



ACUPUNCTURE BOARD

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**California Acupuncture Board
Phoenix Institute of Herbal Medicine and Acupuncture
School Approval Final Report
February 14, 2014**

PART 1: SCHOOL OVERVIEW

The Phoenix Institute of Herbal Medicine and Acupuncture (PIHMA) School and clinic received Accreditation Commission for Acupuncture and Oriental Medicine (ACAOM) candidacy for accreditation in 2001, accreditation in May of 2004 and seven year re-accreditation in 2012. PIHMA started 16 years ago, growing from a school with a few faculty and one to two classrooms to their current facility that houses the school, administration, five classrooms, herbal dispensary, library, clinic and research office.

The School offers Acupuncture and Oriental Medicine Degrees:

1. Master of Science in Oriental Medicine (MSOM).

This degree program includes Herbology and is the program applying for Training Program approval with the California Acupuncture Board with a total of 3533 hours of education.

2. Master of Science in Acupuncture (MSAc). This program does not include Herbology.

I. Institutional Mission, Vision and Purpose

The school has innovative shared values that provide a nurturing learning environment for students and inspiring workplace environment. Both students and school personnel are passionate about the school and acupuncture. The School has an active strategic planning process that is updated regularly with both short-term and long-term planning goals.

The Core Values are:

- Live the Medicine
- Serve Compassionately
- Be Innovative
- Grow Thoughtfully, Practice Gratitude , Commit to Excellence

PIHMA's mission statement is to prepare students to meet the national and professional certification standards prescribed for the practice of Acupuncture and Oriental Medicine by educating and training students to be healing facilitators in the art, science and philosophy of acupuncture, herbal and Oriental Medicine.

Their vision in achieving these goals is to:

- Promote higher standards in the practice of acupuncture and herbology.
- Facilitate research and advance public awareness as to the benefits and usefulness of acupuncture and herbology
- Provide Community service through health clinics and other community projects
- Promote the rights of acupuncturists to practice the Oriental arts and sciences as an independent practitioner.

PIHMA has several clinic externships, affording their students to work in an integrated care setting within mainstream medicine in the United States.

II. Governance, Administration and Personnel

The School's governance appears to be sound and in compliance with organizational governance standards and laws. Although PIHMA is a small school, they are professionally structured to address the educational and business needs of an academic institution. They have the required board members consisting of two Public Members, an Alumni Member as well as the School President. The Board meets regularly, records the meeting minutes and conduct business with a great degree of transparency.

The school's administration also appears sound. Moreover, since PIHMA does not offer any other programs outside of Acupuncture and Oriental Medicine, the school can focus solely on the needs of those programs.

PIHMA conducts annual SWOT reviews and maintains vigilance on how it can better meet the needs of its students as well as its business needs. They are currently working on helping alumni by creating a Center for Professional Education.

III. Ethical Principals, Practices, and Advertising

The school's shared values are reflected in their materials and outreach activities in the community. They offer honest career counseling that helps students succeed and helps failing students embrace that reality. The policies are fair and protect the interests of students.

The school has a team that conducts many outreach events in the community as well as having a strong internet presence through their website. Their marketing program has a licensed acupuncturist as their recruiter, a communications staff person that creates materials and manages the website.

IV. Acupuncture and Oriental Medicine Curriculum and Instruction

PIHMA's Curriculum Committee meets every two months to work on curriculum needs.

An overall sign of academic quality, interns appeared confident and had good grasp of TCM theory and its application in determining a differential diagnosis. Review of clinical medical charts indicated intern logs were clear and verifiable with appropriate signatures and legal disclosures

After submission and review of PIHMA corrections to deficiencies, it now meets the curriculum and clinical requirements for Acupuncture Training programs as set forth in the California Code of

Regulations Title 16, Chapter 3.5. The initial deficiencies found are discussed in Part 2: Non-Compliance.

V. Admission Standards

The School's admission requirements exceed California's requirements. California requires 60 hours of school at a college or university recognized by the US Department of Education. PIHMA's requirements include 60 hours with specific course work requirements in: Chemistry, Biology, Psychology and Physics.

PIHMA's Admission staff provide student counseling for navigating the course requirements. The school follows the same credit transfer policy as California. Credit Transfers are evaluated by both licensed acupuncture staff and administrative staff to assure quality and accuracy of equivalency assessments of course work from other schools.

VI. Graduation Requirements

Currently, PIHMA offers two degrees; a Master of Acupuncture (MSAc) and a Master of Oriental Medicine (MSOM). Only the MSOM Degree meets California curriculum requirements.

VII. Faculty Qualifications

PIHMA has a talented faculty of 24 Instructors who are passionate about teaching and promoting acupuncture. All faculty meet California Requirements.

VIII. Student Services and Records

PIHMA offers a wide variety of student services. The Academic/Student affairs coordinator has a flexible, nurturing attitude towards serving students. She conducts the orientation and student centered activities. A tutoring service is also offered to help meet student needs.

PIHMA's Registrar has a meticulous record keeping system to track grades and course credits. The Registrar produces quarterly reports for students which tracks their progress toward completion of course work for their particular degree of choice. Records are kept secure in locked files. They are also kept on an encrypted computer that only the Registrar has access to in her locked office. Records are also backed up electronically at an offsite secured location through a secure vendor. This level of security and limited access to records prevents any tampering with files or security breaches.

IX. Tuition, Fees, and Refund Policies

PIHMA's tuition and refund policies are transparent, well-advertised and students receive counseling that explains the details and implications for them. While refund policies are fair, the school does keep a reserve fund to cover refunds. School fiscal staff indicates that it has not been a problem and so they have not seen the need to set up a special reserve fund.

As of 2013, tuition for the Degree in Oriental Medicine costs \$18.00 per clock hour, with books and material fees estimated at \$1200.00 per year

X. Facilities and Library

Facilities are located within a beautiful campus with a waterfall and Koi pond in the courtyard. Although the campus does have other businesses sharing space in the building all school facilities are separate from them and they do not interfere with school operations. The library is relatively small, but provides opportunity for study, research, using either books or online research in a separate room with three computers available. The Library is well stocked with reference books from around the world along with copies of the text books used in the courses the school offers. The glass walls are aesthetically pleasing and there was soft, gentle music playing conducive to studying. While the school is expanding its space, its current space is adequate to meet classroom, course work, administration, and student needs.

PIHMA's library also functions as the Alternative Medicine Library, which includes not only the Acupuncture and Oriental Medicine books but also books from several other alternative health colleges in the nearby area including massage, naturopathy and homeopathy. This is a joint venture to reduce costs for all the institutions involved and offer more resources to students, staff, alumni, alternative health professionals, and the community.

PIHMA's clinic is well laid out with proper access to hygiene stations and privacy for treatments. Students have a room wherein they can review charts and discuss patients with the supervisor that is out of the way of the treatment rooms. Both their dry-storage and cold storage herbs are handled and stored properly.

PIHMA recently started an Acupuncture Research Program that holds great promise both as a resource for training faculty and students to conduct research to perform cutting edge research. The research director is impressive both in her credentials and goals. She is teaching research methods to both faculty and students. Her background with the National Institute of Health (NIH) positions her to lead the school in performing cutting edge research in both health and in Acupuncture.

XI. Financial Resources

The financial resources and fiscal health are in order. The school has maintained a stable budget with annual surpluses despite enrollment fluctuations. While the CFO is a governing board member and unpaid CFO, the arrangement appears to provide adequate fiscal checks and balances for the school. School financial records are audited by an outside auditing firm.

PART 2: NON-COMPLIANCE

1. Supervision of clinical interns.

Finding 1: What we observed is direct supervision during needling is not consistently performed in compliance with Title 16 California Code of Regulations section 1399.434 (h). We observed variation

from clinic supervisor to clinic supervisor in how consistently they provided the direct supervision of intern as required by 1399.434 (h).

“During the initial 275 hours of diagnosis, evaluation and clinical practice, the clinic supervisor shall be physically present at all time during the diagnosis and treatment of the patient. Thereafter, for a second period of 275 hours the clinic supervisor shall be physically present at the needling of the patient. The clinic supervisor shall otherwise be in close proximity to the location at which the patient is being treated during the clinical instruction. The student shall also consult with the clinic supervisor before and after each treatment.”

Corrective action: Ensure that all supervisors consistently provide direct supervision as required by 1399.434 (h). We suggest amending clinic supervisor job description or job assignment agreement to include the language of 1399.434 (h). This would provide accountability with faculty to ensure they provide intern supervision in compliance with the California regulations.

And,

Finding 2: Clinic Supervisor Assistants were hired to provide additional direct supervision in the clinic to be in compliance with 1399.434 (h). However, only 1 out of 4 clinic supervisor assistants has the required 5 years of licensure as required by 1399.435 (e). Thus, the clinic does not comply with either section 1399.434 (h) or 1399.435 (e).

1399.435 (e) *“The director and supervisors of the clinic portion of the training program shall be a licensed acupuncturist in the state where the education institution is located and with at least 5 years of licensed clinical experience in the practice of acupuncture and Oriental medicine.”*

Corrective Action: All clinic supervisor assistants must be licensed for 5 years to comply with both 1399.434 (h) and 1399.435 (e).

Action Taken by School: PIHMA has adopted changes to the job descriptions, Faculty/Supervisor handbook, Clinic Supervisor Training, and faculty contracts that insure they have qualified supervisors that both meet minimum qualifications (at least five years as a licensed acupuncturist) and are physically present for all times as listed under 1399.434 (h).

This corrective action brings PIHMA into compliance with California requirements for these deficiencies.

2. Compliance with Clinical Sciences and Clinical Medicine requirements 1399.434 (c) (10) and (11):
(10) *“Clinical sciences—a review of internal medicine, pharmacology, neurology, surgery, obstetrics/gynecology, urology, radiology, nutrition and public health;”*
(11) *“Clinical medicine—a survey of the clinical practice of medicine, osteopathy, dentistry, psychology, nursing, chiropractic, podiatry, naturopathy, and homeopathy to familiarize practitioners with the practices of other health care practitioners.”*

Finding 1: The curriculum does not meet the Clinical Science requirements of 1399.434 (C) (10). The curriculum only meets public health, nutrition, and pharmacology requirements of 1399.434 (10). HCR

432 and HCR 522 meet pathology and pathophysiology requires under Basic Science 1399.434 (A) (7), but not 1399.434 (C) (10) clinical medicine requirements.

Corrective Action: Include review of internal medicine, neurology, surgery, obstetrics/gynecology, urology, and radiology in new courses or existing courses that specifically teach these topics as core competencies.

School Action Taken: Changes were made to the competencies covered in the course HCR 421 – History of Medicine course to include the missing health fields.

This action brings PIHMA into compliance with California requirements for this deficiency.

Finding 2: The curriculum does not meet the Clinical Medicine requirements of 1399.434 (C) (11). HCR 425 History of Medicine only meets 4 of the 9 Clinical Medicine requirements: clinical practice of medicine, osteopathy, naturopathy, and homeopathy. Additionally, that course incorrectly attributes 10 hours of instruction when the course syllabus indicates 3 hours for those topics. HCR 441 does not meet the Clinical Medicine requirements; it only meets the public health requirements of Clinical Science.

Corrective Action: Include a survey of clinical practice of medicine, dentistry, psychology, nursing, chiropractic, and podiatry in new or existing courses that specifically teach these topics as core competencies.

School Action Taken: PIHMA instituted changes in their course HCR 441 – Public Health, which included the missing clinical course work.

This action brings PIHMA into compliance with California requirements for this deficiency.

3. Compliance with California Workers' Compensation/Labor codes 1399.434 (d) (8):
(8) "Case management for injured workers and socialized medicine patients, including knowledge of workers compensation /labor codes and procedures and qualified medical evaluations."

Finding 1: There are no courses that teach California Workers Compensation as a course competency. Thus, the requirements of 1399.434 (d) (8) are not met by the curriculum.

Corrective Action: Create or add this topic to new or existing course.

School Action Taken: PIHMA has made changes to the course MGT 521 – Principles of Practice Management to include discussion and review of items required under 1399.434 (d)(8)
This action brings PIHMA into compliance with California requirements for this deficiency.

4. Compliance with other California laws as required by 1399.434 (e) (3):
"Knowledge of regulatory compliance and jurisprudence (municipal, California, and federal laws, including OSHA, Labor Code, Health Insurance Portability and Accountability Act of 1996 (HIPAA).

Finding 1: There are no courses that specifically teach California laws as required by 1399.434 (e) (3).

Corrective Action: Create or add this topic to new or existing course.

School Action Taken: PIHMA has made changes to the course MGT 521 – Principles of Practice Management to include discussion and review of items required under 1399.434 (e) (3). This action brings PIHMA into compliance with California requirements for this deficiency.

PIHMA has addressed all issues of non-compliance and are now in full compliance with CA regulations.

PART 3: RECOMMENDATION

Education Committee Recommendation: PIHMA Masters of Science in Oriental Medicine (MSOM) meets all Board requirements; the site visit team recommends approval of PIHMA's MSOM Training Program to become a California approved training program.