



**Kingston University**  
**12100 Imperial Hwy**  
**Norwalk, CA 90650**  
**Non-Compliance Exit Report**

## **PART I: INTRODUCTION**

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On January 22, 2015, the California Acupuncture Board conducted a compliance visit at Kingston University. The site team found the following issues of non-compliance with the California Acupuncture Board Training Program requirements.

## **PART II: KINGSTON UNIVERSITY'S TRAINING PROGRAM**

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Kingston University is in **full compliance** with CCR Section 1399.435 Criteria for Acupuncture and Oriental Medicine Training Programs.

## **PART III: KINGSTON UNIVERSITY'S MASTER OF SCIENCE IN ORIENTAL MEDICINE CURRICULUM NON-COMPLIANCE**

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Kingston University is approved for its Master of Science in Oriental Medicine training program. The program has a total of 3,120 curriculum hours.

**Finding #1: The knowledge of critique of research methods requirement is not met.**

### **California Acupuncture Board Training Program Requirement**

CCR Section 1399.434(g)(3):

*"Knowledge of critique of research methods."*

### **Kingston University's Curriculum**

Kingston listed course, PM 1911 World History of Medicine and Professional Development, on its curriculum requirement form to fulfill CCR Section 1399.434(g)(3) The course lacks instruction of knowledge of critique of research methods and therefore does not meet the Board's requirement.

## Training Program Corrective Action Taken

Changes were made to the competencies covered in the course, PM 1911 World History of Medicine, to include knowledge of critique of research methods (See Kingston University's Corrective Action Report).

[This action brings Kingston University in compliance with CCR Section 1399.434\(g\)\(3\).](#)

## **PART IV: KINGSTON UNIVERSITY'S MASTER OF SCIENCE IN ORIENTAL MEDICINE CLINICAL NON-COMPLIANCE**

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The site visit team evaluated the clinic for compliance to ensure the curriculum requirements are reflected in the clinical training pursuant to CCR 1399.434.

**Finding:** Kingston University's clinical practicum for intern training did not demonstrate sufficient application of Eastern and Western diagnostic procedures in evaluating patients.

### **California Acupuncture Board Training Program Clinical Requirement**

CCR Section 1399.434(h)(2):

*"Diagnosis and evaluation (minimum 275 hours) – the application of Eastern and Western diagnostic procedures in evaluating patients"*

### **California Acupuncture Board Record Keeping Requirement**

CCR Section 1399.453:

*"An acupuncturist shall keep complete and accurate records on each patient who is given acupuncture treatment, including but not limited to, treatments given and progress made as a result of the acupuncture treatments."*

### **Department of Industrial Relations Worker's Compensation Requirement**

Section 9785. Reporting Duties of the Primary Treating Physician:

*"(h) When the primary treating physician determines that the employee's condition is permanent and stationary, the physician shall, unless good cause is shown, report within 20 days from the date of examination any findings concerning the existence and extent of permanent impairment and limitations and any need for continuing and/or future medical care resulting from the injury. The information may be submitted on the "Primary Treating Physician's Permanent and Stationary Report" form (DWC Form PR-3 or DWC Form PR-4) contained in section 9785.3 or section 9785.4, or in such other manner which provides all the information required by Title 8, California Code of Regulations, section 10606. For permanent disability evaluation performed pursuant to the permanent disability evaluation schedule adopted on or after January 1, 2005,*

*the primary treating physician's reports concerning the existence and extent of permanent impairment shall describe the impairment in accordance with the AMA Guides to the Evaluation on Permanent Impairment, 5th Edition (DWC Form PR-4). Qualified Medical Evaluators and Agreed Medical Evaluators may not use DWC Form PR-3 or DWC Form PR-4 to report medical-legal evaluations.”*

### **Kingston University’s Clinic**

1. Eastern assessments were not applied to patients on multiple inspected medical charts:
  - a. Although there is a section for Eight Principles on the medical chart, it is rarely filled out.
  - b. Some patient’s initial intake history forms are blank. This does not allow for pharmacological assessments to be performed.
  - c. ICD-9 not used in Patient Medical records. Instead, it is replaced by the differential diagnosis. Both are needed.
  - d. Treatment plans do not indicate frequency or duration of treatment.
2. Western assessments were not applied to patients on multiple inspected medical charts:
  - a. Medical charts do not include the location and type of condition
  - b. The Orthopedic exam is not always used when called for. For teaching purposes, the Orthopedic Exam needs to be incorporated into the patient form.
3. The lack of information collected in the Eight Principles and Pulse pattern reading leads to incomplete differential diagnosis and treatment planning.
4. Patient records are not accurate and complete:
  - a. No page number is listed on the patient files.
5. The two dimension pain scale is not used and therefore cannot account or record the frequency of the pain.

### **Training Program Corrective Action Taken**

Kingston University submitted new medical charts to demonstrate corrective action of findings of clinical non-compliance found during the site visit (See Kingston University’s Corrective Action Report). Upon review of the medical charts, Kingston University is in compliance with CCR Section 1399.434(h)(2).

**[This action brings Kingston University in compliance with CCR Section 1399.434\(h\)\(2\).](#)**

### **SUMMARY**

The above clinical non-compliance indicates a lack of preparation, training and mastery of the necessary knowledge for interns to properly enter into clinical training. Kingston University does not meet the California Acupuncture Board’s clinical training program requirement.

## **PART V: PEER REVIEW RECOMMENDATION**

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1. The Progress notes have a section for the supervisor to sign off on but it is only labeled as 'L.Ac'. It is recommended that Kingston University replace this with 'Clinic Supervisor'.
2. One Patient Medical chart states 'diagnostic plan'. This should read 'Treatment Plan'.
3. It is recommended Intern Hours list total accumulated hours for all periods as opposed to listing totals for just each period.
4. The clinic director is also a clinic supervisor and demonstrates both western and eastern exam and diagnosis. However, in the charts reviewed, interns are also led by other clinic supervisors, and all of these diagnostic methods are not reflected in those patient records. The Clinic Director's approach should be reflected in the forms so that all clinic supervisors adhere to the same standard.
5. There are two designs for pulse pattern. One distinguishes between left and right side. This creates confusion as to which chart to fill out and can lead to omission of information if the chart distinguishing the sides is not used. Only the chart distinguishing the sides should be used on the form.

## **PART VI: CONCLUSION**

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"The board may deny, place on probation, suspend or revoke the approval granted to any acupuncture training program for any failure to comply with the regulations in this article, the Acupuncture Regulations or the Acupuncture Licensure Act". CCR Section 1399.438 Suspension or Revocation of Approval

**Kingston University is in full compliance with the Board's Regulations.**