

Info, HigherEd, NMHED

From: Paul Rossingnol <paul@acupuncturecollege.edu>
Sent: Friday, August 14, 2020 2:13 PM
To: Info, HigherEd, NMHED
Cc: abbate888@gmail.com
Subject: [EXT] Questons RE: Proposed Rules Change and Public Comment Hearing 08/18/2020
Attachments: SWACQuestionNMHEDRulesChange2020.pdf

Please see attached document regarding questions for public comment period and hearing scheduled for 08/18/2020.

Dr. Paul Rossignol, DOM
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sent from [Outlook Mobile](#)

Southwest Acupuncture College- Request for Clarification of Proposed Rules Changes by New Mexico Higher Education Department (NMHED) 08/14/2020

By Dr. Paul Rossignol, DOM- Campus Director, Southwest Acupuncture College, Santa Fe Campus

My name is Dr. Paul Rossignol, DOM, Campus Director at Southwest Acupuncture College, Santa Fe, New Mexico. I respectfully submit the following to NMHED in accordance with the period for public comment regarding rules changes proposed by NMHED and to be discussed in the public hearing scheduled for 08/18/2020. On behalf of Southwest Acupuncture College, a private, post-secondary, institution in New Mexico for over 40 years, and the only institution in New Mexico currently providing acupuncture and Oriental medicine education sufficient to obtain medical licensure, I request clarification of the following proposed rules changes:

1. 5.100.6.20- Reporting Requirements
 1. B.5-SWAC does not currently have placement programs and most students go on to open their own private practice. The BLM has only recently begun developing data on the profession. Accurate data on median earnings is more difficult to obtain for alumni. Does language of "if available" provide for exemption if data is unavailable? Is there a standardized exemption that could be included? How would we report questions about employers?
 2. "C. An institution renewing application with the department must submit required reporting and maintain records of the institution's efforts to provide the information of this section to prospective students for at least five years after the student enrolls at the institution."- Could this requirement be clarified? What type of documentation will constitute "records of the institutions efforts to provide the information of this section"?
2. 5.100.7.14- Reporting Requirements
 1. Under 14.B.2 "Financial Information"- Detailed financial information is already reported to NHMED by institutions yearly. What specific information are institutions required to disclose to prospective students? I assume this is in reference to cost of attendance, aggregate debt, etc.? Not necessarily private financial details of a private, licensed, business? Clarification of language is requested.
 2. Under 14.B.5 "Satisfaction of Students and Employers"- data on student satisfaction is gathered via online survey for every course in every semester. Results from individual courses might not be appropriate to disclose to students (for reasons of faculty or student privacy etc.), but overall responses and trends could be published. Periodic student, faculty, and alumni surveys are performed and already reported to NMHED. We would request clarification of language as to what data should be published. SWAC does not have placement programs and most students go on to open their own private practice. Data on "employer satisfaction" is more difficult to obtain in those cases. We would request clarification of language for this requirement or alternate requirement or exemptions to be detailed.
 3. Under 14.B.7- SWAC does not have placement programs and most students go on to open their own private practice. We would request clarification of language for this requirement or alternate requirement or exemptions to be detailed.
 4. Under 14.B.8-SWAC does not have placement programs and most students go on to open their own private practice. BLM has only recently begun developing data on the profession. Accurate data on median earnings is more difficult to obtain for alumni. Does language of "if available" provide for exemption if data is unavailable? Is there a standardized exemption that could be included? How should we answer questions regarding employers?

5. Under 14.D- Will signed enrollment agreements indicating review and acceptance of college policy and standards for promotion and graduation which reference literature conforming to these standards be sufficient as documentation to be retained for 5 years? Is there further specific “documentation of effort” sought by NMHED that they could clarify in the rules and specific documentation required?

Thank you for your consideration of our requests for clarification. If the NMHED has any additional questions or concerns prior to the public hearing, please don't hesitate to contact me via email at paul@acupuncturecollege.edu or via phone at (505)363-4626.

Sincerely,

Paul Rossignol

Dr. Paul Rossignol, DOM

Campus Director, Southwest Acupuncture College, Santa Fe