

# ACAHM Accreditation Commission for Acupuncture and Herbal Medicine

<b>Policy Title:</b>	Distance Education Policy
<b>Approved By:</b>	ACAHM Commission
<b>Document History:</b>	Implementation Date: 17 October 2015  Last Updated: 29 September 2023
<b>Related Commission Policies:</b>	<a href="#">Notification of Change Policy</a> ; <a href="#">Fees and Dues Schedule</a> ; <a href="#">Glossary</a> ; <a href="#">Accreditation Procedures</a> ; <a href="#">Standards and Criteria for Accreditation</a>
<b>References:</b>	<a href="#">34 CFR (Code of Federal Regulation) Part 602</a> ; <a href="#">20 U.S. Code § 1099(b)</a> ; <a href="#">Dear Colleague Letter GEN-0617</a> ; <a href="#">Distance Education COVID-19 flexibilities: March 5, 2020, Electronic Announcement, December 11, 2020, Federal Register Notice, January 15, 2021 Electronic Announcement</a> ; <a href="#">Announcement on Recision of Dear Colleague Letter GEN-06-11</a> ; <a href="#">Distance Education and Innovation Final Rule</a> ; <a href="#">2020 FSA Conference – Regulatory Update Distance Education and Innovation</a> ; <a href="#">Department of Education Guidance on Accreditation and Eligibility Requirements for Distance Education</a> ; <a href="#">Accreditation and Eligibility Requirements for Distance Education (GEN-23-09)</a>
<b>Responsible Official:</b>	ACAHM Executive Director

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**Policy Summary:** This policy outlines the Accreditation Commission for Acupuncture and Herbal Medicine’s (ACAHM or Commission) requirements to offer distance education and deliver any portion of an ACAHM-accredited/pre-accredited program curriculum digitally.

## 1. AUTHORITY

A “*Dear Colleague Letter*” ([GEN-06-17](#)), published September 2006, interpreted the U.S. Department of Education’s (USDE or Department) regulatory requirements to establish a 50 percent threshold for accreditor approval of distance education. Under that interpretation, if an institution did not offer more than 50 percent of an educational program via distance education, distance education was not required to be evaluated or approved by an accrediting agency.

On 5 March 2020, the Department’s Office of Postsecondary Education published “[Guidance for interruptions of study related to Coronavirus \(COVID-19\)](#)” that provided broad approval to institutions to use online technologies to accommodate students on a temporary basis without going through the Department’s regular distance education approval process.

On 17 March 2020, the Department’s Office of Postsecondary Education posted further guidance titled [“Information for Accrediting Agencies Regarding Temporary Flexibilities Provided to Coronavirus Impacted Institutions or Accrediting Agencies.”](#)

On 2 September 2020, the Department’s Office of Postsecondary Education published its renegotiated [Federal Distance Education and Innovation Rules](#) that became effective July 1, 2021.

On 19 January 2021, the Department provided additional guidance on accreditation and eligibility requirements for distance education in its electronic announcement titled *Guidance on Accreditation and Eligibility Requirements for Distance Education* ([EA ID: OPE-21-06](#)). In that guidance, the Department stated that Dear Colleague Letter [GEN-06-17](#) had been rescinded, and that **before an institution offers courses or any portion of a distance education program that can be eligible for Title IV, the institution must be evaluated and accredited for its effective delivery of distance education by a recognized agency that has distance education within its scope of recognition. (Emphasis added)**

To accommodate the Department’s numerous regulatory changes the Accreditation Commission for Acupuncture and Herbal Medicine (ACAHM or Commission) added distance education within the scope of its accreditation authority, and revised its [Distance Education Policy](#) and its 1.15 substantive change policy and procedures. Most notably the 50 percent threshold previously used to determine the need for accreditor approval of distance education was removed.

On 30 January 2023, the White House announced that the COVID-19 national and public health emergencies will end on **11 May 2023**. Accordingly, ACAHM-accredited programs and institutions must receive the Commission’s 1.15 substantive change approval to offer accredited distance education **within six (6) months of 11 May 2023 (or by 11 November 2023)** if they wish to continue offering courses or any portion of an ACAHM-accredited program via distance education.

On **18 May 2023** the US Department of Education issued a [“Dear Colleague Letter”](#) establishing **7 October 2023** as the end date for waivers and flexibilities in Federal regulations, rules and policies relating to higher education, including distance education flexibilities. Based on this guidance ACAHM-accredited programs and institutions must receive 1.15 initial substantive change for distance education by 7 October 2023 if they wish to continue offering courses or any portion of an ACAHM-accredited program via distance education beyond that date.

## **EDUCATION RELATED DEFINITIONS<sup>1</sup>**

**INSTRUCTIONS.** Institutions and programs should refer to these definitions when communicating with ACAHM, and especially when completing ACAHM’s 1.15 Substantive Change Application.

**Asynchronous Learning:** Students participate in digital learning activities at different times. Asynchronous learning requires students to complete the course requirements according to published course expectations and deadlines, and engage in learning activities independently, without real time instructor-led interaction, and in different physical locations from the instructors and students. Course activities and assignments typically facilitate asynchronous engagement with other students. Instructors provide substantive formative and summative feedback at regular intervals within the defined academic term to promote development that aligns with the published course expectations and deadlines.

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<sup>1</sup> The Commission’s official definitions are contained in [ACAHM’s Glossary](#) and are repeated here to assist readers..

**Correspondence Delivery:** Course delivery that typically involves 100% asynchronous learning with no formative, substantive feedback at regular intervals, and no real-time interaction or engagement between the instructor and student unless initiated by the student. The student completes learning activities in different physical locations from the instructor and all participants. Course activities and assignments do not facilitate engagement with other students. The student typically completes the learning activities independently and then submits the work for grading and feedback. **ACAHM DOES NOT ACCREDIT CORRESPONDENCE PROGRAMS OR PROGRAMS THAT INCLUDE CORRESPONDENCE COURSES.**

**Digital Communication Platform:** A software or web-based product that supports the use of audio and video technology (both hardware and software) to create a synchronous digital meeting space between two or more people in different physical locations. Participants can see and hear each other through this technology.

**Digital Curriculum (Course) Delivery:** A program delivers, collects, evaluates and/or stores any portion of their curriculum and learning activities using software and/or tele-communications tools. These tools are also used to facilitate regular and substantive interaction or engagement among students and between students and instructor(s). (Emphasis added)

**Distance Education:** Education that uses one or more of the technologies listed in paragraphs (1)(i) through (1)(iv) of this definition to deliver instruction to students who are separated from the instructor or instructors, and to support regular and substantive interaction between the students and the instructor or instructors, either synchronously or asynchronously.

(1) The technologies that may be used to offer distance education include:

- (i) The internet;
- (ii) One-way and two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite, or wireless communications devices;
- (iii) Audio conferencing; or
- (iv) Other media used in a course in conjunction with any of the technologies listed in paragraphs (1)(i) through (1)(iii) of this definition.

(2) For purposes of this definition, an instructor is an individual responsible for delivering course content and who meets the qualifications for instruction established by the institution's accrediting agency.

(3) For purposes of this definition, substantive interaction is engaging students in teaching, learning, and assessment, consistent with the content under discussion and includes at least two of the following:

- (i) Providing direct instruction;
- (ii) Assessing or providing feedback on a student's coursework;
- (iii) Providing information or responding to questions about the content of a course or competency;
- (iv) Facilitating a group discussion regarding the content of a course or competency; or
- (v) Other instructional activities approved by the institution's or program's accrediting agency.

(4) An institution ensures regular interaction between a student and an instructor or instructors by, prior to the student's completion of a course or competency:

- (i) Providing the opportunity for substantive interactions with the student on a predictable and regular basis commensurate with the length of time and the amount of content in the course or competency; and
- (ii) Monitoring the student's academic engagement and success and ensuring that an instructor is responsible for promptly and proactively engaging in substantive interaction with the student when needed based on such monitoring, or upon request by the student.

ACAHM considers a program "distance education" **if any portion of the program includes a distance education course or course(s).**

**Learning Management System (LMS):** A software application designed with the intentional purpose to plan, execute a learning process, and assess student learning outcomes. The software application allows for curriculum delivery and learning activity collection, evaluation and storage. The LMS allows for regular and substantive interaction engagement among students and between students and instructor(s).

**Regular Interaction:** A program ensures a recurring pattern of interaction between a student and instructor(s) throughout the course by:

- (1) Providing the opportunity for substantive interactions with the student on a predictable and consistent basis commensurate with course requirements according to published course expectations and deadlines; and
- (2) Monitoring the student's academic engagement and success, and promptly and proactively engaging in substantive interaction with the student.

**Substantive Interaction:** An instructor engages students in all learning activities such as:

- (1) Providing direct instruction;
- (2) Assessing or providing feedback on a student's coursework;
- (3) Providing information or responding to questions about the content of a course or competency;
- (4) Facilitating student interaction regarding the content of a course or competency; and/or
- (5) Engaging in other instructional activities approved by ACAHM.

**Synchronous Learning:** Students participate in learning activities simultaneously in real-time.

**Digital Synchronous Learning:** Students participate in digital learning activities simultaneously in real-time. Digital synchronous learning requires students to complete the course requirements according to published course expectations and deadlines and engage in learning activities together at scheduled times, yet in different physical locations from the instructor and/or students. Course activities and assignments typically facilitate synchronous engagement with other students. Instructors provide substantive formative and summative feedback in real time and at regular intervals within the defined academic term to promote development that aligns with the published course expectations and deadlines.

**In-Person Synchronous Learning:** Students participate in in-person learning activities simultaneously in real-time. In-person synchronous learning requires students to complete the course requirements according to published course expectations and deadlines and engage in learning activities together at scheduled times and in the same physical location with the instructor and students. Course activities and assignments typically facilitate synchronous engagement with other students. Instructors provide substantive formative and summative feedback in real time and at regular intervals within the defined academic term to promote development that aligns with the published course expectations and deadlines.

## **2. GENERAL DISTANCE EDUCATION APPROVAL PROCEDURES**

Consistent with the USDE's guidance, all ACAHM-accredited institutions/programs must be evaluated and accredited by ACAHM to offer courses or any portion of programs via distance education.

### **A. ACAHM-accredited institutions**

The Commission requires that ACAHM-accredited institutions successfully complete ACAHM's **1.15 Substantive Change approval** process before offering any course or any portion of an ACAHM-accredited program(s) via distance education.

#### **B. Non-ACAHM accredited institutions**

The Commission requires non-ACAHM accredited institutions:

- 1) be approved to offer distance education by an agency that has accreditation of distance education within the scope of its accreditation, **and**
- 2) receive ACAHM's **1.15 Substantive Change** approval before offering any course or any portion of an ACAHM-accredited program(s) via distance education.

#### **4. REQUIRED ELEMENTS**

ACAHM requires institutions and programs to describe and provide evidence documenting compliance with all the elements specified in ACAHM's **1.15 substantive change application**.

#### **5. DISTANCE EDUCATION THRESHOLDS AND LIMITATIONS**

The following thresholds and limitations apply to all distance education authority granted by the Commission:

##### **A. Laboratory/Practicum Experiences**

Educational experiences involving the development of hands-on skills, including but not limited to acupuncture point location, physical examination, application of clinical techniques and assessment of the same, must be completed via in-person synchronous learning.

##### **B. Clinical Training**

For entry-level (specifically master's and entry-level doctoral) programs, a minimum of 75 hours of ACAHM's 150-hour total clinical observation requirement must be completed via in-person synchronous learning.

For entry-level and certificate programs the minimum number of clinical internship clock hours of instruction specified in [Criterion 7.02](#) of ACAHM Comprehensive Accreditation Standards must be completed via in-person synchronous learning.

For advanced practice doctoral programs the minimum number of clinical training clock hours of instruction specified in [Criterion 7.02](#) of ACAHM Standards must be completed via in-person synchronous learning.

**\*Distance Education accreditation decisions may require a site visit and/or monitoring reports following implementation as directed by the Commission.**

**Revision History**

<b>Date Revised</b>	<b>Summary of Revisions</b>	<b>Approved By</b>
161030	Refreshed and Reformatted.	ACAOM Executive Director
180306	Added or clarified definitions of <i>Distance Education</i> , <i>Classroom Course</i> , <i>Blended Classroom Course</i> and <i>Online Course</i>	ACAOM Executive Director
190206	Change to definitions, addition of language regarding monitoring reports and state/regional authorizations, general editing for clarity	ACAOM Executive Director
210601	Section 2: Removed limitation on distance education coursework in Korean and/or Mandarin	ACAOM Executive Director
220422	Comprehensive revisions to address recent DE regulatory changes	ACAOM Executive Director
230131	Revised to 1. reflect White House guidance regarding the end of COVID-19 national and public health emergencies and associated flexibilities, and 2. provide updated instructions to ACAHM-accredited programs and institutions regarding distance education accreditation next steps.	ACAOM Executive Director
230929	The definition of "Distance Education Courses and Programs" and its accompanying footnote and Illustration were deleted	ACAOM Executive Director