July 3, 2013

Philip Pumerantz, Ph.D., President
Western University of Health Sciences
309 E. Second St.
Pomona, CA 91766-1854

Dear Dr. Pumerantz:

At its Annual Meeting on June 26-29, 2013, the Accreditation Council on Optometric Education (ACOE) considered the report of the February 3-6, 2013 evaluation visit to the professional optometric degree program at Western University of Health Sciences College of Optometry. The Council voted to accept the report, to adopt the Council summary, the statement of compliance with the standards, the recommendations, and the suggestions for program enhancement attached to the report, and to grant the accreditation classification of “Accredited” as of February 6, 2013. Congratulations to the Western University of Health Sciences College of Optometry for achieving this status!

The classification of “Accredited” is granted to a professional optometric degree program that generally meets the standards of accreditation. This classification indicates the program has no deficiencies or weaknesses that compromise the educational effectiveness of the total program. However, recommendations relating to marginal compliance with certain standards, and suggestions relating to enhancement can be found in the final section of the enclosed evaluation report.

The program is required to report in a progress report due May 1, 2014 on its efforts and progress made to address the recommendations found at the end of the report. In accordance with requirements for accrediting agencies recognized by the US Department of Education, the Council requires that all professional optometric degree programs come into full compliance with the ACOE standards within 24 months from the date that the Council determines the program is not in full compliance. Western University of Health Sciences College of Optometry, is hereby notified that it must take action within 24 months (by no later than June 29, 2015) to come into compliance with the following standards:

<table>
<thead>
<tr>
<th>Standard</th>
<th>Status</th>
<th>Reason for Met in Part or Not Met</th>
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<tbody>
<tr>
<td>I</td>
<td>Met in Part</td>
<td>Program does not publish current goals. (1.1.1) Program does not publish current and reliable information on its performance, including student achievement. (1.4)</td>
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<tr>
<td>VIII</td>
<td>Met in Part</td>
<td>Patient record does not allow for efficient review. (8.2.4)</td>
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This finding is more completely articulated in the enclosed evaluation report.

If the program does not come into compliance with the standards within 24 months, the USDE requires the Council to take prompt adverse action against the program. As required by the USDE, the Council defines adverse action as “an official Council action such as the
withdrawal or denial of an accreditation or preaccreditation decision.” The Council may extend the time frame for compliance for good cause.

The Council’s policy follows concerning the extension of the time frame for compliance for good cause:

The ACOE will grant good cause extensions for situations where the program has made substantial, but not complete, progress toward compliance with ACOE standards, where a limited amount of time is needed to reach full compliance and where all reasonable alternatives for achieving compliance within the appropriate time period have been exhausted.

Therefore, in progress reports and annual reports, programs with outstanding recommendations must provide all efforts made to address the recommendations and include alternative means taken to address the recommendations in the event that the program has not been able to fully address the recommendations.

Council policies indicate that professional optometric degree programs must be evaluated through an on-site visit at least once every eight years, and all programs are reviewed annually through the annual report process. Currently the next scheduled evaluation visit for the professional optometric degree program at Western University of Health Sciences College of Optometry is in February 2021.

The accreditation is measured from the date of the most recent evaluation visit. Professional optometric degree programs should avoid using such phrases as “accreditation has been continued for an eight-year period.” Accreditation by the ACOE is not necessarily for a specific period of time since it is subject to a continual review. Depending on the outcomes of annual reports, progress reports, interim visits, substantive program changes and other events affecting a program, the Council may decide to schedule a full on-site evaluation before the original eight-year accreditation period is complete.

The ACOE’s policy on substantive change may be found on pages 41-42 of the enclosed Accreditation Manual: Professional Optometric Degree Programs. Any institution which contemplates a substantive change in its professional optometric degree program should receive concurrence from the ACOE prior to formal adoption of the change.

Substantive changes must be submitted to the Council in writing for the ACOE’s assessment and approval prior to implementation. Failure to comply with this policy may result in the scheduling of an interim site visit, or in extreme cases, the lowering or withdrawal of the program's accreditation status after due notice and an opportunity for a hearing. Examples of changes which the ACOE considers to be substantive are included in the manual.

The program must submit its first annual report on May 1, 2014 (as described on pages 39-40 of the Accreditation Manual: Professional Optometric Degree Programs). A template for the annual report will be sent to the program in March 2014, but if the program is interested in seeing the required information and format, we would be happy to send a template from the 2013 annual report upon request. The template will include the above mentioned progress report to address the recommendations. (Please note that minor modifications may occur in the template for the 2014 report.)
The enclosed manual also includes information on ACOE’s policies and procedures, including, but not limited to, information on monitoring accredited programs (page 39), appeal of accreditation decision (page 36), information on the Council’s mission (page 2) and the standards of accreditation (Chapter 2).

Notification of the ACOE’s recent action will be posted on the ACOE web site and provided to the community of interest including state boards of optometry by no later than July 28, 2013, which is 30 days following the meeting. The College is free to share this notification letter, or to have interested parties contact Joyce Urbeck, ACOE administrative director at the phone number or email below if validation of accreditation status is needed.

The ACOE appreciated the opportunity to talk with Dr. Elizabeth Hoppe during our meeting and to hear updates on recent activities at the program. I invite you to contact me at the address above or Joyce Urbeck, the ACOE administrative director, at jlurbeck@aoa.org or 314/983-4246, if you have any questions, concerns or suggestions about the accreditation process. For additional information about the Council, please visit our Web site at www.theacoe.org.

Sincerely,

J. Bart Campbell, O.D., Chair

cc: Dr. Elizabeth Hoppe, Evaluation Team