MEMORANDUM

DATE: July 20, 2023

SUBJECT: (1) Accreditation Council on Optometric Education (ACOE) deferral of phase out of ACOE Accreditation of Optometric Technician Programs and 
(2) Call for Comments on Revision of Accreditation Standards Policy and Procedure

TO: Deans and Presidents of Schools and Colleges of Optometry, including proposed programs; 
Presidents and Chancellors of institutions that house Schools and Colleges of Optometry, 
including proposed programs; Externship Directors; Directors of Optometric Residencies; 
Supervisors of Optometric Residencies; Directors of Optometric Technician Programs; ACOE 
Consultants; AOA Board of Trustees, AOA Executive Director, AOA Management Support 
Team, and AOA General Council; Executive Committees and Directors of the ARBO, AAO, NOA, 
NBEQ, 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; 
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 twofold:
(1) To communicate the ACOE’s decision to defer its planned phase-out of ACOE accreditation of 
oppticometric technician programs, and 
(2) To request comments from the communities of interest related to proposed changes to the ACOE 
Policy and Procedure Revision of Accreditation Standards Policy and Procedure

The ACOE will consider comments received relative to topic (2) at its Fall Meeting scheduled October 27-29, 
2023. Please submit any comments by September 3, 2023, to accredit@aoa.org.

Topic (1). During the ACOE’s Fall Meeting, held October 14-16, 2022, following the Council’s review of the 
comments received from the communities of interest and Council deliberation, the Council voted to proceed 
with the phase out of its accreditation of optometric technician programs and charged the Planning 
Committee of the ACOE with developing an implementation plan.

In a memorandum dated March 29, 2023, the ACOE communicated to the communities of interest its 
anticipated timeline and expected effective date of the phase-out. In that memorandum, the Council indicated 
that its planned timeline was structured to include opportunities for stakeholders to forward additional 
information that might result in Council’s reconsideration of its phase out decision.

In its Annual Meeting, held June 21-24, 2023, the ACOE considered additional information received relative to 
the topic and passed the following motion:

Visit the ACOE web site at www.theacoe.org.
That the ACOE defer its decision to phase-out the accreditation of optometric technician programs approved in the ACOE’s October 14-16, 2022, Fall Meeting and petition the Board of the American Optometric Association to explore and take action to increase demand.

While currently accredited programs expressed desire to remain accredited, the Council’s analysis yielded limited-to-no viable candidates for the ACOE’s optometric technician program accreditation outside of those currently accredited. Other stakeholders within the profession also submitted comments expressing desire for the ACOE to continue its accreditation of optometric technician program. The Council determined it would defer the phase-out in the interest of seeking assistance in further exploring whether demand for accreditation could be increased and for action to be taken resulting from this exploration. The ACOE submitted a letter to the American Optometric Association requesting its assistance in exploring increasing demand.

The Council welcomes assistance from any other members of the communities of interest that can help increase demand for the ACOE’s optometric technician program accreditation. The Council will revisit this topic in the future, pending the effectiveness of actions taken.

The Council expresses its sincere gratitude to the individuals and organizations that submitted comments and appreciates the community’s support of the ACOE’s mission which includes serving the public and the profession of optometry by establishing, maintaining, and applying standards to ensure the academic quality and continuous improvement of optometric education.

**Topic (2).** In light of the Council’s decision to defer the phase-out of the ACOE’s accreditation of optometric technician programs, the ACOE approved proposed modifications to the ACOE Policy and Procedure, *Revision of Accreditation Standards*. Specifically, the ACOE seeks to extend the timeframe within which it is required to initiate the next comprehensive review of the *Optometric Technician Standards*. The current Standards were effective January 1, 2019. The change to the Policy and Procedure enables the ACOE to defer initiating the comprehensive Standards review process from January of 2024 to January of 2027, thus, allowing time for actions to be taken to increase demand and preventing a significant workload burden to be taken on by the Council should Council ultimately decide to proceed with the phase-out.

The proposed changes are shown in the mark-ups below.

**Revision of Accreditation Standards**

**Policy**

The *ACOE* maintains a comprehensive systematic program of review that involves all relevant constituencies and that demonstrates that its *Standards* are adequate to evaluate the quality of the education or training provided by the programs it accredits and relevant to the educational or training needs of students.

The *formal comprehensive Standards review process* associated with *professional optometric degree programs and optometric residency programs* is initiated no less frequently than five (5) years since the most recent effective date of the *Standards*.

The *formal comprehensive Standards review process* associated with *optometric technician programs* is initiated no less frequently than eight (8) years since the most recent effective date of the *Standards*.

The Council may review, revise, delete, or add individual *Standards* at any time it deems appropriate. If, through its system of review, the Council determines that it needs to change one or more individual *Standards*, or the *Standards* as a whole, then the *ACOE* shall initiate the revision process
within twelve (12) months of determining that a change is necessary and complete that revision process in a reasonable period of time.

**SCOPE**
- Professional Optometric Degree Programs
- Optometric Residency Programs
- Optometric Technician Programs

**GUIDELINES**
None

**PROCEDURE**

**Formal comprehensive review process**
The ACOE will issue a survey inviting all interested members of the communities of interest to provide input regarding the criticality and clarity of the current Standards, to identify gaps, and to provide comments.

The Council may engage one or more of the ACOE Committees to evaluate the survey results and develop recommendation(s) to the Council related to potential change(s).

The Council will consider results of the survey and any other input received and propose changes to the Standards, ensuring continued compliance with ACOE Policy and Procedure “Accreditation Standards.”

The Council will circulate the draft Standards to programs holding an accreditation status or Preliminary Approval, the state boards of optometry, the USDE, other stakeholders within the profession, and other interested parties inviting comments from the relevant constituencies. The public is also invited to comment via posting on the ACOE’s website. The comment period will be a minimum of thirty (30) days.

Following review of comments on Standards, the Council may elect to recirculate a revised draft for additional comments.

When the comment solicitation and review process is complete, the Council takes action to adopt the Standards and establish the effective date.

The ACOE will publish the revised Standards in a timeframe that reasonably allows programs to come into compliance by the effective date.

**Revision of Standards outside formal review process**
The Council may receive a request or may become aware via other means of the need to change one or more Standards.

The Council may engage one or more of the ACOE Committees to evaluate and develop recommendation(s) to the Council related to the potential change(s).

The Council will review the recommendations and develop proposed change(s), ensuring continued compliance with ACOE Policy and Procedure “Accreditation Standards.”

The Council will circulate the contemplated change(s) to programs holding an accreditation status or Preliminary Approval, the state boards of optometry, the USDE, other stakeholders within the profession, and other interested parties inviting comments from the relevant constituencies. The comment period will be a minimum of thirty (30) days.

Following review of comments on Standards, the Council may elect to recirculate a revised draft for
additional comments.

When the comment solicitation and review process is complete, the Council will take action to adopt the *Standards* and establish the effective date.

The ACOE will publish the revised *Standards* in a timeframe that reasonably allows programs to come into compliance by the effective date.

**FORMS/ATTACHMENTS**

None

**DATES OF REVISION/VALIDATION**

See Historical Revision History; 06/26/2021; 06/18/2022; 02/25/2023 (no/non-substantive changes)

The ACOE will consider comments received relative to topic (2) at its Fall Meeting scheduled October 27-29, 2023. Please submit any comments by **September 3, 2023**, to accredit@aoa.org.

More information regarding the ACOE and optometric technician accreditation is available on the ACOE’s website—**www.theacoe.org**.