



MEMORANDUM

DATE: December 3, 2009

SUBJECT: **Policy of PHI Deidentification and Clarification/Modification of Examples of Evidence of 3.7 of 2009 Optometric Residency Standards**

TO: Deans and Presidents of Schools and Colleges of Optometry; Directors of Optometric Residencies; Supervisors of Optometric Residencies; ACOE Consultants; Federal Service Chiefs

FROM: Roger Boltz, O.D., Ph.D., ACOE Chair

DIST: ACOE, Ms. Urbeck, Ms. Redd, Ms. Wirth, Ms. Leitner

At its October 23-25, 2009 Fall Meeting, the Accreditation Council on Optometric Education (ACOE) adopted the following policy regarding deidentification of Personal Health Information (PHI) in materials to be submitted to ACOE:

Policy on PHI Deidentification

Programs submitting annual reports, progress reports and self-studies or any other information to the ACOE, which might contain PHI, must deidentify the information prior to submission. During site visits to VA programs, the ACOE will review deidentified patient records and use the information provided by the program to determine if a standard is met.

At the Fall Meeting, the ACOE also adopted one modification/clarification of the examples of evidence for standard 3.7 of the 2009 Optometric Residency Standards.

Clarification of and Modification of Examples of Evidence of Standard 3.7 of the 2009 Optometric Residency Standards (Wording added to the examples of evidence is underlined.)

Standard 3.7 requires the residency to provide the resident's professional liability insurance at all educational sites. For programs at U.S. Government-sponsored sites (e.g. VA, IHS, etc.) site teams will need to request or see a copy of the signed Memorandum of Understanding for any external rotations to determine if the resident's professional liability coverage at the external site has been provided.

3.7 The residency must provide the resident's professional liability protection at all educational sites.

Examples of evidence:

- *Certificate of insurance*

- *Federal Tort Claims Act for U.S. Government-sponsored programs, with accompanying MOU's for external rotations*

If you have any additional questions, comments or suggestions for the ACOE regarding the ACOE 2009 Optometric Residency Standards, please feel free to contact me at the address above or Jean Redd, ACOE Manager, at wjredd@aoa.org. The standards and other useful information may be found on the ACOE web site at www.theacoe.org, or by [clicking here](#). Over the next few months, the ACOE will be adding this and other resource information to the ACOE web site, and we will appreciate your feedback on materials that you would find useful.