MEMORANDUM

DATE: July 20, 2023

SUBJECT: End of COVID-19 flexibilities and revisions to Accreditation Council on Optometric Education (ACOE) Professional Optometric Degree Program Standard 2.10.2.1

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, 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; 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

1. provide an update regarding the end of COVID-19 flexibilities,
2. to communicate changes to the Accreditation Council on Optometric Education’s (ACOE’s) Standard 2.10.2.1 for professional optometric degree programs, effective October 7, 2023.

**TOPIC 1:** The ACOE most recently provided guidance related to the end of COVID-19-related flexibilities in a memorandum to the communities of interest on March 20, 2023. In that memorandum, the ACOE communicated it anticipated the end date of the COVID-19-related flexibilities to be November 7, 2023 (180 days following the date on which the COVID-19 national emergency declaration was anticipated to be rescinded). Subsequent to that communication, on April 10, 2023, the national emergency declaration was lifted while the lifting of the public health emergency remained on May 11, 2023. In a [Dear Colleague Letter] issued May 18, 2023, the U.S. Department of Education clarified the relevant date for accreditors as April 10, 2023; thus, the end date of the pandemic-related flexibilities is confirmed to be October 7, 2023.

During its June 21-24, 2023, Annual Meeting, the ACOE passed the following motion

That the ACOE Temporary Policy for Virtual Site Visits, Granting Extensions of Accreditation, Providing Good Cause Extensions, and Granting Retroactive Accreditations and all other Advisories, including all amendments, issued by the ACOE regarding the COVID-19 pandemic be canceled effective October 7, 2023.
Implications for programs. The end of the COVID-19-related flexibilities may have implications for programs in terms of (a) allowance for virtual site visits, (b) allowance for the use of distance education, and (c) allowance for virtual visits to externship sites. Item (c) is addressed under Topic 2.

Regarding (a) allowance for virtual site visits, the ACOE will no longer be able to conduct on-site evaluation visits virtually after October 7, 2023. As communicated it its March 20, 2023, memorandum to the communities of interest, the ACOE resumed on-site evaluation visits in September 2021 and since January 2022, all visits have been conducted in person, including the 40 U.S. Department of Education-required ‘follow-up’ in-person visits to programs that underwent virtual visits associated with accreditation reviews.

Regarding (b) allowance for the use of distance education, the ACOE addressed programs’ use of distance education within its COVID-19 Advisories. Specifically, the COVID-19 Advisory states - Should programs decide to continue using distance learning for the future as part of their curricula beyond the USDE’s waiver period, the ACOE considers this to be a substantive change and will require the program to seek and obtain approval of the continued offering of coursework through distance learning.

As communicated in its March 20, 2023, memorandum, its Policy and Procedure “Substantive Changes” specifies that if a program plans to offer distance education at or above a defined threshold level on an ongoing basis, ACOE approval must be secured. Specifically, the ACOE considers the following as a substantive change - Use of distance education that represents a substantial portion of the curriculum (operationally defined as 25% or more of the credit hours of the accredited curriculum). When 50% or more of a course is delivered by distance education, credit hours associated with that course are considered to be distance education.

Information on distance education is also addressed in the Dear Colleague Letter issued by the U.S. Department of Education on May 18, 2023. The Dear Colleague Letter specifically addresses guidance applicable to institutional accrediting agencies and institutions’ eligibility for Title IV funds. The ACOE is not an institutional accredits and not a gatekeeper for Title IV funds; however, the ACOE does serve as a gatekeeper for programs to establish eligibility for other federal funds and to ensure that eligibility remains intact, the ACOE has formally added distance education to the scope of its recognition from the U.S. Department of Education. The ACOE’s efforts to explicitly incorporate distance education into its Standards of accreditation are well underway and programs are urged to watch for and participate in the ACOE’s calls for comments related to changes to its Standards for professional optometric degree and optometric residency programs.

**TOPIC 2:** During the Council’s Winter Meeting, held February 24-26, 2023, the Council considered that changes being proposed applicable to Professional Optometric Degree Program Standard 2.10.2.1 should be effective as of the end-date of the COVID-19-related flexibilities. Standard 2.10.2.1 deals with program visits to externship sites, where Council provided programs flexibility to conduct these visits virtually during the pandemic. The proposed changes to Standard 2.10.2.1 and its effective date were distributed to the communities of interest in the call for comments on March 20, 2023, in conjunction with the ACOE’s call for comments regarding the comprehensive Professional Optometric Degree Program Standards review. Comments were requested to be submitted by April 19, 2023. Standard 2.10.2.1 in the current Standards was listed as Standard 2.25 in the draft Standards.

Responses from the call for comments were aggregated and reviewed by the ACOE Professional Optometric Degree Committee on June 3, 2023, and subsequently presented to the Council for its
review and consideration in its Annual Meeting, held June 21-24, 2023. The Council adopted the following revisions to ACOE Standard 2.10.2.1 and established the effective date of October 7, 2023.

2.10.2.1 Each externship site must be visited by personnel designated by the program within one year of placement of the first extern(s) and thereafter on a periodic basis of no less than every four years. 

Note: The initial visit must be in person; thereafter, every other visit on an alternating basis may be conducted virtually. Visits conducted jointly with other professional optometric degree programs are acceptable.

Examples of Evidence:
  o Policy and/or procedure that addresses visits to externship sites
  o Administrative structure charged with visiting sites
  o Records showing evidence of visits
  o Log showing dates of visits and extern placement along with scheduled visits.

In the approved version of the Standard, the Council reaffirms that while virtual visits remain allowable, some in-person visits must be conducted given the criticality of externship sites to the overall delivery of the optometric education leading to the conferring of a doctor of optometry degree. The Council also specifies that the initial visit must occur prior to placement of the first extern.

The revised Standard 2.10.2.1 becomes effective on October 7, 2023. The ACOE expects that programs will be able to demonstrate evidence of an in-person visit prior to placement of the first extern for all new externship sites added as of October 7, 2023, and later.

If you have questions, feel free to visit the ACOE website at www.theacoe.org or contact the ACOE staff at accredit@theacoe.org.