

MEMORANDUM

DATE: November 04, 2022

SUBJECT: **Call for Comments on Proposed Modifications to the *Professional Optometric Degree Programs Seeking Accreditation* Policy and Procedure and to Standard 4.3 of the *Standards for professional optometric degree programs seeking preliminary approval pre-accreditation status***

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 Board of Trustees, Executive Director, Management Support Team, and General Council; Executive Committees and Directors of the ARBO, AAO, NBEO, and OEBC; AOSA Executive Director and AOSA Trustees; ASCO Executive Director; Executive Directors and Board Members of State Boards; Presidents and Executive Directors of State Associations; Director of the VA Optometry Service; Military and Public Health Optometric Service Chiefs; ASPA Members, Board and Executive Director; CHEA staff; Regional Institutional Accreditors; USDE staff; Chronicle of Higher Education; any interested party

FROM: G. Timothy Petito, O.D., ACOE Chair

DIST: ACOE, Ms. Puljak, Ms. Wirth, Ms. Mohr, Ms. Martin, Ms. Anderson

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

- 1. Modifications to the Accreditation Council on Optometric Education (ACOE) Policy and Procedure *Professional Optometric Degree Programs Seeking Accreditation***
- 2. Modifications to Standard 4.3 of the ACOE's *Standards for professional optometric degree programs seeking preliminary approval pre-accreditation status***

The ACOE will consider comments received at its Winter Meeting to be held February 24-26, 2023. ***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 **December 05, 2022** to accredit@theacoe.org.

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

The Council thanks the members of the Professional Optometric Degree (POD) Committee for their work in developing proposed modifications to the Policy and Procedure and to Standard 4.3. Members of the POD Committee include:

- David Yang, O.D., Chair
- Ida Chung, O.D.
- Geoffrey Goodfellow, O.D.
- William Miller, O.D., Ph.D.
- Mark Swan, O.D.

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

- Michelle Welch, O.D.
- G. Timothy Petito, O.D., ACOE Chair and ex-officio member

TOPIC 1: Modifications to the ACOE Policy and Procedure *Professional Optometric Degree Programs Seeking Accreditation*

Background: During its Winter 2022 meeting, the ACOE referred the Policy and Procedure *Professional Optometric Degree Programs Seeking Accreditation* to the ACOE’s Professional Optometric Degree (POD) Committee for review and potential modification. Specifically, the Committee was asked to review the criteria for Stage One and Stage Two designation and identify clarification opportunities. The Committee met on May 25, 2022, reviewed a summary of criteria employed by other accreditors, sought input from legal counsel, and developed directional recommendations.

The Committee’s directional recommendations were reviewed and accepted by Council during its Annual Meeting in June 2022. The Committee was directed to develop a proposed version of the Policy and Procedure *Professional Optometric Degree Programs Seeking Accreditation* based on the directional recommendations.

On September 19, 2022, the POD Committee convened and developed its recommendations for revisions to the ACOE Policy and Procedure *Professional Optometric Degree Programs Seeking Accreditation*.

A summary of proposed changes to the Policy and Procedure follows:

- Language referring to prospective professional optometric degree programs that have not yet enrolled students was standardized to “proposed programs.”
- The list of the four main milestones was revised/reworded to reflect formal ACOE classifications.
- Glossary definitions for “Stage One designation” and “Stage Two designation” were developed.
- A reference to required disclosure language applicable to programs in Preliminary Approval status was added to the Policy.
- The requirements for Stage One designation were expanded and detail around expectations added, including (1) letter of intent; (2) documented needs assessment; (3) documented feasibility study; (4) risk assessment associated with the feasibility study; and (5) payment of the application fee.
- The criteria for granting of Stage One designation were clarified.
- An administrative process to evaluate a proposed program’s eligibility for consideration of Stage Two designation was added.
- One of the eligibility criteria was clarified to require employment of separate individuals serving as chief executive officer (CEO) and chief academic officer (CAO).
- The specific required disclosure language for programs in Preliminary Approval status was defined.
- Other wording edits were proposed to improve overall clarity and readability.

Following its review of the marked-up version of the Policy and Procedure, the Council passed the following motion:

That the proposed edits to the ACOE Policy and Procedure *Professional Optometric Degree Programs Seeking Accreditation* be accepted and distributed to the communities of interest in a call for comments.

Request for input: The ACOE seeks input from the communities of interest regarding the proposed changes to the Policy and Procedure *Professional Optometric Degree Programs Seeking Accreditation*. Below please find

- a marked-up version of the Policy and Procedure and
- proposed Glossary definitions for the terms ‘Stage One designation’ and ‘Stage Two designation.’

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

Professional Optometric Degree Programs Seeking Accreditation

POLICY

The ACOE provides a pathway for ~~developingproposed~~ programs to achieve accreditation.

The pathway requires ~~developingproposed~~ programs to meet specified requirements to ~~achieve-be granted~~ each of four ~~main milestones, culminating in an accreditation status~~ classifications.

- *Stage One designation*
- *Stage Two designation*
- *Preliminary Approval (a formal preaccreditation status)*
- *Designation of an accreditation status Accredited with Conditions or Accredited*

Council evaluation and approval is required for each ~~proposed~~ program to be granted each of the designations on the pathway to accreditation.

Neither *Stage One* nor *Stage Two designation* provides any rights or privileges of accreditation, and neither is a formal *preaccreditation status*. The purpose of evaluating ~~proposed~~ programs via the *Stage One* and *Stage Two designations* is to ensure only ~~proposed~~ programs with a high likelihood of successfully attaining accreditation are granted *preaccreditation status* and allowed to enroll students. This process ensures (a) ~~developingproposed~~ programs assess the feasibility and potential viability of a new program, (b) ~~it~~ enables ~~developingproposed~~ programs to receive feedback and information from the Council regarding requirements for compliance with *Standards*, and (c) ~~it~~ ensures ~~proposed~~ programs fully understand the ACOE *Standards* and are prepared to take steps necessary to comply.

In the event a ~~proposed~~ program's application for either *Stage One* or *Stage Two designation* is not granted by the Council, any subsequent application for either *Stage One* or *Stage Two designation* will not be considered by the Council until at least six (6) months have elapsed following the meeting at which the prior application was considered.

A ~~proposed~~ program that does not achieve *Stage One designation* within two (2) years of submission of ~~its-a complete~~ application/~~feasibility study for Stage One designation~~ will have its application ~~status rescinded~~expire. ~~Proposed~~ programs may remain in *Stage One designation* for up to (3) three years while working on the requirements for *Stage Two designation*. ~~Proposed~~ programs may remain in *Stage Two designation* for up to (2) two years. ~~Proposed~~ programs may voluntarily withdraw from *Stage One* or *Stage Two designation* at any time. If the ~~proposed~~ program withdraws or if its status expires, it may not reapply for *Stage One designation* for at least (2) two years from the date of the withdrawal or expiration.

Prior to being granted ~~a preaccreditation status~~ *Preliminary Approval*, ~~proposed~~ programs *must* demonstrate a sufficiently robust *teach-out plan* ~~is drafted~~ which includes a list of academic programs offered by the institution and the names of other institutions that offer similar programs and that could potentially enter into a *teach-out agreement* with the institution on behalf of the program.

~~Proposed~~ programs *must* not recruit or enroll students until the *preaccreditation status* of *Preliminary Approval* has been awarded. If a ~~proposed~~ program recruits students prior to achievement of ~~preaccreditation status~~ *Preliminary Approval*, application ~~status~~ may be ~~rescinded~~ withdrawn. - If a ~~proposed~~ program enrolls students before being granted *Preliminary Approval* status, the Council will not accept the program's application for accreditation until after the first enrolled class is graduated, and the program will be evaluated using the ACOE's *Standards* for professional optometric degree programs.

Programs holding the *Preliminary Approval* status must publish ACOE-specified disclosure language on the program's public website.

The ACOE re-evaluates programs in *Preliminary Approval* status annually during the first three academic years of the program.

Programs may remain in *Preliminary Approval* status for no more than five (5) years before a final accrediting action is made.

When the ACOE denies accreditation to a program it has preaccredited or when it withdraws a program's ~~preaccreditation status of~~ *Preliminary Approval status*, it may maintain the program's ~~preaccreditation~~ *Preliminary Approval status* for currently enrolled students until the program has had a reasonable time to complete the activities in its *teach-out plan* to assist students in transferring or completing their programs, but for no more than 120 days unless approved by the ACOE for good cause (refer to ACOE Policy and Procedure "*Teach-out Process*").

SCOPE

Professional Optometric Degree Programs
Optometric Residency Programs
Optometric Technician Programs

GUIDELINES

Inquiries about the potential accreditation of a proposed professional optometric degree program should be directed to the ACOE staff at accredit@theacoeaa.org.

In response to an inquiry, the ACOE Policies and Procedures Manual and applicable accreditation *Standards* will be provided to the inquiring institution. In addition, the ACOE staff is available to interested ~~programs-institutions~~ to advise on basic information regarding procedures and *Standards*.

Proposed programs which have not yet earned the *preaccreditation status of Preliminary Approval* must avoid making any statements implying achievement of *preaccreditation status*.

Proposed programs on the pathway to accreditation must avoid making any statements implying earning an *accreditation or preaccreditation status* is a certainty.

PROCEDURE

Process to Achieve Stage One Designation

The process to achieve *Stage One designation* is the first step toward potential accreditation. This initial phase is designed to provide proposed programs with input from the ACOE as the proposed program works toward the development of a new professional optometric degree program.

For a ~~potential-proposed~~ professional optometric degree program to be considered for *Stage One designation*, the sponsoring institution must submit a complete application for Stage One designation. A complete application includes:

1. Submit a formal letter of intent from the chief executive officer of the sponsoring institution. The letter of intent must
 - a. ~~and~~ demonstrate that the institution ~~that would be~~ sponsoring the proposed program is devoted primarily to education, ~~and~~
 - b. include an affirmative statement of commitment to the access and availability of sufficient funding for the development of the proposed program.

2. A documented needs assessment. Information sources must be cited and the needs assessment must include but not be limited to:
 - a. Clear and concise articulation of current gaps and/or unmet needs related to the practice of optometry
 - b. Anticipated mission and goals of a new program that tie back to the gaps and unmet needs.
 - c. Quantitative and qualitative justification of the existence of gaps and/or unmet needs, which should include but not be limited to:
 - i. Regional and national data on current workforce needs and workforce needs five (5) – seven (7) years out.
 - ii. Data on annual graduate numbers from other programs, both within the region and nationally.
 - iii. Current and projected demographics of local and regional area that impact optometric practice.
 - iv. Current and projected legislative environment within the region.
 - d. Demonstration of support from local and/or regional practitioners and state association(s).

~~1.—~~

~~2.3. Complete and submit a~~ A documented feasibility study of the proposed professional optometric degree program in terms of:

~~a.—Needs Assessment~~

~~Documentation of the rationale for starting a new program and the public need for a new school or college of optometry;~~

~~a. Students~~

~~i. Describe anticipated class size and total enrollment projections; discuss analyses performed, including key underlying assumptions made, to derive those values.~~

~~ii. Discuss anticipated recruitment strategies and articulate aspects of the strategy that are uniquely compelling. Articulate the proposed program's value proposition to prospective students.~~

~~iii. Discuss anticipated actions to maximize the pool of qualified applicants.~~

~~b.—Faculty~~

~~Documentation of class size and total enrollment projections based upon resources available to the educational program, which takes into account information collected during the needs assessment;~~

~~b. —~~

~~i. Describe anticipated estimated faculty size and discuss analyses performed, including key underlying assumptions made, to derive those values.~~

~~1. If the proposed program anticipates sharing faculty with other programs within the sponsoring institution or with another institution, describe how this factors into the anticipated estimated faculty size.~~

~~ii. Discuss anticipated recruitment and retention strategies and articulate aspects of the strategy that are uniquely compelling. Articulate the proposed program's value proposition to prospective faculty.~~

~~c. Resources~~

~~i. —~~

~~Provide evidence supporting the existence of an appropriate patient base to facilitate student attainment of foundational clinical experiences.~~

- ii. Discuss plans to ensure the proposed program will have access to appropriate , financial resources, available faculty, technological resources , and physical facilities to meet the intent of its mission and goals. s; and
4. A completed risk assessment associated with the feasibility study.
 - a. For each of the areas within the feasibility study, students, faculty, and resources, assess and articulate risks associated with proposed program’s plans.
 - e.b. For each risk, describe potential mitigation strategies.
- ~~3. Career opportunities for graduates.~~
- ~~4.5. Payment of the~~ Submit the initial application fee, which is non-refundable. The current application fees are listed on the ACOE website or may be obtained by contacting the ACOE Director.

At its next ~~duly~~-scheduled designated meeting that occurs at least 60 days following receipt of the above submissions, the ACOE will review the proposed program’s application for *Stage One designation*. The Council will evaluate whether the application for Stage One designation is complete and sufficiently developed.

If the ~~feasibility study~~application for Stage One designation is determined to be complete and ~~adequate~~sufficiently developed, then the proposed program will be granted *Stage One designation*.

If the ~~feasibility study~~application for Stage One designation is incomplete and/or inadequateinsufficiently developed, then the ACOE ~~may return it to the program for additional development.~~will not grant the Stage One designation. Notification to the proposed program will include areas within the application considered incomplete and/or insufficiently developed and information on eligibility and requirements to submit to Council for reconsideration during a future meeting.

Process to Achieve Stage Two Designation

Following the granting of *Stage One designation*, the proposed program must be deemed eligible for Stage Two designation consideration prior to submission of a self-study. Documentation required to demonstrate eligibility includes evidence:

1. Demonstrating the proposed program is part of an institution that possesses an accreditation or preaccreditation status from a regional institutional accreditor;
2. That the regional institutional accreditor has granted approval for the institution to offer a doctor of optometry program;
3. That the institution has employed both a chief executive officer and a separate chief academic officer of the proposed program for at least six months; and
4. That it is authorized by applicable law to confer the doctor of optometry degree upon its graduates in recognition of their successful completion of a four academic year or equivalent professional program of study in optometry.

Within 15 business days of submission of evidence of eligibility, ACOE staff, in consultation with the ACOE Chair, will assess whether eligibility criteria are met and notify the proposed program of the outcome of its review.

Upon notification it has met the eligibility requirements for Stage Two designation consideration, the proposed program may submit a self-study report and associated appendices according to the requirements outlined in ACOE’s “Self-Study” Policy and Procedure and the ACOE Standards for Initial Preaccreditation of a New Professional Optometric Degree Programs, published on the ACOE’s website (www.theacoe.org). The self-study submission must include pro forma financial statements associated with the development of the proposed professional optometric degree program.

~~develops a self-study and other documentation. To be considered for Stage Two designation, the program must:~~

- ~~1. Demonstrate that it is part of an institution that possesses or is actively seeking *regional institutional accreditation*;~~
- ~~2. Have employed a chief executive officer and chief academic officer of the program at least six months prior to submitting the self-study;~~
- ~~3. Provide evidence that it is authorized by applicable law to confer the doctor of optometry degree upon its graduates in recognition of their successful completion of a four academic year or equivalent professional program of study in optometry; and~~
- ~~4. Have completed and submitted a self-study report according to the requirements outlined in ACOE's "Self Study" Policy and Procedure and the ACOE *Standards for Initial Preaccreditation of a New Professional Optometric Degree Programs*, published on the ACOE's website (www.theacoe.org)~~

The ~~proposed~~ program's ~~self-study~~ ~~must submit the above documentation, which and associated~~ appendices will be reviewed by the ACOE at its next ~~duly~~-scheduled designated meeting that occurs at least 60 days following receipt of the program's information self-study to determine whether basic planning and development have progressed to a degree that would warrant an on-site *evaluation visit* as required prior to the consideration of ~~a preaccreditation status~~ Preliminary Approval.

If the program's planning and development is determined to be complete and adequate, then the program will be granted *Stage Two designation*.

If the ACOE in its review of the self-study report discerns deficiencies or weaknesses in the program that make it ~~clearly~~ out of compliance with the *Standards* for new professional optometric degree programs, then the Council may postpone an on-site *evaluation visitation* until the self-study has been further developed, and the deficiencies have been corrected.

Process to Achieve Preliminary Approval (Preaccreditation Status)

Following the granting of *Stage Two designation*, the ACOE will schedule an on-site *evaluation visit* to the program. This visit will normally take place approximately six months after *Stage Two designation* is granted.

At least two (2) -months prior to the scheduled *evaluation visit*, the program will need to submit an updated self-study along with its *teach-out plan*.

The program's *teach-out plan* must include:

1. plans to ensure that all students enrolled at the time the decision to close is made (either by the program or the ACOE) will be afforded the opportunity to complete an ACOE-accredited doctor of optometry program;
2. a list of other institutions that offer similar programs accredited by the ACOE that could potentially enter into a teach-out agreement with the program, should the program be unable to ensure all enrolled students can complete the course of study by the time of closure;
3. general description of the resources (faculty, advising, physical facilities, etc.) that will be available to enrolled students during the teach-out period;
4. whether enrolled students will incur additional charges due to the teach-out plan and if so, how students will be notified as soon as practicable of these charges;
5. how prospective and enrolled students will be informed as soon as practicable of the program's closing and any implications (including, but not limited to, those pertaining to students' prospects for employment or eligibility to sit for exams) of the closure. The program

- must make reasonable best efforts to ensure its students and prospective students receive and acknowledge receipt of this information;
6. how program stakeholders, including faculty and affiliated clinical patient care programs, will be informed as soon as practicable of the program's closure and its implications for stakeholders; and
 7. plans to ensure student records are retained ~~and~~ accessible to former students ~~access to student records.~~

An *evaluation visit* team will ~~conducts~~ a formal on-site *evaluation visit* and ~~completes~~ its report. Report completion typically takes approximately two (2) or more months following the on-site visit and includes the opportunity for the program to perform ~~its a~~ factual accuracy review (see Policy and Procedure "Factual Accuracy Review"). Upon completion, the team's evaluation report is submitted to the Council for its review at its next regularly scheduled meeting.

If the *Stage Two* program is found to meet the Council's *Standards*, then the Council will grant the *preaccreditation status* of *Preliminary Approval*.

Upon the granting of the *preaccreditation status* of *Preliminary Approval*, the following disclosure language must be published to a prominent location on the program's public website:

The Accreditation Council on Optometric Education (ACOE) has granted [Name of Program] the *preaccreditation status* of *Preliminary Approval*. *Preliminary Approval status* signifies *satisfactory progress toward accreditation*. *Achieving Preliminary Approval status is not a guarantee that the ACOE will grant [Name of Program] an accreditation status*. *Participants who graduate from a program in Preliminary Approval status are not deemed to have completed an accredited program*. *For more information, see the ACOE's website at www.theACOE.org.*

Process to Achieve an Accreditation Status

Once a program has been granted the *preaccreditation status* of *Preliminary Approval*, the program has approval to begin student recruitment, selection and admissions, and to begin offering the program.

The Council shall review the *Preliminary Approval* classification annually during each academic year of the program through written reports and/or *evaluation visits* as deemed necessary by the Council.

The Council will conduct a final on-site *evaluation visit* to the program for the consideration of an *accreditation status* during the academic year in which the first class is expected to graduate.

When the Council awards *Preliminary Approval* to a program or at any time during the Council's monitoring of a program holding *Preliminary Approval* status, the ACOE may issue *recommendations* or specify conditions for monitoring which *must* be attained to maintain the *preaccreditation status*.

After an *evaluation visit* team conducts a formal on-site *evaluation visitation*, the team's evaluation report is submitted to the Council for its review.

If the program is found to meet the Council's *Standards*, then the Council will grant an appropriate *accreditation status*.

If the program is denied an *accreditation status* or if its *preaccreditation status* is withdrawn or expires, it must submit an updated *teach-out plan* (refer to ACOE Policy and Procedure "Teach-Out Process").

FORMS/ATTACHMENTS

ACOE *Standards* for professional optometric degree programs and professional optometric degree programs seeking *Preliminary Approval preaccreditation status* are posted on its website (www.theACOE.org)

DATES OF REVISION/VALIDATION

See Historical Revision History; 06/26/2021; 06/18/2022

Proposed Glossary definitions for the terms ‘Stage One designation’ and ‘Stage Two designation.’

- **Stage One designation** - A classification granted to a proposed professional optometric degree program indicating that the proposed program has demonstrated a complete and sufficiently developed needs assessment, feasibility study, and risk assessment. The Stage One designation classification does not provide any rights or privileges of accreditation and is not a formal preaccreditation status. The proposed program has approval to apply for Stage Two designation.
- **Stage Two designation** - A classification granted to a proposed professional optometric degree program indicating that the proposed program’s planning and development are sufficient to warrant an on-site evaluation review in consideration of Preliminary Approval Status. The Stage Two designation classification does not provide any rights or privileges of accreditation and is not a formal preaccreditation status.

TOPIC 2: Modifications to Standard 4.3 of the ACOE’s *Standards for professional optometric degree programs seeking preliminary approval pre-accreditation status*

Background: Following proposal of edits to the Policy and Procedure, the POD Committee determined the need to revise Standard 4.3 of the ACOE’s *Standards for professional optometric degree programs seeking preliminary approval pre-accreditation status*. In particular, the Standard was revised to:

- Match the proposed Stage Two designation eligibility criteria with respect to the six-month minimum tenure of a CEO and CAO and
- Clarify the intent that the CEO and CAO are separate individuals.

Following its review of the marked-up version of Standard 4.3 of the ACOE’s *Standards for professional optometric degree programs seeking preliminary approval pre-accreditation status*, the Council passed the following motion:

That the proposed edits to Standard 4.3 of the ACOE’s *Standards for professional optometric degree programs seeking preliminary approval pre-accreditation status* be accepted and distributed to the communities of interest in a call for comments.

Request for Input: The ACOE seeks input from the communities of interest regarding the proposed changes to Standard 4.3 of the ACOE’s *Standards for professional optometric degree programs seeking preliminary approval pre-accreditation status*. A marked-up version is provided below.

4.3 ~~The positions of program’s chief executive officer and a separate chief academic officer must both be in place for at least six months prior as of the time of submission for consideration of eligibility for Stage Two designation to submission of the self-study for Stage Two Applicant status.~~ The program’s chief executive officer or chief academic officer must have a professional optometric degree. ~~Either of T~~ the program’s chief executive officer or chief academic officer must have experience in higher education, ~~and both~~ the chief executive officer and chief academic officer must be qualified to provide leadership

in optometric education, scholarly activity, and patient care. ~~The positions of chief executive officer and chief academic officer must be in place at least six months prior to submission of the self-study for Stage Two Applicant status.~~

Examples of Evidence

- *Curriculum vitae*
- *Copy of transcript*
- *Copy of diploma*
- *Description of process to verify credentials*