



**POLICY AND PROCEDURES MANUAL**  
**Commission on Massage Therapy Accreditation**  
**Effective March 2014**

## **I. INTRODUCTION**

The term accreditation implies a generally accepted process by which a school or program is evaluated. Schools with accreditation may, therefore, be said to have achieved a minimum level of excellence, based on an accepted set of standards.

The benefit of accreditation to a profession lies in the fact the public to whom the profession is rendering a service is assured of a certain standard of quality from the graduates of accredited schools. Such assurance raises the profession in the eyes of the public and increases the public's confidence.

COMTA aspires to the highest level of integrity in the process of program and institutional accreditation. Programs and institutions seeking accreditation will demonstrate honesty and integrity and agree to comply with all COMTA standards, decisions, policies, and procedures both during the accreditation process and throughout the term of accreditation.

Applicants may choose from one of two types of accreditation that COMTA has the authority to offer.

*Institutional accreditation* is granted to free standing institutions offering massage therapy and bodywork or aesthetics/esthetics/skin care programs. COMTA is concerned with the entire school, including all of the strengths and concerns, as described in the school's Self-Study Report and observed by the on-site evaluation team. In addition to requiring accredited schools adhere to the Standards, COMTA is concerned with ascertaining how well the school meets its own objectives.

*Programmatic accreditation*, available to programs within an institution accredited by an agency recognized by the U.S. Department of Education is granted to an institution's educational program, focusing on program content, quality, and institutional stability. Program accreditation ensures that the school's program in massage therapy or aesthetics/esthetics/skin care reaches the minimum standards set by the profession.

Accreditation is a voluntary process dependent on high standards of integrity. Each institution is expected to impress upon its staff and faculty the importance of personal and professional integrity. Breaches in integrity invalidate the process and the program or institution's status.

Accreditation processes are invariably composed of three components:

1. The self-study in which the program and institution initiate a process of self-evaluation, answering a set of specific questions about all of its parts, ranging from its mission and objectives to fiscal responsibility.
2. The peer review, in which the objective, independent accrediting agency reviews the report and sends a team of educational, administrative and financial experts to the school to verify the self-study.
3. The final evaluation and decision by an independent accrediting commission. The Commission accredits programs and institutions and performs on-going monitoring of their compliance with

COMTA Standards and Policies. Review of annual reports and of institutions'/programs' responses to Commission's expressed concerns is part of this monitoring process. The Commission reserves the right to require a special site visit or a special report if there is credible reason to question the programs'/institutions' continued compliance with the Standards. Such special visits or reports may be required by the Executive Committee and the timeframe for the visit or report will be established by the Executive Committee. Failure to cooperate with a special site visit or to submit required reports is ground for probation or revocation of accreditation.

## **II. HISTORY**

In 1982, the AMTA Council of Schools (COS) was established, in recognition of a shared concern among educators and school Executive Directors for the quality of massage therapy education. Early Council work focused on the need to develop and maintain educational standards.

In 1989 the Commission on Massage Training Approval/Accreditation was established. In the following two years, with the assistance of AMTA's Program Approval Review Committee (PARC), COS, and additional AMTA volunteers and staff, COMTAA created and implemented standards, policies and procedures that would meet the rigorous standards of the USDE for accrediting agencies. Recognition by the Council on Post-Secondary Accreditation (COPA) was pursued as a developmental stage toward the ultimate goal of USDE recognition.

In 1992 in an effort to combat widespread fraud, waste and abuse in the federal Title IV financial aid programs, Congress passed the Higher Education Amendments. This law requires USDE recognized accrediting agencies to act as "gatekeeper" of federal funds. The responsibility for oversight of student loan programs for years had been shared by states, accrediting agencies and the USDE. Congress determined in 1992 this triad was not able to guarantee program integrity and financial accountability in higher education institutions. The Amendments created a new triad in which the states (which have a new enforcement capability) and the accrediting agencies (which have new requirements to meet) each have responsibility for monitoring and reporting to each other and to the USDE.

While waiting for the USDE regulations to be issued, COMTAA continued to accredit and approve programs and continued to refine its policies and procedures to be ready to come into compliance with those regulations. In October 1996, an elected COMTAA Commission was seated. The members were elected by the then current COMTAA approved and accredited programs. The initial representation on the Commission included two massage school administrators, two massage school educators, and two public members, one each of professional academic, massage therapist employer and massage therapist practitioner.

In 1997 the decision was made to end the approval status on March 31, 1999, and change the name to the Commission on Massage Therapy Accreditation (COMTA). USDE recognition was granted July 10, 2002. In 2004 COMTA became a completely independent organization. On November 8, 2004 COMTA's USDE recognition was continued for five years and the scope of practice was expanded to include accreditation of academic associate degree programs. As part of the renewal of recognition process in 2010, COMTA requested an expansion into occupational associate degrees and aesthetics/esthetics and skin care. The expansions were both approved and COMTA's recognition was continued in 2010, with a follow-up review scheduled for December 2012.

## **III. ORGANIZATION OF THE COMMISSION**

### *Commissioners*

Commissioners are elected by COMTA recognized institutions and programs in good standing. Each institution shall be entitled to cast one vote for each commissioner position up for election. Commissioners are elected to a six-year term, and may stand for re-election. The Commission shall be composed of individuals who have been chosen to reflect the experience and concerns of specific communities of interest. Nominees for election to the Commission shall be selected by a nominating committee composed of two COMTA Commissioners and one person who does not serve on the

Commission. The two Commissioners shall be appointed by the Commission. The COMTA Chair shall appoint the external member. The external member may not be an officer or professional staff member of any organization that provides financial support to COMTA or a member of the COMTA staff. No member of the Board of Directors or staff of any massage or aesthetics trade association may serve on the Commission for Massage Therapy Accreditation.

#### *Commission Structure*

There shall be a chairperson of the Commission who is elected for a term of two years by the full Commission. The Chair shall act as the presiding officer of the Commission and the Executive Committee. Should the Chair vacate that position, the Chair's duties shall be assumed by the Vice-Chair. There shall be a vice-chairperson of the Commission who is elected for a term of two years by the full Commission. The Executive Committee shall be composed of the Chair, the Vice-Chair, and Secretary (Member). The Executive Committee shall serve as the primary planning and agenda setting body for the Commission. The Executive Committee, or the Chair when designated by the Executive Committee, shall be responsible for supervising the COMTA Executive Director and monitoring the operation of the COMTA office. The Commission may delegate decision-making power to the Executive Committee to decide specific issues arising under COMTA standards and policies. This provision shall not be construed as the authority to take specific accreditation decisions. The Executive Committee may take emergency actions to respond to situations not covered by existing Commission policies. The Executive Committee shall notify the full Commission of any such actions in a timely fashion. The Commission holds two face to face meetings annually and other electronically mediated meetings as needed. All Commission meetings are closed. The Commission reserves the right to invite guests to provide consultation to the Commission as needed. The Commission may have standing committees and may be required to conduct the Commission's business. The Commission may establish special committees as necessary. Ad Hoc Committees are formed as needed.

#### *Staff*

The Commission hires an Executive Director to oversee daily operations and shall have authority to make and implement necessary rules and procedures to insure the effective and efficient operation of COMTA, subject to review by the Executive Committee and the Commission. The Executive Director shall be a non-voting ex officio member of the Executive Committee. The Executive Director or her/his designee shall be a non-voting ex officio member of all standing committees. The Executive Director hires staff to support the daily operations of the Commission.

### **IV. VISION, MISSION STATEMENT and VALUES**

#### *Vision*

COMTA is the accreditation agency of choice for massage therapy and bodywork educational institutions and programs.

#### *Mission*

The Commission on Massage Therapy Accreditation, a non-profit independent body, seeks to improve the quality of education for students seeking education in the fields of massage therapy and bodywork through an accreditation process that reflects the current and emerging professional practice standards.

#### *Values*

1. COMTA is a dynamic organization dedicated to furthering the success of massage therapy and bodywork education, through ongoing dialogue with educators, practitioners and consumers.
2. COMTA, as a learning organization, values its relationships and dialogue in continuing to identify and reflect the existing and emerging educational trends and professional practice requirements for massage therapy and bodywork education.
3. COMTA acknowledges and supports the holistic and transformative nature of massage therapy and bodywork education.

## V. SCOPE OF ACCREDITATION

COMTA extends its services to those institutions and programs which award post-secondary certificates, diplomas, or degrees in the practice of massage therapy and bodywork and aesthetics/esthetics or skin care. COMTA provides institutional accreditation for freestanding institutions of massage therapy and bodywork as well as aesthetics/esthetics or skin care. COMTA also accredits educational programs in massage therapy and bodywork or aesthetics/esthetics/skin care offered at other institutions. Where institutional accreditation in a country is not otherwise available, the institution must have the approval of the government agency responsible for the oversight of such institutions. National and/or state (or provincial) law will prevail when either or both are in conflict with COMTA standards, policies, procedures, guidelines or decisions. However, when such laws result in educational offerings and services inferior to the minimums required under COMTA standards and policies, programs and institutions must agree to accept the COMTA standards and policies as a condition of accreditation.

## VI. THE FUNCTION OF STANDARDS

Standards serve a variety of functions. They provide a nationally recognized measure against which an institution or program may be evaluated. Hence the general public, employers, clients, government bodies, legislators, and students will know the criteria used to measure the institution or program's suitability for accreditation. Standards are used by both on-site team members and the Accrediting Commission for reviewing and assessing relevant materials submitted by the institution. Standards also serve as a target at which institutions may aim as they strive to improve the quality of their educational programs and services. The Commission periodically and systematically reviews and assesses the reliability and validity of its standards and criteria.

### **ACCREDITATION: COMTA's Responsibilities and Authority**

#### I. ELIGIBILITY CRITERIA

The following requirements must be met prior to applying for accreditation. A school or program may not apply for COMTA accreditation unless there is a minimum of five (5) students enrolled in each program applying for accreditation status.

##### *Institutional Accreditation*

1. All programs offered by the institution must be massage therapy/bodywork programs. Institutions offering aesthetics/esthetics or skin care programs are eligible to apply with the understanding that USDE recognition for COMTA does not yet apply to this subject area.
2. The institution must be legally organized and licensed by the appropriate state education and/or state licensing agency which authorizes the conduct of business in that state.
3. The institution must offer instruction on the post-secondary level.
4. The institution must offer at least one massage therapy or aesthetics/esthetics/skin care program that requires completion of a minimum of 600 clock hours of instruction.

##### *Programmatic Accreditation*

1. The program must be clearly identified as a professional massage therapy or professional aesthetics/esthetics/skin care educational program. Other professional education programs that include massage or skin care courses are not eligible for program accreditation.
2. A specific entity or department, organized for the purpose of overseeing the massage therapy or skin care program, must be responsible for the program.
3. Identifiable faculty and administrative staff with clear authority must be assigned to this entity or department and be responsible for the program.
4. The program must provide an organized plan of study of at least 600 clock hours in length.
5. The institution must offer a certificate, diploma or degree in massage therapy or aesthetics/esthetics/skin care to an identifiable body of students enrolled for the purpose of receiving such a credential.

6. The parent institution must demonstrate its financial commitment to the massage therapy and bodywork program or aesthetics/esthetics/skin care program by allocating enough financial support to enable all enrolled students to complete the program.
7. The program must be located in an institution that already has institutional accreditation from an agency recognized by the U.S. Department of Education.

## II. STEPS IN INITIAL OR RENEWAL OF ACCREDITATION

1. **Application** - To begin the accreditation process, an institution submits an application fee and a letter of intent to apply. The institution/program will then complete the electronic application with supporting documentation. An evaluation of this information will determine the institution's eligibility. (See Appendix A.3, Fee Schedule & Appendix D.1.) A program or institution officially begins the self-study process when its application has been determined to be current, complete, accurate, and having fulfilled all substantive application requirements. If these requirements have not been fulfilled within twelve (12) months following the receipt of the application, that application is void. Application fees are non-refundable according to specific Commission provisions as noted in the Fee Schedule (Appendix A.3). Renewing programs and institutions must submit an application for renewal twelve to eighteen months before their current approval expires.
2. **Accreditation Training Workshop** – After an institution is determined to be eligible, and prior to submission of the SSR, applicants must complete an accreditation training workshop. Institutions/programs may do so prior to submitting an application, but must submit the application within one (1) year of attending the workshop. Applicants for renewal must complete a workshop for updates on current requirements in the twelve to eighteen month period before their current approval expires.
3. **Self-Study Report (SSR)** - If eligible, the applicant institution/program is provided access to the online submission area to complete the SSR process. The process of completing the SSR provides the applicant an opportunity for self evaluation and improvement in areas that need strengthening. The completed Self-Study Report will serve as the main tool for evaluation of the institution/program by the on-site team and the Commission. Along with submission of the SSR, the institution must prepare for the on-site visit to be scheduled. The applicant institution/program must submit their SSR within nine (9) months of the application acceptance or the application becomes void and the institution/program must re-apply. Renewal applicants must submit their SSR no later than nine (9) months prior to the expiration of their current accreditation. The Commission, or its designated agent, may extend this period for reason of documented exceptional circumstances at the institution or at COMTA. An extension of the deadline for SSR submission is subject to late fees of \$500 per 30 day extension at the discretion of the Commission. An accreditation site visit will not be conducted if it is determined by COMTA staff (and confirmed in consultation with the Research and Assessment Committee) that the SSR is incomplete and provides an insufficient foundation for a successful visit and subsequent report by the on-site team. Such findings must be communicated to the applicant in writing, detailing areas requiring improvement and suggestions for making progress in these areas. Applicants may receive such suggestions until COMTA staff and the applicant are convinced the site visit is merited. Applicants may request a site visit, regardless of the suggestions of COMTA staff, and the Commission will comply. However, both parties (the applicant and COMTA) must recognize that the success of a site visit is largely directly dependent on the quality of the SSR. Choosing to discount COMTA staff recommendations is not a choice to be made in haste or to be taken lightly. Copies of the current school catalog and other applicable publications must be submitted with the application and with the SSR when applying for accreditation. Catalog revisions must be in keeping with these guidelines. For specific catalog requirement checklist see Appendix D.3.
4. **On-site Visit** – On-site teams will consist of at least three people. As team members will review the SSR materials and complete the document verification tasks for the institution/program prior to the site visit, the SSR must be complete prior to the actual visit. This step of the process is intended to verify as much as possible so the on-site reviewers may spend their time on campus efficiently. Team members are responsible for specific standards about which they have expertise. The task of the on-site team is to verify the information contained in the SSR and observe that which must be seen in-person. Although the team creates a report of their findings,

the on-site team members do not make the decision about accreditation. All decisions are made by the Commission. On-site peer review visits may be delayed for no more than one accrediting cycle (six [6] months) following the submission of the SSR. The Commission, or its designated agent, may extend this period for reason of documented exceptional circumstances at the institution or at COMTA. An applicant may request voluntary deferral for a maximum of one six (6) month period. A written explanation of the reasons for deferral must accompany the request. An institution or program engaging in an on-site peer review has voluntarily invited a group of peers to provide an assessment based on a visit to the school with representatives of staff, faculty, students, graduates and employers of graduates. The effectiveness of the review depends on the openness and preparedness of the school in responding to the areas of accreditation standards that the on-site evaluation team members are expected to verify as a part of the visit. The details related to preparation and qualifications of the evaluators are outlined in Appendix E. On-site peer reviews may be scheduled visits for accreditation, renewal of accreditation, or unannounced special visits. The applicant receives a completed peer review report following the on-site review. The applicant will have thirty (30) days to respond to that report, to correct any misinformation or to provide additional documentation to clarify questions, which will be submitted to the Commission for review.

5. **Report to the Commission** – Following the on-site visit, the team puts its findings into a written report to the Commission. Prior to submission to the Commission, the report is sent to the applicant institution/program for comments, corrections and additional information. The applicant is allowed at least 30 days for response to the report, unless the applicant requested a site visit date too close to the Commission meeting and agreed beforehand to have a shorter period for response.
6. **Commission Action** – The Commission meets a minimum of twice per year to take action on applications. Actions on applications for initial accreditation include accreditation, deferral, or denial of accreditation. Subsequent, on-going actions of the Commission include renewal or continuance of accreditation, provisional accreditation, transfer of accreditation, probation, and revocation of accreditation. Actions available to applicant and accredited institutions/programs include appeal of adverse actions, withdrawal of application, or surrender of accredited status.
7. **Re-accreditation procedures** – The re-accreditation process provides an opportunity for accredited institutions/programs to periodically reassess the quality of their educational and administrative methods. Because re-accreditation requires participation in the self-study process, institutions/programs are able to reevaluate present practices and contemplate new directions. The required on-site evaluation provides further opportunity for the institution/program to further refine its current procedures. The process of re-accreditation will be familiar to accredited institutions/programs as it mirrors the accreditation process, including the application, attendance at an accreditation workshop, the self-study, and the on-site evaluation.

### III. COMMISSION ACTIONS

The Commission may enact any of the following measures. These actions are assigned based on the extent to which a program or institution complies with the accreditation standards. No adverse action taken by the Commission is final until the appeals process has been exhausted. See section VI. Publication of Commission Actions for details regarding how these statuses are communicated to appropriate parties.

1. **Accreditation** – Confirmation that a program or institution meets or exceeds the accreditation standards. Accreditation may be granted to new applicants for seven (7) years. Conditional accreditation may be granted, provided deviations from full compliance do not immediately threaten the ability to deliver the educational program or to operate legally. When granting conditional accreditation, the Commission must stipulate a time period in which the program or institution must demonstrate compliance with all accreditation standards. The time period for conditional accreditation will be in accordance with the overall timeline for meeting compliance as required by the U.S. Secretary of Education recognition requirements noted here:

The timeline is based on the length of the program in question, or the longest program offered by the institution.

If the program is less than one year in length, the period shall not exceed twelve (12) months.

If the program is longer than one year but less than two years, the period shall not exceed eighteen (18) months.

The maximum length of time for programs of two years or longer shall not exceed two years (24 months).

All statuses which recognize accreditation with some areas needing improvement for full compliance (conditional accreditation, probation, or deferral of re-accreditation) shall contribute to the timeline together. The time period begins when the institution or program is notified by the Commission that there is an area of non-compliance. If compliance is not demonstrated in the allotted time frame, the Commission will take immediate action unless there is good cause to extend the period for achieving compliance. Extensions for good cause will be limited to situations when the institution or program has complied with all directives from the Commission, is showing progress toward full compliance and the provision of additional time is required to see the outcomes of the changes already made. Generally, extensions will not exceed twelve (12) months beyond the required timeline.

2. **Continuance of Accreditation (Re-accreditation)** – Confirmation upon re-evaluation an accredited program or institution continues to meet or exceed the accreditation standards. Continuance of accreditation may be granted for a period of seven (7) years. Conditional accreditation may be granted under the circumstances and conditions noted above.
3. **Provisional Accreditation** – A continuation of a previous grant of accreditation for a limited period of time during which COMTA evaluates new information which may affect the institution's/program's ability to stay in compliance with COMTA standards. Provisional accreditation begins when COMTA receives written notification of the anticipated change and ends when the institution/program receives written notification from COMTA of the Commission's action. A change in the control of an accredited institution/program automatically triggers provisional accreditation. Provisional accreditation is granted by either the COMTA Chair or the Executive Director upon initial notification of the change of control, and is subject to Commission ratification within 30 days. The Commission may modify the terms of or reject the provisional accreditation. Maintenance of provisional accreditation is contingent upon an institution/program's following COMTA procedures and the completion of a site visit no later than six (6) months following the change in control. No Substantive Changes may be made during provisional accreditation.
4. **Transfer of Accreditation** – When provisional accreditation is granted for a change of control, the Commission must decide whether to transfer accreditation within seven (7) months following the change in control. If a complaint is filed prior to completion of the transfer of accreditation, the complaint must be resolved prior to completion of the transfer.
5. **Probation** – An action taken by the Commission when an accredited program or institution is no longer in compliance with the accreditation standards or policies, and the deficiency is serious enough to jeopardize that program's or institution's ability to provide quality education. This is a disciplinary action that may result in revocation. A program/institution may also be placed on probation for failure to meet any reporting deadlines or financial obligations or refusal of a program/institution to respond to or cooperate with the Commission's request for a special visit or report. Following a decision to place an institution or program on probation, the Commission will notify the school specifying the reason for the probation and the conditions and timeframes that need to be met for the school's probation to be removed. During the probationary period, the program or institution is required to change its operation to comply with accreditation standards and policies. The Commission will require a written report addressing the concerns raised in the notification of probation and may require an additional on-site visit. While the program or institution is still recognized and listed as accredited COMTA shall notify, as appropriate, the U.S. Department of Education, state, provincial, or national regulatory authorities, and other accreditation agencies of the program's or institution's status. The period of probation shall be determined by the Commission, but shall not exceed twelve (12) months if the program is less than one (1) year in length; or eighteen (18) months, if the program is one (1) year or more in length. If conditional accreditation or deferral status was issued prior to the probation for the same areas of non-compliance, the timeline for probation must take into account the time periods

allowed in prior statuses to calculate the deadline for compliance. Failure to comply with accreditation standards or policies within the probationary period shall lead to revocation of accreditation. COMTA shall retain the ability to revoke accreditation without placing a program or institution on probation. As part of its decision to invoke probation, COMTA shall specify the means that will be used to determine whether the program or institution has come into compliance with applicable COMTA standards and policies. If these means include a fact-finding visit, the program or institution will be responsible for all expenses. ***A school placed on show cause or probation shall not make substantive changes during the period of show cause or probation order, without written authorization from the Commission. Institutions on probation are restricted from applying for additional locations or credential changes unless prior permission from COMTA has been received.*** COMTA shall have the power to amend the specification during the probationary period.

6. **Deferral of Accreditation** – Deferral is not considered to be an accreditation action, it is a decision to delay taking an accreditation action. Deferral can be used when the following conditions are met: (a) an applicant program or institution is not in compliance with all of the accreditation standards, (b) the Commission believes the applicant will be able to meet the standards within a reasonable period of time, and (c) deviations from compliance are of an order that does not justify accreditation on a conditional basis. The Commission will require an interim report and may require an additional on-site visit before making an accreditation decision. A program or institution may be deferred for a maximum of two six-month periods. The time periods for meeting compliance as noted for conditional accreditation apply if the deferral is regarding the decision to renew the grant of accreditation. Once the renewal decision is made, the period of deferral must be included in calculating the total period for grant of accreditation not to exceed seven (7) years.
7. **Show Cause that accreditation should not be revoked** – Show Cause is an action taken by the Commission when the accreditation of an institution is subject to revocation. The institution will be provided in writing the alleged deficiencies and the institution is requested to "show cause" why its accreditation should not be revoked. When COMTA learns of an adverse action taken by another accrediting or regulatory agency against a COMTA accredited institution a show cause action will automatically be issued to the institution by the COMTA Executive Director. A show cause action is not an adverse action. Rather, it is issued to an institution so the institution may come forward and provide written evidence that revocation action should not be taken. The material provided by the institution is reviewed by the Commission, which renders a decision regarding revocation. COMTA shall retain the ability to revoke accreditation without issuing a show cause action. As part of its decision to invoke show cause, COMTA shall specify the means that will be used to determine whether the program or institution has come into compliance with applicable COMTA standards and policies. The Commission review may include further evaluation including, but not limited to, a special site visit. If a fact-finding visit is required, the program or institution will be responsible for all expenses. COMTA shall have the power to amend the specification during the show cause period. ***A school placed on show cause or probation shall not make substantive changes during the period of show cause or probation order, without written authorization from the Commission. An Institution on show cause is restricted from applying for additional locations or credential changes unless prior permission from COMTA has been received.***
8. **Denial of Accreditation** – An action taken by the Commission when an applicant program or institution is not in compliance with the accreditation standards and the Commission deems the applicant to be unable to meet the standards without very substantial changes in its operations or organization. Notice of denial of accreditation or denial of continued accreditation must be sent to the program or institution with a statement of the reasons for the Commission's decision. COMTA shall also inform the public of a program or institution's denial status and a summary of the reasons for the denial. The institution/program will be given an opportunity to provide official comment which COMTA will also make publicly available. Re-application may be made no sooner than one year after the final decision of the Commission or Appeals Committee. All application and on-site fees and procedures, including submission of a new Self-Study Report, shall apply.
9. **Revocation of Accreditation** – An action taken by the Commission when an accredited program or institution is seriously deficient in its compliance with the accreditation standards or policies.

Notice of revocation of accreditation must be sent to the program/institution outlining the reasons for the Commission's decision. The program or institution must surrender the accreditation certificate when accreditation is revoked. COMTA shall also inform the public of a program or institution's revocation status and a summary of the reasons for the revocation. The institution/program will be given an opportunity to provide official comment which COMTA will also make publicly available. Notification to the public, the USDE and appropriate state and accrediting agencies will be made in accordance with section VI (Publication of Commission Actions) of these policies.

#### IV. INSTITUTION/PROGRAM OPTIONS

Applicant and accredited institutions/programs may take the following actions regarding accreditation status.

1. **Appeal of Adverse Actions** – Institutions/programs may appeal denial or revocation of accreditation. Commission decisions may be appealed by the owner or Executive Director of an institution or by the manager of the approved program in a larger institution.
2. **Withdrawal of Application** – An applicant may withdraw from the accreditation process after submitting an application, but must do so prior to an accreditation decision by the Commission. All fees once paid are non-refundable.
3. **Surrender of Accredited Status** – An institution/program may voluntarily surrender its accredited status. No fees will be rebated, and the accreditation certificate must be surrendered.

#### V. APPEALS PROCESS

Following denial of accreditation or revocation of accreditation, a school has the right of appeal. On appeal, the institution or program has the burden of showing that the Commission's decision to deny or withdraw accreditation resulted from errors or omissions in the execution of the Commission's policies and procedures or that the Commission's decision was arbitrary, capricious and was not based on substantial evidence on the record. the following steps must be followed:

1. A written request for appeal must be made to COMTA within ten (10) calendar days of receiving the Commission's decision. All written materials are to be sent electronically to the Executive Director.
2. A pool of candidates with knowledge of accreditation standards, policies, procedures, and purposes, established by COMTA, serves as the source of members for an Appeals Committee. The candidates will be former Commissioners and experienced Peer Reviewers. The COMTA Chair convenes an Appeals Committee composed of five (5) persons from a list of seven (7) provided to the school in advance within ten (10) calendar days of receipt of request for an appeal of the decision. If the school has sufficient reason to believe an appointed Appeals Committee member should not hear the appeal, it shall notify the COMTA Chair immediately.
3. The Appeals Committee shall include representatives in the following roles:
  - a. One public member;
  - b. One academic representative;
  - c. One administrator within the scope of COMTA approved institutions;
  - d. One educator within the scope of COMTA approved programs; and
  - e. One practitioner within the scope of COMTA approved programs.

The Committee members will receive orientation to their roles for the appeal process as well as updates on current Commission policies and procedures from the Chair and/or Executive Director. All committee members are subject to the COMTA Statement of Ethical Responsibility agreement and conflict of interest policies. The committee will not include any individuals who were current Commissioners at the time the adverse decision was enacted.

4. The appeal fee is submitted within thirty (30) calendar days of receiving the Commission's decision.
5. The school provides a point-by-point written response to the Commission's decision within thirty (30) calendar days of the notification of the Commission's decision. All submissions must be in electronic format within the online submission area provided by the Commission. Presentation of materials during the hearing will be limited to those materials that were available to the

Commission at the time the decision to deny or withdraw accreditation was made or materials that were submitted with the appellant's point-by-point written response within the thirty (30) days following notification to the institution that accreditation was denied or withdrawn.

5. The Appeal Committee will consider new evidence (that which was not available to the Commission at the time of the adverse action) under the following circumstances only:

- a. If the Commission's decision was made on the basis of issues to which the school did not have adequate opportunity to make its position known;  
*Or*
- b. If relevant, existing facts were not presented to the Commission by the school because of a misunderstanding on the part of the school;  
*Or*
- c. If the only remaining deficiency is related to finances, new information which is significant and bears materially on the deficiency becomes available to the school after the adverse action. In this case, new information will only be allowed once and any determination made based on the new evidence is not subject to further appeal.

The Appeals Committee has access to the complete school file. The Appeals Committee shall set a date to hear the appeal within ninety (90) calendar days of receipt of the written statement from the school.

6. The school may send a representative to the hearing for the purpose of making an oral presentation. Intent to send a representative must be stated in the school's point-by-point written response. Oral presentation will be limited to forty-five (45) minutes total by the school representative and must be limited to the information already submitted in writing within thirty (30) days following the decision notification.
7. The school has the right to the presence of counsel at its own expense. A transcript of the appeal proceedings may also be made at the school's expense. Notification of the presence of counsel and the desire to transcribe the proceedings must be done in the point-by-point written response. If a transcript is made, the school will provide a copy to the Appeals Committee at the school's expense. The Commission will provide a list of court reporters and contact information from which the institution may make arrangements for reporting and transcribing.
8. Following review of written materials and oral arguments, the Appeals Committee shall, by majority vote, decide the outcome of the appeals proceedings. Proceedings of the Appeals Committee shall be closed. The Appeals Committee shall prepare a summary report that outlines the evidence and rationale for the committee's decision. The report shall be provided to the Commission. A brief summary of the appeal decision will be created for public notice and communicated to the institution/program.
9. The Appeals Committee may:
  - a. Uphold the decision of the Commission.
  - b. Amend the decision of the Commission.
  - c. Reverse the decision of the Commission, thereby accrediting or re-accrediting the program. This action may be taken only on the basis of evidence previously submitted to the Commission, and may not be taken on the basis of newly submitted materials.
  - d. Return the matter to the Commission for further action.

In cases where new evidence has been submitted, if the Appeals Committee determines the Commission's decision was incorrect, it shall return the matter to the Commission rather than taking action to accredit on the basis of new information.

**All decisions of the Appeals Committee shall be final.**

**Timeline for the process:**

Day\* Action

*Day: 0*

*Action:* Decision of accreditation denial or revocation is received by school.

*Day: 10*

*Action:* School notification of intention to appeal is received at COMTA office.

- Within ten (10) days of notice of appeal, COMTA Chair sends list of seven (7) Appeal Committee Members.
- Within ten (10) days of receipt of the list, school notifies COMTA Chair of any objections to the list of seven (7).
- Within ten (10) days of receipt of school's review of the list, Chair appoints Appeals Committee.

*Day: 30*

*Action:* School's point-by-point response to the decision is received at the COMTA office. School submits the appeals fee to COMTA. (See Appendix A.3 – Fee Schedule)

- Appeals Committee designates a date and hears the appeal within ninety (90) calendar days of receiving the written point-by-point response from the school.

*\*All references to days shall be assumed to be calendar days.*

## **VI. PUBLICATION OF COMMISSION ACTIONS**

Prior to Commission meetings, all institutions and programs to be considered for accreditation action will be announced to the COMTA mailing list and on the website. Comments from third-parties regarding the schools and programs will be accepted by the Chair of the Commission in writing, either hard-copy at the COMTA office or emailed to [chair@comta.org](mailto:chair@comta.org), until two days prior to the meeting.

Institutions and programs will be notified in writing within thirty (30) days following any decision made by the Commission. Notification of any Commission accreditation action including, but not limited to, the granting, continuation, or the placement on or removal from probation status, will be made in writing within thirty (30) days to the United States Secretary of Education, appropriate state agencies, and the appropriate institutional or programmatic accreditation agencies. This notification requirement will also be effected when a program or institution either voluntarily surrenders COMTA accreditation or allows it to lapse. In cases of probation, denial and revocation of accreditation the agency reports the final action to the USDE and state agencies at the same time as notification of the school. The public is notified within twenty-four (24) hours of the notification of the school by placing the notice on the agency web site.

In the event there is a final decision to deny or revoke accreditation, the Commission will send a written summary of the reasons for that decision together with the comments of the affected program or institution to the United States Secretary of Education, appropriate state agencies, and the appropriate institutional or programmatic accreditation agencies within sixty (60) days. A summary of the action taken and the affected party's response will be available to the public on the agency website.

Once each year a summary report of Commission actions and an updated directory of currently approved schools will be made available to the accredited members of the Commission and sent to the United States Secretary of Education. The Commission will also send the Secretary any proposed changes to the Standards or Policies & Procedures which might affect the scope of recognition for COMTA or the compliance with the criteria for recognition by the Secretary.

## **VII. TITLE IV COMPLIANCE MONITORING**

Institutions participating in Title IV, HEA programs are expected to maintain compliance with all requirements of those programs. The Commission will provide to the U.S. Secretary of Education copies of any requested documents that pertain to an institution's compliance with its Title IV HEA program responsibilities. In addition, if the Commission has reason to believe that an institution is failing to meet its Title IV HEA program responsibilities or is engaged in fraud or abuse, the Secretary will be provided with the name of the institution and the reason for the Commission's concerns.

## VIII. CONFIDENTIALITY

The Commission employs multiple methods to maintain confidentiality of information submitted during the accreditation process. Institutions and programs may redact information on documents submitted to the Commission which would personally identify students or employees of the school beyond that which is necessary to confirm appropriate compliance, such as home addresses or social security numbers, unless specified as a component of the required documentation.

## **RESPONSIBILITIES OF ACCREDITED INSTITUTIONS AND PROGRAMS**

### **I. SUBSTANTIVE CHANGE**

COMTA requires prior notification of all changes that affect the educational and institutional integrity and that may affect the ability of the institution to maintain adherence to the accreditation standards. Substantive changes must be approved by COMTA prior to being included as part of the scope of accreditation granted the institution. Approval of Substantive Changes will not be retroactive. Failure to notify COMTA prior to substantive change may adversely affect the institution's accreditation status.

There is no specific limitation on the number of changes which may be made by an institution within an accreditation cycle. However, if more than two Substantive Changes are requested within the same year, the Commission will review the institution or program to determine if there are indications that the quality of education is not being maintained (data from annual reports, financial statements, high numbers of complaints, etc.) or if a mid-cycle visit is warranted. An institution or program will be subject to a comprehensive review modeled after the renewal of accreditation process when the Substantive Changes within one accreditation cycle include items A (change of control), G (change of leadership), and H (change in name or location).

Substantive changes include the following:

- A. Any change in the legal status, form of control or ownership of the institution.
- B. Changes in the established mission or objectives of the institution and/or program.
- C. Curriculum Change:
  1. Change of courses or programs offered representing a significant departure in either content or method of delivery, from those offered when the Commission last evaluated the institution, including adding Distance Education or changing from linear to modular scheduling of courses.
  2. A substantial change in the number of hours required for successful completion of a program. A substantial change is considered a change of 25% or greater in the number of hours of a specific program.
- D. Establishment of an additional location geographically or the addition of a program within a location that is geographically apart from the main campus at which the institution offers at least 50% of an educational program.
- E. Addition of courses or programs at a degree or credential level different from that which is included in the institution's current accreditation.
- F. A change from clock to credit hour.
- G. Change in leadership of the institution or program such as the CEO, President, Executive Director or Program Director. This refers to a change in the position of authority for making daily management decisions that affect the institution or program. Changes in leadership only apply to such persons as the CEO, President or Executive Director. All other changes must not be submitted to the COMTA office.
- H. Change in the name or location of the institution or program.
- I. Addition of an eligible program. This refers to new programs in massage therapy and bodywork as well as adding a program in another subject area such as aesthetics/esthetics or skin care.
- J. Change of Type of Accreditation (programmatic or institutional)
- K. Acquisition of any other institution or any program or location of another institution.

- L. Addition of a permanent location at a site at which the institution is conducting a teach-out for students of another institution that has ceased operating before all students have completed their program of study.
- M. Entering into a contract under which an institution or organization not certified to participate in the title IV, HEA programs offers more than 25 percent of one or more of the accredited institution's educational programs (applicable only to those with institutional approval from COMTA).

**Procedures:**

Listed below are the notification procedures and Commission processes for addressing each of the thirteen (13) categories of substantive change within an organization or program.

**A. Change in Institutional Control**

Accreditation does not automatically transfer with any change in the legal status or form of effective control of an institution. COMTA must be assured of the continuance of institutional integrity and the maintenance of educational standards if accreditation is to be successfully transferred. In the absence of any specific action by COMTA either to grant provisional accreditation, to transfer accreditation, or to reinstate accreditation any change in the legal status or form of effective control results in the immediate and automatic discontinuation of accreditation.

**Definitions:**

- **Change of Ownership:** refers to the change in power within a proprietary institution. It is defined as, but not limited to, the following situations:
  1. Sale of the institution
  2. Transfer of controlling interest of stock of the institution or its parent corporation
  3. Merger of two or more institutions
  4. Transfer of controlling interest of stock to parent corporation
  5. Division into two or more institutions
  6. Transfer of assets or liabilities of institution to Parent Corporation or owners
  7. Change from profit to non-profit or to collective
- **Change of Control:** refers to change in power within a non-profit institution. It is defined as, but not limited to, the following situations:
  1. Change in fifty percent or more in the Board of Executive Directors voting membership over a twelve (12) month period.
  2. Board of Executive Directors powers of control are nullified by any management agreement
  3. Change from non-profit to profit or collective.
- **Provisional Accreditation:** A continuation of the institution's previous grant of accreditation for a limited period of time during which COMTA evaluates new information which may affect the program's ability to stay in compliance with COMTA standards. Provisional accreditation begins when COMTA receives written notification of an anticipated change in institutional control and ends when the program receives written notification from COMTA of the transfer of accreditation. Provisional accreditation is initially granted by the Commission upon initial notification of the change in institutional control within 30 days. Maintenance of provisional accreditation is contingent upon faithfully following COMTA procedures and the completion of a site visit no later than six (6) months following the change in institutional control.

**Procedure:**

1. Notify COMTA Executive Director in writing at least thirty (30) days prior to a Change in Institutional Control (whether a change of ownership or control) for COMTA to grant Provisional Accreditation.
  - a. Provide a copy of the relevant Board of Executive Directors' meeting(s) minutes which set forth the conditions of the proposed change.

- b. Provide name and address of proposed new controller (owners/Executive Directors/Board members).
2. Within fourteen (14) days after the Change in Institutional Control, submit to COMTA either a "Change of Ownership(Proprietary)" form (Appendix D.4) or a "Change of Control (Non-Profit) form (Appendix D.5)
  - a. Submit the processing fee to COMTA with the appropriate document indicated above. (See Fee Schedule – Appendix A.3)
3. Within forty-five (45) days after the Change in Institutional Control (Proprietary or Non-profit) submit a "Change in Institutional Control – Attachments" form (Appendix D.6).
  - a. The new owner or authorized official must provide evidence of maintaining all the standards and conditions of accreditation. Attendance at a COMTA Accreditation Workshop must be completed within six (6) months of the change of control.
  - b. The institution must submit a report detailing all substantive changes made in the program or institution since the most recent accreditation review and planned for in the subsequent twelve (12) months. In those cases where COMTA accredits a program within a larger institution, this provision shall be limited to those institutional level changes that bear directly upon the capacity of said institution to support the accredited program. Substantive Changes may not be made during the period of provisional accreditation. Transfer of accreditation must be finalized and all proposed changes approved prior to implementation.
  - c. Copies of all legal documents of transfer of ownership or control must be submitted. For non-profit schools, include copies of the Articles of Incorporation and Bylaws. This requirement is waived for public sector institutions.
  - d. Personnel forms (Appendix D.7 & D. 8) on all professional level employees hired after the change in institutional control must be submitted. If a new Executive Director or person with leadership responsibility is hired, the employment agreement (including any agreed upon performance goals), curriculum vitae, and the job description must be submitted.
  - e. Submit copies of curriculum vitae of the new owners or board members.
  - f. School must provide a refund guarantee statement or a financial plan for teaching out the students currently enrolled.
  - g. Current financial status must be reported to the Commission using COMTA forms (Appendix D.15a & 15b) or other forms or documents providing the same information. An external accountant must verify this information.
4. As soon as available, submit proof of state authorization under the new owner.
5. Within six (6) months of the change of institutional control, a site visit will be scheduled for verification that the quality of the educational process is maintained through adherence to the accreditation standards and the policies of COMTA. The cost of the site visit is the responsibility of the institution and is included in the fee for the change.
6. Transfer of Accreditation. When provisional accreditation is granted, the Commission must decide whether to transfer accreditation no later than at the first meeting of the Commission following the on-site visit. If a complaint is filed prior to completion of the transfer of accreditation, the complaint must be resolved prior to completion of the transfer. The transfer of accreditation granted is for the time period remaining on the accreditation awarded at the most recent accreditation awarded the institution.
7. Reinstatement. In cases where failure to meet COMTA notification and other procedures regarding change in institutional control have resulted in the automatic discontinuation of accreditation, the Commission may grant that institution provisional accreditation based upon that institution's good faith efforts to comply with COMTA policies and procedures. The Commission may not waive Transfer of Accreditation for any reason.

#### Limitations and Exclusions

1. For the purposes of determining the locus of institutional control, married couples are viewed as a single entity. Additionally, closely related family groups shall also be viewed as a single entity when it can be established the present and future shareholders actively participate in the management of the institution, or the stock is transferred to a close family member by will or operation of law upon the death of one of the shareholders.

2. Should a change in ownership or control be contingent on the transfer of COMTA accreditation, and should COMTA not approve that transfer, COMTA will not automatically reinstate the accreditation to the previous owner or Board of Executive Directors. COMTA will consider a request for reinstatement based upon the provisions of the COMTA change in institutional control policy.
3. A change in institutional control occurs when there is a change of 50% or more in the Board of Directors of any private or non-profit institution within any twelve (12) month period, irrespective of continuity in the articles of incorporation of that institution. A change in institutional control also occurs through the adoption of any management agreement that has a nullifying effect on the Board's powers of control over the institution.
4. A change in institutional control occurs when, in the absence of a majority owner, there is a transfer of 50% or more of the outstanding stock since the previous accreditation, irrespective of the size of individual holdings.
5. A change in institutional control occurs when there is a dilution of stock that results in a majority owner having 50% or less of the outstanding stock.

**B. Change in the Established Mission or Objectives of the Institution**

1. Notify COMTA in writing of the change and articulate how this change will affect the quality of the educational program and specifically the integrity of the accreditation status of the institution.
2. Include in your notification how this change will affect the strategic planning and direction of your institution.
3. Submit the appropriate fee (See Fee Schedule – Appendix A.3).
4. COMTA will review materials and render decision regarding approval at its next meeting.

**C. Curriculum Change**

Addition of courses or changes to programs that represent a significant departure in either content or method of delivery from those offered when the agency last evaluated the institution, or a substantial increase in the number of hours required for successful completion of a program.

1. Notify COMTA in writing of the proposed changes and their relationship to the program elements in place as part of the most recent accreditation evaluation.
2. Specify how these courses, programs and/or hours relate to the institutions mission and objectives.
3. Specify any changes to method of delivery and how the criteria for Standards 2.4 and 2.5.2 will be met by the new methods.
4. If the changes affect the Competency Chart, complete an updated chart and submit revised syllabi for all courses in the program.
5. Identify the instructional staff hired to meet the additional requirements and submit the COMTA Instructional Staff forms for each instructor (Appendix D.7) and the job description for each proposed instructor specifically identifying the qualifications and expectations of each position.
6. Identify the process the institution used in determining the need for this expansion of programming, courses and/or hours.
7. To add a distance education course, you must comply with all of the procedures detailed above, in addition to an abbreviated SSR to comply with Standard 2.9, application form D.18 and its corresponding exhibits.
8. Submit the appropriate fee (See Fee Schedule, Appendix A.3).
9. COMTA will render an approval decision based on the information provided at its next meeting.

**D. Additional Campuses (Branch or Auxiliary Classroom)**

Additional campus locations may be opened under specific conditions and procedures outlined in this section. COMTA's primary concern is the capability of the institution to demonstrate the planning, financial, and administrative resources necessary for ensuring continuing compliance with the COMTA standards and policies. An institution applying for the addition of a branch, auxiliary classroom or program

within the additional location must be prepared to administer all aspects of the operation as a fully accredited extension of the main campus or program at the main campus effective the first day of approval. The failure of a branch or auxiliary classroom to be in full compliance is a direct reflection on the main campus and will call into question the accreditation status of the institution. An auxiliary classroom must be located within reasonable and customary distance of the main campus or branch it supports, and it must provide evidence of the distance being reasonable and customary for the school's geographic location.

1. The COMTA approved institution may not advertise, enroll or teach at the proposed branch prior to written COMTA interim approval.
2. The proposed branch may be a start-up at a new location or the acquisition of a separate institution.
3. After receiving initial accreditation by COMTA, institutions may not apply to add a new branch or auxiliary classroom until one (1) year from the grant of initial accreditation.
4. After a change in institutional control, institutions may not apply to add a new branch or auxiliary classroom until one (1) year from the change in institutional control and until the transfer of accreditation has been approved by COMTA.
5. Institutions involved in the reaccreditation process may not submit request for approval of additional external locations following the due date of the Self Study Report and prior to a final Commission decision on the institution as represented in the SSR. Exception may be made by a vote of the Commission.
6. An institution under any restrictive or adverse action by the Accrediting Commission, including deferral, denial, probation, or withdrawal may not apply for additional locations unless prior permission from COMTA is received.
7. An institution whose current grant of accreditation is three (3) years or more may make application to establish a maximum of one (1) branch and three (3) auxiliary classrooms in any given twelve (12) month period. Exception may be made by a vote of the Commission.

*Process:*

1. Notify COMTA in writing of the intent to open a branch campus or auxiliary classroom prior to initiating classes.
2. Complete the Branch Campus Application (Appendix D.9) or Auxiliary Classroom Application (Appendix D.10); submit fee (Appendix A.3) and supplemental information and documentation.
3. COMTA will review documentation and provide interim approval. Interim approval must be granted prior to the beginning of classes.
4. The institution will be required to submit a Self-Study Report for the branch or auxiliary classroom location where at least 50% of the program is being offered, within three (3) months from the start of classes at the new site. A due date will be provided when the Commission notifies the school of interim approval status. The report should address any areas applicable, with the understanding that some Standards will not be evidenced yet due to the lack of history at the location.
5. An on-site visit of one (1) or two (2) days and one (1) or two (2) persons will be conducted within six (6) months of the start of classes of the branch or auxiliary classroom or program within the new location, offering at least 50% of a program. The institution and the Commission will receive a copy of the team report and the institution will have an opportunity to respond to the report. The Commission will review the team report and the institution's response to the team report at its next regularly scheduled meeting and make a final decision regarding the approval of the new site. The length of accreditation will coincide with the current term of accreditation of the main campus.
6. The Chair and/or designee will review and make determination regarding institutions requesting approval of an auxiliary classroom that provides less than 50% of the program offered at the main campus.

**E. Credential Change**

Addition of courses or programs at a degree or credential level different than that which is included in the institution's current accreditation. This is a two step process with permission required prior to offering the degree program, and follow-up verification after a specified amount of time has passed.

Step 1:

1. Notify COMTA in writing of the proposed change and the evidence the institution has the recognition of the appropriate jurisdictional authority to administer the program and provide the credential proposed.
2. Submit the appropriate fee (See Fee Schedule, Appendix A.3).
3. All documents should be sent electronically. Upon receipt of the appropriate fee and notification of the institution's intent to add a program, an area for submission of further documentation will be made available in the online submission system (EDvera).
4. Outline in writing how this change will impact on the other program(s) within the institution that is part of the current original accreditation action.
5. An institution under any restrictive or adverse action by the Accrediting Commission, including deferral, denial, probation, show cause, or withdrawal, may not apply for credential change unless prior permission from COMTA has been received.
6. Submit Appendix D.17 with all supporting documents
7. COMTA will render a decision regarding interim approval based on information at its next scheduled meeting.

Step 2:

After the degree program has been in operation for at least six (6) months and no longer than twelve (12) months, compliance with the COMTA Standards must be verified.

1. All documents should be sent electronically. Upon receipt of the appropriate fee and notification of the institution's intent to add a program, an area for submission of further documentation will be made available in the online submission system (EDvera).
2. Complete a Self-Study Report with all answers and exhibits focused on the program being considered for accreditation,
3. A Peer Review and On-site Visit will be conducted to verify compliance with the Standards and in particular the presence of a library appropriate for degree level instruction. A report from the visit will be provided to the school for response.
4. The program SSR, report from On-site Visit and response from the school will be evaluated by the Commission at the next regular meeting.

#### **F. Change from clock to credit hour**

1. Provide the conversion used for both lecture and lab and externship courses.
2. Submit the appropriate fee (See Fee Schedule, Appendix A.3).
3. COMTA will render a decision regarding approval based on information provided at its next scheduled meeting.

#### **G. Leadership change**

A change in leadership of the institution or program such as the CEO, President or Executive Director. This refers to a change in the position of authority for making daily management decisions that affect the institution or program. **Changes in leadership only apply to such persons as the CEO, President or Executive Director. Other changes must not be submitted to the COMTA office except for the purpose of updating our records for who to contact at the institution.**

1. Notify COMTA in writing within forty-five (45) days after the change by submitting a copy of the curriculum vitae of the new leader. Include an employment contract with any agreed upon goals. Also submit Appendix D.8 and a current job description.
2. COMTA Executive Director or Chair will acknowledge receipt of notification and report change to the Commission at its next scheduled meeting.

#### **H. Change in name or location of the institution**

1. For a name change - provide the legal documentation of the change including copies of the changes reflected in the by-laws of the corporation or similar documents.
2. For a change of location - notify COMTA prior to the move and include a clearly detailed floor plan drawing outlining the location of classrooms, administrative offices, library, etc. Also include the lease once executed and jurisdictional approval for the use of the space. COMTA is concerned the space is appropriate to support the ongoing adherence to the standards and maintaining the quality of education within the facility. A limited site visit is required within six (6) months of the start of classes at the new location. Applies to all changes in location including main campus, branches and auxiliary classrooms.
3. Submit the appropriate fee (See Fee Schedule, Appendix A.3).
4. COMTA will render a decision regarding approval based on information provided at its next scheduled meeting.

#### **I. Addition of an eligible program**

Addition of programs that are distinct from those offered when the agency last evaluated the institution, or a program in a new subject area not previously evaluated by the agency. This refers to any program that an institution intends to include in institutional approval for Title IV funding after receiving COMTA accreditation, unless the program is a degree (see guideline E for Credential Change). This is a two step process with permission required prior to offering the program, and follow-up verification after a specified amount of time has passed.

##### **Step 1:**

1. Notify COMTA in writing of the proposed programs and their relationship to the institutional/program elements in place as part of the most recent accreditation evaluation.
2. Submit the appropriate fee (See Fee Schedule, Appendix A.3).
3. All documents should be sent electronically. Upon receipt of the appropriate fee and notification of the institution's intent to add a program, an area for submission of further documentation will be made available in the online submission system (EDvera).
4. Submit Appendix D.19 with all supporting documents.
5. COMTA will render an interim approval decision based on the information provided at their next meeting.

##### **Step 2:**

After the new/additional program has been in operation for at least six (6) months and no longer than twelve (12) months, compliance with the COMTA Standards must be verified.

1. All documents should be sent electronically. Upon receipt of the appropriate fee and notification of the institution's intent to add a program, an area for submission of further documentation will be made available in the online submission system (EDvera).
2. Complete a Self-Study Report with all answers and exhibits focused on the program being considered for accreditation,
3. A Peer Review and On-site Visit will be conducted if the program is in a new subject area (such as aesthetics/skin care at a school where massage has been approved previously). A report from the visit will be provided to the school for response. In cases when a visit is not applicable, a summary report will be created based on the documentation provided in the SSR.
4. The program SSR, summary or report from On-site Visit and response from the school will be evaluated by the Commission at the next regular meeting.

#### **J. Change of Type of Accreditation**

From Institutional to Programmatic:

1. Notify COMTA in writing of the change.
2. Submit the appropriate fee (See Fee Schedule – Appendix A.3).
3. Submit (1) a copy of the approval from the new institutional accrediting agency, (2) evidence that the USDE has approved the change on the ECAR, and (3) an updated catalog showing COMTA properly designated as programmatic approval.
4. COMTA will review materials and render a decision regarding approval at its next meeting.

From Programmatic to Institutional:

1. Notify COMTA in writing of the change.
2. Submit the appropriate fee (See Fee Schedule – Appendix A.3).
3. All documents should be sent electronically. Upon receipt of the appropriate fee and notification of the institution's intent to change to institutional accreditation, an area for submission of further documentation will be made available in the online submission system (EDvera).
4. Complete an abbreviated Self-Study Report which addresses the areas of the Standards pertaining to institutions versus programs. For most schools this will be focused on Standards 5, 6, 7, 8 and 9, (A small number of schools will not need to complete this SSR as they were already evaluated on all the Standards as they apply to institutions. Consult with COMTA staff to determine if this applies for a particular program.)
5. A limited Peer Review and On-site Visit will be conducted to verify management, financial and administrative capacity. A report from the visit will be provided to the school for response.
6. The program SSR, report from On-site Visit and response from the school will be evaluated by the Commission at the next regular meeting.

#### **K. Acquisition of other institution or program**

The acquisition of any other institution or any program or location of another institution is subject to approval by COMTA prior to being considered part of the grant of accreditation. If the institution to be acquired is already accredited by COMTA, follow the procedures for Change in Institutional Control above. For acquisition of a location which will be considered a branch of an existing COMTA accredited main campus, follow the procedure for adding a branch campus. If the acquired institution will be an independent main campus, the initial accreditation process must be followed.

#### **L. Addition of teach-out location**

The addition of a permanent location at a site at which the institution is conducting a teach-out for students of another institution that has ceased operating before all students have completed their program of study. Only students included in the teach-out may attend this location prior to COMTA interim approval as a branch. Advertising and new enrollment for the branch may not commence until interim approval has been granted. The procedure for adding a branch location applies, with the following additional requirement:

1. Submit the agreement with the closing institution detailing the expected time required to complete the teach-out of existing students. Explain how this timeline relates to the intended start date for this location to be considered a branch of the COMTA approved school.

#### **M. Contract with non Title IV entity**

This applies only to those institutions which use approval from COMTA for title IV eligibility entering into a contract under which an institution or organization not certified to participate in the title IV, HEA programs offers more than 25 percent of one or more of the accredited institution's educational programs. Students may not receive Title IV funding for courses delivered by entities not certified to participate, even if the curriculum is approved at the institutional level.

1. Proposed contract must be submitted to COMTA prior to being finalized. A letter of explanation which details what aspect of the program will be delivered by the external entity should be included.
2. Submit the appropriate fee (See Fee Schedule – Appendix A.3).
3. The Executive Director and/or Chair will review the contract and determine if further documentation is required. A decision of approval will be made by the Commission at the next regularly scheduled meeting of the Commission. The contract may only be finalized following approval.

## **II. ANNUAL REPORT**

An annual report from accredited institutions and programs is required to report completion, placement and licensure data, financial stability and continued compliance with all Standards for Accreditation. Sufficient notice will be given regarding deadlines and submission dates. Within sixty (60) days of the reporting deadline, a letter will be sent with the acceptance or non-acceptance of the report or what clarification will be needed in order to determine this action. All annual reports are due within six (6) months following the end of the institution's fiscal year (See Appendices D.11, D.12 and D.12a), along with the applicable financial reports.

For institutions, financial reports are due within six (6) months of the close of the fiscal year. Financial reports include the audited or reviewed balance sheet and income statement for the completed fiscal year. Please see Appendices D.11 and D.15a (Guidelines for Filing Financial Reports) for additional information. For programs within institutions accredited by another USDE recognized agency, submit financial statements prepared in accordance with the requirements of the institutional accrediting agency or a budget for the program under COMTA approval.

Annual Reports also require data regarding changes in institutional revenue and number of students enrolled during the year. Increases or decreases in either value of more than 20% from the year prior will be evaluated for further monitoring. If the program/institution is approved for Distance Education, any change of greater than 50% will be reported to the USDE immediately.

**Annual sustaining fees are also due for all programs and institutions on March 1 of each year. (See Fee Schedule, Appendix A.3 - newly Accredited schools/programs will pay a prorated sustaining fee.)**

### **III. ADVERTISING**

Any and only education programs (or institutions) accredited by COMTA shall use the following statement and/or logo (which can be provided as an electronic file at the accredited school/program's request) in advertising and promotional materials to identify their accreditation status with COMTA:

"Program [or institution] accredited by the Commission on Massage Therapy Accreditation (COMTA)".



These materials will be clear and comprehensive.

1. If an institution includes both accredited and non-accredited programs, all advertising and promotional materials must clearly reflect this distinction.
2. This policy defines promotional material as including printed, broadcast, film and video and electronic media.
3. When referencing their accreditation, schools must include the full name, address and phone number for COMTA in their catalog.
4. Schools must comply with COMTA's Accreditation Standards relating to advertising (See Standard 5.3).

If any accredited or non-accredited entity is found to be advertising incorrect or misleading information about their accreditation status, the contents of reports from on-site visits, or COMTA actions related to their accreditation status, the Commission will require the institution or program to publicly correct the information. From the point at which the inaccurate information is discovered until the issue is resolved, COMTA will post public notification of the issue on the COMTA website.

### **IV. CATALOG REQUIREMENTS**

Prior to selecting a school or program, potential students are entitled to detailed information about the educational experience being offered. The catalog of a COMTA accredited institution will present an accurate description of the massage therapy or aesthetics/skin care field and the education offered. The school catalog must be provided to students prior to the signing of an enrollment agreement. The school catalog must include the items listed on the Catalog Requirements Checklist (Appendix D.3). If the current catalog does not include all items, those excluded must be attached as catalog supplements. Massage therapy or aesthetics/skin care programs in larger institutions may not be able to publish all the required information in the catalog of the institution. Brochures and other program-specific publications may be used to make sure prospective students have all the required information.

## **V. ACTIONS OF OTHER ACCREDITING COMMISSIONS OR STATE LICENSURE STATUS**

An accredited program or institution must notify COMTA in writing within thirty (30) days of any denial, suspension, revocation, probation or any other final or interim adverse action affecting the accreditation status of the institution or program. An accredited program must notify COMTA in writing within thirty (30) days of any state agency attempting to withdraw authorization or licensure of the program or institution. Failure to comply shall be grounds for probation, revocation or conditioning of its grant of accreditation.

A new applicant who has a pending or final adverse action by a State agency or other USDE recognized accrediting agency may not be eligible for accreditation with COMTA. All applicants must be legally authorized to operate in their State. In cases when the State has taken adverse action, COMTA accreditation will not be granted. If the applicant is seeking programmatic approval from COMTA and the adverse action is with the primary institutional accrediting agency, the program cannot be accredited. If the applicant is seeking institutional accreditation and can demonstrate full compliance with the COMTA Standards more currently than the information upon which the adverse action was taken, the Commission may consider granting accreditation. Upon grant of accreditation, the Commission will notify the USDE within 30 days regarding the decision, including the explanation for why the Commission acted differently than the other recognized body.

## **VI. ON-SITE PEER REVIEW PROCESS**

An institution or program engaging in an on-site visit evaluation has voluntarily invited a group of peers to provide an assessment based on a visit to the school with representatives of staff, faculty, students, graduates and employers of graduates. The effectiveness of the review depends on the openness and preparedness of the school in responding to the areas of the accreditation standards the on-site evaluation team members are expected to verify as part of the visit. The details related to preparation and the qualifications of the evaluators are outlined in Appendix E. Site visits may be scheduled visits for accreditation, renewal of accreditation or unannounced special visits.

## **VII. COMPLAINT PROCESS**

For complaints brought against institutions recognized or offering programs recognized by the Commission on Massage Therapy Accreditation, or against the Commission, its staff or its volunteers, the process is as follows:

1. Jurisdiction
  - A. COMTA has jurisdiction over those complaints directly related to COMTA standards, policies, and procedures.
  - B. This jurisdiction shall be interpreted in a manner consistent with U.S. Department of Education Criteria for Recognition. Institutions/programs are expected to make complaint forms available upon request (Appendix D.13).
  - C. Parties initiating a complaint will be expected to have exhausted remedies available at their institution.
2. Purpose
  - A. To provide a means for COMTA to ascertain whether a recognized institution or program remains in compliance with COMTA standards, policies, and procedures, and to take

appropriate action under COMTA policies. Within that context, the complaint process serves the purposes stated below.

- B. To provide a forum for the aggrieved party and for the responding program to clarify what occurred and reach a mutually agreed upon resolution.
- C. To provide a process by which all parties concerned will have an opportunity to present information regarding the complaint.
- D. To allow thoughtful consideration of all information submitted.
- E. To investigate all aspects of what occurred, and based upon information gathered, to develop a recommendation to the Commission, the aggrieved party, and the responding school for resolution of the complaint.
- F. To provide a hearing procedure if a mutually agreed upon resolution is not reached. (Complaint Procedure: Appendix A.1 and the Complaint Form: Appendix D.13.)

## VIII. TEACH-OUT POLICY

### **Rationale:**

Institutions and programs seek to ensure that students are afforded every opportunity to successfully complete their training, whether it is with another institution that has agreed to teach those students, by the institution itself, or through refunds paid to students so that they may continue their education elsewhere. Therefore, COMTA will work with the U.S. Department of Education (USDE) and the appropriate state and accrediting agencies, to the extent feasible, to make sure that students are given reasonable opportunities to complete their education without additional charge.

A school which intends to close or which, in the Commission's judgment, lacks sufficient financial resources for the proper operation of the school or program and discharge of obligations to students may be required to submit a comprehensive teach-out plan. A Teach-Out Plan would include the intended procedure to follow in the event of dissolution of the school including a proposed Teach-Out Agreement.

According to the Higher Education Act, situations which would automatically require the submission of a teach-out plan include (USDE Regulations 602.24):

1. The Secretary of Education notifies the Commission that the Secretary has initiated an emergency action against an institution, in accordance with section 487(c)(1)(G) of the HEA, or an action to limit, suspend, or terminate an institution participating in any title IV, HEA program, in accordance with section 487(c)(1)(F) of the HEA, and that a teach-out plan is required.
2. The Commission acts to withdraw, terminate, or suspend the accreditation of the institution.
3. The institution notifies the Commission that it intends to cease operations entirely or close a location that provides one hundred percent of at least one program.
4. A State licensing or authorizing agency notifies the agency that an institution's license or legal authorization to provide an educational program has been or will be revoked.

### **Definitions:**

Teach-out Plan: A plan which details the timing and process for closing of the COMTA-accredited institution or program. It does not necessitate the institution make public this plan or arrive at a formal agreement with another institution. It is meant to assure COMTA that the institution has a plan for the appropriate teach out of its students, should it be necessary. See Appendix D.20 for required approval form and minimum requirements.

Teach-out Agreement: A teach-out agreement is a legally binding contract between an institution or program that may terminate and another institution that provides for the education of students enrolled by the former. In its discretion, COMTA may direct an institution or program to provide a teach-out agreement as part of its submitted teach-out plan. An institution that enters into a teach-out agreement

with any other institution, either on its own or at the discretion or request of COMTA or any other agency or authority, must submit that teach-out agreement to COMTA for approval. See Appendix D.21 for required approval form and minimum requirements.

### **Teach-out Plan**

Overall a teach-out plan must address and/or provide: (a) the institution's plan to teach out its own students; (b) an executed teach-out agreement with one or more institutions located in reasonable geographic proximity which currently offer programs similar to those offered at the closing institution and have agreed to conduct the teach-out; or (c) a description of how the tuition recovery fund or other means will be used to make student refunds.

#### Teach-out Plan Minimum Requirements:

1. The date of last classes scheduled and date of site or program closure.
2. A listing of all students enrolled, including name and their estimated graduation dates, as well as their standing in their programs of study (credits earned) and any financial responsibilities (unearned tuition, refunds due or additional charges pending if tuition is not paid in full).
3. A description of how the tuition recovery fund (if applicable) or other means will be used to make student refunds (if applicable).
4. An explanation accompanied by appropriate supporting documentation and timelines of how the school would notify students in the event of closure, including notification of the students' rights and opportunities for teach-out, transfer and refunds.
5. A demonstration and description of how the delivery of training to students will not be materially disrupted and that obligations to students will be timely met. (This may or may not involve a Teach-Out Agreement with another institution.)
6. If applicable, the name of the proposed teach-out institution. If more than one institution will be utilized for different programs, please list information for all. Submit a *Teach Out Agreement Approval Form* (Appendix D.21) for each agreement.
  - a. If a self teach-out is proposed, please note.
7. If applicable, a brief statement of proposed teach-out institution's history and description of its current operations, including its faculty, facilities, equipment, and mission statement; and, other materials to evidence that the institution is stable, carries out its mission, meets all obligations to existing students, and is able to provide the necessary experience, resources and support services. Submit the official Agreement and the *Teach-Out Agreement Approval Form* (Appendix D.21).
  - a. If self teach-out is proposed, detail how stability and obligations to students will be maintained.
8. A detailed listing of additional charges, if any, which would be charged to students to perform the teach-out and how students will be informed of the charges.
9. In the event of school closure, a description of how all student records, including educational, billing, accounting and financial aid records, will be maintained or disposed of in an accessible location and in accordance with applicable legal requirements.

#### **Teach-out Agreements:**

If a COMTA-accredited school enters into a Teach-Out Agreement with another school (either as the closing school or the teach-out school), or if required by the Commission to submit a proposed Teach-Out Agreement as part of a Teach-Out Plan, the Agreement must be approved by the Commission **prior** to implementation.

As dictated by the USDE, COMTA will approve the teach-out agreement only if the agreement is between institutions that are accredited or preaccredited by a recognized accrediting agency, is consistent with applicable standards and regulations, and provides for the equitable treatment of students by ensuring that:

1. The teach-out institution has the necessary experience, resources, and support services to:
  - a. Provide an educational program that is of acceptable quality and reasonably similar in content, structure, and scheduling to that provided by the institution that is ceasing operations either entirely or at one of its locations; and
  - b. Remain stable, carry out its mission, and meet all obligations to existing students; and
2. The teach-out institution demonstrates that it can provide students access to the program and services without requiring them to move or travel substantial distances and that it will provide students with information about additional charges, if any.

#### Teach-out Agreement Minimum Requirements

In addition to the previous USDE requirements, the following criteria will be considered in approving the Teach-out Agreement. *Appendix D.21 Teach-Out Agreement Approval Form* must be submitted with each Agreement.

1. Evidence to show that the teach-out institution is accredited in good standing by an accrediting agency recognized by the U.S. Department of Education.
2. Evidence to show that the teach-out institution is appropriately licensed and in good standing with any applicable state or federal regulatory oversight agency.
3. The Teach-Out Agreement must stipulate how the teach-out school will provide for the equitable treatment of students.
4. The Teach-Out Agreement must stipulate that the teach-out school has the necessary experience, resources, and support services to meet the requirements herein and has the capacity to remain stable, carry out its mission, and meet all obligations to existing students. Submit supporting documentation as evidence, including:
  - a. A schedule of time allocation between the administration of the teach-out students' and existing students' education; and
  - b. A budget of projected income and expenses for the entire period of the teach-out, as determined by the last date of graduation, that shows income and expenses required for the proper operation of the teach-out.
5. The Teach-Out Agreement must stipulate that the teach-out school will provide an educational program that is of acceptable quality and reasonably similar in content, structure, and scheduling to that provided by the institution that is ceasing operations whether entirely or at one of its locations. Submit supporting documentation as evidence, including:
  - a. A list of all programs at the closing school and all programs offered at the teach-out institution in a side-by-side comparison;
  - b. A list of any staff or faculty being hired or retained temporarily for the purposes of the teach-out, the programs and courses taught by each, and information showing that each faculty member meets COMTA faculty qualification requirements; and
  - c. An explanation as to how the proposed teach-out institution would be capable of conducting a teach-out of the programs.
6. The Teach-Out Agreement must show that the teach-out school has the capacity to provide all students with all of the instruction and services for which the students originally contracted and paid but did not receive due to the closure of the school without requiring them to move or travel substantial distances. Submit supporting documentation as evidence, including:
  - a. A description of the location and type of facility where the student will be taught out, as well as any arrangements for the absorption or addition of sites;
  - b. An explanation as to the adequacy of the teach-out location's facilities and equipment and how it complies with COMTA Standard 4.0; and

- c. A map detailing the distance between the closing school and the teach-out institution.
7. The Teach-Out Agreement must stipulate that the students will not be incurring additional charges to complete their originally contracted program, and any changes to their original program must be made through the execution of a new enrollment agreement.
8. The Teach-Out Agreement must include the maximum number of students that can be accepted from the closing school and their expected date of completion.
9. The Teach-Out Agreement includes description of the financial responsibilities of all parties, including the assumption of any liability.
10. The Teach-Out Agreement must state whether, upon completion of the program, the student will receive a degree, diploma or certificate from the teach-out school, or whether the degree, diploma or certificate will be awarded by the closing school.
11. The Teach-Out Agreement must indicate whether students who had already enrolled but who had not yet started their course of study at the closing school, and whether students who are on leave of absence from the closing school, would be entitled to begin training or re-enroll at the teach-out school.
12. The agreement states that the closing institution will provide the teach-out institution with copies of the following records for the students being taught out: (a) Enrollment Agreements; (b) Financial Aid Transcripts; (c) Attendance Records; (d) Academic Transcripts; (e) Student Registration List; and (f) Student Account Records.
13. The Teach-Out Agreement must provide for placement services to students who complete their courses of study.
14. The Teach-Out Agreement must require that the teach-out school shall separately maintain records and document performance under accrediting standards for the students being taught-out.
15. The Teach-Out Agreement must provide for appropriate notification to the Commission and federal and state authorities.
16. The Teach-Out Agreement must comply with applicable federal and state law.

### **Review and Approval Process**

The Teach-Out Plan and/or Agreement will be reviewed and approved by the Executive Committee within 10 days of receipt. The Executive Committee will use Appendix D.20 Teach Out Plan Approval Form and Appendix D.21 Teach Out Agreement Approval Form, if applicable, as its criteria for review and approval.

The full Commission will be notified of the approval at its next regular meeting. If the Plan includes a Teach-Out Agreement with an institution accredited by another agency, notification of the approval will be sent from COMTA to the other agency.

### **Closure without a Teach-Out Plan or Agreement**

In the event that a school closes without a Teach-Out Plan or Agreement, COMTA will work with the U.S. Department of Education and the appropriate state agency to assist students in finding reasonable opportunities to complete their education without additional charge.

Owners and/or senior administrators who fail to comply with these regulations and provide an adequate teach-out plan/agreement to minimize the risk and hardships to its students may be subject to a review by the Commission for consideration of notification to financial aid authorities and/or may be subject to legal action by the state within which the institution was licensed.

COMTA-accredited institutions that enter into Teach-Out Agreements as a teach-out school with a closing school *without* prior approval by the Commission will be subject to disciplinary action, including but not limited to Probation or Revocation of Accreditation.