



## **TEMPORARY POLICY TO ACCEPT INTERACTIVE DISTANCE LEARNING HOURS**

Pursuant to California Business and Professions Code sections 4600 *et. seq.* (hereinafter the "Massage Therapy Act"), the California Massage Therapy Council ("CAMTC") has adopted Policies and Procedures for Approval of Schools ("Procedures") which establish minimum requirements for the approval of massage schools. Pursuant to this authority, CAMTC has adopted Procedures section 1.B., which states: "CAMTC does not accept online or distance learning hours, including but not limited to, externships, homework, and self-study or credits through challenge examinations, achievement tests, or experiential learning."

On March 12, 2020, in response to the escalating COVID-19 crisis, CAMTC staff issued an emergency "Coronavirus (COVID-19) Contingency Plan for Schools" which allowed certain temporary measures, including, but not limited to, accepting interactive distance learning ("IDL") for lecture-based subject matter for a set period of time. CAMTC subsequently issued two updates extending these measures for additional periods of time. The most recent update on May 11, 2020, extended these measures through August 31, 2020.

The California Department of Public Health, the Governor's Office, and county health departments have ordered most higher education providers in California, including most massage therapy programs, to suspend in-person classes. These orders remain in place until further notice. However, various county health departments have allowed student clinics to operate, so long as they can meet the guidelines for massage therapy and other personal care businesses.

To achieve CAMTC's mission of protecting the public, CAMTC is taking steps aimed at trying to ensure both that California's citizens training to be massage therapists are not unnecessarily put at risk during this healthcare emergency, and that future certificate holders are appropriately trained to properly massage the public in years to come. Thus, the CAMTC Board hereby ratifies the "Coronavirus (COVID-19) Contingency Plan for Schools" documents dated March 12, 2020, March 27, 2020, and May 11, 2020. Additionally, as of the date of adoption of the policies contained herein, these policies supersede and replace the previous Coronavirus (COVID-19) Contingency Plan for Schools document dated May 11, 2020. The Board hereby adopts the following additional temporary measures:

1. Temporarily accept IDL for students whose training, provided on or after March 12, 2020, has been or is interrupted or otherwise impacted as a result of the COVID-19 crisis. The temporary policies described herein expire 30 days after the date that the State and the health department for the county in which the school is located allows in-

person classes to resume. These policies shall be temporarily reinstated if the State or local county health department again prohibits in-person classes due to subsequent COVID-19 shutdowns or if the school must discontinue in-person classes due to a COVID-19 outbreak within the school. Subsequent reinstatements of these policies expire 30 days after the date that the State and health department for the county in which the school is located allows in-person classes to resume or, in the case of a COVID-19 outbreak within the school, 14 days after the school is closed due to the outbreak.

2. IDL may include both lecture and hands-on hours, all under the active and direct supervision of a qualified instructor. However, as part of the 500 hours required for certification, students shall successfully complete a minimum of 75 hands-on hours in-person under the active and direct supervision of a qualified instructor. The minimum 75 in-person, hands-on hours may be completed as part of a program's student clinic, so long as the student clinic is approved as part of the program and meets all requirements of Procedures section 5.E.c. In-person classes and student clinics shall only resume under the documented permission and guidance of each school's local county health department.
3. Procedures section 5.E.b. requires: "A minimum of 250 hours shall be in the supervised instruction of hands-on massage; California Business and Professions Code section 4601(e) defines massage as 'the scientific manipulation of the soft tissues.'" While the minimum 250 hours of supervised instruction of hands-on massage may include a reasonable number of hours of massage theory and demonstration, student hands-on practicum shall comprise most of these hours. This means that students shall successfully complete substantially more hands-on hours than the minimum 75 in-person, hands-on hours required above. Students may complete these additional hands-on hours through IDL as described below.
4. To meet the requirements for providing IDL for lecture hours, a school shall:
  - a. Communicate to students through one of several types of technology, and instructors must initiate substantive communication with students, either individually or collectively, on a regular basis;
  - b. Verify the identity of each IDL student; and
  - c. Appropriately assess each student's knowledge.
5. To meet the requirements for providing IDL for hands-on hours, a school shall:
  - a. Provide synchronous (real time) sharing of hands-on practice using video conferencing;
  - b. Verify the identity of each IDL student;
  - c. Appropriately assess each student's skills based on observed levels of performance during this time;
  - d. Ensure students are equipped with the proper tools to effectively demonstrate practical applications;
  - e. Maintain required student-teacher ratios (in the case of hands-on IDL, a maximum of 18 practicing students:1 instructor); and
  - f. Provide in-person opportunities for students (when in-person classes resume) to complete or audit hands-on hours if the student fails to successfully complete any or all of the IDL hours, fails appropriate skills assessments, or if the student

requests it.

- g. Notify each student in writing, before the student starts the hands-on IDL hours, and obtain a signed confirmation from each student acknowledging that the student has received written notification of the following:
  - (a) Pursuant to CAMTC's Temporary Policy to Accept Interactive Distance Learning (IDL) Hours, this school offers both lecture and hands-on hours through IDL under the active and direct supervision of a qualified instructor.
  - (b) While some hands-on hours may be completed through IDL, CAMTC requires students to successfully complete a minimum of 75 of the total hands-on hours in-person under the active and direct supervision of a qualified instructor. The minimum 75 in-person, hands-on hours may be completed as part of a program's student clinic, if available.
  - (c) Students who fail to successfully complete any or all of the IDL hands-on hours or fail appropriate hands-on skills assessments shall complete the hands-on hours in-person when in-person classes resume.
  - (d) A student may choose to complete any or all hands-on hours in-person rather than through IDL when in-person classes resume.
  - (e) A student, prior to graduation, who completes hands-on hours through IDL may request to audit hands-on hours in-person when in-person classes resume.
6. Schools shall properly account for each student engaged in IDL, including complete and accurate records of attendance, clearly identifying whether the student completed hours in-person or through IDL, and whether or not the student successfully completed those hours. Pursuant to Procedures section 5.E.d: "Students may not be credited more than 40 hours of total education in any 7-day period, with no more than 10 hours in any one day."
7. In addition to meeting the requirements of Procedures section 5.B., transcripts or transcript addenda, if applicable, for students who have completed any IDL hours shall identify how many hours of each course were completed in-person or through IDL.
8. While CAMTC has extended its temporary acceptance of IDL as stated herein, the California Bureau for Private Postsecondary Education's ("BPPE") temporary use of distance education techniques expired June 30, 2020, for institutions holding Full Approval status with BPPE. **For CAMTC to continue to accept IDL from a BPPE Full Approval institution, that school must receive written approval from BPPE to continue to offer IDL, and provide proof of written approval to CAMTC.** Pursuant to Business and Professions Code section 4601, CAMTC can only accept hours completed as part of a program approved by BPPE. **Institutions that BPPE has Approved by Means of Accreditation must obtain written approval to offer IDL through their accrediting agency, and provide proof of written approval to CAMTC.**
9. CAMTC Approved Schools may enter into temporary consortium agreements with other CAMTC Approved Schools so that students can complete courses at other

institutions but be awarded credit by their home institution. If this occurs, transcripts must clearly identify the education provide by each school

10. By the 10<sup>th</sup> of every month starting August, 2020, and until the school discontinues the use of IDL, the school shall notify CAMTC by email at [schooldocs@camtc.org](mailto:schooldocs@camtc.org) with the subject line of the email as “COVID-19 Temporary Education Plan – School Name – CAMTC School Code – Month and Year” (e.g., COVID-19 Temporary Education Plan – ABC School of Massage – SCH0500 – August 2020) and provide the following information:

- School Name and CAMTC School Code;
- Local county jurisdiction and that county’s current allowance for 1) in-person classes, and 2) in-person clinics (must be able to provide documentation);
- Start and end dates of BPPE or accrediting agency’s approval to offer IDL (must be able to provide documentation);
- IDL delivery method for both lecture and hands-on hours, including the technology or program being used;
- Method used for tracking student attendance, including each student’s successful completion of those hours and identifying between in-person and IDL hours;
- Confirmation that the school is maintaining photo or video evidence confirming the hands-on hours of attendance as part of each student’s permanent record or provide class access information, in advance of the class occurring, to CAMTC;
- Current enrollment by program, course, cohort, or class, as relevant to each school;
- Current schedule of classes (including but not limited to: dates, days of week, hours in day, in-person or IDL); and
- Any anticipated changes or changes in the past month to the method of delivery.

11. Schools desiring to make changes to their approved curriculum, outside of the method of delivery described herein, must apply to and receive approval from CAMTC for any such changes, as well as for any other changes including, but not limited to, change of ownership, school name, physical or mailing addresses, contact information, or staff employment.

12. In accordance with the Massage Therapy Act, CAMTC approved schools shall meet all minimum standards for training and curriculum, as well as all requirements stated in the Procedures unless specifically and temporarily amended by these policies herein.

As of the date of adoption, this document is CAMTC’s complete policy for the temporary acceptance of interactive distance learning.