September 30, 2020

Stephanie S. Messner, O.D.
ACOE Chair
Accreditation Council on Optometric Education
243 N. Lindbergh Blvd.
St. Louis, MO 63141

RE: Comments on the action Withdrawal of ACOE Accreditation from the Residency in Ocular Disease at the Albuquerque VA, which is affiliated with the University of Houston College of Optometry

Dear Dr. Messner:

Per your letter “Albuquerque VA Final Notification of Withdrawal” dated September 2, 2020, accreditation for our Optometry Residency has been withdrawn. That letter states (quote):

Statement of Reason for Withdrawal of ACOE Accreditation from the Residency in Ocular Disease at the Albuquerque VA, which is affiliated with the University of Houston College of Optometry
The Residency in Ocular Disease at the Albuquerque VA, which is affiliated with University of Houston College of Optometry, lost all faculty members in June 2019. In the progress report provided to the ACOE in May 2020, the program reported that the majority of the faculty, including a residency coordinator, have not been replaced. The program also reported a hiring freeze, preventing timely replacement of the program faculty. The Council considers the loss of faculty and coordinator, without rapid replacement, a major loss of resources. In accordance with requirements from the U.S. Department of Education, the ACOE must take adverse action and withdraw accreditation due to the program’s major loss of resources. The Council therefore withdraws accreditation from the Albuquerque VA Residency in Ocular Disease effective on August 23, 2020.

Your letter also notes that the program is allowed to submit comments related to this action and that these comments will be provided to the USDE, the Texas Optometry Board, appropriate accrediting agencies and the public. Please consider these comments in response.

As of June 30, 2019, our facility had lost our key Optometry Residency Program faculty, including our Residency Coordinator, to higher-paying employment opportunities in the community. Per the accreditation standards requirements, ACOE was notified by letter.
dated July 24, 2019. From there, we kept in close communication with ACOE. In particular, our on-going recruitment efforts were detailed in our annual report, our consequent progress report submitted January 3, 2020 and our progress report submitted May 15, 2020. Despite a five-month hiring freeze imposed by our regional VA office and the COVID-19 pandemic, we managed to recruit and hire 2 of our 5 Optometrist vacancies. Unfortunately, both of these candidates were stronger clinically and not satisfactory candidates for our Residency Coordinator position. Our recruitment efforts have been approved to move forward and we anticipate of 3 additional Optometrist hires before the end of the calendar year. All of our candidates have been reviewed by our the national Veterans Health Administration Director of Optometric Services and the Director of Residency Programs, University of Houston. Several Optometrists, including our top three candidates, have the expertise to serve as a strong Optometric Residency Coordinator.

Our facility has had a long-standing record of excellence in Optometric Residency education since our date of initial accreditation, June 30, 1979. This was noted at the time of our most recent site visit by the Accreditation Council on Optometric Education (ACOE), November 2, 2017. The Council Summary of Strengths and Concerns for that site visit stated (quote):

*The Albuquerque VA Residency in Primary Eye Care -Department of Veterans Affairs residency program affiliated with the UHCO is a one-year high quality post-graduate clinical education program in primary care optometry with an emphasis on ocular disease. The program has a dynamic curriculum with a robust didactic component. There is evidence of high quality day-to-day clinical teaching and the variety of clinical lectures, grand rounds, case presentations, and hot topics presentations reinforces the evidenced-based clinical practice of the program.*

*Opportunities in the area of glaucoma research enhance the scholarly activities of the residents to a level that makes this program unique. The number and the quality of the posters consistently presented at national meetings throughout the years is impressive. The affiliate providing support for the residents to attend a professional meeting is an important component of this success. At the core of this success is the highly qualified, dedicated, and invested faculty who have a strong interest in the individual education of each resident. The program’s success in recruiting motivated residents who strive to meet and exceed the expectations of the program is another essential component. Furthermore, the support of ABQVA Medical Center administration of the program is apparent as the glaucoma research program was identified as an important asset of the medical center.*

*Areas of concern include the lack of written policy on the graduated levels of increasing responsibility for the residents, and the negative impact of some missing or dysfunctional essential equipment. Finally, the change in the program’s clinical training emphasis to include ocular disease is not reflected in the title of the program and thus is not reflected on the residency certificate issued to the residents on completion of the program.*
(Of note, the minor suggestions related to program enhancement were quickly made following that site visit.)

Throughout this year, we have had continued support and frequent communications with the national Veterans Health Administration Optometric Services and the University of Houston College of Optometry. We feel that we have been transparent in our communications with the ACOE and diligent in our recruitment efforts. We are disappointed by the ACOE decision to close our Optometry Residency Program of over 40 years. Once our Optometry Residency Program faculty recruitment is complete, we will communicate with you to re-apply for accreditation.

Sincerely,

Darra D. Kingsley, MD
Designated Education Officer (DEO)
Associate Chief of Staff for Education
New Mexico VA Health Care System

cc: Karen Fern, O.D.; John Townsend, O.D.