

Amendment to ACOE Temporary Policy for Virtual Site Visits, Granting Extensions of Accreditation, Providing Good Cause Extensions, and Granting Retroactive Accreditations – October 23, 2020

As per previously provided USDE direction, if ACOE implements virtual visits, the ACOE will follow-up with in-person visits to meet the USDE's statutory and regulatory requirements to perform regular on-site inspections. Virtual site visits should rely on an engaged, interactive format (e.g., telephonic meetings, video conference calls, and the like), rather than solely document reviews or exchanges of emails. A followup, in-person visit to the campus (though not necessarily a full peer-review site visit) would be conducted by the ACOE within a reasonable period of time following the virtual site visit.

In accordance with the advice included in the USDE Guidance Letter, ACOE amends its temporary Policy adopted during March 27, 2020 Teleconference. ACOE will allow for the use of virtual site visits for optometric residency programs that have applied for an initial award of accreditation.

ACOE does not change its Policy regarding Stage I and Stage II applicants for professional optometric degree programs and does not consider it feasible to employ virtual site visits for programs in these stages of application.

ACOE will continue to allow the use of virtual visits under this Temporary Policy for a period of time not to exceed the allowance of these flexibilities by the USDE and any subsequent updates ([UPDATED Guidance for interruptions of study related to Coronavirus \(COVID-19\) \(Updated June 16, 2020\)](#)).

- *M/S/C: That the ACOE adopts the following amendment to the single addendum that is being used to temporarily amend all relevant ACOE standards and policies (rather than amend each set of standards and policies.). The Council will cancel the addendum once the COVID-19 interruption passes and ACOE has caught up on its site visit schedule by visiting programs that were subject to virtual visits or site visit postponements during the crisis. (Vote tallied 10-0).*

MOTION adopted by ACOE during March 27, 2020 Teleconference: That the ACOE adopts the following single addendum that will be used to temporarily amend all relevant ACOE standards and policies (rather than amend each set of standards and policies.) The Council will cancel the addendum once the COVID-19 interruption passes and ACOE has caught up on its site visit schedule by visiting programs that were subject to virtual visits or site visit postponements during the crisis. (Vote tallied: 9-0.)

ACOE Temporary Policy for Virtual Site Visits, Granting Extensions of Accreditation, Providing Good Cause Extensions, and Granting Retroactive Accreditations

The United States Department of Education (USDE) has determined that it is reasonable and prudent to permit on a temporary basis accrediting agencies to perform virtual site visits during this period of addressing the COVID-19 interruption of normal activities. Understanding that this is a temporary amendment to the procedures utilized by the Accreditation Council on Optometric Education (ACOE), the ACOE will cancel this addendum document once the interruption caused by the COVID-19 emergency has passed and the ACOE has caught up on its site visit schedule.

USDE has directed that the agency board (or other decision-making body) should approve any change to policies governing virtual visits (or increased use of virtual visits) using the abbreviated process described in a recent guidance letter ("[RE: Information for Accrediting Agencies Regarding Temporary](#)

[Flexibilities Provided to Coronavirus Impacted Institutions or Accrediting Agencies”](#)), hereinafter referred to as the “USDE Guidance Letter” and attached hereto as Attachment 1.

As per USDE direction, if ACOE implements virtual visits, the ACOE would follow-up with in-person visits to meet the USDE’s statutory and regulatory requirements to perform regular on-site inspections. Virtual site visits should rely on an engaged, interactive format (e.g., telephonic meetings, video conference calls, and the like), rather than solely document reviews or exchanges of emails. A followup, in-person visit to the campus (though not necessarily a full peer-review site visit) would be conducted by the ACOE within a reasonable period of time following the virtual site visit.

In accordance with the advice included in the USDE Guidance Letter, ACOE adopts the following temporarily:

The ACOE has determined that it will allow the use of virtual site visits to currently accredited programs that are in good standing and that are engaged in renewal of accreditation, as well as to Stage III applicants for professional optometric degree programs holding the preaccreditation status of preliminary approval.

ACOE has determined that it is not feasible to employ virtual site visits for programs in other stages of application, including but not limited to:

1. Stage I and Stage II applicants for professional optometric degree programs, and
2. optometric residency programs that have applied for an initial award of accreditation.

During this period of COVID-19 interruption, ACOE will develop, adopt, modify, and implement temporary virtual site visit policies. In accordance with the USDE Guidance Letter, ACOE will do so without a public comment period. Procedures to implement this temporary virtual site visit policy will be adopted by the ACOE Executive Committee.

The USDE has also granted accrediting agencies the discretion to extend the term of accreditation, for a reasonable period of time during the COVID-19 interruption, for a program that is undergoing renewal of accreditation and was scheduled to have a site visit during a COVID-19 interruption. In addition, USDE has advised that during the COVID-19 interruption, accreditors may provide a good cause extension to programs or probation if the agency is unable to perform a required site visit or hold a hearing with representatives of the program because of the COVID-19 interruption. This includes providing an additional good cause extension to an institution or program that has otherwise already been provided with the agency’s maximum allowable good cause extensions. ACOE’s policy will be to make use of this temporary authority, with the goal of resuming normal practices as soon as reasonably possible after the COVID-19 interruption has ended. ACOE will be responsive to further guidance issued by USDE on this topic as the circumstances created by COVID-19 unfold. During the period of COVID-19 interruption, the Council will use its discretion in deciding when to grant extensions to accredited programs.

The USDE Guidance Letter acknowledges that, in some instances, ACOE may have scheduled a site visit of a program such that the results of that site visit would inform ACOE’s decision in time to ensure that students who graduate during the current or prior term will be considered to have graduated from an accredited program. The USDE Guidance Letter reminds accrediting agencies that retroactive accreditation is permissible as long as the effective date of accreditation is no earlier than the date on

which the program accepted the program as an applicant on the pathway to accreditation, or the date of a previous negative decision regarding an initial award of accreditation. ACOE has a retroactive accreditation policy that establishes the effective date as the date of a site visit to the program. If such site visit has now been cancelled or delayed as a result of the COVID-19 interruption, the effective date of the final decision could still be assigned based on the date of the scheduled site visit or an earlier date, but no earlier than the date on which the program was accepted as an applicant on the pathway toward accreditation.

In adopting this temporary policy, ACOE will take full advantage of the guidance from the USDE, which states that it may waive the normal process by which accrediting agencies are required to develop, seek public comment, and enact new policies for the limited purpose of allowing agencies to implement the changes described in the USDE Guidance Letter. This initial temporary policy shall be approved by the ACOE and shall be confirmed by the AOA Board of Trustees consistent with AOA House of Delegates Resolution 491. Revisions to this policy, consistent with current or future guidance from USDE, may be made by the ACOE alone. ACOE may meet via telephonic or videoconference meetings during this period of COVID-19 interruption. ACOE temporarily rescinds public comment periods for adoption of new temporary policies during the period of COVID-19 interruption. Should the ACOE desire to make a policy or policy modification permanent after the period of COVID-19 interruption, it must adhere to applicable statutory and regulatory requirements.

ACOE shall record in writing and publish on its website this new policy. In addition, ACOE shall record decisions to use the temporary flexibilities described in this temporary policy, and shall include in its records the name of the program, a description of the waiver or extension, an explanation of the basis for granting the waiver or extension, the date on which the agency granted the waiver or extension, and a description of the suspended activity resulting from the waiver or extension. ACOE shall also record in writing the vote of the Council when establishing a new or revised policy in response to circumstances created by the COVID-19 interruption.