, "[REDACTED] will make sure that standards are being met as it relates to the operations of the college including the academic delivery of the program" (*Id.*, pg. 4). However, as mentioned earlier, the school also stated on page two of the response that the Chief Compliance Officer no longer exists and the duties taken over by the President, [REDACTED]. Regardless, the Commission has found that [REDACTED] has failed to demonstrate

an ability to contribute to the operations of the school in compliance with accreditation standards as either an owner or a manager.

To further demonstrate the Commission's concern with the school's ability to provide reliable and accurate data to the Commission, the Commission noted the following inaccuracies/inconsistencies provided in the school's most recent response (this is an illustrative but not exhaustive list):

- In multiple areas of the response EWCNM refers to exhibits and supporting documentation, which is not included in the response (i.e., I-1a, II-2a, II-2d, III-1a, and III-1b);
- The list of graduates who gained employment in-field that was provided differed from the list provided in the school's previous response for the same timeframe (see *Ground #3*);
- Incomplete backup documentation (i.e., pg. 75 – Faculty Development Training is missing pages);
- The school stated that the Chief Compliance Officer role no longer exists and that the duties were taken over by [REDACTED], however, the school later states that [REDACTED] is acting as the Compliance Officer within his role as the Campus Director; and
- The school lists [REDACTED] as the Campus Director, however, the school submitted an ACCSC Change of Director Form changing the Campus Director information from [REDACTED] [REDACTED]

The Commission noted that while EWCNM indicated that the school has created new processes for self-assessment and data validation, the school did not provide evidence that the new processes described in the school's responses are in fact in use. In addition, the Commission found that the school's continued failure to provide accurate and reliable information failed to mitigate the significant concern as to whether the school has supplied the Commission with complete, truthful, and accurate information and documentation showing the school's compliance with all accrediting standards. Given the multiple instances of inconsistencies and omitted information noted throughout the entirety of the review process, the Commission determined that EWCNM has failed to demonstrate that ACCSC can place a high level of reliance upon the information, data, and statements provided to the Commission by the school.

3. EWCNM failed to demonstrate that the school supports its reported rates of graduation and employment by maintaining verifiable records, is able to justify the classification of each graduate as employed in-field using the Commission's Guidelines for Employment Classification, and ensures that the employment classifications are verified by the school (*Section VII (B)(4)*,⁴ *Substantive Standards, Standards of Accreditation* and *Appendix VII, Guidelines for Employment Classification*).

In its June 14, 2023 Probation, the Commission expressed concern with the school's process for recording and verifying graduate initial employment and classifying records as "in-field" placements. The Commission directed EWCNM to submit a description of the school's policies and procedures for recording and verifying graduate employment, copies of current verification forms or tools that the school was utilizing, and supporting documentation that the school relied upon to classify each graduate listed as "employed-in-field" for all graduates provided in the school's April 17, 2023 response. Upon review of the school's response to the Commission's June 14, 2023 Probation, the Commission noted additional concerns with the school's process and procedures as well as multiple inconsistencies with the backup documentation provided, including missing school signatures, dates, and incomplete sections on multiple employment verification and self-employment attestation forms. As part of the

⁴ Prior to July 1, 2025, cited as *Section VII (B)(3), Substantive Standards, Standards of Accreditation*.

October 4, 2024 Continued Probation, the Commission directed EWCNM to again provide an updated description of the school's process and procedures for recording and verifying graduate initial employment, the timeline for when the verifications occur, a copy of the current form or other tools that the school utilizes to verify employment, and a list of a list of all graduates that gained employment in the field for which the school provided education since the submission of the school's October 12, 2023 response.

In response to the Commission's October 4, 2024 Continued Probation, EWCNM provided a copy of the school's relevant policies and procedures, a list of graduates who gained employment in a career field for which the school provided education since the October 12, 2023 response submission, and backup documentation to support the placements classified as "in-field." As part of the response, EWCNM submitted a list of seven (7) graduates, stating that the "list provides a comprehensive overview of graduate placements and highlights the alignment between graduate employment and the training provided by EWCNM" (EWCNM's January 7, 2025 Continued Probation Response, pg. 22). Upon review of the job titles and job duties provided in the response, however, the Commission determined that of the graduates classified as employed, none appear to have obtained employment in a field for which the school provided training. Specifically, the school provided employment information for graduates employed as "flight attendant," "server," "TA" and "Administration/Career Services." In addition, the school listed three graduates employed as "Massage Therapist." In review of the backup documentation, the Commission noted that one graduate checked that the skills acquired at the school did not lead to employment or help maintain employment; one graduate was employed as a teaching assistant at the school; and the third record identified the graduate's job duties as "office manager, massage therapist, acupuncturist waiting for licensure." More importantly, the Commission concluded that the job duties of a Massage Therapist do not align with the objectives of the Master's Degree in Acupuncture and Herbal Medicine program. The Commission acknowledged that while a graduate could be employed as a Massage Therapist while in the process of obtaining licensure, the graduate at that time would not be appropriately classified as "employed in-field." Typically, a Master's degree in Acupuncture and Herbal Medicine is not required to work as a Massage Therapist and as such this cannot be construed as related employment. Given that the school had not demonstrated that any graduates had been appropriately classified as employed in-field, as part of the March 28, 2025 Continued Probation letter the Commission expressed that the serious nature of the concerns which raised questions not only about the reliability, accuracy, and completeness of the information provided by the school, but also more critically whether **any** graduates of the school have obtained employed in the field for which the school has provided education.

In the March 28, 2025 Continued Probation, the Commission had directed the school to supply a justification for the classification of "in-field" placements for the seven (7) graduates that school had previously provided. In response, EWCNM provided another list of seven (7) graduates; however, this list appears to replace three graduates that were included in the previous response with three new individuals. In addition, the dates (e.g., graduation date, date of initial employment, etc.), job titles, and descriptions for those graduates who were included in the previous response appear to be different in the school's response to the March 28, 2025 Continued Probation.

To justify the "in-field" classifications, the school stated, "[e]ach role was validated through employer verification or graduate attestation, confirming the role requires knowledge and skills gained from EWCNM training" (April 28, 2025 EWCNM Continued Probation-Response #1, pg. 9). However, the employment records included with the response do not appear to support the school's claim that the employment classifications are correctly categorized as "in field." For example, in one instance, a student selected "no" when prompted to answer the following "[d]id the skills, tools and knowledge provided by the college help lead to your hiring in your field or help you maintain your current

position?” (*Id.*, pg. 9). Regarding the three new graduates that the school included in the table, the Commission noted that two do not have employment information listed and the third was listed as employed as a Hair Stylist.

In addition to the Commission’s request for a justification for the seven students identified in the school’s January 7, 2025 response, the Commission also requested as part of Item #4e, “...a list of each graduate who gained employment **in a field for which the school provided education** since October 2023” (ACCSC March 28, 2025 Continued Probation, pg.14). In response to Item #4e, EWCNM provided a table that includes two December 2023 graduates that the school classified as placed in-field; however, the school did not provide the correlating employment verification forms as directed by the Commission to support the information provided. The school did include two employment verification forms that were not previously provided to the Commission; however, the Commission could not correlate those forms with any of the graduates listed in either table provided. Specifically, the two graduates listed in the table as part of Item #4e are [REDACTED] employed at [REDACTED] and the second is [REDACTED] employed at [REDACTED]; however, the Commission could not locate verification forms for either graduate. The additional forms that were provided do not list student numbers and the employment listed on the forms does not match the graduates listed in the table.

The Commission concluded that the clear discrepancies between the school’s narrative and the supporting documentation in the most recent response, compounded by the concerns previously raised regarding validity and reliability of the record, demonstrated to the Commission that EWCNM has failed to support its reported rates of graduation and employment by maintaining verifiable records and to reliably justify the classification of each graduate as employed in-field. Further, EWCNM failed to show through reliable information and documentation that the school’s leadership understands the necessity and importance of appropriately classifying graduate employment and of supporting student achievement rates. As previously stated in Item #1 above in this letter, it is not the Commission’s responsibility to determine the school’s compliance based on conflicting information or assumptions; rather, it is the school’s responsibility to clearly demonstrate compliance.

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 July 24, 2025.**

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 July 24, 2025.**
- 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 August 13, 2025.**
- If EWCNM elects not to appeal this decision, the Commission's decision will become effective on **July 24, 2025.** The school may submit comments **on or before July 24, 2025** 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

c:

[REDACTED]

[REDACTED]

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



Accrediting Commission of Career Schools and Colleges

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

LETTER OF INTENT TO APPEAL A COMMISSION DECISION

To Be Submitted No Later Than July 24, 2025

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 August 13, 2025**, 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

[illegible]

PUBLIC COMMENT DISCLOSURE FORM

To Be Submitted No Later Than July 24, 2025

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 July 24, 2025.**

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