COMMISSION UPDATES REGARDING COVID-19

ACAOM UPDATE REGARDING COVID-19 AND CLINICAL TRAINING (2 April 2020)

The Accreditation Commission for Acupuncture and Oriental Medicine (ACAOM or Commission) continues to closely monitor evolving guidance issued by federal, state and authorities around the COVID-19 threat, and how this official guidance impacts ACAOM accredited institutions and programs. Despite COVID-19’s challenges, institutions and programs are expected to operate within this official guidance and maintain compliance with ACAOM accreditation standards, criteria, policies and procedures (regulatory guidance).

ACAOM has a longstanding commitment to meeting evolving educational needs through innovation and flexibility consistent with its obligations under 34 CFR §602 and established regulatory guidance. For example, on 17 March 2020 ACAOM quickly implemented emergency waiver protocol for institutions and programs to deliver didactic coursework via distance education for currently enrolled students in response to the unprecedented COVID-19 threat.¹ To date, 50 of 51 total institutions with ACAOM-accredited or pre-accredited programs have applied for and received emergency waiver approvals to deliver didactic coursework via distance education.² It should also be noted that because of evolving official guidance and expanded quarantine directives, on 30 March 2020, ACAOM extended all emergency waiver approvals to deliver didactic coursework until 1 June 2020.

In contrast, COVID-19 presents significant challenges for delivering face-to-face clinical training - not the least of which is addressing evolving and expanding threats to patient, student, faculty and staff health and safety. While programs and institutions could reschedule or suspend clinical training and modify curriculum sequences accordingly, these options often lead to delayed degree completion, delayed professional employment, increased student and program/institution expenses, cash flow and financial exigencies, incomplete grade management, federal financial aid issues (leave of absence, satisfactory academic progress, loan repayment, etc.), SEVIS/Homeland Security VISA issues, challenges to student persistence and faculty retention, and other undesirable outcomes.

Alternatively, programs and institutions could consider adapting their existing clinical training by incorporating innovations like:

1. Grand round case reviews
2. Tele/videoconferencing student-delivered patient care under faculty and institutional/programmatic control and direction
3. Clinical simulations

Regardless, clinical training alternatives must satisfactorily address: patient, student and faculty health and safety;³ achievement of expected clinical education outcomes and program objectives; meet credit/clock hour

¹ Please refer to the ACAOM.org homepage and “ACAOM NEWS” items for the Commission’s Update on COVID-19 [novel coronavirus] 17 Mar 2020 and other specific information and processes related to didactic distance education coursework delivery
² Almost all emergency waiver applications were processed by ACAOM and authorization granted within 24 hours of receipt.
³ Students in clinical setting are expected to follow institutional guidelines for care of patients with communicable diseases of all kinds. Students, faculty and staff are encouraged to receive required and refresher training on proactive health safety measures like hygiene practices and appropriate use of personal protective equipment – especially as it pertains to communicable disease and current COVID-19 epidemiology.
requirements, proper maintenance of clinical records; compliance with federal, state and local laws and regulations; professional licensure requirements, etc.

To help programs/institutions navigate clinical training challenges caused by COVID-19, on 25 March 2020 ACAOM implemented an emergency waiver request protocol for seeking permission to deliver a portion of their clinical training via distance education.\(^4\) In general, programs/institutions must:

1. Secure an ACAOM emergency waiver to deliver didactic coursework via distance education,\(^5\) and
2. Submit a completed \textit{Emergency Distance Education in Clinical Training Waiver Request Form}\(^6\)

As of 31 March 2020, ACAOM had received and processed ten (10) applications from programs/institutions seeking authority to deliver a portion of clinical training via distance education and associated approvals will be forthcoming.

The Commission convened a special meeting on 1 April 2020 to review current COVID-19 challenges; consider input received from the Council of Colleges of Acupuncture and Oriental Medicine; and discuss options for clinical training via distance education. Following deliberation, the Commission amended its \textit{Emergency Distance Education in Clinical Training Waiver Request} form by increasing clinical observation limitations from 15 hours to 50 hours for entry-level programs in acupuncture and for entry-level programs in acupuncture with a specialization in Chinese herbal medicine. The total limitations, per student for the duration of their total program of study, are now as follows:

<table>
<thead>
<tr>
<th>Program Category</th>
<th>Clinical Observation</th>
<th>Clinical Internship</th>
<th>Student-Delivered Patient Care</th>
</tr>
</thead>
<tbody>
<tr>
<td>\textit{Entry-level programs in acupuncture (M.Ac, Dipl.Ac, PD acu. only)}</td>
<td>50 hours</td>
<td>50 hours</td>
<td>25 treatments</td>
</tr>
<tr>
<td>\textit{Entry-level programs in acupuncture with a specialization in Chinese herbal medicine (MOM, Dipl.OM, PD w CHM)}</td>
<td>50 hours</td>
<td>70 hours</td>
<td>35 treatments</td>
</tr>
<tr>
<td>\textit{Certificate programs in Chinese herbal medicine}</td>
<td>21 hours</td>
<td></td>
<td></td>
</tr>
<tr>
<td>\textit{Advanced practice doctoral programs (DAOM)}</td>
<td>20 hours</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

\textbf{EMERGENCY WAIVER REQUESTS: DISTANCE EDUCATION IN CLINICAL TRAINING (25 March 2020)}

The COVID-19 pandemic has created an unprecedented challenge for every sector of activity in the United States, including higher education. The last three weeks have been a flurry of activity for us all. It has only been 23 days since the Commission received initial inquiries from ACAOM-accredited programs and institutions regarding COVID-

\(^4\) Please refer to the ACAOM.org homepage and “ACAOM NEWS” items for \textit{Emergency Waiver Requests: Distance Education in Clinical Training (25 March 2020)} and other specific information and processes related to clinical distance education coursework delivery.

\(^5\) As previously noted, only one (1) institution with ACAOM-accredited programs out of 51 has not sought nor obtained an emergency waiver to deliver didactic coursework via distance education.

\(^6\) No fee is required.
19; 19 days since the Commission issued its first guidance; and 15 days since the first emergency waiver relating to distance education was approved.

For the last few days, the Commission has been evaluating and re-evaluating a number of issues, now that it is clear that interruptions to on-campus and in-person educational activities are likely to continue for a considerable period of time. In particular, clinical education options under current conditions require clarification. Many programs and institutions have communicated with Commission staff regarding the challenges they now face. CCAOM has also been helpful in organizing programs and institutions to provide more specific input and raise questions.

In addition to the important considerations of programs, the Commission must also take into account local, state and Federal laws that may pertain; and rulings and guidance from the US Department of Education, various state higher education offices, state licensing boards, and others. It is easy to move faster than many of these agencies, and the Commission must not put accredited programs and institutions, students, patients or itself at later risk by exceeding the limitations of evolving external guidance.

Accordingly, the Commission will begin accepting additional waiver requests for emergency distance education relating to clinical education. This is to provide temporary and limited distance education alternatives for some clinical interactions, specifically for the “hands-on” practical portion of clinic-based courses within degree programs.

A specific **Emergency Distance Education in Clinical Training Waiver Request Form [Word format only]** must be fully completed and submitted for Commission consideration. Before these requests will be considered by ACAOM, a program or institution must have received ACAOM’s prior approval of an Emergency Distance Education Waiver Request [see previous post]. As with the previous emergency waiver requests, no fee will be imposed.

Waivers will terminate upon the date indicated in the corresponding action letter, or at the conclusion of the declared public health emergency – whichever of those is sooner. The Commission will entertain subsequent waivers or extend existing waivers, if conditions warrant such.

Waivers may only be granted if the institution/program demonstrates that educational quality will be promoted, that the institution/program will remain in compliance with Commission standards, and that the interests of students and the public will be protected by the proposed waiver. The decision whether to grant a waiver is made solely by the Commission and denials of waivers may not be appealed. The Commission may also impose such conditions, as it deems appropriate, on the scope or duration of any waiver that it may grant.

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**ACAOM UPDATE ON COVID-19 [NOVEL CORONAVIRUS] (17 March 2020)**

ACAOM continues to closely monitor the rapidly evolving circumstances surrounding the COVID-19 novel coronavirus and its impact on ACAOM accredited institutions and programs. As of 15:00 CT on 17 March 2020, the Commission has received and processed emergency waiver requests from 35 institutions, representing 39 campuses/locations.

The health and safety of students, program and institution faculty and staff, and peer reviewers are of great importance to us. We hope that:

- institutions are enacting action plans to keep their students, faculty and staff safe;
- programs are creating plans for alternate methods for program delivery; and
- clinical sites are taking appropriate steps to keep their staff and clients safe.

**Federal, state and international advisories**
Please monitor federal, state and local government websites for up-to-date information, guidance and instructions, including any protocols concerning students on campus and returning from study or visits abroad. There are many useful resources available, including:

U.S. Centers for Disease Control and Prevention

U.S. Department of Education
- https://www.ed.gov/coronavirus

World Health Organization
- https://www.who.int/health-topics/coronavirus

Distance Education [DE]

ACAOOM anticipates that many of its accredited programs and institutions will be considering options related to distance education as part of their planning.

The Commission strongly encourages you to review the ACAOM Distance Education Policy.

In the event that you have not previously submitted a Change Notification 1.15 DE application to ACAOM, you may wish to review the form as soon as possible, as a part of your COVID-19 planning. Requirements outlined in the application’s narrative may assist you in evaluating your readiness and capability to implement distance education options.

As of 11 March 2020, ACAOM has adopted this simplified procedure for accredited programs and institutions that wish to use distance education delivery as part of their plan for COVID-19 related campus emergencies or closures:

- If a local state of emergency or similar condition is declared which will affect your campus, submit an Emergency Waiver Request that outlines the temporary change to your previously approved program(s). The Commission will not assess a waiver fee if such request is supported by a declared local state of emergency.

- Emergency waiver approvals are for a limited and fixed duration, generally based on the last date of your current academic term. If circumstances require a longer waiver, the Commission will accept additional requests.

- You may complete and submit the Request using either a PDF form or a Word Document.

Plan Ahead and Stay In Contact

ACAOOM recognizes that accredited programs must follow institutional directives and make decisions that are best for their institution when providing accommodations to students in extenuating circumstances. As these accommodations are made, be mindful of potential consequences for students in terms of degree completion, financial aid, accreditation, licensure and/or certification, and future employment.

Please communicate directly with ACAOM (by email to info@acaom.org) to voice any concerns you may have or to share with us contingencies that are being put in place at your institution. This will allow us to monitor any
potential impact to ACAOM accredited programs and/or challenges to the program’s ability to be in compliance with the ACAOM standards.

ACAOM will continue to update our accredited institutions/programs as circumstances warrant.