

MEMORANDUM

DATE: March 25, 2021

SUBJECT: **Call for Comment on Several Proposed Changes to Accreditation Council on Optometric Education (ACOE) Standards, Policies, and Procedures**

TO: Deans and Presidents of Schools and Colleges of Optometry; Directors of Optometric Residencies; Supervisors of Optometric Residencies; Directors of Optometric Technician Programs, ACOE Consultants, AOA O, T, ED, AED, GC; Executive Committees and Directors of ARBO, AAO, NBEO, and AOSA; AOSA Trustees; ASCO Executive Director; President and EDs of State Optometric Associations; State Board Secretaries; Director of the VA Optometry Service; Military and Public Health Optometric Service Chiefs; ASPA Members, Board and Executive Director; CHEA Board and Executive Director; Regional Accreditors; USDE staff; Chronicle of Higher Education; any interested party

FROM: Stephanie S. Messner, O.D., ACOE Chair

DIST: ACOE, Ms. Puljak, Ms. Wirth, Ms. Mohr, Ms. Wynn, Ms. Mittler

The purpose of this memorandum is to invite interested parties to submit comments regarding proposed changes relating to three topical areas:

1. The Mission, Goals, and Objectives of the ACOE
2. The ACOE's Fee Structure
3. ASCO Request to consider Diversity, Equity, and Inclusion in Curriculum standards

The ACOE will consider comments received at its Annual Meeting on June 23-26, 2021. ***Comments provided may include discussion of more than one topic, but we request that your comments indicate the number of the topical area being discussed.*** Please submit any comments by **April 30, 2021** to accredit@aoa.org.

The standards and other useful information may be found on the ACOE web site at www.theacoe.org.

TOPIC 1: The Mission, Goals, and Objectives of the ACOE

Background: At the ACOE's Winter Meeting in February 2021, the Council accepted for distribution to the communities of interest for comment the recommendation of the ACOE's Planning Committee concerning revised mission, goals, and objectives of the ACOE, which was last updated in 2010. Members of the Planning Committee include:

- G. Timothy Petito, O.D., Committee Chair, ACOE Vice Chair and practitioner in St. Petersburg, FL
- Pat Capone, BS, COTA/L, ACOE Public Member
- Jennifer Coyle, O.D., M.S., Dean, Southern California College of Optometry at Marshall B. Ketchum University
- David Damari, O.D., Dean, Ferris State University Michigan College of Optometry
- Kimberly Lambreghts, RN, O.D., ACOE Consultant, Associate Dean of Professional Studies at University of Houston College of Optometry

As ACOE Chair, I served as an ex-officio member of the Committee.

Visit the ACOE web site at www.theacoe.org.

The Committee’s recommendation was informed by the results of survey conducted in January 2021, whereby members of the communities of interest were invited to provide input. The survey included questions on a series of activities and respondents were asked to evaluate the ACOE in terms of how it performs each activity. Respondents were also asked to provide their feedback on the importance of ACOE performing each activity well. The survey provided the opportunity for respondents to comment on each of the activities listed. The survey also included a series of open-ended questions to which respondents could provide narrative comments.

The current mission, goals, and objectives of the ACOE are as follows:

Mission of the Accreditation Council on Optometric Education: The Accreditation Council on Optometric Education serves the public and the profession of optometry by establishing, maintaining and applying standards to ensure the academic quality and continuous improvement of optometric education that reflect the contemporary practice of optometry. The scope of the Accreditation Council on Optometric Education encompasses professional optometric degree, optometric residency, and optometric technician programs.

Goals	Objectives
1. To serve the public, the optometric profession and the other communities of interest by ensuring the continued effectiveness of the Council.	1. Maintain an independent and objective accreditation process.
	2. Implement the accreditation process with integrity, transparency and high ethical standards.
	3. Ensure that the orientation and training process for Council members, staff and consultants includes relevant information on optometric practice, health profession education, and higher education.
	4. Identify competent individuals to serve as Council members.
	5. Train competent individuals who are appointed to serve as Council members
	6. Develop and disseminate information on the Council’s policies and procedures.
	7. Inform the general public and the optometric, educational and accreditation communities of interest regarding the accreditation status of programs.
	8. Maintain communication between the Council and its constituents.
	9. Keep the optometric community informed of current trends and developments in specialized accreditation.
	10. Serve as a resource on optometric accreditation.
	11. Continue to seek the most cost effective way to provide the services of the Council.
2. To develop, maintain, apply and periodically review the Council’s accreditation processes and the standards for accreditation of optometric education and training programs in the United States and Canada.	1. Review optometric education and training programs and make accreditation decisions in accordance with Council’s standards and procedures and the program’s mission, goals and objectives.
	2. Establish and disseminate standards, policies and procedures in accreditation manuals for the programs accredited by or seeking accreditation from the Council.
	3. Comprehensively review the standards for accreditation at least every five years.
	4. Solicit suggestions from accrediting teams relative to standards, procedures and process.
	5. Solicit suggestions from the communities of interest relative to standards, procedures and process.
	6. Identify competent individuals to participate in accreditation site visits and provide appropriate training.

Visit the ACOE web site at www.theacoe.org.

Goals	Objectives
	7. Evaluate the performance of site visitors and team chairs and use the results of the evaluations to identify areas needing emphasis in the training process.
	8. Monitor programs in the interim between evaluation visits through the use of annual reports, progress reports and interim visits.
3. To foster continuous improvement of the Council by remaining current regarding the contemporary nature of optometric practice, health professions education, and higher education.	1. Review information relating to optometric practice, health professions education, and higher education that impact on optometric accreditation.
	2. Continue dialog with representatives of optometric organizations, health care delivery systems, health professions, higher education and other accreditors.
	3. Modify the accreditation standards, policies and procedures as necessary.
4. To foster continuous improvement of optometric education by valuing innovation and creativity in optometric education programs.	1. Communicate to the communities of interest that the Council values innovation and creativity in optometric education programs that maintain acceptable outcomes.
	2. Ensure that the policies and the procedures of the Council do not inhibit innovation.
	3. Ensure that the Council and consultants perceive innovation as a positive approach to foster continuous improvement in optometric education.
5. To assure the continued effectiveness of the accreditation process by the development and application of continuous quality assurance, self-assessment, and external review of the Council.	1. Maintain recognition by the U.S. Department of Education and Council on Higher Education Accreditation.
	2. Seek external review by organizations that recognize accrediting bodies and follow accepted codes of good practice.
	3. Engage in planning and conduct periodic self-assessments.
	4. Evaluate and test the validity and reliability of the Council's processes.
	5. Maintain a committee structure that involves Council members and other experts in planning, quality improvement, and self-assessment.
	6. Seek regular input from the communities of interest relative to planning, quality improvement, and self-assessment.

Recommendation and Rationale:

In addition to the results of the survey, the Planning Committee considered proposing a more concise articulation of the Council's mission, goals, and objectives and to define objectives that are measurable, improving the ability of the ACOE to evaluate its own performance.

The proposed mission, goals, and objectives of the ACOE are as follows:

Mission of the Accreditation Council on Optometric Education: The Accreditation Council on Optometric Education serves the public and the profession of optometry by establishing, maintaining and applying standards to ensure the academic quality and continuous improvement of optometric education that reflect the contemporary practice of optometry. The scope of the Accreditation Council on Optometric Education encompasses professional optometric degree, optometric residency, and optometric technician programs.

Goals	Objectives
1. To protect and inform the public, the optometric profession, and the	1. Ensure policies, processes, and expectations are fair, appropriate, and clearly communicated

Goals	Objectives
other communities of interest by ensuring a robust and transparent accreditation program	2. Ensure accreditation reviews are conducted by and accreditation decisions made by qualified and unbiased professional peers and public representatives
	3. Provide for integrity and transparency with respect to Accreditation decisions including decision rationale
	4. Effectively monitor programs between evaluation reviews to assure continued compliance
2. To serve as a role model within the optometric profession with respect to application of innovation, the importance of continuous improvement, and the value of external validation	1. Continuously seek cost-effective ways to deliver the services of the Council
	2. Implement measures that reduce administrative burden associated with the accreditation process
	3. Employ a continuous process of self-assessment and self-improvement
	4. Maintain recognition by the U.S. Department of Education and Council on Higher Education Accreditation.
3. To recognize trends and evolve in alignment with the contemporary practice of optometry and higher education	1. Ensure open lines of communication between the Council and stakeholders within the profession
	2. Actively engage with the communities of interest to inform and implement accreditation standards that remain relevant and contemporary
	3. Keep the optometric community informed of current trends and developments in specialized accreditation

TOPIC 2: The ACOE's Fee Structure

Background: At the ACOE's Winter Meeting in February 2021, the Council accepted for distribution to the communities of interest for comment an additional recommendation of the ACOE Planning Committee, to revise the Council's current fee structure, which was adopted in 2011 and implemented in 2012.

The ACOE's current fee structure is published on its website (www.theACOE.org) and is as follows:

Application Fees:

The ACOE assesses programs seeking accreditation or pre-accreditation an application fee. Application fees for new professional optometric degree programs should be submitted with the program's feasibility study and letter of application. Application fees for optometric residency programs and optometric technician programs should be submitted with the program's letter of application. The current application fees follow:

Type of Program	Application Fee Per Program
Professional Optometric Degree Programs	\$25,000
Optometric Residency Programs	\$2,500
Optometric Technician Programs	\$2,500

Annual Accreditation Fees:

All accredited programs and programs applying for initial accreditation or pre-accreditation are also charged an annual accreditation fee. The following is the schedule of the current annual accreditation fees charged to each program, with a 3% increase annually. Due to the effect the pandemic has had on educational programs, ACOE has waived the 3% increase for the 2021 annual accreditation fee.

Type of Program	2021 Annual Fee Per Program
-----------------	-----------------------------

Visit the ACOE web site at www.theacoe.org.

Professional Optometric Degree Programs	\$6,896
Optometric Residency Programs	\$1,592
Optometric Technician Programs	\$1,592

Recommendation and Rationale:

The Planning Committee assessed programmatic growth trends in conjunction with results of a benchmark study comparing ACOE to a peer group relative to overall costs borne by programs to become and remain accredited. These factors were considered as the Committee evaluated the impacts of varying fees to the five-year budget projection for the Council.

The Committee developed its recommendation as a means to enable the ACOE to be self-funding within three years of implementation. Moreover, implementation of the fee structure allows the ACOE to continue to comply with the requirements of the United States Department of Education and the Council on Higher Education for accrediting groups to have adequate fiscal resources.

The following fee adjustments are proposed.

Type of Program	Application Fee Per Program		Annual Fee Per Program*	
	Current	Proposed	Current (2021)	Proposed
Professional Optometric Degree Programs	\$25,000	\$27,500	\$6,896	\$7,034
Optometric Residency Programs	\$2,500	\$2,750	\$1,592	\$1,751
Optometric Technician Programs	\$2,500	\$2,750	\$1,592	\$1,751

*subject to a 3% increase annually

TOPIC 3: ASCO Request to consider Diversity, Equity, and Inclusion in Curriculum standards

Background:

At its Fall Meeting in October 2020, the ACOE requested the Professional Optometric Degree Committee consider the request of the ASCO to consider the inclusion of the topics of diversity, equity, and inclusion (DEI) and cultural competency into its curriculum standards. Members of the Professional Optometric Degree Committee include:

- David Yang, O.D., Committee Chair, ACOE Member, Adjunct Clinical Professor at UCB and Chief of the Optometry Section at VA Palo Alto
- Ida Chung, O.D., Associate Dean of Academic Affairs, Western University of Health Sciences College of Optometry
- Geoffrey Goodfellow, O.D., Associate Dean for Academic Assessment and Records, Illinois College of Optometry
- William Miller, O.D., Ph.D., ACOE Member, Associate Dean for Academic Affairs at University of the Incarnate Word Rosenberg School of Optometry
- Laura Neumann, D.D.S., M.P.H., ACOE Public Member
- Mark Swan, O.D., ACOE Consultant, Professor, Ferris State University Michigan College of Optometry,
- Michelle Welch, O.D., ACOE Consultant, Practitioner with the Choctaw National Health Services Authority

As ACOE Chair, I served as an ex-officio member of the Committee.

The Committee developed a recommendation and at its Winter Meeting in February 2021, the Council accepted for distribution to the communities of interest for comment the recommendation of the Professional Optometric Degree Committee concerning revisions to Professional Optometric Degree Standards 2.9.5, 2.9.6, and 2.9.8.

Recommendation and Rationale:

Visit the ACOE web site at www.theacoe.org.

The Professional Optometric Degree Committee considered examples of standards from other accreditors in the course of developing its recommendations. The recommended edits are as follows (proposed additions are underlined; deletions shown as ~~strikethrough~~):

Optometric Degree Program 2017 Standards Effective July 1, 2017 (updated 2019)		Examples of Evidence
Standard II – Curriculum		
2.9.5	The graduate must be able to use the knowledge of optometry’s role and the roles of other health professions to appropriately assess and address the health care needs of the patients and <u>diverse</u> populations being served.	<ul style="list-style-type: none"> ▪ <i>Description of clinical competencies</i> ▪ <i>Completed medical record reviews</i> ▪ <i>Faculty evaluation of clinical performance</i> ▪ <i>Referral letters and other communications</i> ▪ <i>Course and clinical learning objectives</i>
2.9.6	The graduate must be able to apply knowledge of professional, ethical, legal, and public health, <u>and diversity, equity, and inclusion</u> principles to the delivery of optometric care.	
2.9.8	The graduate must be able to <u>demonstrate effectively and culturally competent communicationse, both orally and in written,ing</u> with other professionals and patients.	