



Stanton University
9618 Garden Grove Blvd, Suite #201
Garden Grove, CA 92844
Non-Compliance Exit Report

PART I: INTRODUCTION

On December 3, 2014, the California Acupuncture Board conducted a compliance visit at Stanton University. The site team found several issues of non-compliance with the California Acupuncture Board Training Program requirements.

PART II: STANTON UNIVERSITY'S TRAINING PROGRAM NON-COMPLIANCE

Finding: Multiple Student Enrollment Agreement forms were not in English.

California Acupuncture Board Training Program Requirement

CCR Section 1399.439(c):

"All student records shall be maintained in English."

Training Program Corrective Action Taken

Stanton University re-examined student files and made sure that "Student Enrollment Agreement" forms were signed and in English.

This action brings Stanton University in compliance with CCR Section 1399.439(c).

OBSERVATION

Multiple student records had incomplete documents:

- a) Insurance Policy document was signed and acknowledged by students but one option was not selected.
- b) Acknowledgement of Distribution document signed and acknowledged by student but one or more options were not selected.
- c) Students did not initial school's Performance Fact Sheet.

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

Finding #1: The general psychology requirement is not met due to lack of instruction of counseling skills.

California Acupuncture Board Training Program Requirement

CCR Section 1399.434(a)(4):

“General Psychology, including counseling skills.”

Stanton University's Curriculum

Stanton University listed on its curriculum requirement form that course, BS 212 Psychology, satisfies CCR Section 1399.434(a)(4), but the course lacks instruction of counseling skills. This course does not meet the Board's requirement.

Training Program Corrective Action Taken

Changes were made to the competencies covered in the course, CS 212 Psychology, to include counseling skills (See Stanton University's Corrective Action Report).

This action brings Stanton University in compliance with CCR Section 1399.434(a)(4).

Finding #2: The physiology requirement due to lack of instruction of neurophysiology and neurochemistry.

California Acupuncture Board Training Program Requirement

CCR Section 1399.434(a)(6):

“Physiology – a survey of basic physiology, including neurophysiology, endocrinology, and neurochemistry.”

Stanton University's Curriculum

Stanton University stated on its curriculum requirement form that the courses listed below fulfill CCR Section 1399.434(a)(6). However, the courses lack instruction of neurophysiology and neurochemistry and therefore does not meet the Board's requirement.

1. BS 323 Anatomy & Physiology III
2. BS 324 Anatomy & Physiology IV

Training Program Corrective Action Taken

Changes were made to the competencies covered in the courses, BS 323 Anatomy & Physiology III and BS 324 Anatomy & Physiology IV, to include neurophysiology and neurochemistry (See Stanton University's Corrective Action Report).

This action brings Stanton University in compliance with CCR Section 1399.434(a)(6).

Finding #3: The pathology and pathophysiology requirement is not met due to the lack of instruction of microbiology, psychopathology, and epidemiology.

California Acupuncture Board Training Program Requirement

CCR Section 1399.434(a)(7):

"Pathology and Pathophysiology – a survey of the nature of disease and illness, including microbiology, immunology, psychopathology, and epidemiology."

Stanton University's Curriculum

Stanton University listed the courses below on its curriculum requirement form to fulfill CCR Section 1399.434(a)(7). The courses do not meet the Board's requirement because they lack instruction of microbiology, psychopathology, and epidemiology.

1. BS 431 Pathology I
2. BS 432 Pathology II

Training Program Corrective Action Taken

Changes were made to the competencies covered in the courses, BS 431 Pathology I and BS 342 Pathology II, to include microbiology, psychopathology, and epidemiology (See Stanton University's Corrective Action Report).

This action brings Stanton University in compliance with CCR Section 1399.434(a)(7).

Finding #4: The acupuncture and Oriental Medicine specialties requirement is not met due to lack of instruction of geriatrics, traumatology, orthopedics, and emergency care.

California Acupuncture Board Training Program Requirement

CCR Section 1399.434(b)(1)(F):

“Acupuncture and Oriental Medicine Specialties, including dermatology gynecology, pediatrics, ophthalmology, orthopedics, internal medicine, geriatrics, family medicine, traumatology, and emergency care.”

Stanton University’s Curriculum

Stanton University listed the following courses on its curriculum requirement form to satisfy CCR Section 1399.434(b)(1)(F):

1. OM 531 Oriental Internal Medicine I
2. OM 532 Oriental Internal Medicine II
3. OM 533 Oriental Internal Medicine III
4. OM 534 Oriental Internal Medicine IV

The courses lack instruction of geriatrics, traumatology, orthopedics, and emergency care and therefore does not meet the Board’s requirement.

Training Program Corrective Action Taken

Changes were made to the competencies covered in the courses, OM 531 Oriental Internal Medicine I, OM 532 Oriental Internal Medicine II, OM 533 Oriental Internal Medicine III, and OM 534 Oriental Internal Medicine IV, to include geriatrics, traumatology, orthopedics, and emergency care (See Stanton University’s Corrective Action Report).

This action brings Stanton University in compliance with CCR Section 1399.434(b)(1)(F).

Finding #5: The herbal prescription, counseling and preparation requirement is not met due to the lack of instruction of counseling.

California Acupuncture Board Training Program Requirement

CCR Section 1399.434(b)(2)(E):

“Herbal prescription, counseling and preparation.”

Stanton University’s Curriculum

Stanton University listed course, CL 500 Practice Observation, on its curriculum requirement form to fulfill CCR Section 1399.434(b)(2)(E), but it lacks instruction on counseling and therefore does not meet the Board’s requirement.

Training Program Corrective Action Taken

Changes were made to the competencies covered in the courses, HB 531 Herbal Prescription and HB 420 Herbal Practice, to include herbal counseling (See Stanton University’s Corrective Action Report).

This action brings Stanton University in compliance with CCR Section 1399.434(b)(2)(E).

Finding #6: The Oriental and Western clinical and medical nutrition, dietary and supplement prescription and counseling requirement is not met due to lack of instruction on counseling.

California Acupuncture Board Training Program Requirement

CCR Section 1399.434(b)(2)(F):

“Oriental and Western clinical and medical nutrition, dietary and supplement prescription and counseling.”

Stanton University’s Curriculum

Stanton University listed courses: 1) HB 430 Nutrition in Oriental Medicine and 2) BS 311 Nutrition and Vitamins on its curriculum requirement form to fulfill CCR Section 1399.434(b)(2)(F). The courses lack instruction on counseling and therefore does not meet the Board’s requirement.

Training Program Corrective Action Taken

Changes were made to the competencies covered in the courses, BS 311 Nutrition and Vitamins and HB 430 Nutrition in Oriental Medicine, to include counseling (See Stanton University’s Corrective Action Report).

This action brings Stanton University in compliance with CCR Section 1399.434(b)(2)(F).

Finding #7: The cold and health therapy requirement is not met due to the lack of instruction of ultrasound.

California Acupuncture Board Training Requirement

CCR Section 1399.434(b)(2)(G):

“Cold and heat therapy, including moxibustion and ultrasound.”

Stanton University’s Curriculum

Stanton University listed course, AC 522 Acupuncture Techniques II, on its curriculum requirement form to satisfy CCR Section 1399.434(b)(2)(G). The course does not meet the Board’s requirement because it lacks instruction of ultrasound. However, ultrasound is taught in another course but that course is not listed on the curriculum requirement form to fulfill CCR Section 1399.434(b)(2)(G).

Training Program Corrective Action Taken

Changes were made to the competencies covered in the course, WM 420 Lab Test/Radiology, to include ultrasound (See Stanton University’s Corrective Action Report).

This action brings Stanton University in compliance with CCR Section 1399.434(b)(2)(G).

Finding #8: The lifestyle counseling, and self-care recommendations requirement is not met.

California Acupuncture Board Training Program Requirement

CCR Section 1399.434(b)(2)(H):

“Lifestyle counseling, and self-care recommendations.”

Stanton University’s Curriculum

Stanton University listed the following courses on its curriculum requirement form to fulfill CCR Section 1399.434(b)(2)(H):

1. OM 421 Oriental Medicine Diagnosis I
2. OM 422 Oriental Medicine Diagnosis II
3. AC 531 Acupuncture Therapeutics I
4. AC 532 Acupuncture Therapeutics II

None of the courses have instruction on lifestyle counseling and self-care recommendations and therefore does not meet the Board’s requirement.

Training Program Corrective Action Taken

Changes were made to the competencies covered in the courses, OM 531 Oriental Internal Medicine I, OM 532 Oriental Internal Medicine II, OM 533 Oriental Internal Medicine III, and OM 534 Oriental Internal Medicine IV, to include lifestyle counseling and self-care recommendations (See Stanton University’s Corrective Action Report).

This action brings Stanton University in compliance with CCR Section 1399.434(b)(2)(H).

Finding #9: The adjunctive acupuncture procedures requirement is not met due to the lack of instruction of cupping or gua sha.

California Acupuncture Board Training Program Requirement

CCR Section 1399.434(b)(2)(J):

“Adjunctive acupuncture procedures, including bleeding, cupping, gua sha, and dermal tacks.”

Stanton University’s Curriculum

Stanton University stated on its curriculum requirement form that the course, AC 522 Acupuncture Techniques II, satisfies CCR Section 1399.434(b)(2)(J).

However, the course lacks instruction of cupping and gua sha and therefore does not meet the Board's requirement.

Training Program Corrective Action Taken

Changes were made to the competencies covered in the course, AC 522 Acupuncture Techniques II, to include cupping and gua sha (See Stanton University's Corrective Action Report).

This action brings Stanton University in compliance with CCR Section 1399.434(b)(2)(J).

Finding #10: The adjunctive acupoint stimulation devices requirement is not met due to the lack of instruction of magnets and beads.

California Acupuncture Board Training Program Requirement

CCR Section 1399.434(b)(2)(M):

"Adjunctive acupoint stimulation devices including magnets and beads."

Stanton University's Curriculum

Stanton University stated on its curriculum requirement form that the course, AC 521 Acupuncture Techniques I, satisfies CCR Section 1399.434(b)(2)(M). However, the course lacks instruction of magnets and beads and therefore does not meet the Board's requirement.

Training Program Corrective Action Taken

Changes were made to the competencies covered in the course, AC 522 Acupuncture Technique II, to include magnets and beads (See Stanton University's Corrective Action Report).

This action brings Stanton University in compliance with CCR Section 1399.434(b)(2)(M).

Finding #11: The standard physical examination and assessment requirement is not met due to the lack of instruction of neuromusculoskeletal, orthopedic, neurological, ear, and nose examinations, and functional assessment.

California Acupuncture Board Training Program Requirement

CCR Section 1399.434(c)(2):

"Standard physical examination and assessment, including neuromusculoskeletal, orthopedic, neurological, abdominal, and ear, nose and throat examinations, and functional assessment."

Stanton University's Curriculum

Stanton University listed the following courses on its curriculum requirement form to fulfill CCR Section 1399.434(c)(2):

1. WM 430 Western Physical Assessment
2. WM 531 Western Clinical Medicine I
3. WM 532 Western Clinical Medicine II
4. WM 533 Western Clinical Medicine III

None of the courses above have instruction of neuromusculoskeletal, neurological, ear and nose examinations and functional assessment. Therefore, the courses do not meet the Board's requirement.

Training Program Corrective Action Taken

Changes were made to the competencies covered in the course, WM 430 Western Physical Assessment, to include neuromusculoskeletal, neurological, ear and nose examinations, and functional assessment (See Stanton University's Corrective Action Report).

This action brings Stanton University in compliance with CCR Section 1399.434(c)(2).

Finding #12: The patient/practitioner rapport, communication skills, including multicultural sensitivity requirement is not met.

California Acupuncture Board Training Program

CCR Section 1399.434(c)(4):

"Patient/practitioner rapport, communication skills including multicultural sensitivity."

Stanton University's Curriculum

Stanton University listed courses: 1) CL 400 Pre-Clinical Procedure and 2) WM 430 Western Physical Assessment on its curriculum requirement form to fulfill CCR Section 1399.434(c)(4). However, the courses do not meet the Board's requirement because they lack instruction of patient/practitioner rapport, communication skills, including multicultural sensitivity.

Training Program Corrective Action Taken

Changes were made to the competencies covered in the courses, WM 430 Western Physical Assessment and CL 400 Pre-Clinical Procedure, to include patient/practitioner rapport, communication skills, including multicultural sensitivity (See Stanton University's Corrective Action Report).

This action brings Stanton University in compliance with CCR Section 1399.434(c)(4).

Finding #13: The clinical impressions and the formation of a working diagnosis requirement is not met.

California Acupuncture Board Training Program Requirement

CCR Section 1399.434(c)(7):

“Clinical impressions and the formation of a working diagnosis, including acupuncture and Oriental medicine diagnoses and the World Health Organization’s internal classification of disease (ICD-9).”

Stanton University’s Curriculum

Stanton University listed the following courses to fulfill CCR 1399.434(c)(7) on its curriculum requirement form:

1. WM 430 Western Physical Assessment
2. WM 531 Western Clinical Medicine I
3. WM 532 Western Clinical Medicine II
4. WM 533 Western Clinical Medicine III
5. OM 421 Oriental Medicine Diagnosis I
6. OM 422 Oriental Medicine Diagnosis II

None of the courses have instruction on clinical impressions and the formation of a working diagnosis, including acupuncture and Oriental medicine diagnoses and the World Health Organization’s internal classification of disease (ICD-9). Stanton University does have a course that fulfills this requirement but it is not listed on the curriculum requirement form for CCR Section 1399.434(c)(7).

Training Program Corrective Action Taken

Changes were made to the competencies covered in the courses, WM 531 Western Clinical Medicine I, WM 532 Western Clinical Medicine II, WM 533 Western Clinical Medicine III, OM 531 Oriental Internal Medicine I, OM 532 Oriental Internal Medicine II, OM 533 Oriental Internal Medicine III, OM 534 Oriental Internal Medicine IV, WM 633 Case Management III, to include acupuncture and Oriental medicine diagnoses and the World Health Organization’s internal classification of disease (ICD-9).

This action brings Stanton University in compliance with CCR Section 1399.434(c)(7).

Finding #14: The awareness of at-risk population requirement is not met.

California Acupuncture Board Training Program Requirement

CCR Section 1399.434(c)(8):

“Awareness of at-risk population, including gender, age, indigent, and disease specific patients.”

Stanton University's Curriculum

Stanton University stated on its curriculum requirement form that the course, WM 430 Western Physical Assessment, fulfills CCR Section 1399.434(c)(8). The course lacks instruction of awareness of at-risk population, including gender, age, indigent, and disease specific patients and therefore does not meet the Board's requirement.

Training Program Corrective Action Taken

Changes were made to the competencies covered in the course, WM 430 Western Physical Assessment, to include awareness of at-risk population, including gender, age, indigent, and disease specific patients (See Stanton University's Corrective Action Report).

This action brings Stanton University in compliance with CCR Section 1399.434(c)(8).

Finding #15: The clinical sciences requirement is not met.

California Acupuncture Board Training Program Requirement

CCR Section 1399.434(c)(10):

"Clinical sciences – a review of internal medicine, pharmacology, neurology, surgery, obstetrics/gynecology, urology, radiology, nutrition and public health."

Stanton University's Curriculum

Stanton University listed the following courses on its curriculum requirement form to fulfill CCR Section 1399.434(c)(10):

1. WM 531 Western Clinical Medicine I
2. WM 532 Western Clinical Medicine II
3. WM 533 Western Clinical Medicine III

The courses do not meet the Board's requirement because they lack instruction of a review of internal medicine, pharmacology, neurology, surgery, obstetrics/gynecology, urology, radiology, nutrition, and public health.

Training Program Corrective Action Taken

Changes were made to the competencies covered in the courses, WM 531 Western Clinical Medicine I, WM 532 Western Clinical Medicine II, and WM 533 Western Clinical Medicine III, to include internal medicine, pharmacology, neurology, surgery, obstetrics/gynecology, urology, radiology, nutrition, and public health (See Stanton University's Corrective Action Report).

This action brings Stanton University in compliance with CCR Section 1399.434(c)(10).

Finding #16: The clinical medicine requirement is not met.

California Acupuncture Board Training Program Requirement

CCR Section 1399.434(c)(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.”

Stanton University’s Curriculum

Stanton University stated on its curriculum requirement form the following courses fulfill CCR Section 1399.434(c)(11):

1. WM 520 Survey of Healthcare Systems
2. WM 531 Western Clinical Medicine I
3. WM 532 Western Clinical Medicine II
4. WM 533 Western Clinical Medicine III

None of the courses have a survey of dentistry and podiatry and therefore does not meet the Board’s requirement.

Training Program Corrective Action Taken

Changes were made to the competencies covered in the course, WM 520 Survey of Healthcare Systems, to include dentistry and podiatry (See Stanton University’s Corrective Action Report).

This action brings Stanton University in compliance with CCR Section 1399.434(c)(11).

Finding #17: The primary care responsibilities requirement is not met.

California Acupuncture Board Training Program Requirement

CCR Section 1399.434(d)(1):

“Primary care responsibilities.”

Stanton University’s Curriculum

Stanton University listed course, WM 631 Case Management, on its curriculum requirement form to fulfill CCR Section 1399.434(d)(1). The course does not have instruction of primary care responsibilities and therefore does not meet the Board’s requirement. Stanton University does have a course that teaches primary care responsibilities but it is not listed on the curriculum requirement form for CCR Section 1399.434(d)(1).

Training Program Corrective Action Taken

Changes were made to the competencies covered in the course, WM 631 Case Management I, to include primary care responsibilities (See Stanton University's Corrective Action Report).

This action brings Stanton University in compliance with CCR Section 1399.434(d)(1).

Finding #18: The secondary and specialty care responsibilities requirement is not met.

California Acupuncture Board Training Program Requirement

CCR Section 1399.434(d)(2):

“Secondary and specialty care responsibilities.”

Stanton University's Curriculum

Stanton University listed course, WM 631 Case Management, on its curriculum requirement form to fulfill CCR Section 1399.434(d)(2). The course does not have instruction of primary care responsibilities and therefore does not meet the Board's requirement. Stanton University does have a course that teaches secondary and specialty care responsibilities but it is not listed on the curriculum requirement form for CCR Section 1399.434(d)(2).

Training Program Corrective Action Taken

Changes were made to the competencies covered in the course, WM 631 Case Management I, to include secondary and specialty care responsibilities (See Stanton University's Corrective Action Report).

This action brings Stanton University in compliance with CCR Section 1399.434(d)(2).

Finding #19: The psychosocial assessment requirement is not met.

California Acupuncture Board Training Program Requirement

CCR Section 1399.434(d)(3):

“Psychosocial assessment”.

Stanton University's Curriculum

Stanton University stated on its curriculum requirement form that the course, WM 631 Case Management I, fulfills CCR Section 1399.434(d)(3). However, the course lacks instruction of psychosocial assessment and does not meet the Board's requirement.

Training Program Corrective Action Taken

Changes were made to the competencies covered in the course, WM 631 Case Management I, to include psychosocial assessment (See Stanton University's Corrective Action Report).

This action brings Stanton University in compliance with CCR Section 1399.434(d)(3).

Finding #20: The follow-up care, final review, and functional outcome measurement requirement is not met.

California Acupuncture Board Training Program Requirement

CCR Section 1399.434(d)(6):

"Follow-up care, final review, and functional outcome measurements."

Stanton University's Curriculum

Stanton University listed course, WM 632 Case Management II, on its curriculum requirement form to fulfill CCR Section 1399.434(d)(6). However, the course does not meet the Board's requirement because it lacks instruction of follow-up care, final review, and functional outcome measurements.

Training Program Corrective Action Taken

Changes were made to the competencies covered in the course, WM 632 Case Management II, to include follow-up care, final review, and functional outcome measurement (See Stanton University's Corrective Action Report).

This action brings Stanton University in compliance with CCR Section 1399.434(d)(6).

Finding #21: The prognosis and future medical care requirement is not met.

California Acupuncture Board Training Program Requirement

CCR Section 1399.434(d)(7):

"Prognosis and future medical care."

Stanton University's Curriculum

Stanton University listed course, WM 632 Case Management II, on its curriculum requirement form to fulfill CCR Section 1399.434(d)(7). The course does not have instruction of prognosis and future medical care and therefore does not meet the Board's requirement.

Training Program Corrective Action Taken

Changes were made to the competencies covered in the course, WM 632 Case Management II, to include prognosis and future medical care (See Stanton University's Corrective Action Report).

This action brings Stanton University in compliance with CCR Section 1399.434(d)(7).

Finding #22: The medical-legal report writing, expert medical testimony, and independent medical review requirement is not met.

California Acupuncture Board Training Program Requirement

CCR Section 1399.434(d)(10):

"Medical-legal report writing, expert medical testimony, and independent medical review."

Stanton University's Curriculum

Stanton University stated on its curriculum requirement form that the course, WM 633 Case Management III, satisfies CCR Section 1399.434(d)(10). The course lacks instruction of medical-legal report writing, expert medical testimony, and independent medical review and therefore does not meet the Board's requirement.

Training Program Corrective Action Taken

Changes were made to the competencies covered in the course, WM 633 Case Management III, to include medical legal report writing, expert medical testimony, and independent medical review (See Stanton University's Corrective Action Report).

This action brings Stanton University in compliance with CCR Section 1399.434(d)(10).

Finding #23: The special care/seriously ill patients requirement is not met.

California Acupuncture Board Training Program Requirement

CCR Section 1399.434(d)(11):

"Special care/seriously ill patients."

Stanton University's Curriculum

Stanton University listed course, WM 633 Case Management III, to fulfill CCR Section 1399.434(d)(12). However, the course does not have instruction on special care/seriously ill patients, and therefore does not meet the Board's requirement.

Training Program Corrective Action Taken

Changes were made to the competencies covered in the course, WM 633 Case Management III, to include special care/seriously ill patients (See Stanton University's Corrective Action Report).

This action brings Stanton University in compliance with CCR Section 1399.434(d)(12).

Finding #24: The business written communications requirement is not met.

California Acupuncture Board Training Program Requirement

CCR Section 1399.434(e)(2):

"Business written communications."

Stanton University's Curriculum

Stanton University stated on its curriculum requirement form that the course, WM 521 Clinic Management, fulfills CCR Section 1399.434(e)(2). However, the course lacks instruction of business written communications and therefore does not meet the Board's requirement.

Training Program Corrective Action Taken

Changes were made to the competencies covered in the course, WM 521 Clinic Management, to include business written communications (See Stanton University's Corrective Action Report).

This action brings Stanton University in compliance with CCR Section 1399.434(e)(2).

Finding #25: The knowledge of regulatory compliance and jurisprudence requirement is not met due to the lack of instruction of labor code.

California Acupuncture Board Training Program Requirement

CCR Section 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 1966 (HIPAA))"

Stanton University's Curriculum

Stanton University listed the following courses on its curriculum requirement form to satisfy CCR Section 1399.434(e)(3):

1. CL 400 Pre-Clinical Procedure
2. WM 522 Ethics

3. WM 631 Case Management I

None of the courses have instruction of labor code and therefore does not meet the Board's requirement.

Training Program Corrective Action Taken

Changes were made to the competencies covered in the courses, WM 321 CNT and WM 631 Case Management I, to include Labor Code (See Stanton University's Corrective Action Report).

This action brings Stanton University in compliance with CCR Section 1399.434(e)(3).

Finding #26: The treatment of chemical dependency requirement is not met.

California Acupuncture Board Training Program Requirement

CCR Section 1399.434(f)(4):

"Treatment of chemical dependency."

Stanton University's Curriculum

Stanton University stated on its curriculum requirement form that the course, WM 310 Public Health, fulfills CCR Section 1399.434(f)(4). However, the course does not have instruction of treatment of chemical dependency and therefore does not meet the Board's requirement.

Training Program Corrective Action Taken

Changes were made to the competencies covered in the course, WM 310 Public Health, to include treatment of chemical dependency (See Stanton University's Corrective Action Report).

This action brings Stanton University in compliance with CCR Section 1399.434(f)(4).

Finding #27: The research and evidence based medicine requirement is not met.

California Acupuncture Board Training Program Requirement

CCR Section 1399.434(g)(1):

"Research and evidence based medicine."

Stanton University's Curriculum

Stanton University listed course, WM 302 Research Methodology, on its curriculum requirement form to fulfill CCR Section 1399.434(g)(1). However, this

course lacks instruction of research and evidence based medicine and therefore does not meet the Board's requirement.

Training Program Corrective Action Taken

Changes were made to the competencies covered in the course, WM 302 Research Methodology, to include research and evidence based medicine (See Stanton University's Corrective Action Report).

This action brings Stanton University in compliance with CCR Section 1399.434(g)(1).

Finding #28: The knowledge of academic peer review process requirement is not met.

California Acupuncture Board Training Program Requirement

CCR Section 1399.434(g)(2):

"Knowledge of academic peer review process."

Stanton University's Curriculum

Stanton University listed course, WM 302 Research Methodology, on its curriculum requirement for to fulfill CCR Section 1399.434(g)(2). However, the course lacks instruction of knowledge of academic peer review process and therefore does not meet the Board's requirement.

Training Program Corrective Action Taken

Changes were made to the competencies covered in the course, WM 302 Research Methodology, to include academic peer review process (See Stanton University's Corrective Action Report).

This action brings Stanton University in compliance with CCR Section 1399.434(g)(2).

Finding #29: The knowledge of critique of research method requirement is not met.

California Acupuncture Board Training Program Requirement

CCR Section 1399.434(g)(3):

"Knowledge of critique of research methods."

Stanton University's Curriculum

Stanton University listed course, WM 302 Research Methodology, on its curriculum requirement form to fulfill CCR Section 1399.434(g)(3). However, the

course lacks instruction of knowledge of critique of research method and therefore does not meet the Board's requirement.

Training Program Corrective Action Taken

Changes were made to the competencies covered in the course, WM 302 Research Methodology, to include knowledge of critique of research methods (See Stanton University's Corrective Action Report).

This action brings Stanton University in compliance with CCR Section 1399.434(g)(3).

Summary of Stanton University's Curriculum Non-Compliances

CCR Section 1399.434	Stanton University's Curriculum	Unsatisfied Requirement	Corrective Action
1. (a)(4): "General Psychology, including counseling skills."	BS 212 Psychology	Counseling skills	Changes were made to the competencies covered in the course, CS 212 Psychology, to include counseling skills
2. (a)(6): "Physiology – a survey of basic physiology, including neurophysiology, endocrinology, and neurochemistry."	BS 323 Anatomy & Physiology III BS 324 Anatomy & Physiology IV	Neurophysiology and neurochemistry	Changes were made to the competencies covered in the courses, BS 323 Anatomy & Physiology III and BS 324 Anatomy & Physiology IV, to include neurophysiology and neurochemistry
3. (a)(7): "Pathology and Pathophysiology – a survey of the nature of disease and illness, including microbiology, immunology, psychopathology, and epidemiology."	BS 431 Pathology I BS 432 Pathology II	Microbiology, psychopathology, and epidemiology	Changes were made to the competencies covered in the courses, BS 431 Pathology I and BS 342 Pathology II, to include microbiology, psychopathology, and epidemiology
4. (b)(1)(F): "Acupuncture and Oriental Medicine Specialties, including dermatology gynecology, pediatrics, ophthalmology, orthopedics, internal medicine, geriatrics,	OM 531 Oriental Internal Medicine I OM 532 Oriental Internal Medicine II OM 533 Oriental Internal Medicine III OM 534 Oriental Internal Medicine IV	Geriatrics, traumatology, orthopedic	Changes were made to the competencies covered in the courses, OM 531 Oriental Internal Medicine I, OM 532 Oriental Internal Medicine II, OM 533 Oriental Internal Medicine III, and OM 534 Oriental Internal Medicine IV, to

family medicine, traumatology, and emergency care.”			include geriatrics, traumatology, orthopedics, and emergency care
5. (b)(2)(E): “Herbal prescription, counseling and preparation.”	CL 500 Practice Observation	Counseling	Changes were made to the competencies covered in the courses, HB 531 Herbal Prescription and HB 420 Herbal Practice, to include herbal counseling
6. (b)(2)(F): “Oriental and Western clinical and medical nutrition, dietary and supplement prescription and counseling.”	HB 430 Nutrition in Oriental Medicine BS 311 Nutrition and Vitamins	Counseling	Changes were made to the competencies covered in the courses, BS 311 Nutrition and Vitamins and HB 430 Nutrition in Oriental Medicine, to include counseling
7. (b)(2)(G): “Cold and heat therapy, including moxibustion and ultrasound.”	AC 522 Acupuncture Techniques II	Ultrasound	Changes were made to the competencies covered in the course, WM 420 Lab Test/Radiology, to include ultrasound
8. (b)(2)(H): “Lifestyle counseling, and self-care recommendations.”	OM 421 Oriental Medicine Diagnosis I OM 422 Oriental Medicine Diagnosis II AC 531 Acupuncture Therapeutics I AC 532 Acupuncture Therapeutics II	Lifestyle counseling and self-care recommendations	Changes were made to the competencies covered in the courses, OM 531 Oriental Internal Medicine I, OM 532 Oriental Internal Medicine II, OM 533 Oriental Internal Medicine III, and OM 534 Oriental Internal Medicine IV, to include lifestyle counseling and self-care recommendations
9. (b)(2)(J): “Adjunctive acupuncture procedures, including bleeding, cupping, gua sha, and dermal tacks.”	AC 522 Acupuncture Techniques II	Cupping and gua sha	Changes were made to the competencies covered in the course, AC 522 Acupuncture Techniques II, to include cupping and gua sha
10. (b)(2)(M): “Adjunctive acupoint stimulation devices including magnets and beads.”	AC 521 Acupuncture Techniques I	Magnets and beads	Changes were made to the competencies covered in the course, AC 522 Acupuncture Technique II, to include magnets and beads
11. (c)(2): “Standard physical examination and	WM 430 Western Physical Assessment WM 531 Western	Neuromusculoskeletal, neurological, ear and nose	Changes were made to the competencies covered in the course, WM 430

assessment, including neuromusculoskeletal, orthopedic, neurological, abdominal, and ear, nose and throat examinations, and functional assessment.”	Clinical Medicine I WM 532 Western Clinical Medicine II WM 533 Western Clinical Medicine III	examinations and functional assessment	Western Physical Assessment, to include neuromusculoskeletal, neurological, ear and nose examinations, and functional assessment
12. (c)(4): “Patient/practitioner rapport, communication skills including multicultural sensitivity.”	CL 400 Pre-Clinical Procedure WM 430 Western Physical Assessment	Patient/practitioner rapport, communication skills, including multicultural sensitivity	Changes were made to the competencies covered in the courses, WM 430 Western Physical Assessment and CL 400 Pre-Clinical Procedure, to include patient/practitioner rapport, communication skills, including multicultural sensitivity
13. (c)(7): “Clinical impressions and the formation of a working diagnosis, including acupuncture and Oriental medicine diagnoses and the World Health Organization’s internal classification of disease (ICD-9).”	WM 430 Western Physical Assessment WM 531 Western Clinical Medicine I WM 532 Western Clinical Medicine II WM 533 Western Clinical Medicine III OM 421 Oriental Medicine Diagnosis I OM 422 Oriental Medicine Diagnosis II	Clinical impressions and the formation of a working diagnosis, including acupuncture and Oriental medicine diagnoses and the World Health Organization’s internal classification of disease (ICD-9)	Changes were made to the competencies covered in the courses, WM 531 Western Clinical Medicine I, WM 532 Western Clinical Medicine II, WM 533 Western Clinical Medicine III, OM 531 Oriental Internal Medicine I, OM 532 Oriental Internal Medicine II, OM 533 Oriental Internal Medicine III, OM 531 Oriental Internal Medicine IV, WM 633 Case Management III, to include acupuncture and Oriental medicine diagnoses and the World Health Organization’s internal classification of disease (ICD-9).
14. (c)(8): “Awareness of at-risk population, including gender, age, indigent, and disease specific patients.”	WM 430 Western Physical Assessment	Gender, age, indigent, and disease specific patients	Changes were made to the competencies covered in the course, WM 430 Western Physical Assessment, to include awareness of at-risk population, including gender, age, indigent, and disease specific patients
15. (c)(10): “Clinical sciences – a	WM 531 Western Clinical Medicine I	A review of internal medicine,	Changes were made to the competencies covered in

review of internal medicine, pharmacology, neurology, surgery, obstetrics/gynecology, urology, radiology, nutrition and public health.”	WM 532 Western Clinical Medicine II WM 533 Western Clinical Medicine III	pharmacology, neurology, surgery, obstetrics/gynecology, urology, radiology, nutrition, and public health	the courses, WM 531 Western Clinical Medicine I, WM 532 Western Clinical Medicine II, and WM 533 Western Clinical Medicine III, to include internal medicine, pharmacology, neurology, surgery, obstetrics/gynecology, urology, radiology, nutrition, and public health
16. (c)(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.”	WM 520 Survey of Healthcare Systems WM 531 Western Clinical Medicine I WM 532 Western Clinical Medicine II WM 533 Western Clinical Medicine III	A survey of dentistry and podiatry	Changes were made to the competencies covered in the course, WM 520 Survey of Healthcare Systems, to include dentistry and podiatry
17. (d)(1): “Primary care responsibilities.”	WM 631 Case Management	Primary care responsibilities	Changes were made to the competencies covered in the course, WM 631 Case Management I, to include primary care responsibilities
18. (d)(2): “Secondary and specialty care responsibilities.”	WM 631 Case Management	Secondary and specialty care responsibilities	Changes were made to the competencies covered in the course, WM 631 Case Management I, to include secondary and specialty care responsibilities
19. (d)(3): “Psychosocial assessment”.	WM 631 Case Management	Psychosocial assessment	Changes were made to the competencies covered in the course, WM 631 Case Management I, to include psychosocial assessment
20. (d)(6): “Follow-up care, final review, and functional outcome measurements.”	WM 632 Case Management II	Follow-up care, final review, and functional outcome measurements	Changes were made to the competencies covered in the course, WM 632 Case Management II, to include follow-up care, final review, and functional outcome measurement
21. (d)(7): “Prognosis and future medical care.”	WM 632 Case Management II	Prognosis and future medical care	Changes were made to the competencies covered in the course, WM 632 Case

			Management II, to include prognosis and future medical care
22. (d)(10): “Medical-legal report writing, expert medical testimony, and independent medical review.”	WM 633 Case Management III	Medical-legal report writing, expert medical testimony, and independent medical review	Changes were made to the competencies covered in the course, WM 633 Case Management III, to include medical legal report writing, expert medical testimony, and independent medical review
23. (d)(11): “Special care/seriously ill patients.”	WM 633 Case Management III	Special care/seriously ill patients	Changes were made to the competencies covered in the course, WM 633 Case Management III, to include special care/seriously ill patients
24. (e)(2): “Business written communications.”	WM 521 Clinic Management	Business written communications	Changes were made to the competencies covered in the course, WM 521 Clinic Management, to include business written communications
25. (e)(3): “Knowledge of regulatory compliance and jurisprudence (municipal, California, and federal laws, including OSHA, Labor Code, Health Insurance Portability and Accountability Act of 1966 (HIPAA))”	CL 400 Pre-Clinical Procedure WM 522 Ethics WM 631 Case Management I	Labor code	Changes were made to the competencies covered in the courses, WM 321 CNT and WM 631 Case Management I, to include Labor Code
26. (f)(4): “Treatment of chemical dependency	WM 310 Public Health	Treatment of chemical dependency	Changes were made to the competencies covered in the course, WM 310 Public Health, to include treatment of chemical dependency
27. (g)(1): “Research and evidence based medicine.”	WM 302 Research Methodology	Research and evidence based medicine	Changes were made to the competencies covered in the course, WM 302 Research Methodology, to include research and evidence based medicine
28. (g)(2): “Knowledge of academic peer review process.”	WM 302 Research Methodology	Knowledge of academic peer review process	Changes were made to the competencies covered in the course, WM 302 Research Methodology, to

			include academic peer review process
29.(g)(3): "Knowledge of critique of research methods"	WM 302 Research Methodology	Knowledge of critique of research methods	Changes were made to the competencies covered in the course, WM 302 Research Methodology, to include knowledge of critique of research methods

PART IV: STANTON UNIVERSITY’S MASTER OF SCIENCE IN ORIENTAL MEDICINE CLINICAL NON-COMPLIANCE

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: Stanton 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."

Stanton University's Clinic

1. Western assessments were not applied to patients in multiple inspected medical charts:
 - a. Some medical charts did not have accurate Standard Medical Terminology.
2. Patient's records were not accurate and complete:
 - a. Some medical records were not translated into English.
 - b. Patient's records do not have page numbers.
3. Although the charts did list a section for a pain scale, it was not the two dimensional scale used in California's Worker's Compensation system. It did not have severity and frequency.

Training Program Corrective Action Taken

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

This action brings Stanton University in compliance with CCR Section 1399.434(h)(2).

SUMMARY

For the purposes of a training clinic, all of the above should be included in a patient medical chart with Differential Diagnosis/Assessment so that the intern learns all aspects of the training program.

PART IV: PEER REVIEW RECOMMENDATION

1. For training purposes, list the 8 principles and Zang Fu on the medical charts for interns to circle. This will help the interns develop differential diagnosis.
2. For teaching purposes, instructors should encourage interns to use individual herbs and customized formulas based on differential diagnosis.
3. The orthopedic exam was only minimally performed and not documented in the medical charts. The orthopedic exam should be performed with more detail and documented in the medical charts.

4. Medical charts do not document all aspect of the findings and exams in details. For teaching purposes, students should be exposed to proper and adequate medical documentation.

PART V: CONCLUSION

“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

Stanton University is in full compliance with the Board’s regulations.