



REPRESENTING BEAUTY & WELLNESS EDUCATION

Distance Education Webinar

April 8, 2020

- 1) School has transitioned to distance ED- a student has the ability to participate, is not sick or effected directly by covid-19, Student now decides that he/she doesn't want to continue to participate in distance ed— but does want to continue once brick & Mortar reopens- CAN they be placed on a LOA until that time or are they a withdrawal?

Gina: The student could be put on an LOA, as long as the LOA does not extend past 180 days.

Dr Mirando: Should the institution have a LOA policy, yes, the student can be placed on a LOA if one is requested by the student. The school cannot automatically place the student on a LOA. Should a student's request be granted and the student placed on a LOA, the timeframe would need to fall within the school's policy, which can be no more than 180 days within a 12-month period.

- 2) When we have taught the 60 hours allowed in our State for the Esthetics program do we then place the Student on a Leave of Absence?

G: You can only do the total amount of TDE hours allowed by your state, or no more than 50% of the hours per NACCAS, therefore you would need to put that student on an LOA.

Dr M: The school would need to ensure it follows the State, federal, and NACCAS allowances for amount of distance education. Should all allowable hours have been utilized, the student could request a LOA. If the school completes all available training via TDE for all enrolled students, that school should suspend operations and notify NACCAS. In this instance, an LOA would not be appropriate, though contract extensions should be made for all students for the period of time operations have been suspended.

- 3) Can you address student teacher ratios? NACCAS requires a 30:1 ratio... If your state doesn't have a policy or they have provided an exception to this policy will NACCAS consider waiving their's? Many schools have laid off faculty during this unprecedented time...

Dr M: At this time, the NACCAS Board of Commissioners has not taken action to amend or waive its Standards & Criteria. However, NACCAS' 30:1 Student-Teacher Ratio requirement is only applicable in the absence of State regulation. If a State were to affirmatively waive its pre-existing requirement, this would supersede NACCAS's required ratio.

- 4) In relation to SAP...as we are now inputting hours manually and on occasion are a day or two behind schedule. My fear is students will meet SAP 2-3 days later as the manual input is time consuming. Can you advise?

Dr. M: NACCAS states in item 13 of the SAP checklist for clock hours that all evaluations must be completed within seven school business days following the established evaluation point. This allows the school some time for manual input and still completing the evaluation timely.

- 5) What if some of our students have school age children at home and they are all sharing devices & are not able to clock in and out every hour but are able to comply with the work load if receiving Asynchronized classes?

G: As long as an instructor is monitoring the student's attendance during the hours the student is participating in class, the student can do Asynchronized classes. A student can not do self study and get work done and receive hours for doing the work. Students need to be monitored during the hours they are in school.

Dr M: Schools need to have a system in place to monitor a student's attendance to include the hours a student "is in attendance", per the schedule established for that student in his/her enrollment agreement. Further, in accordance with guidance issued from the US Department of Education, "an institution that offers asynchronous instruction in a clock-hour program must maintain an online learning platform or another system for monitoring each student's academic engagement to ensure that students are academically engaged in at least 50 minutes for each hour that is recorded as a clock hour attended by the student. In this circumstance, an instructor can complete a student's timesheet to include clock hours earned in a distance education format, but the hours must be based on data or the instructor's own knowledge that the student was academically engaged for at least 50 minutes out of each clock hour that is recorded.

- 6) I would LOVE for you to address schools maintaining compliance so a few bad players don't ruin it for our industry and give "for profits" like some "predatory" schools did under the last administration that hurt alot of good schools.

G: It is important to document everything so schools can stay in compliance.

Dr M: NACCAS expects that all accredited institutions will strive to maintain compliance at all times – not only with NACCAS requirements, but with those of local, State and federal

agencies which might also have regulatory oversight of the institution. While many regulatory entities, including NACCAS, have made special allowances for schools during this pandemic, it does not diminish the need for schools to put their best foot forward. If anything, compliance is more crucial at this time than at any others. While institutions should expect that they will continue to be evaluated by NACCAS and other entities in the manner that they are accustomed, each school's reputation with their students and their community will be forever affected by how they handle themselves during the extraordinary time.

- 7) Dr. Mirando, our state just announced that K-12 onsite instruction closed for the remainder of the year, and the Governor's Office is considering it for Post Secondary Institution as well. The current DE guidelines allow us to start DE in the current payment period, and the following payment period. Is the Commission considering to increase this timeframe (third payment period)?

G: This is a DOE requirement, not a NACCAS issue

Dr M: The Commission is following guidance from the Department of Education. Should the Department's guidance change, NACCAS will take the new information into consideration.

- 8) Can students make up hours while on DE if they fall behind. This would be above and beyond their normal scheduled hours.

Dr M: The school may continue to operate under its existing Makeup Policy so long as instructors are available to provide instructions and monitor student progress.

- 10) What percentage of NACCAS schools are currently, actively participating in TDE? Guesstimate?

G: About 42%

Dr M: NACCAS has acknowledged TDE to be utilized by 76% of schools either accredited by, or seeking accreditation with NACCAS as of April 14, 2020. Additional schools continue to apply daily.

- 11) does the 50% max for distance apply to non-title IV programs

Dr M: The 50% max applies for any NACCAS approved program, regardless of whether or not the program is eligible for Title-IV.

- 12) Once student hits maximum time amount allowed under TDE- (say 50%) are they placed on LOA until Brick and Mortar resumes?

G: Yes

Dr M: The school would need to ensure it follows the State, federal, and NACCAS allowances for distance education. Should all allowable hours have been utilized, the student could request a LOA.

- 13) For those that were only approved for theory and now the state has approved us for practical do we need to resubmit the application to Naccas to be approved to do the practical

G: No, but it never hurts to notify NACCAS via email.

Dr M: No, the school can maintain a copy of the March 20, 2020 e-blast that was sent from NACCAS, in connection with the original approval letter received from NACCAS, as documentation.

- 14) Being that no one knew how long this would be when originally submitting our TDE form to NACCAS, If we need to add more to it should we just resubmit the same form again?

G: No need to reapply, but it never hearts to notify NACCAS via email.

Dr M: No, the school can maintain a copy of the March 20, 2020 e-blast that was sent from NACCAS, in connection with the original approval letter received from NACCAS, as documentation.

Please note, however, that institutions may only utilize TDE for those programs NACCAS has previously provided acknowledgement. If you wish to begin offering TDE for approved programs you did not previously seek acknowledgment to offer via TDE, an additional application to NACCAS would be required.

- 15) Is NACCAS considering zoom/ webinar accreditation workshops so that schools can meet the attendance requirement?

Dr M: At this time, no changes have been made to the NACCAS Accreditation Workshop schedule. This is a matter NACCAS continues to monitor. If changes are deemed necessary, notice will be distributed to all institutions via email and a notice will be published to the NACCAS website.

- 16) For those with a fiscal year ending 6/30, would composite scores be a part of that discussion as well? And to take in to consideration those who are not calendar year

Dr M: At this time, the NACCAS Board of Commissioners has not taken action to amend or waive its Standards & Criteria, to include the Financial Stability requirements of Standard VII, Criterion 1. Should any temporary changes be deemed necessary in the

future, NACCAS would distribute notice to all institutions via email and a notice would be published to the NACCAS website.

- 17) Has NACCAS determined if it will allow COVID-19 exclusions (graduation) or unavailables (placement) for the annual report? We have some 2020 annual report cohort students that are still active that this will apply to and we'd rather get our documentation in line now versus waiting.

Dr M: At this time, the NACCAS Board of Commissioners has not taken action to amend or waive its Standards & Criteria, to include the Student Outcome requirements of Standard I, Criteria 3, 4 & 5. Should any temporary changes be deemed necessary in the future, NACCAS would distribute notice to all institutions via email and a notice would be published to the NACCAS website.

- 18) Do we still need to file at 30 days that we are extending our DE. OR can we just send you an email notifying you since it is obvious this is going to last longer than first anticipated.

G: No need to reapply, but it never hurts to notify NACCAS via email

Dr M: There would be no need to submit an additional application with NACCAS. The school is permitted to continue its Temporary Distance Education so long as is permitted by State regulation or NACCAS guidance, whichever is shorter.

- 19) I know this was addressed in the webinar, but I just want to confirm: Leaves of Absence apply to students CHOOSING NOT to continue with distance ed as well as students who CAN'T continue because of internet access, etc.

G: That is correct, as long as the LOA is not past 180 days.

Dr M: That is correct, as long as the school has a LOA policy and is following the number of days within the policy, which can be no more than 180 days within a 12 month period.

- 20) Is an email ok to notify Dr. Mirando about offering DE? Or do we need to send a certified letter to NACCAS.

G: If you have not already been approved for TDE, you must go through the approval process with NACCAS. If you were recently approved and the state requirement made a change that allowed you to increase your hours or to teach practical by TDE, you do not have to go through another approval, but notifying NACCAS via email does not hurt.

Dr M: If a school has not yet submitted the appropriate application and been approved for TDE, the school would need to submit that application in order to obtain approval. This

application should be uploaded to NACCAS electronically through the member portal in accordance with the instructions included on the [application](#).

- 21) Does NACCAS have a sample of the disclaimer we need to send to our students to sign in regard to Temporary Distance Education?

Dr M: Schools may elect to adopt the language within Checklist Item #5 of the NACCAS *Distance Education Policy* itself or modify it to suit their own situation: “[A]cademic achievement earned via distance education may not be acceptable for reciprocity or eligible for licensure in other states.”

- 22) How would NACCAS like us to inform them if our school is interested in the 50% maximum?

G: For TDE, there is an application process with NACCAS if have not already been approved for teaching via TDE.

Dr M: If a school has not yet submitted the appropriate application and been approved for TDE, the school would need to submit that application in order to obtain approval. This application should be uploaded to NACCAS electronically through the member portal in accordance with the instructions included on the [application](#). If the school has already obtained approval to offer TDE and is seeking to increase the amount of DE, the school can maintain a copy of the March 20, 2020 e-blast that was sent from NACCAS, in connection with the original approval letter received from NACCAS, as documentation.

- 23) Do we HAVE to teach the scheduled contracted hours in our enrollment agreements or can we modify that to slow the hours and accomodate those with kids at home. i.e 3 hours sessions instead of 6

G: You can do less hours, but be very careful not to schedule your students for less than half time. Talk to your 3rd party servicer about this.

Dr M: Should a school not teach the scheduled contracted hours as originally agreed upon in the original enrollment agreement, the school would need to revise the original enrollment agreement and obtain the necessary initials/signatures for the revised contract. Please note that all available schedules for each program must be published within the school’s catalog. If the institution is to utilize a schedule that has not been previously published and results in an as-yet unreported number of hours of instruction per week, the institution must notify NACCAS of the new schedule via [Non-Substantive Notification Form #1M](#).

Additionally, institutions are encouraged to contact their regional office of the US Department of Education or their 3rd party servicer to seek guidance on the impact a reduced schedule may have on the students' eligibility for financial aid.