



COMTA Distance Education Guidelines

These policies support and extend COMTA Accreditation Standard X. As such, institutions and programs that offer distance education must demonstrate compliance.

STATEMENT OF PURPOSE: Distance education (synchronous, asynchronous and hybrid courses) utilizes technology to create enriching virtual classroom experiences. Distance education must meet the criteria of supporting regular and substantive interaction between the students and the instructor. (Independent study or correspondence courses do not meet that criterion.) The Commission acknowledges that there are some competencies within a massage/bodywork or esthetics program that may be taught through distance education. These competencies do not involve on-site, or hands-on instruction, or direct supervision of student work. Programs using distance education must demonstrate continued compliance with these and other applicable standards.

Distance Education

Distance education means education that uses technology to deliver instruction to students who are physically separated from the instructor and supports regular and substantive interaction between the students and the instructor. Distance education includes both fully online courses and hybrid courses which include some online and some in-class time. However, distance education should not be confused with Correspondence Education or Independent Study, which are not eligible for accreditation by COMTA. (See COMTA Definition of Terms below for full description and applicable terms).

COMTA allows for portions of programs or courses to be taught via Distance Education, provided the requirements in Standard X are met and appropriate approvals are first obtained.

Allowable Amount of Distance Education

COMTA encourages the use of innovative teaching methods including those available using distance methods. Massage therapy and esthetics are professions that rely on skill-based learning in an in-person classroom environment, therefore COMTA does not accredit programs with more than 49% of the content taught via Distance Education methods.

During the accreditation process, the school will be asked to explain how they have determined the amount of clock hours or credits awarded for each class using distance education methods. There should be some method for calculating the amount of time an average student would need to complete the assigned work, with a reasonable allowance for some students to complete it faster and others who need more time. The Commission does not expect that individual students will have hours calculated for their work, but documentation of student work should be maintained to confirm that the hours awarded are reasonably appropriate on average.



Learning Management Systems (LMS) or Online Textbook

Distance Education methods have been developing rapidly over the past several years. A small school or program offering only a portion of a course via distance education may not need to use a traditional Learning Management System (LMS) (see the COMTA Definition of Terms below for details), but a similar platform that facilitates interaction and accountability is required.

Many textbook companies now provide auxiliary tools to expand the resources available to students and instructors. While the technology behind some of them is increasingly similar to an LMS platform, some of these resources are inadequate for being considered “distance education”, particularly if the materials do not include interaction with fellow students or an instructor. However, the materials could still be beneficial for students as homework or support for integrating information learned in class. The Commission makes the distinction between the clock hours or credits a school awards and activities that are expected to learn the course content. When selecting an LMS or similar platform to develop the distance education program, schools should pay careful attention to whether it meets all the requirements of Standard X.

ADA Compliance

The Americans with Disabilities Act of 1990 and subsequent amendments, establish a firm legal basis for the requirement that information technology procured, developed, and used by postsecondary institutions be accessible to individuals with disabilities. These statutes require that campus offerings — including those made available through applications software, websites, videos, PDF files, and other IT — be available to all students, faculty, staff, and visitors for whom they are designed, including individuals with disabilities.

"Accessible" means a person with a disability is afforded the opportunity to acquire the same information, engage in the same interactions, and enjoy the same services as a person without a disability, in an equally effective and equally integrated manner, with substantially equivalent ease of use. "Accommodations" are adaptations made for specific individuals when a product or service is not accessible - digital accessibility allows for students with disabilities to meet the same outcomes as students without disabilities.

Among the most common accommodations made for students with disabilities in online courses include: the addition of closed captions to videos, transcription of audio recordings, utilizing audio recordings or other remediation of documents, use of screen readers, and providing alternative text options and/or adjustments to font sizing.

For more resources and information on ADA IT compliance, see:

<https://tech.ed.gov/accessibility/>



Impact on Professional Licensing

In some jurisdictions, professional practice laws prohibit the use of distance education methods for meeting entry-level education requirements for massage therapy and/or esthetics. In some cases, this may mean that a program does not qualify graduates for licensed practice outside of the campus where the program is offered. Therefore, it is important for prospective students to be notified of the details of how distance education instruction is included in the program, any additional costs associated with distance education instruction, and whether or not the program is approved for professional practice by the applicable state licensing agency. The institution is responsible for ensuring that these issues disclosures are part of the information made available to prospective students in writing, before enrollment.

Institutions are responsible for ensuring that student records include documentation of whether a course was completed on-campus or via distance education.

Important Definitions

(from COMTA Definition of Terms, Appendix C)

Distance Education: Per USDE, Distance education (DE) is education that uses one or more types of technology to deliver instruction to students who are separated from the instructor and to support regular and substantive interaction between the students and the instructor synchronously or asynchronously.

Correspondence Education: Per USDE, education provided by an institution under which the institution provides instructional materials, by mail or electronic transmission, including examinations on the materials, to students who are separated from the instructors. **COMTA is not recognized to accredit correspondence education courses.**

Hybrid: A distance education course that involves some in-class, face-to-face instruction and some online requirements. The course may be taught primarily online with some regularly scheduled on-campus classroom meetings. A course is considered “hybrid” if students are earning hours or credits for the work/time devoted when not in the classroom. If credit or hours are not awarded, distance education methods may be used as supplementary tools for a regular course and do not need to be approved by COMTA. *See also Distance Education.*

Learning Management System (LMS): The technology platform through which students access online courses. A LMS generally includes software for creating and editing course content, communication tools, assessment tools, and other features for managing the course. The LMS should be appropriate to the size and scope of the distance learning program, either including large-scale platforms (e.g. Blackboard, Moodle) or it could include publisher-based or internal systems if they meet the Distance Education standards.



Asynchronous: Types of online courses that do not require students to meet online at specific times. Interaction between students and teacher occurs in different places and at different times. Typically students will still be required to meet certain deadlines.

Synchronous: A type of online course where classes have a scheduled meeting time in which students must attend virtually. Interaction between students and teacher occurs in “real time.”

Proctored Assessment: A proctored assessment is an exam that is administered by an individual who supervises the student while they are taking the exam. The proctor’s function is to ensure the integrity and security of the exam in a secure environment.

The Commission recommends contacting COMTA staff at info@comta.org or 202-888-6790 for further clarifications or to determine if your procedures meet the letter and spirit of the Standards.