

**JOINT REVIEW COMMITTEE
ON EDUCATIONAL PROGRAMS
IN NUCLEAR MEDICINE TECHNOLOGY**

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October 29, 2021

Richard H. Hart, MD, DrPH
President
Loma Linda University
11060 Anderson St.
Loma Linda, CA 92350

Distributed by email

Dear Dr. Hart:

At its meeting on October 22, 2021, the Joint Review Committee on Educational Programs in Nuclear Medicine Technology (JRCNMT) evaluated the self-study and letter of site visit findings of the nuclear medicine technology program at Loma Linda University. It was determined that the program is not in compliance with three accreditation standards, therefore, the program was placed on probation for one year.

The following deficiencies require attention and resolution to achieve full compliance with the *Accreditation Standards for Nuclear Medicine Technologist Education*:

- C1d The program must create and follow a master educational plan for program delivery. The plan should contain sufficient detail to support program continuity when there are changes in faculty. The plan should include: a clinical education schedule template and guidelines for making clinical assignments, which demonstrate that all students will have the opportunity to meet required competencies.

The program does not have a clinical education schedule template and guidelines for making clinical assignments.

- C1e The program must create and follow a master educational plan for program delivery. The plan should contain sufficient detail to support program continuity when there are changes in faculty. The plan should include: an explanation of how the didactic curriculum correlates with the clinical curriculum.

The program director was unable to articulate or produce a master education plan that explains the correlation of didactic curriculum with the clinical curriculum in the program.

- D3.4 The results of ongoing assessment must be appropriately reflected in the curriculum and other dimensions of the program. In particular, the program must systematically document the application of assessment results in the process of program improvement.

The University and the program have a robust and well documented assessment process, but there is no evidence that the results of ongoing assessment are appropriately reflected in the curriculum and other dimensions of the program. Feedback provided on graduate and employer surveys, not the survey return rate, should be used to evaluate program quality. In addition, the consistent meeting of benchmarks with no action necessary is not an indicator of ongoing program improvement.

As part of the comprehensive program review process, an assessment of all clinical affiliates determined that a maximum of 23 students can be accommodated in the clinical education portion of the program. The following institutions are recognized as the program's clinical affiliates:

Affiliate	Location	Capacity for This Program
Adventist Health Glendale	Glendale, CA	1
Adventist Health White Memorial	Los Angeles, CA	arr @ 1
City of Hope Duarte Campus	Duarte, CA	2
Desert Regional Medical Center	Palm Springs, CA	1
Emanate Health Inter- Community Hospital	Covina, CA	arr @ 1
Halo Diagnostics	Indian Wells, CA	arr @ 1
Huntington Hospital	Pasadena, CA	2
Kaiser Permanente Fontana Medical Center	Fontana, CA	2
Loma Linda University Medical Center	Loma Linda, CA	2
Pomona Valley Hospital Medical Center	Pomona, CA	1
Providence St. Joseph Hospital Orange	Orange, CA	1
Providence St. Jude Medical Center	Fullerton, CA	1
Redlands Community Hospital	Redlands, CA	1
Ronald Reagan UCLA Medical Center	Los Angeles, CA	2
San Antonio Regional Hospital	Upland, CA	2
Torrance Memorial Medical Center	Torrance, CA	2
UCLA Santa Monica Medical Center	Santa Monica, CA	1
VA Loma Linda Healthcare System	Loma Linda, CA	2
Total program capacity		23

In accordance with JRCNMT policy 2.800 (enclosed), an institution may request reconsideration of probation if it believes the factual accuracy of a deficiency is in question. The request, due by **November 19, 2021**, must include evidence demonstrating that a deficiency was cited in error. Changes implemented as a result of the site evaluation may not be included in the request for reconsideration.

If reconsideration is not requested by the deadline, the JRCNMT's action is final and notification will be forwarded to the academic institution's accrediting agency. The information will also be made available to the public through the JRCNMT website and its publications.

Programs placed on probation are required in JRCNMT policy 2.150 (enclosed) to advise current and prospective students of the program's probationary status on its website and in publications within 10 days of receipt of this letter. In addition, a program on probation may not add clinical affiliates or expand its student capacity until the probationary status has been removed, except when addition of clinical affiliates is necessary to address a cited deficiency.

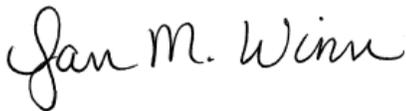
To monitor the program's progress in addressing the deficiencies, a series of two progress reports is required. The first is due no later than **February 15, 2022** and the second by **August 1, 2022**. The reports must describe and provide supporting evidence of the changes implemented to achieve compliance with each standard. If the JRCNMT determines at its April 2022 meeting that the first progress report documents satisfactory correction of a deficiency, compliance with that standard will not have to be addressed in the second progress report.

Per JRCNMT policy, a focused site visit must also be conducted to verify the information contained within the progress reports. Depending on the nature of the deficiencies, the focused visit may be conducted in-person or virtually. JRCNMT staff will contact Mr. Ho in April 2022 to discuss the format of the focused visit and schedule it in the summer.

Both progress reports and the focused visit findings will be considered by the JRCNMT at their meeting in fall 2022. Probation may be removed if the progress reports and focused visit satisfactorily demonstrate that the program is in compliance with all accreditation standards. If compliance has not been achieved, probation may be extended for up to one additional year or accreditation may be withdrawn in fall 2022 if significant progress toward compliance has not been made.

If you have questions or would like assistance in the preparation of the progress report, please contact the JRCNMT office.

Sincerely,

A handwritten signature in black ink that reads "Jan M. Winn". The signature is written in a cursive, flowing style.

Jan M. Winn, M.Ed., RT(N), CNMT
Executive Director

Attachments: JRCNMT Policies 2.800 and 2.150

cc Raynold Ho, MBA, RT(N), CNMT
Program Director

Laura Alipoon, EdD, RT(R)
Chair, Dept. of Radiation Technology

2.800 Reconsideration of Probation

Policy Statements

The Joint Review Committee on Educational Programs in Nuclear Medicine Technology (JRCNMT)

- 2.801 Develops and disseminates procedures for reconsideration of probation prior to the decision becoming final.
- 2.802 Maintains the accreditation status of a program pending disposition of a request for reconsideration of probation.

Procedures

1. The JRCNMT informs the program sponsor of its decision to place the program on probation.
2. The program sponsor is provided 15 business days from the date of the notice to request reconsideration of the decision. In the event the sponsoring institution does not request reconsideration within the stipulated time, probation becomes final.
3. The sponsoring institution's request for reconsideration must be in writing and include documentation that the cited deficiencies did not exist *at the time* the JRCNMT arrived at its original recommendation. Members of the JRCNMT Board will analyze the written documentation and uphold or overturn the original decision.
 - a. Decision Upheld -- Probation becomes final and is not subject to appeal or further review.
 - b. Decision Overturned-- Where the documentation provides evidence that deficiencies were cited erroneously, the Board will vacate its decision and assign a new accreditation award in accordance with JRCNMT standards and procedures.

In either case, the JRCNMT will communicate its decision on reconsideration to the sponsoring institution within thirty (30) business days.
 - c. A final decision to place a program on probation is made public through publication of a notice of accreditation actions. The appropriate state licensing or authorizing agency and appropriate accrediting agencies are notified of the decision at the same time that it is communicated to the sponsoring institution. The program must also publish notice on its website in accordance with JRCNMT policy 2.100.
 - d. The sponsoring institution may voluntarily relinquish its accreditation at any time during the accreditation process.

CAHEA: Adopted Oct 1978; revised July 1983, Jan 1984, May 1991.

JRCNMT: Revised Nov 1994, Nov 2010, July 2011, Nov 2012, Apr 2015.

Section 2: Initial and Continued Accreditation

2.100 Basis for Accreditation Decisions

A program receives an initial or continued accreditation decision after the following steps have occurred:

1. A self-study report written by program personnel;
2. An on-site evaluation by trained JRCNMT evaluators;
3. Review of the relevant materials by the JRCNMT; and
4. Action by the JRCNMT.

The JRCNMT shall make accreditation decisions based on information from the self-study, the letter of site visit findings, the response of the program to the letter of site visit findings, additional materials provided by the program, eligible written third-party comments and other interim reports submitted by the program. Additional information may be requested by the JRCNMT from the program director and/or the on-site evaluation team leader when such information is required for clarification.

Written notice of the JRCNMT's action and rationale is provided to the institution and program in the form of an accreditation action letter that is available for public review on the JRCNMT website.

2.150 Accreditation Actions

The accreditation action taken for each program is based upon compliance with current accreditation standards, published JRCNMT policies and whether the program is seeking initial or continued accreditation.

A. Actions for Programs Seeking Initial Accreditation

Initial Accreditation

Initial accreditation may be granted to a program not currently accredited by the JRCNMT. Initial accreditation is given when the review process confirms that the program is in substantial compliance with the *Standards*. Initial accreditation is for a period of five years, awarded in two steps. The first step of initial accreditation is for a maximum period of three years. Upon submission of a satisfactory mid-cycle report at the mid-point of the accreditation period, accreditation may be extended two additional years. If the mid-cycle report is unsatisfactory accreditation may be withdrawn or the program may be placed on probation if the JRCNMT determines that the deficiencies can be addressed prior to the next JRCNMT meeting.

Defer Action

The JRCNMT may defer action on a program pending receipt of a progress report, submission of additional information and/or the results of an additional on-site evaluation. The maximum deferral period is until the next JRCNMT meeting unless extended for good cause. The notification letter to the institution identifies each standard and explains the deficiency related to it. The letter also identifies the deadline for submission of a progress report and the timeline for an additional site visit, if one is deemed necessary.

Accreditation Withheld

When a program seeking initial accreditation is not in substantial compliance with the *Standards* accreditation may be withheld. The notification letter to the institution:

- a. Identifies each standard and explains the deficiency related to it.

- b. Indicates that the institution may appeal the decision. A copy of the JRCNMT Appeal Policy is included with the award letter.
- c. Explains that the sponsoring institution has the option to withdraw its application for accreditation and apply for accreditation at a future date when the program is in substantial compliance with the *Standards* and with administrative requirements for maintaining accreditation.

B. Actions for Programs Seeking Continued Accreditation

Continued Accreditation

Continued accreditation is granted to a program when the accreditation review process confirms that the program is in substantial compliance with the *Standards*. Continued accreditation is for a period of seven years. Programs receiving continued accreditation must submit a mid-cycle progress report at the mid-point of the accreditation cycle.

Accreditation with Conditions

If a program is noted as having one or more deficiencies in compliance with the *Standards*, it may receive accreditation with conditions. In this situation, the notification letter to the program and institution provides a clear statement of each deficiency and the due date for a progress report.

Accreditation with conditions is typically for a period not to exceed six months, though the period may be extended to a maximum of one year for good cause. Failure to submit a satisfactory progress report in the time allotted may result in the program being placed on probation.

Probation

An accredited program may be placed on probation when it is not in substantial compliance with the *Standards* and the deficiencies are serious enough to threaten the program's ability to provide an acceptable education.

In most situations, a program is placed on probation when evidence of deficiencies is substantiated by a site visit; however, if the cited deficiencies are not in dispute, the JRCNMT may place a program on probation without conducting a site visit. The maximum probation period is two years but may be extended one additional year for just cause.

Before notice of probation is published, the JRCNMT provides the program with an opportunity to request reconsideration of the decision (see policy 2.800 Reconsideration of Probation).

The JRCNMT accreditation letter provides a clear statement of each deficiency contributing to the program's failure to be in substantial compliance with the *Standards* and/or with the requirements for maintaining or administering accreditation. The letter also indicates that (1) a progress report, self-study, or other action is required by a specific date; (2) failure to come into substantial compliance will result in the withdrawal of accreditation; and (3) currently enrolled students and those seeking admission must be notified that the program is on probation within 10 days of receipt of the letter indicating the program has been placed on probation, unless the program files an official request with the JRCNMT for reconsideration.

Appropriate student notification of probation by a program requires placing the following statement on the main nuclear medicine program web page, and keeping it there until the program receives notification from the JRCNMT that probation has been rescinded.

The nuclear medicine technology program at [Name of Institution] is accredited by the Joint Review Committee on Educational Programs in Nuclear Medicine Technology (JRCNMT), 820 W. Danforth Rd, #B1 / Edmond, OK 73003; phone 405-285-0546; mail@jrcnmt.org; www.jrcnmt.org. This program is currently on probation but it is accredited. For more information go to JRCNMT online directory of accredited programs and read the accreditation letter linked to the program's directory listing (<https://www.jrcnmt.org/find-a-program/>).

A focused site visit, conducted by a current or past JRCNMT board member trained as an on-site evaluator and a second, trained site evaluator, is also required for removal of probation. Probation decisions are final and not subject to appeal. While on probation, a program may not add affiliates, increase student capacity or expand to an additional campus unless doing so is necessary to address a deficiency that contributed to the program being placed on probation.

Accreditation Withdrawn

The JRCNMT may withdraw accreditation at the conclusion of a specified period when the review process confirms that a program placed on Probation or Administrative Probation remains in substantial non-compliance with the Standards or with the requirements for maintaining or administering accreditation. The letter notifying the appropriate officials that accreditation has been withdrawn from the program includes a clear statement of each deficiency and indicates that the institution may appeal the decision. A copy of the JRCNMT Appeal Policy is included with the award letter. The letter also informs the sponsoring institution that it has the option to withdraw its application for accreditation and apply for accreditation at a future date when the program is in substantial compliance with the *Standards* and with administrative requirements for maintaining accreditation.

In unusual circumstances, such as evidence of critical deficiencies that appear to be irremediable within a reasonable length of time or a documented threat to the welfare of current and potential students, the JRCNMT may withdraw accreditation without first providing a period of probation. Programs from which accreditation is withdrawn without a probationary period are ensured due process through the JRCNMT Appeal Policy.

Students who have completed 75% of the published professional curriculum at the time the sponsoring institution is notified of the withdrawal may complete the requirements for graduation and will be considered graduates of a JRCNMT-accredited program.

Administrative probation

A program may be placed on Administrative Probation when one of the following situations occurs:

- A self-study, interim report or progress report is not submitted to the JRCNMT by the deadline transmitted to the program in a written notification.
- Fees are not paid by the deadline transmitted to the program in a written notification and/or published in the JRCNMT fee schedule.
- Program does not assist with setting a reasonable site visit date at or near the time established for on-site evaluation of the program.

When the JRCNMT places a program on Administrative Probation, the sponsoring institution is informed of the relevant requirements that must be met for the decision to be rescinded and the timeline.

The JRCNMT does not provide opportunity for reconsideration of Administrative Probation and it is not subject to appeal. A fee to rescind Administrative Probation must be paid by the program upon demonstration of compliance. During a period of Administrative Probation, programs are recognized and listed as being accredited in JRCNMT publications.

C. Voluntary Withdrawal of Accreditation

An institution sponsoring a program may voluntarily withdraw from the JRCNMT accreditation process (initial or continuing accreditation) at any time. In the event of program closure, the effective date of voluntary withdrawal must be established to assure that program accreditation continues until the date of graduation of the last class of students. In the event of voluntary program closure, the JRCNMT regards as graduates only those students who have successfully completed the program prior to the effective date of closure.

D. Inactive Programs

A sponsoring institution may request inactive status for up to two years for a program with no students enrolled. Programs holding probationary accreditation status may not request inactive status until all probationary issues have been addressed satisfactorily. The program and its sponsoring institution must continue to pay required annual fees while inactive. Should a program be inactive for two years and not be reactivated, it will be considered discontinued and accreditation will be withdrawn.

Clinical affiliates may discontinue their affiliation with the inactive program or adjust student capacities in shared affiliate situations during a program's inactive period. Notification of such changes must go to the Program Director of the inactive program, if one is on staff.

A program may be reactivated if it meets all the following criteria:

- There has been no change in Program Director
- There has been no change in type of academic award
- There have been minimal faculty changes
- There have been no significant changes in curriculum
- Less than 25% of the original clinical affiliates have severed ties with the program
- Payment of fees is current

In the event a program does not meet the aforementioned criteria a self-study for continued accreditation must be submitted 60 days prior to reactivation.

When an eligible program is ready to reactivate, the program director must submit a letter to the JRCNMT requesting reactivation. This letter should state the reason for the inactivation of the program including an itemized explanation of all changes that have occurred in any of the following areas:

- Program administration
- Didactic and clinical faculty, supported by submission of documentation demonstrating qualifications for the position
- Curriculum
- Clinical affiliates – an application must be submitted for all new clinical affiliates
- Written confirmation from each clinical affiliate of its ability to resume student education

A separate letter must be sent by the CEO of the sponsoring institution supporting the re-activation of the nuclear medicine technology program.

E. Closure of Clinical Affiliate of Accredited Program

Should an accredited program become aware that one of its major clinical affiliates will cease operation prior to the end of the academic year, it is the program's responsibility to relocate students to other acceptable clinical sites until they complete the program.

If there are other JRCNMT-approved clinical affiliates in the region an application may be made by the program to temporarily relocate students to these sites providing the following conditions are met:

- a. Relocation of students will be based on the existing criteria stated in the *Accreditation Standards for Nuclear Medicine Technologist Education*.
- b. The relocation may only continue until the current class of students completes the program unless a new application for a clinical affiliate is made demonstrating the ability of the site to continue to handle additional students.
- c. Should the clinical site be affiliated with a program other than the one wishing to relocate students, a shared affiliate agreement must be documented and signed by the affiliate clinical supervisor and each program director.
- d. In the event there are no alternative currently accredited sites that are geographically convenient, the program must immediately make arrangements with other facilities for clinical training. Affiliation agreements and applications for new clinical affiliates must be received by the JRCNMT no more than 30 days after the notification of closure of the major affiliate.

CAHEA: Adopted Jan 1978; revised Aug 1982, Oct 1985, Oct 1990, May 1991, Oct 1992.

JRCNMT: Revised Mar 1996, Nov 1997, Oct 1999, Jul 2002, Apr 2010, Nov 2010, Apr 2012, Nov 2012, Apr 2013, Nov 2013, Oct 2014, Apr 2018, Apr 2019, July 2019, Oct 2020.