

# INSTITUTIONAL PLANNING

EAP Form 1.10 (Rev. 11/18)



STATE OF WISCONSIN  
EDUCATIONAL APPROVAL PROGRAM  
P.O. Box 8366  
MADISON, WISCONSIN 53708-8366  
(608) 266-1996

The Educational Approval Program (EAP) is a postsecondary education agency that employs a regulatory model focused not only on compliance, but also institutional effectiveness. To facilitate an environment in which schools seek to be effective organizations that improve over time, the EAP requires schools to submit evidence that appropriate planning has been conducted. Although similar to a strategic or business plan, this information will enable the EAP and school officials to engage in a dialogue over time about the effectiveness and future of the school.

Schools that already have some type of strategic or business plan (e.g., schools that have either a corporate or accreditation plan) must adapt these documents to the following requirements and focus on Wisconsin operations and students. The EAP does not expect any school to divulge any sensitive, proprietary business information. The information must address the five elements identified below and provide the information requested.

## I. SCHOOL INFORMATION

Name of School:

Pacific College of Health and Science

## II. PLANNING ELEMENTS

**A. MISSION.** Describe your school's mission and vision, which identifies its purpose and its core values.

Mission: Pacific College of Health and Science improves lives by educating and inspiring compassionate, skilled leaders of traditional medicine and integrative health sciences.

Core Value Statement and Core Values: All members of the Pacific College community embody the intention of improving lives exponentially by supporting health and wellbeing through our daily actions. We lead by example and by practicing the values of: Integrity, Mindfulness, Compassion Critical Thinking, Collaboration and Education

Vision: Pacific College is the recognized leader in delivering traditional medicine and integrative health science education to practitioners and the public. Pacific College is a catalyst for the adoption and expansion of traditional medicine and integrative health science principles, practices, and research, empowering individuals to gain and maintain health and enjoy life. Pacific College is contributing to the transformation of the structure and economics of healthcare by bringing education and integrative health science to where people live, learn, and play.

**B. MARKET.** Discuss the nature of your school and the business in which it is engaged. Describe who your existing and/or potential customers are and what motivates them to enroll in your school. Explain how you let these customers know you are in business. Finally, identify who your competitors are and how you are different from them.

Established in 1986, Pacific College of Health and Science has been a leader in Chinese medicine and holistic/integrative healthcare education. With a prestigious WASC (WSCUC) accreditation, the college has expanded beyond its three campuses to include online nursing and health science education programs. Our online programs attract students who wish to further their health degrees to obtain degree parity with their colleagues and/or the required continuing education hours for their professions. Our potential students are typically employed part-time or full-time and the flexibility of online courses allows students to continue to work and complete their coursework based on their own schedule. Our website is easily accessible to potential customers and we advertise through email blasts, print ads in health publications and mailers. Our preliminary research suggests that there are two brick-and-mortar institutions in Wisconsin that offer degrees for acupuncture/Chinese Medicine and none that offer holistic nursing degrees. We wish to offer our accredited programs online to the residents of the Wisconsin to expand integrative healthcare education options and provide necessary required continuing education hours for these professions

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**C. MANAGEMENT.** Describe your management team and how it functions to lead, administer and position the school. If your school has advisory boards, describe how the school uses them for program and school improvement.

Please see attachments labeled "School Management Structure," "Institutional Organization Chart" and "Governance Organization Chart."

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**D. SWOT ANALYSIS.** Identify your school's strengths, weaknesses, opportunities and threats (SWOT). Based on the results of this SWOT analysis, provide the following:

- 3 to 5 goals for strengths/weaknesses and how they will be addressed by your school.
- 3 to 5 goals for opportunities/threats and how they will be addressed by your school.

The goals should have specific objectives, defined results, a timeline for completion and metrics (some type of evaluation or measurement) by which the institution can evaluate/measure their success. In developing its goals, the school may wish to refer to the Elements of Effective Institutions graphic that is included on the back page of this form.

Please see attachment "SWOT Analysis."

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**D. SWOT ANALYSIS** *(continued)*

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**E. FUTURE VISION.** Describe your school 5 years from now. What will it look like and how will it be positioned in the marketplace.

Pacific College of Health and Science will continue to be a leader in Chinese medicine and holistic/integrative healthcare by fulfilling our mission to educate and inspire compassionate, skilled leaders. The college will continue to develop on-ground and online programs and certificates to provide more integrative medicine education options to the marketplace. A new pre-licensure Bachelor of Science in Holistic Nursing (BSN) program for first degree students was approved by the New York State Education Department's Office of Professions with plans for an on-ground launch January 2023 at our New York campus. We will continue to develop our continuing education department to provide necessary required hours for licensed massage therapists, acupuncturists, herbalists and nurses and build and connect the alumni community. We will continue to hire educators that are leaders in their professions and strive for optimal student learning outcomes and satisfaction. We look forward to continued growth and development of our college, employees and students to further our mission and bring integrative medicine to the public.

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**III. SUBMISSION**

***I hereby certify that the information contained on this form and any attachments to the form is true and correct to the best of my knowledge.***

Signature of Authorized School Official:

*malcolm youngren*

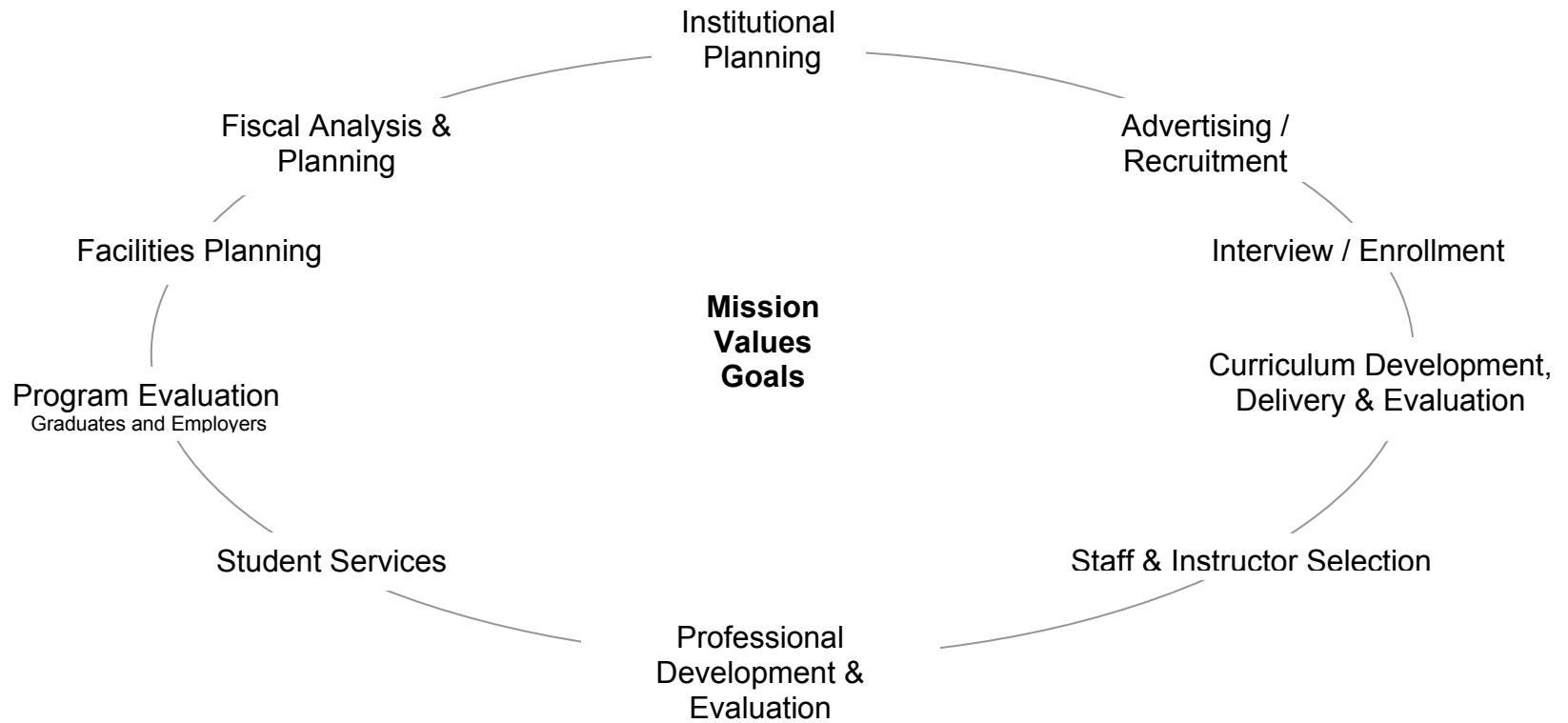
Print or Type Name and Title of Authorized School Official:  
Malcolm Youngren, CEO/President

Date:  
7/19/2023

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# INSTITUTIONAL SYSTEMS



## **Pacific College of Health and Science School Management Structure**

### **INSTITUTIONAL ORGANIZATION**

#### **Board of Trustees**

The ownership corporation retains the right to make ultimate decisions in the best interest of investors and the corporation. The corporate board of directors appoints the board of trustees. The board of trustees includes shareholder representation, but public members comprise the majority membership. The board of trustees hires and evaluates the chief executive officer.

#### **Institutional-Level Employees**

Institutional employees include the CEO, COO, CFO, vice president of academic affairs, vice president of human resources and finance, vice president of financial aid, vice president of admissions, vice president of marketing, vice president of information technology, and dean of libraries. These individuals supervise the activities of staff members across all three campuses and online.

#### **Campus Administration**

Each of the three campuses have local administration led by a campus director. At the individual campus level, deans and department chairs are hired or appointed in line with the college's mission. Academic deans and directors of education ensure that admissions standards, curriculum, faculty qualifications, and outcomes conform to higher education purposes.

### **GOVERNANCE ORGANIZATION**

Please note that each committee listed below has a charter.

#### **President's Council**

The President's Council is a deliberative and informational body that works collaboratively with the President to realize the vision of the college and to address the strategic issues, challenges, and projects underway at the college. All members of the Council will present projects and will be invited to participate in discussion of issues and resolution of problems or concerns. The Council is also a forum for the Vice Presidents and Directors to get clarity and direction from the College President.

- Members: Chairman of the Board (recent former President), CEO, Vice Presidents, Institutional Directors, Campus Directors
- Standard Data Reviewed: enrollment, retention, graduation, committee reports, exit interviews, survey data

#### **Academic Affairs Committee (AAC)**

To review academic issues that affect the three campuses in order to establish best practices, consistency in action, and foster student learning and faculty success. The Council organizes and increases intercampus communication between the faculty of the three campuses. The Council also

selects a Faculty Governance Chairperson for each campus to oversee the standing faculty governance committees and activities.

- Members: Academic Deans from all campuses, Assistant Academic Deans, Academic Department Chairs, other support staff as requested or required
- Standard Data Reviewed: enrollment, retention, graduation, Faculty Governance minutes, program review reports, faculty ranking data, comprehensive exam reports, course evaluation data, grade distribution reports, state and national exam results, survey results, exit interviews

#### **AAC Sub-Committee: Academic Deans Council**

To solicit feedback from the department chairs on the current state of the college and to work on specific issues facing the college.

- Members: Academic Deans of all programs. Academic Department Chairs, Vice President Academic Affairs, Faculty Governance Chair, Campus Director, Student Advisors, Librarian
- Standard Data Reviewed: classroom observation schedule, course evaluation data, grade distribution reports, enrollment, retention, graduation, program review reports, comprehensive exam reports, state and national exam results, survey results, exit interviews

#### **Student Success Committee (SSC)**

To monitor and optimize student progress (persistence), retention and graduation rates and support readiness for the successful practice of acupuncture, massage therapy, or holistic nursing. The Student Success Committee recommends policies, procedures, and guidelines addressing all aspects of student life from admission to graduation. The committee reviews and interprets data under the leadership of the institutional research analyst and recommends budgetary needs related to policy and process changes to the President's Council.

- Members: Campus Director Chair, Academic Deans, Faculty Representative, Staff Representative from one or more of Student Affairs/Academic Advising, Clinic, Registrar's office and Alumni Affairs office
  - o Other invited staff who may attend any or all meetings are: Director of Institutional Research, College President, Vice President of Operations, Vice President of Academic Affairs, other members of the college community based on topics covered.
- Standard Data Reviewed: absences by day by course, attendance, term enrollment summary, student withdrawals spreadsheet, retention, comprehensive exam reports, survey results, exit interviews

#### **SSC: Sub-Committee: Admissions**

The purpose of the Admissions Committee is to review applications of applicants who fall outside of standard admission requirements as set forth in the college catalog. The committee also reviews data related to admissions, enrollment, and student success to periodically assess the appropriateness of admissions standards and requirements.

- Members: Campus Director Chair, Academic Deans, Faculty Representative, Staff Representative, Institutional Research Analyst, College President, Vice President of Academic Affairs

- Standard Data Reviewed: weekly activity report, term to date (all leads), recent activity, roster, demographics and admissions, enrollment, admissions

### **SSC Sub-Committee: Student Advisement Committee**

The purpose of the Student Advisement Committee is to make advisement decisions regarding student progress in their program not defined by current policy and procedure. The Committee also considers and decides upon petitions for policy exception submitted by students following precedent and after consultation with members of the committee on the other campuses.

- Members: Campus Director Chair, Student Advisors (for each program), Academic Dean (for each program), Faculty Members (as required or requested), Registrar
- Standard Data Reviewed: transcripts, policy and procedure exceptions, disqualifications, transfer credit policy and exceptions, comprehensive exam results

### **SSC Sub-Committee: Graduate Success**

The Graduate Success Committee supports graduates of all programs to become an integral part of healthcare. implementation, and decision-making.

- Members: Campus Director Chair, Academic Deans, Faculty Representative, Staff Representative, Institutional Research Analyst, President, Vice President of Academic Affairs
- Standard Data Reviewed: exit interviews, alumni survey results, job placement reports, gainful employment data

### **Faculty Governance (FG)**

The Faculty Governance advises on curriculum, program review and professional development and provides recommendations to college administrators. Recommendations from Faculty Governance become official when adopted by the President's Council.

- Members: all faculty
- Standard Data Reviewed: sub-committee minutes, program review recommendations from previous reports, Professional Development Plan, research and scholarship awards, budget for Faculty Development

### **FG Sub-Committee: Curriculum and Program Review (CPR)**

The Curriculum and Program Review committee is established by and for faculty members in order to provide an independent voice for faculty members in defining strategic plans, academic standards, and curriculum development. The committee also acts as the vehicle through which the faculty guides the overall development of the educational programs of the college.

- Sub committees: Library Advisory Committee, Clinical Quality Assurance Committee
- Members: Chairperson (full-time faculty member), at least one member from each program and independent department, Adjunct Faculty Member (encouraged, but not required), VP of Academic Affairs, Academic Deans, Librarian
- Standard Data Reviewed: enrollment, retention, graduation, program review recommendations from previous reports, faculty ranking data, comprehensive exam reports, course evaluation data, grade distribution reports, state and national exam results, survey results, exit interviews

### **FG Sub-Committee: Faculty Professional Development (FPD) Committee**

Established by and for faculty to define and assess faculty effectiveness. The committee is involved in the hiring process through resume screening and interviewing. The committee may also make recommendations concerning rank, advancement and promotion policy, faculty governance, and the terms and conditions of employment. This committee also reviews faculty requests for research and scholarships funding to support professional development.

- Sub committees: Hiring & Promotion; Research, Scholarship, & Training
- Members: Chairperson, secretaries, full-time faculty members
- Standard Data Reviewed: Professional Development Plan, Research and Scholarship Awards, Budget for Faculty Development, Professional Action Plans, Student Course Evaluation, Survey Results, Classroom Observation Summaries

### **Curriculum Advisory Committee (CAC)**

The purpose of the Curriculum Advisory Committee is to provide a venue for review of proposals for additions or subtractions to College curriculum. Further considerations include assessment of educational effectiveness of existing individual courses or series of courses. Items are presented for discussion to student representatives, Department Chairs, and other faculty members.

- Members: Academic Deans of each program, Department Chairs, full-time faculty members as
- Assigned, Adjunct Faculty Membership (encouraged, but not required), Student Council representatives from each program
- Standard Data Reviewed: comprehensive exam results, licensing exam results, student course evaluations, alumni exit surveys

### **Program Advisory Committee (PAC)**

The purpose of the Program Advisory Committees is to:

- a. Review the established curriculum of the program and comment as to the appropriateness and adequacy of the program objectives, program length, curriculum content, learning resources, and the adequacy of facilities and equipment.
- b. Review and comment on student graduation, graduate employment, and state licensing examination outcomes of each program.
- c. Review and comment on each new program including the appropriateness of curriculum objectives, program length, and curriculum content prior to accreditation agency approval of the new program.
- d. Review of college mission, vision, and core values.
  - Members: three member from each of the following: employers, practitioners, graduate/alumni and general education
  - Standard Data Reviewed: enrollment, retention, graduation, program review reports, comprehensive exam reports, course evaluation data, grade distribution reports, state and national exam results, survey results, exit interviews, gainful employment



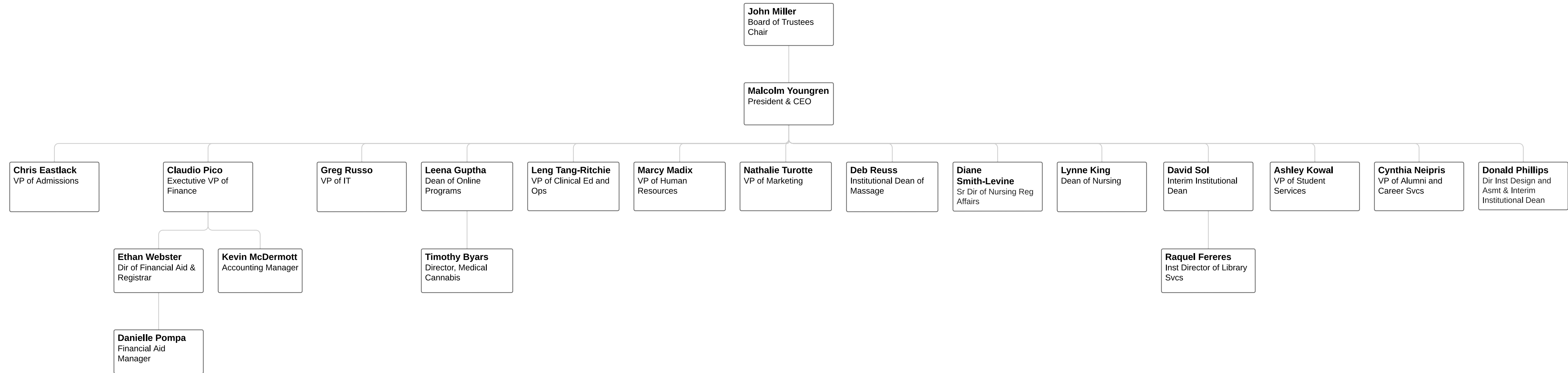


# PACIFIC COLLEGE

of HEALTH AND SCIENCE

## Institutional Leadership

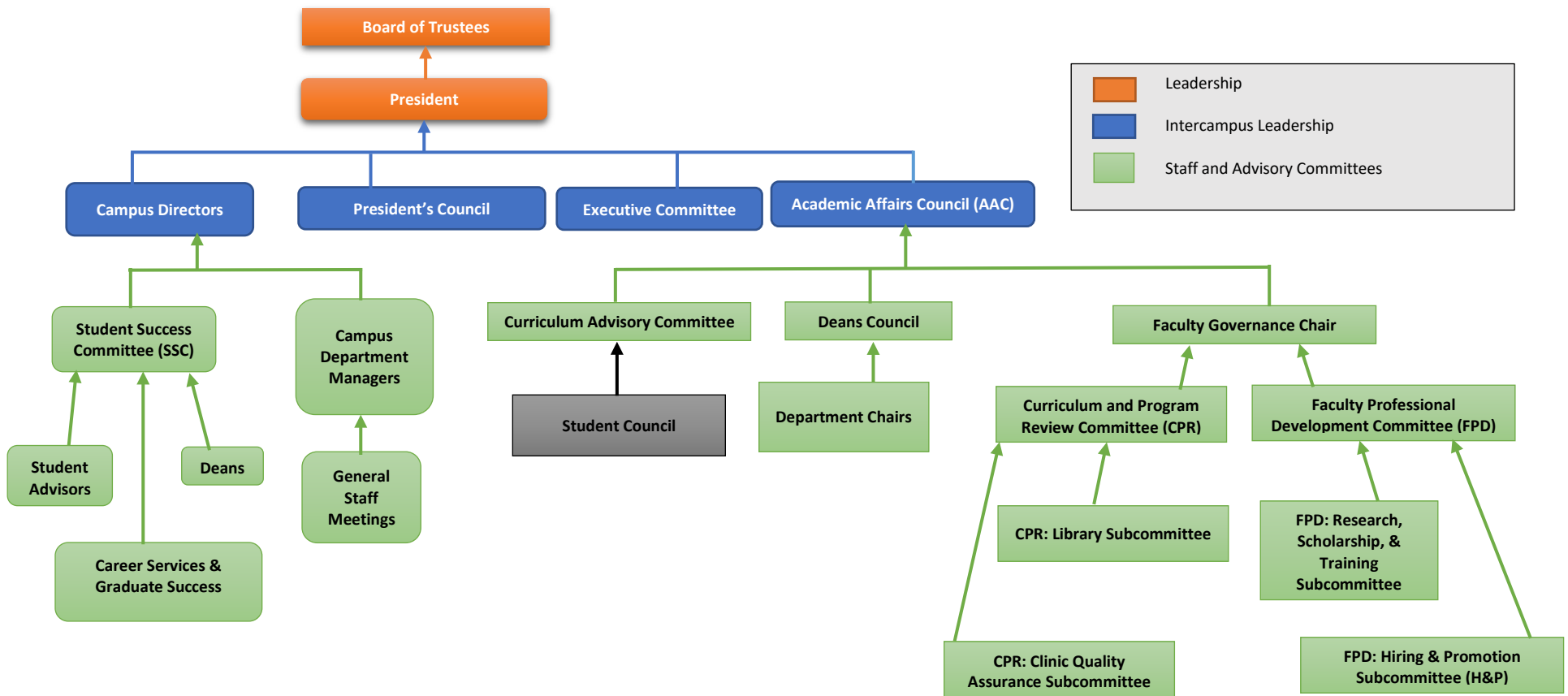
as of July 2023





# PACIFIC COLLEGE *of* HEALTH AND SCIENCE

## Governance Organization Chart



Recommendations come from all committees and move up to Executive Committee or President's Council for final decision. All decisions from intercampus leadership are disseminated back to Staff and Advisory Committees.

## **SWOT Analysis Attachment for Form 1.10: Institutional Planning for Pacific College of Health and Science (PCHS)**

### **Strengths**

*Using distance education to deliver Chinese and integrative medicine education.*

- Objective: To use distance education to deliver Chinese and integrative medicine education.
- Results: Over the last decade, PCHS has built its online learning capabilities to develop and offer seven certificate and degree programs in the distance learning format. An Online Education department led by Dean Leena Guptha, DO, MBA, MS, BCTMB, PhD has made distance learning an integral part of the college. The fully online Master of Science in Medical Cannabis Therapeutics (MS MCT) launched Fall 2022 in approved states and currently has 17 students enrolled.
- Timeline for Completion: PCHS will continue to develop and offer distance education certificates and degrees at the undergraduate and graduate level, as well as maintain and online or hybrid format for many existing courses. The online programs will retain their students and increase their total enrollment starting in the Fall 2023 trimester.
- Evaluation/Measurement of Success: The seven distance education programs will have a collective enrollment of 200 or more students in approved states as of Spring 2024.

*Support of alumni network*

- Objective: To continue to support PCHS' alumni network.
- Results: PCHS has over 3,000 alumni practicing in more than 37 states and internationally. The Career and Alumni Services Department (CASD) assists with career services (resumes/cover letters, interviewing skills, etc.), patient referrals, job postings, discounts on malpractice insurance and continuing education opportunities. The college provides an official Alumni Google Group, lifelong library access, and a variety of continuing education courses. The Pacific Symposium is an annual educational event that draws acupuncturists, massage practitioners, chiropractors, nurses, medical doctors, and Traditional Chinese Medicine (TCM) students from around the world, and the Pacific Center for Lifelong Learning (PCLL) is the extension studies division of PCHS. The 2022 job placement rate average was over 90% for the programs tracked by the college.
- Timeline for Completion: PCHS will continue to support its growing alumni network through the CASD, PCLL and the Pacific Symposium. Job placement data is collected annually by April/May.
- Evaluation/Measurement of Success: Maintain a job placement rate of over 90% in the acupuncture and nursing degree and certificate programs for the data collected in April/May 2023.

*School reputation with regional and programmatic accreditations*

- Objective: To maintain the positive, reliable reputation of the school with regional and programmatic accreditations.
- Results: Established in 1986 as Pacific College of Oriental Medicine, PCHS has been a leader in Chinese medicine and holistic/integrative healthcare education for over three decades. PCHS was initially accredited by the Accreditation Commission for Acupuncture and Herbal Medicine (ACAAM) on 3/30/2016 and has been successfully renewed. PCHS was initially accredited by WASC Senior College and University Commission (WSCUC) on 3/11/2013 and was successfully renewed. PCHS's Bachelor

of Science in Nursing (RN-BSN) program was initially accredited by the Accreditation Commission for Education in Nursing (ACEN) on 3/30/2016 and was successfully renewed. The MSN obtained ACEN candidacy on 6/22/2021, completed an successful accreditation visit June 2023 and is awaiting the final decision. The new prelicensure Bachelor of Science in Nursing (BSN) is expecting its ACEN sub-change approval in November 2023.

- Timeline for Completion: PCHS will continue to maintain its reputation with ACAHM, WASC-WSCUC and ACEN accreditations. The next scheduled reviews are February 2026 for ACAHM, March 2026 for WASC-WSCUC, and Fall 2028 for the RN-BSN and prelicensure BSN ACEN. The MSN full accreditation is expected in September 2023.
- Evaluation/Measurement of Success: Successfully obtain full ACEN accreditation for the MSN in September 2023 and submit the ACEN change application for the RN-BSN/prelicensure BSN September 2023.

### **Weaknesses**

#### *Market brand awareness in nursing markets for online nursing programs*

- Objectives: To increase brand awareness and PCHS visibility in nursing markets.
- Results: All advertising and marketing for the nursing department is handled in-house and the college hired Tribeca Marketing Group to assist in brand awareness and visibility. The Board of Trustees has approved an increase in budget for marketing and advertising the nursing programs. Prior changes to the format of the courses and marketing have proved successful for increasing enrollment in the nursing programs. Despite increasing brand awareness, the RN-BSN enrollment decreased from 53 students in Fall 2022 to 45 students in Spring 2023. The Holistic Nursing Certificate (HNC) enrollment increased from 12 students in Fall 2022 to 17 students in Spring 2023. The MSN initial cohort is currently 17 students.
- Timeline for Completion: PCHS will continue to increase brand awareness and visibility in nursing markets to promote increased enrollment for the Fall 2023 semester.
- Evaluation/Measurement of Success: Increase total enrollment of RN-BSN to over 50 students, HNC to over 15 students and MSN to over 30 students for the Fall 2023 trimester.

#### *Improving student retention and completion for all programs*

- Objectives: To improve student retention and completion for all programs.
- Results: PCHS has prioritized retention and completion of programs by focusing on curriculum review and increasing engagement with the student population. Curricula reviews have revealed that providing online/hybrid/distance education, allowing for delayed viewing of synchronous webinars, and offering classes more frequently can increase retention and graduation. PCHS strives to increase student engagement creating ways to connect through town halls, newsletters, master class webinars, welcome emails to new admits, restructured online orientation, and a student-led Facebook group. As of the Fall 2020 semester, students are required to schedule an academic advising appointment each semester and all faculty will have one regular open office hour per week for each class they teach. The 2022 job placement rate average was over 90% for the programs tracked by the college. Job placement data will continue to be collected/measured annually.

- Timeline for Completion: PCHS will continue to improve the retention and completion of all programs by supporting and engaging students. Program completion and job placement rates are recorded as estimated level of achievements (ELAs). PCHS strives for an ELA of above 85% for program completion rate and an ELA of above 75% for job placement. This data is collected annually in April/May.
- Evaluation/Measurement of Success: Maintain a job placement rate of over 90% in the acupuncture, nursing and health coach degree and certificate programs for the data collected in April/May 2023.

*California Board of Registered Nursing does not approve post-licensure nursing programs*

- Objectives: To obtain approval from the California Board of Registered Nursing (BRN) for a prelicensure nursing program to proceed with Wisconsin post-licensure nursing program approval.
- Results: For the post-licensure RN-BSN and HNC, PCHS has gone through the rigorous process of New York Stated Education department (NYSED) and ACEN approvals. The Wisconsin Administrative Code Chapter N1: Approval for Schools of Nursing states, "APPROVAL. An out-of-state school of nursing shall be approved if all of the following requirements are met: (a) The school is approved by the board of the state the school is located. (b) The school is accredited by a nursing accreditation body recognized by the Wisconsin board." PCHS' state of legal domicile is California and the California BRN does not authorize/approve post-licensure nursing programs, but the California Bureau for Private Postsecondary Education (BPPE) has approved the programs for distance education. The Wisconsin Board of Nursing determined at the April 8, 2021 meeting that PCHS could not be approved unless the college has nursing programs approved by the California BRN due to a literal interpretation of the administrative code.
- Timeline for Completion, Evaluation/Measurement of Success: The prelicensure BSN feasibility study is currently under review and granted an extension by the California BRN. Once the prelicensure BSN has been approved by California BRN, the college will re-apply to the Wisconsin Board of Nursing for RN-BSN and HNC approvals by August 2024.

### **Opportunities**

*Developing new nursing programs for the undergraduate and graduate levels*

- Objectives: To develop and obtain approvals for a new undergraduate nursing program.
- Results: PCHS currently offers post-licensure RN-BSN completion program, HNC for licensed Registered Nurses and MSN: Nurse Coach or Educator. A new Vice President of Nursing Patrick Robinson, PhD, ACRN, CNE, RN, ANEF, FAAN, has been hired and applications for a prelicensure BSN have been approved by New York and granted an extension by California.
- Timeline for Completion, Evaluation/Measurement of Success: PCHS will continue to develop and offer undergraduate and graduate nursing programs. The prelicensure BSN will launch at the New York campus in January 2024 and the California feasibility study will be approved by May 2024.

*Increasing student knowledge of business skills and practice management*

- Objectives: To increase student knowledge of business skills and practice management.
- Results: PCHS currently offers business fundamentals and practice management courses as a required or elective course for all programs. For example, the Transitional Doctorate of Acupuncture or Acupuncture with Chinese Herbal Medicine specialization

(TDAc/TDAcCHM) requires *BU611: Practice Management and Ethics*, a hands-on class that gives students a comprehensive view of the various office management, record-keeping, insurance billing and collection, and bookkeeping systems related to an Oriental medicine practice. Practice building techniques are introduced in this class, and students design a business plan to give themselves a head start in creating a successful practice. Additionally, PCHS staff and guests regularly present workshops on issues related to building a successful career and the CASD assists with career services. The 2022 job placement rate average was over 90% for the programs tracked by the college.

- Timeline for Completion: PCHS will continue to increase student knowledge of business skills and practice management with designated courses, workshops and CASD services. Job placement data is collected annually by April/May.
- Evaluation/Measurement of Success: Maintain a job placement rate of over 90% in the acupuncture and nursing distance education programs for the data collected in April/May 2022.

#### *Encouraging faculty research and scholarship*

- Objectives: To encourage faculty research and scholarship.
- Results: The Faculty Research, Scholarship, and Training Committee supports faculty development in the areas of research and scholarship, teaching effectiveness, and service. The Faculty Professional Development Committee develops faculty professional action plans for each instructor which includes research and scholarship goals. Through a National Institute of Health (NIH) \$669,000 grant “Evidence-Informed Practice (EIP): Faculty and Curriculum Development,” EIP was integrated into the curriculum and almost 100% of faculty were trained in EIP. PCHS has provided over \$400,00 in tuition subsidies to faculty and increased its doctoral trained graduate faculty from 10% in 2012 to 66% in 2018. Faculty regularly publish in nationally recognized journals and media, as well as write book and participate in conferences. Although PCHS did not meet the goal of 65% of its graduate faculty having doctoral education by the Spring 2023 semester, many new qualified doctoral-prepared directors and faculty have been hired in 2023.
- Timeline for Completion, Evaluation/Measurement of Success: PCHS will continue to encourage faculty research and scholarship through faculty committees, grants and providing tuition subsidies. PCHS would like 60% of its graduate faculty to obtain doctoral education by the Spring 2024 semester.

### **Threats**

#### *New department of education regulations*

- Objectives: To comply with the Department of Education’s 2020 *Accreditation and State Authorization* regulations.
- Results: A compliance consultant was hired to research the requirements for distance education action by state and to obtain the mandatory approvals or exemptions. Dr. Diane-Smith Levine, EdD, MSN, MHA, BSN, RN, CNE was hired as Senior Director of Nursing Regulatory Affairs, WSCUC Accreditation Liaison Officer and ACAHM Institutional Liaison. Bi-weekly meetings are held with the President/CEO, Executive VP of Finance, VP of Admissions, Dr. Diane Smith-Levine, and the compliance consultant. As of August 2023, authorizations/exemptions were obtained in 41 states.
- Timeline for Completion, Evaluation/Measurement of Success: PCHS will continue to obtain and maintain state authorizations and exemptions for distance education. A new

project manager has been hired to streamline the state application process and PCHS hopes to obtain approval for pending new program applications in Minnesota and Oregon by September 2024.

*State of legal domicile California does not participate in the NC-SARA*

- Objectives: To obtain state authorizations and exemptions to provide distance education to enrolled students residing in those states.
- Results: When states participate in the National Council for State Authorization of Reciprocity Agreements (NC-SARA), they follow agreed-upon national standards for online education. PCHS' state of legal domicile California has introduced legislation to participate in NC-SARA but is the only state that continues to operate independently outside of the NC-SARA. As of August 2023, distance education authorizations/exemptions were obtained in 41 states.
- Timeline for Completion, Evaluation/Measurement of Success: PCHS will continue to obtain and maintain state authorizations and exemptions for distance education. A new project manager has been hired to streamline the state application process and PCHS hopes to obtain approval for pending new program applications in applications in Minnesota and Oregon by September 2024.

*New physical therapy schools getting into acupuncture programs education.*

- Objectives: To support national standards for acupuncture education established by the ACAHM.
- Results: As stated by the Wisconsin Society of Certified Acupuncturists (WISCA), "Dry needling' is a pseudonym for acupuncture that has been adopted by physical therapists, chiropractors, and other health providers who lack adequate training, education and legal ability to practice acupuncture within their scope of practice. Rebranding acupuncture as 'dry needling' allows these groups to skirt safety, testing, and certification standards put into place for the safe practice of acupuncture." Wisconsin acupuncturists require a minimum of 1,900 hour of didactic education and 660 hours of supervised clinical training within a highly regulated ACAHM curriculum. A preliminary search for Wisconsin reveals there is no standardized curriculum for dry needling as they utilize a 15 to 25 hour continuing education format. Dry needling is prohibited in California and New York, where two PCHS campuses are located.
- Timeline for Completion, Evaluation/Measurement of Success: PCHS will continue to support national standards for acupuncture education by maintaining the ACAHM accreditation. The next scheduled review is February 2026.