



ACUPUNCTURE BOARD

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**Hongik International University
4077 West Pico Boulevard
Los Angeles, CA 90019
Training Program Seeking Approval Exit Report**

PART I: BACKGROUND

INSTITUTION HISTORY, PURPOSE, AND MISSION

Located in Los Angeles, CA and occupying approximately over 2,400 square feet, Hongik International University (HIU) was established in 2006 to offer an acupuncture and oriental medicine program to individuals who wish to become practitioners. The purpose of HIU is to educate and develop students' intellectual and analytical skills to become respectable and competent health care providers in Traditional Oriental Medicine and serve their community. The mission of HIU is to:

"to improve the quality of health care by providing graduate education for training practitioners with courses of traditional Oriental medicine integrated with western medical technology through lectures, hands-on laboratory, and clinical training. The University is dedicated to enhancing the standard of professionalism in practice and theory in Traditional Oriental Medicine and the fostering of commitment to pursue lifelong learning. The University is standing in the forefront to carry forward and develop Traditional Oriental Medicine in American health care. Inherent in the school's mission is nurturing and developing professional healing arts practitioners in their own individual style, art, and energy through basic and continuing education".

APPROVAL FROM BPPVE/BPPE

HIU received a conditional approval by the Bureau for Private Postsecondary Education (BPPVE) in 2005. When BPPVE re-established as Bureau for Private Postsecondary and Vocational Education (BPPE) in 2010, HIU applied for re-approval. In July 2014, HIU was granted full approval for its Master of Acupuncture and Oriental Medicine program curriculum portion. However, HIU received a conditional approval for the clinical portion of its program and will be granted full approval from BPPE if the school receives approval from the California Acupuncture Board.

ACCREDITATION

HIU's Master of Science in Acupuncture and Oriental Medicine program is not accredited by the Accreditation Commission for Acupuncture and Oriental Medicine (ACAOM).

DEGREE OFFERED AT HIU

1. Master of Acupuncture and Oriental Medicine

Currently, HIU have 4 students enrolled in its Master of Acupuncture and Oriental Medicine program. HIU currently offers only the Korean Language track.

Student Interview

Interviews were conducted with two of the students. The students were excited to attend HIU and happy with the education they are receiving. Both students praised Dr. Choi for his accomplishments and his teaching style, stating that he is both informative and funny. Additionally, both students were referred to HIU by their families due to Dr. Choi's popularity, both in the Korean-American Community as well as in South Korea.

PART II: GOVERNANCE, ADMINISTRATION, AND PERSONNEL

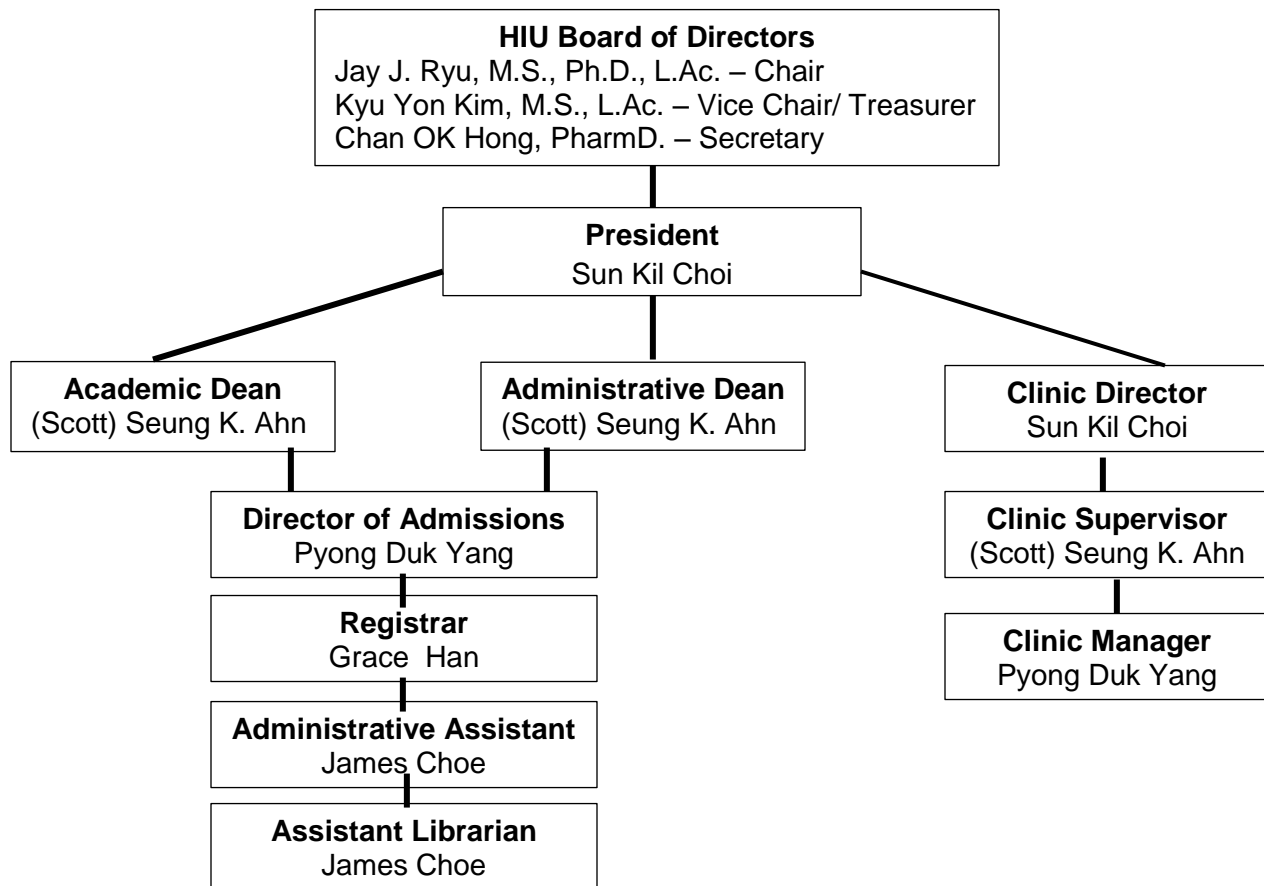
HIU's board of directors consists of three members:

- 1) Jay J. Ryu, M.S., Ph.D., L.Ac. – Chair
- 2) Kyu Yon Kim, M.S., L.Ac. – Vice Chair/ Treasurer
- 3) Chan OK Hong, PharmD. – Secretary

The board of directors meets annually and faculty records the meeting minutes. Additionally, there are five faculties at HIU that holds multiple positions.

- 1) Sun Kil Choi, Ph.D., L.Ac. – President & Clinic Director
- 2) (Scott) Sueng Kun Ahn, M.S., L.Ac. – Academic Dean, Administrative Dean & Clinic Supervisor
- 3) Pyong Duk Yang, M.S., L.Ac. – Director of Admissions & Clinic Manager
- 4) Grace Han – Registrar
- 5) James Choe – Assistant Librarian & Administrative Assistant

The organization chart is as follows:



OBSERVATIONS DURING SITE VISIT

Observation #1:

Dr. Choi is the only faculty presently teaching at HIU as well as President and Clinic Director of HIU.

Training Program Corrective Action Taken

HIU is actively looking for more instructors. Staff has one potential instructor

Please note that this was a recommendation and is not required of the training program to be in compliance.

Observation #2:

Inconsistent student records:

- a) Numerous students' files were missing financial record statements
- b) Official documents in student files were not corrected properly (i.e. white-out and crossed out words with no initials and dates)

- c) Application entrance essays and several correspondences between Registrar and students were not in English

Training Program Corrective Action Taken

1. Student records were corrected to include financial records statements (See HIU Corrective Action Report).
2. Student records were corrected to include entrance essays. Entrance essays are in Korean and translated into English (See HIU Corrective Action Report).

Please note that this was a recommendation and is not required of the training program to be in compliance.

Observation #3:

Lack of security of student records:

- a) Password for HIU grade database is not periodically changed
- b) Student files are not in a locked cabinet. However, it is located in a locked room
- c) Final exams are kept in President's office and not in a location with other secure documents

Training Program Corrective Action Taken

Observation #3

1. Student records are now kept in a locked cabinet (See HIU Corrective Action Report).

Please note that this was a recommendation and is not required of the training program to be in compliance.

PART III: RESOURCES

TEACHING FACILITIES

HIU have two classrooms located in their main building. The first classroom can seat up to 28 students while the second classroom can seat up to 12 students. The classrooms are equipped with various learning materials such as a full skeleton and other models of the human body, teaching charts, and LCD projectors.

LIBRARY

HIU's library is open on weekdays from 9:00am – 6:00pm. It is over 112 square foot and resourced with approximately 700 Chinese textbooks and 150 Korean textbooks regarding acupuncture and oriental medicine. Additionally, the library contains over 200 English supplemental textbooks. Students can check out books using the "honor system" for a period of 15 days. The library also contains a computer lab that has two

computers for student use. Furthermore, HIU subscribes to database with the latest medical journals and publications.

FINANCES

HIU operates as a non-profit organization. The major expenditures for HIU are: 1) Building Cost 2) Acupuncture Training Program 3) Advertising 4) Administrative and 5) Medical Supply. Their top major incomes are: 1) Medical Clinic 2) Tuition and 3) Contribution. In 2010, HIU had a net surplus of \$22,157 but decreased in 2011 and 2012 with a net surplus of less than \$3000. In 2013 HIU had a deficit of \$6000. School financial records are audited by an outside firm. Please see the chart below for HIU summary of finances for expenditures and income.

Hongik International University Expenditures and Revenues

	2013	2012	2011	2010
Expenditures				
Buildings	\$66136	\$61636	\$56136	\$26945
Acupuncture Training Program	\$60000	\$54000	\$20000	\$13098
Advertising	\$16605	\$26570	\$24015	\$4200
Administrative	\$30000	\$22000	\$24093	\$8732
Medical Supply	\$14466	\$15582	\$39991	\$0
Total	\$187207	\$179788	\$164236	\$52975
Income				
Medical Clinic	\$187156	\$207397	\$188266	\$68057
Tuition	\$49730	\$30640	\$26220	\$18354
Contribution	\$0	\$0	\$0	\$7000
Net Surplus/Deficit	(\$6311)	\$2315	\$2718	\$22157

PART IV: HIU MASTER OF ACUPUNCTURE AND ORIENTAL MEDICINE CURRICULUM NON-COMPLIANCE

HIU is applying for California Acupuncture Board approval for its Master of Acupuncture and Oriental Medicine program. HIU operates as a quarter system with a duration of 30-40 weeks per school year. It is a 4 year program with a total of 3400 hours.

Finding #1: The Physiology requirement is not met due to the lack of discussion of neurochemistry.

Acupuncture Board Training Program Curriculum
CCR Section 1399.434 (a)(6):

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

HIU Curriculum

HIU listed the following courses to satisfy the CCR Section 1399.434 (a)(6):

- 1) WM 300 Anatomy and Physiology I
- 2) WM 302 Anatomy and Physiology II
- 3) WM 304 Anatomy and Physiology III
- 4) WM 306 Anatomy and Physiology IV

None of the four courses listed above include the neurochemistry requirement for physiology.

Training Program Corrective Action Taken

Changes were made to the competencies covered in the course, WM 300 Anatomy & Physiology I, to include neurochemistry (See HIU Corrective Action Report).

This action brings HIU into compliance with CCR Section 1399.434(a)(6).

Finding #2: The Pathology and Pathophysiology requirement is not met due to the lack of discussion of epidemiology.

Acupuncture Board Training Program Curriculum

The curriculum does not meet CCR Section (a)(7):

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

HIU Curriculum

HIU listed the following courses to satisfy the CCR Section 1399.434 (a)(7):

- 1) WM 404 Pathology I
- 2) WM 406 Pathology II
- 3) WM 408 Pathology III

None of the three courses listed include epidemiology. However, this subject is taught in another course offered at HIU but is not correctly stated in the curriculum requirement form.

Training Program Corrective Action Taken

Changes were made to the competencies covered in the course, WM 406 Pathology II, to include instruction of epidemiology (See HIU Corrective Action Report).

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

Finding #3: The Adjunctive Acupuncture Procedures requirement is not met due to the lack of review of bleeding, cupping, gua sha, and dermal tacks.

Acupuncture Board Training Program Curriculum

CCR Section (b)(2)(i):

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

HIU Curriculum

HIU listed course, AC 400 Acupuncture Techniques I, to fulfill CCR Section (b)(2)(i), but this course does not include bleeding, cupping, gua sha, and dermal tacks as topics.

Training Program Corrective Action Taken

Changes were made to the competencies covered in the course, AC 400 Acupuncture Techniques I, to include instruction of bleeding, cupping, gua sha, and dermal tacks (See HIU Corrective Action Report).

This action brings HIU in compliance with CCR Section 1399.434(b)(2)(i).

Finding #4: The Clinical Sciences requirement is not met due to the lack of review of neurology, nutrition, pharmacology, radiology and public health.

Acupuncture Board Training Program Curriculum

CCR Section 1399.434 (c)(10):

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

HIU Curriculum

HIU stated that the following courses fulfill CCR Section 1399.434(c)(10):

- 1) WM 400 Survey of Western Medicine I
- 2) OM 400 O.M. Internal Medicine I
- 3) OM 406 O.M. Internal Medicine IV
- 4) OM 410 Men’s Health & Urology

These courses listed above do not cover: neurology, nutrition, pharmacology, radiology, and public health. Though the subjects: nutrition, pharmacology, radiology, and public health are fulfilled by other courses in HIU curriculum, it is incorrectly listed in the curriculum requirement form. However, HIU still does not have a course that teaches students about neurology.

Training Program Corrective Action Taken

Changes were made to the competencies covered in the course, WM 400 Survey of Western Medicine I, to include instruction of neurology, nutrition, pharmacology, radiology and public health. Upon review of the revised course, WM 400 Survey of Western Medicine, the course still lacks instruction of nutrition and public health.

However, nutrition and public health are fulfilled by other courses in HIU curriculum; it is not correctly listed in the curriculum requirement form and therefore HIU remains in non-compliance (See HIU Corrective Action Report).

HIU is not in compliance with CCR Section 1399.434(c)(10).

Finding #5: The Regulatory and Jurisprudence requirement is not met due to the lack of Labor Code.

Acupuncture Board Training Program Curriculum

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)”

HIU Curriculum

HIU stated that the course PM 500 Clinic Management & Public Health I/CPR fulfills CCR Section 1399.434 (e)(3). This course does not include labor code. Therefore, HIU does not have any courses that teach students about labor code.

Training Program Corrective Action Taken

Changes were made to the competencies covered in the course, PM 500 Clinic Management and Public Health I/CPR, to include instruction of labor code (See HIU Corrective Action Report).

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

Summary of Findings of Hongik International University Curriculum Non-Compliance

CCR Section 1399. 434 Curriculum Requirements	HIU Curriculum	Unsatisfied Requirement
1. (A) (6): Physiology – a survey of basic physiology, including neurophysiology, endocrinology, and neurochemistry	1) WM 300 Anatomy and Physiology I 2) WM 302 Anatomy and Physiology II 3) WM 304 Anatomy and Physiology III 4) WM 306 Anatomy and Physiology IV	Neurochemistry
<p>Training Program Corrective Action Taken:</p> <p>Changes were made to the competencies covered in the course, WM 300 Anatomy & Physiology I, to include neurochemistry (See HIU Corrective Action Report).</p> <p>This action brings HIU into compliance with CCR Section 1399.434(a)(6).</p>		
2. (A) (7): Pathology and Pathophysiology – a survey of the nature of disease and illness, including microbiology, immunology, psychopathology, and epidemiology	1) WM 404 Pathology I 2) WM 406 Pathology II 3) WM 408 Pathology III	Epidemiology
<p>Training Program Corrective Action Taken</p> <p>Changes were made to the competencies covered in the course, WM 406 Pathology II, to include instruction of epidemiology (See HIU Corrective Action Report).</p> <p>This action brings HIU in compliance with CCR Section 1399.434(a)(7).</p>		
3. (B) (2) (j): Adjunctive acupuncture procedures, including bleeding, cupping, gua sha, and dermal tacks	1) AC 400 Acupuncture Techniques I	Bleeding, cupping, gua sha and dermal tacks
<p>Training Program Corrective Action Taken</p> <p>Changes were made to the competencies covered in the course, AC 400 Acupuncture Techniques I, to include instruction of bleeding, cupping, gua sha, and dermal tacks (See HIU Corrective Action Report).</p> <p>This action brings HIU in compliance with CCR Section 1399.434(b)(2)(i).</p>		

<p>4. (C) (10): Clinical sciences – a review of internal medicine, pharmacology, neurology, surgery, obstetrics/gynecology, urology, radiology, nutrition, and public health</p>	<p>1) WM 400 Survey of Western Medicine I 2) OM 400 O.M. Internal Medicine I 3) OM 406 O.M. Internal Medicine IV 4) OM 410 Men’s Health & Urology</p>	<p>Neurology, nutrition, pharmacology, radiology, and public health</p>
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Training Program Corrective Action Taken

Changes were made to the competencies covered in the course, WM 400 Survey of Western Medicine I, to include instruction of neurology, nutrition, pharmacology, radiology and public health. Upon review of the revised course, WM 400 Survey of Western Medicine, the course still lacks instruction of nutrition and public health.

However, nutrition and public health are fulfilled by other courses in HIU curriculum; it is not correctly listed in the curriculum requirement form and therefore HIU remains in non-compliance (See HIU Corrective Action Report).

HIU is not in compliance with CCR Section 1399.434(c)(10).

<p>5. (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)</p>	<p>1) PM 500 Clinic Management & Public Health I/CPR</p>	<p>Labor code</p>
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Training Program Corrective Action Taken

Changes were made to the competencies covered in the course, PM 500 Clinic Management and Public Health I/CPR, to include instruction of labor code (See HIU Corrective Action Report).

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

CURRICULUM OBSERVATION - NOT RELATED TO COMPLIANCE

Observation: There is a concern that there are only 3 hours devoted to the Clinical Medicine requirement.

Acupuncture Board Training Program Curriculum

CCR Section 1399.434(c)(11):

The curriculum in clinical medicine, patient assessment and diagnosis shall consist of at least 240 hours of didactic instruction and shall prepare the student to possess the knowledge, skills and abilities necessary to utilize standard physical examinations, laboratory and imaging studies, and international classification of diseases (ICD) diagnostic principles to improve treatment efficacy, patient safety, referral, and continuity of care; to improve communication and collaboration of care with all other medical providers; to assist in the evaluation and documentation of patient progress; and to improve the acupuncturists understanding of biochemical etiology and pathology.

CCR Section 1399.434(c)(11) is satisfied through AC 406 Acupuncture Therapeutics II and OM 408 O.M. Gynecology. However, the teaching of dermatology, pediatrics, ophthalmology, orthopedics, internal medicine, geriatrics, family medicine, traumatology, and emergency care in one week is questionable and does not embrace the spirit of the curriculum.

Training Program Corrective Action Taken

Changes were made to the competencies covered in the course, AC 406 Acupuncture Therapeutics II which split the review of the clinical sciences into multiple weeks (See HIU Corrective Action Report).

Please note that this was a recommendation and is not required of the training program to be in compliance.

PART V: HIU MASTER OF ACUPUNCTURE AND ORIENTAL MEDICINE CLINICAL NON-COMPLIANCE

HIU submitted a training program application with an operating clinic. Since HIU has not received training program approval from the Board, the school has not started any students in the clinical internship. However, the site visit team evaluated the clinic for compliance to ensure the curriculum requirements are reflected in the clinical training pursuant to 1399.434

Finding: HIU clinical practicum for intern training did not demonstrate sufficient application of Eastern and Western diagnostic procedures in evaluating patients.

Acupuncture Board Training Program Curriculum

CCR Section 1399.434(h) (2):

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

HIU Clinic

The application of Eastern and Western diagnostic procedures in evaluating patients is not met as evidenced by the following findings:

- 1) Proposed Herbs/Formulas not listed in some patient charts. For teaching purposes, herbs/formulas should be included.
- 2) The treatment plan, including the treatment points, was not written in the inspected charts.
- 3) Western assessments were not applied to patients.
- 4) Standard Medical Terminology was not used on the charts.
- 5) Pharmacological Assessments were not conducted.
- 6) Lack of consistency between different patients’ medical record.
- 7) The Clean Needle Technique was not properly applied:
 - a. Hand/fingers touched the needle during insertion
 - b. Prior to Needling, the area was disinfected with alcohol dipped cotton ball using a back and forth motion, as opposed to a one time swipe (C rubbing circle).
- 8) No medical records were written or translated into English.
- 9) Worker’s Compensation Pain Scale not used. 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.
- 10) Patient’s records were not accurate and complete:
 - a. Patient’s height, weight and blood pressure was not taken
 - b. Patient’s files did not have page number or file number
 - c. Inconsistent patient forms. The clinic had two forms, one in English and one in Chinese. The Chinese form had age and gender fields while the English form did not.
 - d. Forms did not have supervisor initials or signature

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.

Training Program Corrective Action Taken

HIU submitted redacted medical charts to demonstrate corrective action of non-compliances found during the site visit (See HIU Corrective Action Report). Upon review of the medical charts, HIU clinical practicum for intern training does not demonstrate sufficient application of Eastern and Western diagnostic procedures in evaluating patients evidenced by the following findings:

- 1) Proposed Herbs/Formulas not listed in some patient charts. For teaching purposes, herbs/formulas should be included.
- 2) The treatment plan was not written in the inspected charts.

- a. On Page 113, medical charts show SP 30 Point Used. SP 30 Point does not exist.
- 3) Western assessments were not applied to patients.
- 4) Standard Medical Terminology was not used on the charts. Most medical charts showed description of conditions.
- 5) Pharmacological Assessments were not conducted.
- 6) Lack of consistency between different patients' medical record. Some medical charts did not have blood pressure record for initial patient.
- 7) Not all medical records were written or translated into English in submitted medical records.
- 9) Worker's Compensation Pain Scales are partially used. Although the charts did list a section for a pain scale (1 to 10), it was not the two dimensional scale used in California's Worker's Compensation system.
- 10) Patient's records were not accurate and complete:
 - a. Patient's height, weight and blood pressure was not taken in medical chart labeled "Choi Acupuncture Clinic Form".
 - b. Patient's files did not have page number or file number.
 - c. Inconsistent patient forms. The clinics have two forms: 1) University of Clinic and 2) Choi Acupuncture Clinic which is in Chinese. Both forms are not consistent with one another.
 - d. Chinese Medical Charts does not have supervisor initials or signature.

HIU is not in compliance with CCR Section 1399.434(h)(2).

PART VI: RECOMMENDATION

Protection of the public shall be the highest priority for the Acupuncture Board in exercising its licensing, regulatory, and disciplinary functions. Whenever the protection of the public is inconsistent with other interests sought to be promoted, the protection of the public shall be paramount (California Business and Professions Code, Section 4928.1).

Education Committee Recommendation: Denial

HIU's Master of Acupuncture and Oriental Medicine does not meet Board's requirements; the Education Committee recommends denial of HIU's Master of Acupuncture and Oriental Medicine training program to become a California Acupuncture Board approved training program