

## MEMORANDUM

**DATE:** March 20, 2023

**SUBJECT:** **Update on anticipated end of COVID-19 flexibilities and call for comments on proposed 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; 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 (1) provide guidance to programs related to the anticipated end of COVID-19 flexibilities, (2) to invite interested parties to submit comments regarding proposed changes to the Accreditation Council on Optometric Education's (ACOE's) Standard 2.10.2.1 for professional optometric degree programs, and (3) provide an update on the status of ACOE's in-person follow-up visits.

All interested parties are invited to submit written comments concerning proposed changes to Standard 2.10.2.1 by **April 19, 2023**. Please submit comments to [accredit@theacoe.org](mailto:accredit@theacoe.org).

In early February 2023, the Biden administration announced its intent to end the COVID-19 national emergency and public health emergency on May 11, 2023. As described in [COVID-19 Advisories](#) published on the ACOE's website, the ACOE has aligned its allowances related to externship site visits and use of distance education to an end date of 180 days following the date on which the COVID-19 national emergency declaration is rescinded. During its February 24-26, 2023 Winter Meeting, the ACOE considered its plans assuming an anticipated end date of **November 7, 2023** (which is 180 days after May 11, 2023). Please note – should the COVID-19 national emergency and public health emergency not end on May 11, 2023, the associated end date of ACOE flexibilities will be adjusted accordingly.

**Distance Education.** Regarding programs' use of distance education, while the ACOE does not include distance education in its scope of recognition from the USDE, 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.*

The ACOE updated its requirements regarding distance education in its Policy and Procedure "Substantive Changes;" those updates were approved by Council on June 26, 2021. 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.*

The Council expects that should a program anticipate utilization of distance education at or above the threshold defined in ACOE Policy and Procedure "Substantive Changes" as of November 7, 2023 and after, a substantive change request must be submitted to and accepted by the ACOE. Upcoming meetings where a substantive change request can be considered by the Council are scheduled for June 21-24, 2023, and October 27-29, 2023.

**Externship Site Visits.** Regarding professional optometric degree programs' compliance with Standard 2.10.2.1, the ACOE's COVID-19 Advisory approved June 27, 2020 states - *Regarding the section of Standard 2.10.2.1 that states "Each site must be visited by personnel designated by the program within one year of placement of the first extern(s)..." , in those instances where a site must be visited by December 31, 2020 to meet this section of the standard, the program may conduct a remote (virtual) visit in lieu of an in-person visit.*

In subsequent update to the COVID-19 Advisory (February 26, 2021) the ACOE modified the end date of the timeframe for COVID-19 flexibilities, stating - *The allowance for use of virtual visits to externship sites is extended to align with updated guidance issued by the U.S. Department of Education (USDE). On December 11, 2020, the USDE updated guidance for the timeframe for its flexibilities to be duration of the national emergency declaration and 180 days following the date on which the COVID-19 national emergency declaration is rescinded.*

The ACOE considered whether to formally allow for virtual visits on an ongoing basis and proposed modifications to Standard 2.10.2.1. The proposed verbiage changes to Standard 2.10.2.1 are identical to those proposed as part of the ACOE's Comprehensive Standards Review process (*see ACOE Call for Comments issued March 3, 2023 and due April 19, 2023*). The Council's intent is to make the changes specific to Standard 2.10.2.1 effective as of the expiration of the ACOE's COVID-19 allowances. Any comments submitted regarding Standard 2.10.2.1 associated with the March 3, 2023 call for comments will also be considered relative to this call for comments. You may also choose to respond directly to this call for comments. The proposed changes are shown below.

2.10.2.1 Each externship site must be visited by personnel designated by the program within no sooner than one year prior and no later than one year following 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:

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

The ACOE invites all interested parties to submit written comments concerning proposed changes to Standard 2.10.2.1 by **April 19, 2023**. Please submit comments to [accredit@theacoe.org](mailto:accredit@theacoe.org).

**Virtual Site Visits Update.** In the months following the COVID-19 outbreak, the ACOE took several actions. These actions resulted in the issuance of several COVID-19 Advisories, which were updated as needed, and communicated to the communities of interest.

One such action included allowances for virtual site visits. The ACOE's guidance allowed for virtual site visits to accredited programs in good standing, professional optometric degree programs holding Preliminary Approval status, and residency programs seeking an initial award of accreditation. As per USDE requirements, ACOE guidance included that in-person follow-up visits would be completed in a reasonable period of time following the virtual site visit.

During its Winter meeting in February 2021, Council established its intent to resume in-person site visits as soon as September 2021. This intention was reaffirmed in the Council's Annual meeting in June 2021. The ACOE successfully resumed in-person site visits in September 2021. These visits were limited to full accreditation visits; follow-up visits were deferred given uncertainty with the pandemic at the time.

In its Winter meeting in February 2022, the ACOE approved the plans and templates for in-person follow-up visits to both professional optometric degree programs and optometric residency programs. Three (3) professional optometric degree programs and 37 optometric residency programs underwent virtual visits associated with an accreditation decision and required follow-ups.

As of the writing of this memorandum, all follow-up visits to professional optometric degree programs and 24 follow-ups to residency programs have been completed. The remaining 13 follow-up visits to optometric residency programs are anticipated to be completed by the end of June 2023.

The ACOE expresses its sincere gratitude to programs for their flexibility in accommodating both the virtual visits and the in-person follow-up visits and to the ACOE consultants who took time from their busy schedules to perform the follow-up visits on the ACOE's behalf. ***Thank you!***