

MEMORANDUM

DATE: July 26, 2021

SUBJECT: **Notification of Adoption and Publication of Accreditation Council on Optometric Education (ACOE) Policy and Procedure (P&P) Manual and revised ACOE Fee Structure**

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 BOT, ED, COO, CFO, and GC; Executive Committees and Directors of ARBO, AAO, NBEO, and OEBC; AOSA ED and Trustees; ASCO Executive Director; Presidents and EDs of State Optometric Associations; State Board EDs and Presidents; 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. Martin

The purpose of this memorandum is to notify members of the communities of interest of two (2) important updates.

- (1) Adoption and publication of *ACOE Policy and Procedure (P&P) Manual*, replacing existing *Accreditation Manuals*
- (2) Adoption of revised ACOE Fee structure

ACOE P&P Manual

The ACOE has historically simultaneously maintained *Accreditation Manuals* for each of the three program types it accredits, Professional Optometric Degree Programs, Optometric Residency Programs, and Optometric Technician Programs. As the ACOE embarked on preparation of documentation to support reaffirmation of recognition from both the United States Department of Education (USDE) and the Council for Higher Education Accreditation (CHEA), an opportunity to streamline documentation into a single comprehensive *P&P Manual* was identified. The Council anticipates several benefits to implementing this change: (1) the risk of inconsistency is reduced as same/similar content will no longer be maintained in multiple places; (2) the process to maintain and update content is more efficient as one manual is reviewed/updated rather than three; (3) a new format offers the opportunity to more clearly distinguish between statements of policy and procedural steps, and to supplement content where gaps present themselves; and (4) tracking of ongoing revisions/validations of policies and procedures can be more precise and allow for the ACOE to react more nimbly to needed changes because updates can be made at a P&P level rather than at a manual level.

The construct underlying the *ACOE P&P Manual* is centered around the idea of putting forth discrete policies and procedures, organized by topic area, and replaces the narrative-based *Accreditation Manuals*. The new construct is provided below with explanation.

Policy Title

POLICY

Policy statements are the 'rules' to which ACOE/impacted programs must adhere. Many are driven by requirements imposed upon ACOE from the bodies that recognize it – the USDE and CHEA.

SCOPE *Scope clarifies to which program type(s) the policy applies; most policies in the P&P Manual apply to all three program types*

- Professional Optometric Degree Programs
 - Optometric Residency Programs
 - Optometric Technician Programs
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GUIDELINES

Guidelines provide supplementary relevant content to aid the user in understanding/complying with the associated the Policy and/or Procedure.

PROCEDURE

The procedure contains the step-by-step actions associated with compliance to the Policy.

FORMS/ATTACHMENTS

If there are specific forms or other documents associated with a given policy, they will be listed in this section.

DATES OF REVISION/VALIDATION

This section allows for the opportunity to have differential review/revision dates at a Policy level. 'Validation' dates provide evidence that the Policy was reviewed for currency even if it was not edited.

Historically, Accreditation Standards have been included within each *Accreditation Manual*. Going forward, the Standards will not be included within the *ACOE P&P Manual*; rather, each set of Accreditation Standards will be maintained as stand-alone documents and will continue to be published on the ACOE's website.

As part of the development of the comprehensive *P&P Manual*, the ACOE incorporated several updates. A summary of material changes is provided below.

Section	Summary of Changes
Introduction and General Information	
Mission, Goals, and Objectives	Updated Mission, Goals, and Objectives for the ACOE were adopted by the ACOE in its June 2021 Annual Meeting, following review of comments received from the call for comments that was distributed to the communities of interest on March 25, 2021.
General Policies and Procedures	
Policy on Policies	New Policy & Procedure. Developed to provide definition and structure to how the ACOE manages and maintains its P&Ps. The new Policy was adopted by the ACOE in its June 2021 Annual Meeting. This followed a review of comments submitted following distribution of the draft <i>P&P Manual</i> to the communities of interest for comment on May 3, 2021.
Ethics and Integrity	New Policy & Procedure. The subject of a standard or policy regarding institutional ethics and integrity was initially raised in 2019. The new Policy was adopted by the ACOE in its June 2021 Annual Meeting. This followed a review of comments submitted following distribution of the draft <i>P&P Manual</i> to the communities of interest for comment on May 3, 2021.
Conflicts of Interest	The preexisting Policy was revamped. Specifically, the language in the Policy statement was recrafted; the Guidelines were expanded and upgraded; and the Procedural section was newly drafted, largely in line with current practices. Two enhancements were added to the Procedure section: (1) where committee members serve on committees that review individual programs the collection of a completed disclosure/attestation will be enforced; (2) evaluation team members whose signed disclosure/attestation on file is aged two or more years at the time of the planned evaluation visit will be required to complete an updated disclosure/attestation. The revised Policy was included within the <i>P&P Manual</i> adopted by the

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	ACOE in its June 2021 Annual Meeting and followed distribution to the communities of interest for comment on May 3, 2021.
Confidentiality of Protected Health Information (PHI)	Adjustments to Policy wording made to better align with current practices regarding the use of Business Associate Agreements (BAAs). Revised process verbiage for Evaluation Team Members – to require completion of the ACOE’s HIPAA training to occur within two years of a scheduled evaluation visit. The revised Policy was included within the <i>P&P Manual</i> adopted by the ACOE in its June 2021 Annual Meeting and followed distribution to the communities of interest for comment on May 3, 2021.
Policies Related to Accreditation of Programs	
Accreditation and Preaccreditation Standards	New Policy & Procedure. Developed to serve as a checkpoint during standards updates so ACOE remains in compliance with USDE criteria. The new P&P was included within the <i>P&P Manual</i> adopted by the ACOE in its June 2021 Annual Meeting and followed distribution to the communities of interest for comment on May 3, 2021.
The Role of the Liaison Associated with Review of Programs	P&P was modified to allow for the potential need to assign a liaison Council member in support of an Optometric Technician evaluation review. This scenario is only employed should existing members of the Council be unavailable to serve on a team due to conflict of interest or other limitations. The revised Policy was included within the <i>P&P Manual</i> adopted by the ACOE in its June 2021 Annual Meeting and followed distribution to the communities of interest for comment on May 3, 2021.
Professional Optometric Degree Program Seeking Accreditation	<p>The ACOE identified the need to improve clarity of the verbiage within the <i>Accreditation Manual: Professional Optometric Degree Programs</i> addressing the process for newly developing programs to pursue accreditation.</p> <p>Additional content was incorporated to support compliance to new USDE requirements; specifically, USDE requires that programs 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 as a precondition of being granted a preaccreditation status.</p> <p>Another material change relates to the process for programs undergoing consideration for either Stage One or Stage Two designation. Specifically, the proposed change is as follows: In the event a 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. The intent of this change is to allow developing programs more time to evaluate and incorporate feedback from the Council’s review.</p> <p>The revised Policy was included within the <i>P&P Manual</i> adopted by the ACOE in its June 2021 Annual Meeting and followed distribution to the communities of interest for comment on May 3, 2021.</p>
Ongoing Monitoring	
Substantive Changes	The ACOE identified the need to revisit the guidance within the <i>Accreditation Manual: Professional Optometric Degree Programs</i> addressing the potential for programs’ continued reliance on distance education once USDE flexibilities allowed due to the COVID-19 pandemic end. Specifically, the ACOE added as an example of a substantive change associated with a Professional Optometric Degree program the following guideline: 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). If 50% or more of a course is delivered by distance education, credit hours associated with that course are considered to be distance education. In addition, a revision was proposed within the Procedure: If the substantive

Section	Summary of Changes
	<p>change request relates to distance education, the program must provide to Council evidence of authorization from its regional accreditor.</p> <p>The policy is applicable to all three types of programs the ACOE accredits, and replaced terminology ‘programmatic changes’ used associated with optometric residency programs previously. Additional content was added to the Procedural section to better support USDE criteria – in particular, the steps around ensuring consideration of other potential regulatory or accreditation implications was added.</p> <p>The revised Policy was included within the <i>P&P Manual</i> adopted by the ACOE in its June 2021 Annual Meeting and followed distribution to the communities of interest for comment on May 3, 2021.</p>
<p>Consideration of Actions of States and Other Accrediting Groups</p>	<p>Clarified that preaccreditation falls within the scope of this P&P. Language was revised within the Policy to improve alignment with USDE criteria. Procedural content was added to clarify steps taken. Proposed the addition of performing primary source verification on programs’ accreditation status as part of the process. The revised Policy was included within the <i>P&P Manual</i> adopted by the ACOE in its June 2021 Annual Meeting and followed distribution to the communities of interest for comment on May 3, 2021.</p>
<p>Other Policies Related to Accreditation</p>	
<p>Timeframe for Compliance with Standards</p>	<p>The USDE revised its criteria associated with the timeframe for compliance with standards. Specifically, the revised language is as follows: In the event the Council determines that a program is not in compliance with any of the Council’s standards, the Council shall provide a written timeline to the program requiring that such program take prompt action within a timeline from the date of the Council’s decision that is reasonable based on the nature of the finding and the stated mission, goals, and objectives of the program. The timeline may include intermediate checkpoints and must not exceed the lesser of four (4) years or 150% of the length of the program. The revised Policy was included within the <i>P&P Manual</i> adopted by the ACOE in its June 2021 Annual Meeting and followed distribution to the communities of interest for comment on May 3, 2021.</p>
<p>Required Notifications and Timing</p>	<p>Content was revamped to align with changes in USDE criteria. Notable changes from the USDE include specific requirements to which the ACOE must comply in terms of reporting timing and stakeholders in conjunction with certain accreditation-related decisions, and requirements of the program to notify current and prospective students of these decisions within a specified timeframe.</p> <p>Added new content resulting from review of USDE criteria related to adverse actions subject to arbitration requirements.</p> <p>Added new content resulting from review of USDE criteria related to the ACOE’s obligation to notify the Department if it identifies instances of noncompliance to the USDE regulations relating to federal student aid programs.</p> <p>The revised Policy was included within the <i>P&P Manual</i> adopted by the ACOE in its June 2021 Annual Meeting and followed distribution to the communities of interest for comment on May 3, 2021.</p>
<p>Program Interruption</p>	<p>New content added to both the Policy and the Procedure as a result of changes to USDE requirements around timeframe and process related to a program interruption. The revised Policy was included within the <i>P&P Manual</i> adopted by the ACOE in its June 2021 Annual Meeting and followed distribution to the communities of interest for comment on May 3, 2021.</p>
<p>Reconsiderations</p>	<p>Added content to the Procedure to clarify steps taken. Added a timeframe for Council consideration of a petition for reconsideration to support USDE criteria. USDE does not specify the timeframe; the proposed aligns with the ACOE’s standard timeframe for inclusion on the</p>

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

Section	Summary of Changes
	ACOE's agenda. The revised Policy was included within the <i>P&P Manual</i> adopted by the ACOE in its June 2021 Annual Meeting and followed distribution to the communities of interest for comment on May 3, 2021.

ACOE Fee Structure

At its February 26-28, 2021 Winter Meeting, the Accreditation Council on Optometric Education (ACOE) considered a recommendation of the Planning Committee to revise the ACOE's fee structure

In developing its recommendation, 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 is intended to allow the ACOE to continue to comply with the requirements of USDE and CHEA for accrediting groups to have adequate fiscal resources.

Following the ACOE's Winter Meeting, a call for comments was sent March 25, 2021 with request for responses by April 30, 2021. After review of the comments received from the communities of interest at its June 23-26, 2021 Annual Meeting, the ACOE adopted the following revised ACOE fee structure.

Application Fees: The ACOE assesses programs seeking accreditation or preaccreditation 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. Effective **January 1, 2022**, application fees will be as follows:

Type of Program	Application Fee Per Program
Professional Optometric Degree Programs	\$27,500
Optometric Residency Programs	\$2,750
Optometric Technician Programs	\$2,750

Annual Fees: All accredited programs are also charged an annual accreditation fee, and professional optometric degree programs in Stage One designation, Stage Two designation, or a *preaccreditation status* are charged an annual administrative fee equal to the professional optometric degree program annual accreditation fee. The Council approved a one-time fee increase to be effective with the fees associated with calendar year 2023 (to be included in invoices distributed fall of 2022). The following is the schedule of the current and anticipated annual accreditation fees charged to each program. Note - a 3% increase continues to be applied annually and is independent of the one-time increase.

Type of Program	2022	(fee increase applied) 2023	2024
Professional Optometric Degree Programs	\$7,103	\$7,454	\$7,678
Optometric Residency Programs	\$1,640	\$1,848	\$1,903
Optometric Technician Programs	\$1,640	\$1,848	\$1,903