



COMTA Student Outcomes Tracking Policy

NOTE: This document replaces Appendix D.12 CPL Chart & D.12a Instructions.

These policies support and extend COMTA Accreditation Standard VIII.C. As such, institutions programs must demonstrate compliance with both.

STATEMENT OF PURPOSE: Accrediting agencies are required to assess institutions and programs based on success in achieving their stated objectives and continual efforts to improve educational quality. One metric used to determine success of a vocational program is the completion and placement rates, as well as applicable licensure exam pass rates of its students. Metrics are increasingly important to the US Department of Education, particularly for those students receiving federal funds for their education. However, all institutions and programs are encouraged to use this data for all students to ensure that they have created a program which students can complete and leads to successful employment.

Descriptions of the Professions represented by COMTA:

Massage Therapy

Massage Therapists and bodyworkers are skilled practitioners who work with a variety of client demographics in one-to-one sessions. These sessions may be conducted in a public space with the client remaining clothed, or in a private room with the client disrobed and draped with a sheet or towel. Massage Therapists and bodyworkers have extensive knowledge of musculoskeletal anatomy for the entire body, basic physiological understanding related to the effects of soft tissue manipulation, and awareness of the psychological benefits to be gained through receiving massage and bodywork. They perform basic assessment of the client's health conditions and preferences for the session to ensure the methods used will be in the best interest of the client's health and wellness. Recommendations for additional sessions and post-session care may be provided. They consult with and refer to other health professionals when client conditions exceed the massage therapist's/bodyworker's education, training, experiences or scope of practice.

Esthetics

Estheticians and skin care specialists are skilled practitioners who work with a variety of client demographics in one-to-one sessions. The sessions may be in a public space with the client remaining clothed, or in a private room with the client disrobed and draped with a sheet or towel. Estheticians and skin care specialists have extensive knowledge of the anatomy of the skin, as

well as detailed musculoskeletal knowledge of the head and neck. They have basic understanding of the anatomy and physiology of the whole body, with detailed understanding of the physiological factors which influence skin health. Estheticians and skin care specialists perform assessment of the skin and gather information from the client regarding health conditions and lifestyle factors which may impact methods used during the treatment session as well as the products to be applied to the skin. Recommendations for additional sessions and post-session care may be provided. They consult with and refer to other health professionals when client conditions exceed the esthetician's education, training, and experiences.

Definition of “Placement” for Massage/Bodywork and Skin Care

The employment options for graduates in these fields of study are quite varied. While part-time and full-time employee positions are becoming more available, most graduates are still entering the professional world as independent contractors or sole proprietors immediately after graduating. People choosing to study massage or esthetics frequently use their training as a supplement to other work, or as a part-time occupation while they provide care to family members. Training in these fields is also known to be an outlet for people to do something they love, while the other job(s) they hold provide greater income and benefits.

This makes calculating a “Placement” rate quite challenging. COMTA supports encouraging graduates to seek the type of employment which meets their needs, and we recognize that this may mean that it takes graduates more time to establish themselves after graduation than in other types of employment. Therefore, we aim to evaluate school success regarding graduate employment in a simplified manner.

To be considered “placed”, graduates must meet the following criteria:

1. Working legally (having obtained applicable licensing, etc.);
2. Utilizing knowledge and skills acquired during the training;
3. Be either:
 - a. Employed: Full-time or part-time work for another entity
 - b. Self-employed: Independent contractor, sole proprietor, etc.
4. Be placed within 180 days after graduating

Working legally

Commonly, obtaining a license or permit to practice is the first step, which in itself can take several weeks or even months. COMTA recognizes this potential delay, but we also expect schools to be proactive in guiding their graduates toward applying for the applicable licensing and starting the process as soon as possible.

Utilizing knowledge and skills acquired during the training

A position is considered “within the field of training” if the position description includes qualifications which demand completion of the training, or if the tasks regularly performed are recognizable as massage therapy, bodywork, or skin care. These positions are always considered “Placed”.

A position can be considered “related” to the field if the training enhances performance of another role and that enhancement can be clearly identified. For example, some of the skills taught in massage and skin care programs are also included in the scope of other licensed professions. Someone who is already working in another profession might pursue training in either of these fields to expand their skills in their current position. These positions which the student held prior to completing the training can be considered placement, but only when there is clearly an opportunity for the training to be utilized. For instance, a nurse might complete bodywork training to provide additional care for patients, or a Cosmetologist might complete advanced skin care training to offer a wider variety of services. In such cases, the change in services offered or the additional care provided should be described clearly in any documentation for that graduate to substantiate considering them as “Placed”.

Graduates who are employed in unrelated fields (not currently using knowledge or skills related to the training) may not be included as “Placed”. Specifically, performing unrelated duties in an environment where massage or esthetics services are offered would not be considered “Placed” unless the job description required that training had been completed.

Employed

The definitions of part-time and full-time employment may vary based on state and federal laws, employer guidelines for offering benefits, type of environment where services are offered and other factors. COMTA does not believe such distinctions should be relevant to confirming that the education provided was appropriate to enter the professions in question, therefore “employed” is broadly defined as working for another entity, in the field of training or related. There is no minimum timeframe that a graduate must remain employed, however the Commission encourages graduates to report back to their school regarding employment lasting fewer than 30 days to help ensure that the school understands why the graduate is no longer employed at that location, particularly if it is relevant to improving the educational program.

Self-employed

Graduates frequently enter these professions as independent contractors, sole proprietors, or in collaboration with other professionals. The Commission understands that choosing this route may require more time for the graduate to establish their business, thus the graduate is considered “self-employed” based on completing the necessary steps to work legally with this status. No minimum number of clients or hours of work are required, however the Commission encourages graduates to contact their school regarding any challenges they encounter, particularly if it is relevant to improving the educational program. COMTA further recommends that graduates utilize the many services offered by the applicable professional association for free websites, client referral directories and other support for new business owners.

Verifiable Record Guidelines

Each school is responsible for collecting enough information about graduates such that the placement statistics could be verified by someone else. Because of problems with some schools publicizing over-inflated rates, there is now more scrutiny on these rates at the national level, especially for schools participating in federal financial aid programs. Several accrediting agencies are moving toward an external audit of placement rates to verify that the rates schools report are accurate. At this time, COMTA is encouraging all schools to strengthen their record-keeping for graduate placement and be prepared to show back-up documentation regularly, not just during a scheduled site visit.

- Examples of verifiable records of **employment** include but are not limited to:
 - Employer name and contact information
 - Completion of employer verification form
 - Verbal confirmation by school with employer; notes to verify contact name and date
- Examples of verifiable records of **self-employment** include but are not limited to:
 - Client logs
 - Business cards, brochures, or other promotional materials
 - Website address or screenshot
 - Signed attestation by graduate
 - Business permit or license (in addition to massage license)
 - Tax documents
- Graduate employment records verify that the graduate is **working legally** according to all local professional licensing or credentialing laws and business permit requirements.
 - Records of state or municipal credentialing or licensure are kept, where available

Reporting Guidelines:

Completion:

The Commission will provide a secure portal within EDvera called “Student Roster” for the school to report student data on an ongoing basis. The system is intended to collect the most current data from the school to be a reflection of the quality of the current curriculum and operations. The school will indicate a status for each student directly within the portal, in the following categories for completion:

- Completed Satisfactorily
- Still Active
- Incomplete/Unsatisfactory
- Withdrawn Voluntarily
- Terminated
- Other

Completion data will be evaluated after the normal time for completion of each program. If the percentage meets the minimum benchmark at that time, no further demonstration of compliance

for that period will be required. If the percentage is below the benchmark, there will be a second checkpoint after the 150% satisfactory academic progress point has been reached.

Placement

Placement data will be collected for each graduate within the same secure portal, also on an ongoing basis. The placement will be recorded in a simple YES/NO/UNKNOWN format, with a space to note the company name and contact information for either the outside employer or that of the self-employed graduate.

The checkpoint for meeting the minimum benchmark will be based on the schedule for the normal completion of the program, plus one hundred and eighty (180) days to obtain licensing and begin working. The exact timing of Commission review may vary, but a school will be allowed a second checkpoint to recognize the 150% timeframe for completion of the program should the initial group of graduates not meet the minimum placement percentage.

If the completion and/or placement percentages are not meeting the benchmark after allowing for the 150% time to completion, the following will apply:

- For programs with rates 5% or more below the Commission benchmark, a plan for improvement must be implemented and progress toward reaching the minimum benchmark must be demonstrated within the maximum timeframe for compliance described in the COMTA Accreditation Manual.
- For programs with rates less than 5% below the minimum Commission benchmark, a school may demonstrate the successful achievement of students in that program through other reliable indicators documented by the school, or an explanation of external factor negatively impacting the rates for that specific time period.

Excluded from Placement

In some instances graduates are simply not able to go to work in the field after graduation. So that these graduates do not count against a school's placement rate, a graduate may be marked as "Excluded". These situations may include one of the following:

- Incarceration
- Active military service
- Death
- Medical conditions that keep the graduate from working
- International students who have left the country
- Further Education*

**Further Education* is an exclusion for those program graduates who decided to continue their education after graduating from the training program. *Only graduates who continue their education at an accredited institution and attend at least half-time can be counted.* This information will need to be verified. If the graduate also enters the profession, record them as "Placed" rather than "Excluded".

Commission Minimum Benchmarks, Effective May 2014

Completion:	65%
Placement:	65%
Exam Pass Rate:	TBD in 2016 after first year of data collection

For additional information on Salary and Projected Growth for the Professions

Please refer to the links for the Bureau of Labor Statistics, U.S. Department of Labor, *Occupational Outlook Handbook*, for the most current salary and growth for the professions.

- Massage Therapists: <http://www.bls.gov/ooh/healthcare/massage-therapists.htm>
- Skincare Specialists: <http://www.bls.gov/ooh/personal-care-and-service/skincare-specialists.htm>