



## **AOA Commission on Optometric Specialties**

### **1986 Memo of Transmittal**

By 1984, VA optometry residencies had existed for nine years and, while still small in numbers, were expanding from the VA to residency programs at schools and colleges of optometry. Some group practices of MDs and MD-ODs were beginning to specify residency training when recruiting ODs as were some schools of optometry recruiting clinical faculty.

The Association of Schools and Colleges (ASCO) had earlier recognized the value of residency training in specialties and had approved areas appropriate for post-graduate residency training.

A residency matching program existed for applicants to VA residency programs that was later expanded, with the approval of ASCO, to include all ACOE accredited optometry residency programs (Optometric Residency Matching System, ORMS).

The VA had requested the American Council on Optometric Education accredit its optometry residency programs which led ACOE to expand its charter into the accreditation of post-graduate, residency training programs.

Efforts began to interest the National Board of Examiners in Optometry into creating a written examination for residents in medical optometry but this was impractical due to the small number of residents in 1984. [In 1999, the National Association of VA Optometrists would meet with NBEO to request a specialty examination for medical optometry and, in 2005, the ACOE examination was offered by NBEO. In 2009 ABCMO formed and issued the first certification in medical optometry in 2010.]

In 1984, as a result of this growing awareness of specialty training via residency programs, the AOA formed a Commission on Optometric Specialties and instructed it to establish guidelines and policy for designating specialty areas suitable for advanced training, recommend the form of this advanced training and of the credentialing-certification appropriate for those completing specialty training.

This AOA Commission on Specialties issued its Report in 1986 and conveyed its findings via the attached Memo to the AOA House of Delegates for its approval. The Report recommended recognition of optometry specialties, offered guidelines for how specialties should be selected and specified post-graduate training for specialists.

St. Louis Office



American Optometric Association

BULLETIN

from the

COMMISSION ON OPTOMETRIC SPECIALTIES

VOLUME 44

BULLETIN NO. 106

May 29, 1986

TO: Affiliated Association Presidents, Presidents-Elect, Executive Directors, AOA Contact Lens, AOA Low Vision, AOA Multidisciplinary, AOA Sports Vision Section Councils, American Academy of Optometry Board, College of Optometrists in Vision Development Board, National Eye Research Foundation, Association of Schools and Colleges of Optometry-ED, Administrative Heads - Schools and Colleges of Optometry, International Association of Boards of Examiners in Optometry Executive Council, Optometric Extension Program Board

SUBJ: REPORT OF THE COMMISSION ON OPTOMETRIC SPECIALTIES

FROM: Craig F. Willoth, O.D., Chairman

DIST: O, T, E, ED, DED, C, GC, CmOSP, COE, AS, Center Directors

Attached is the written portion of the AOA Commission on Optometric Specialties report, to be presented to the 1986 AOA House of Delegates as mandated by the 1984 House of Delegates.

The following schedule has been set at Congress regarding the Report of the Commission on Optometric Specialties:

Monday: June 23, 1986 -- Open hearing  
1:30 - 3:00 p.m. -- El Camino Room

Tuesday: June 24, 1986 -- AOA House of Delegates  
10:15 a.m. -- Report of the Commission on Optometric Specialties

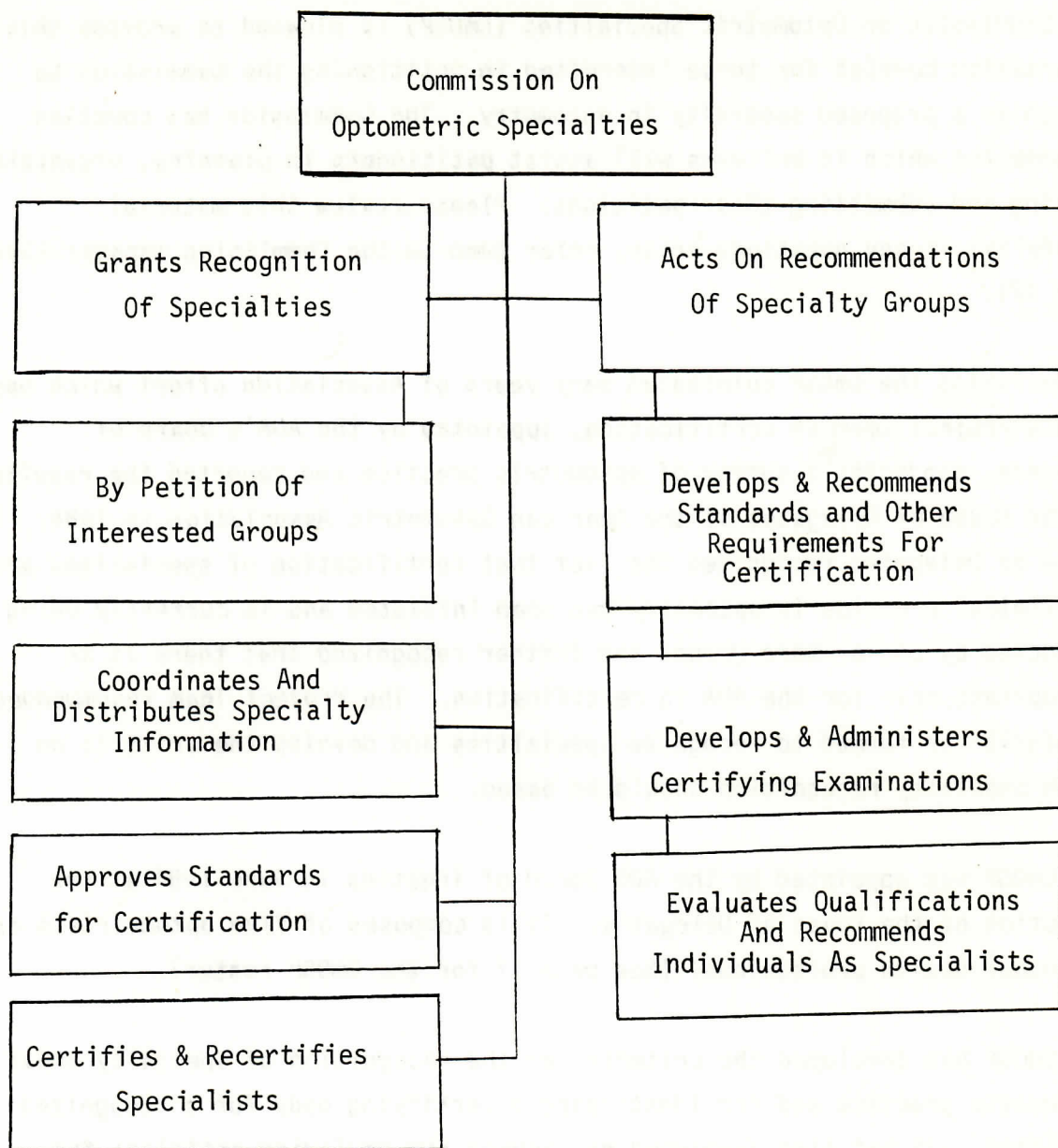
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Enclosures

PETITIONER'S GUIDE FOR  
SPECIAL INTEREST AREA RECOGNITION

1. Introduction
2. Criteria for Specialty Recognition
3. Procedures for Considering Petitions
4. Instructions to Petitioners
5. Procedures for Recognizing Certifying Bodies
6. CmOSP Membership Roster

American Optometric Association  
243 N. Lindbergh Boulevard  
St. Louis, MO 63141





## 1. INTRODUCTION

The Commission on Optometric Specialties (CmOSP) is pleased to provide this information booklet for those interested in petitioning the Commission to recognize a proposed specialty in optometry. The Commission has compiled information which it believes will assist petitioners in planning, organizing, writing and submitting their petitions. Please review this material carefully; if any questions arise, refer them to the Commission Manager (See page 17).

Establishing the CmOSP culminated many years of Association effort which began when a Project Team on Certification, appointed by the AOA's Board of Trustees, conducted a survey of optometric practice and reported the results to the House of Delegates of the American Optometric Association in 1984. The House of Delegates recognized the fact that certification of specialized areas of clinical practice in optometry had been initiated and is currently being conducted by one or more groups and further recognized that there is an appropriate role for the AOA in certification. The Project Team recommended a Commission be formed to recognize specialties and develop the criteria on which specialty recognition should be based.

The CmOSP was appointed by the AOA Board of Trustees in June 1984 at the direction of the House of Delegates. It is composed of five optometrists and one other health professional (See page 17 for the CmOSP roster).

The CmOSP has developed the criteria for the recognition of specialty areas in optometric practice and for identifying a certifying body for a recognized specialty. It has also developed procedures for reviewing petitions for specialty recognition. These procedures provide for comment from other optometrists and from the public. These procedures are listed on page 12.

The Commission has prepared this booklet to assist in the preparation of petitions for specialty recognition. The CmOSP wishes to assure that every prospective petitioner is given equal opportunity to present the case for designation of a specialty area. The Commission will approach each petition in an objective manner and consider its merits based on the criteria adopted by the AOA House of Delegates. Finally, the CmOSP feels that the procedures for appeal provide petitioners a full consideration of their petition.

## 2A. CRITERIA FOR SPECIAL INTEREST AREAS

The following are the criteria received by the AOA House of Delegates in June 1985 for the Recognition of Special Interest Areas in Optometry. Following each criterion is a set of guidelines to serve as a guide to petitioners regarding specific information, assessments and documentation which the Commission considers necessary in meeting the criterion. Petitioners are encouraged to provide all information requested. If any of the requested information is lacking, petitioners should include specific reasons why such information is not available and when it will become available.

### CRITERION 1

**The area of specialization shall represent an identifiable and distinct field of practice.**

This criterion addresses the DEFINITION of the specialty area.

#### Guidelines for Petitioners

1. Identify and describe the practice standards for this specialty, i.e., the tasks, functions and procedures that delineate the range of activities.
2. Identify areas which are unique to this specialty.
3. Submit evidence that such tasks and functions differ from those performed by entry level practitioners by enclosing statements from other elements of the optometric profession, e.g., schools and colleges of optometry.

## CRITERION 2

The area of specialization shall rest on a specialized knowledge of optometric science, which has its basis in the biological, physical and behavioral sciences, and not solely on the basis of managerial, procedural or technical services, nor solely on the basis of the environment in which optometry is practiced.

This criterion relates to SPECIALIZED KNOWLEDGE BASE.

### Guidelines for Petitioners

1. Describe specific elements in basic and optometric science that apply to this special interest area.
2. Identify current research trends as related to this knowledge base.
3. Describe how the scope of that knowledge base differs from that of a recent graduate or entry level of competence.

## CRITERION 3

The area of specialization shall be one for which specifically trained practitioners are needed to fulfill the responsibilities of the profession of optometry in improving the health and welfare of the public, which responsibilities may not otherwise be effectively fulfilled.

This criterion addresses NEED for this area.

### Guidelines for Petitioners

1. Demonstrate that specially trained practitioners will result in better quality eye and health care.
2. Discuss how the lack of development of specialization may be detrimental to the public welfare.

3. Describe how developing areas of the specialty are improving eye and health care delivery.
4. Are there current unmet needs that would be fulfilled by this specialty area?
5. Discuss the relationship of the services provided by this specialty area to the services already offered by other health disciplines and the general doctor of optometry.

#### CRITERION 4

The area of specialization shall represent special clinical or practical knowledge and skills acquired by education and training and/or experience beyond the basic optometric education and training.

This criterion addresses CLINICAL OR PRACTICAL KNOWLEDGE AND SKILLS (distinct field of practice).

#### Guidelines for Petitioners

1. What are the advanced skills necessary for competent practice in this area?
2. Document that these skills are beyond the basic skills acquired by recent graduates.
3. Identify national or regional clinical centers which are dedicated to providing care to patients by practitioners in this specialty area.
4. Identify and describe specialized instrumentation.

#### CRITERION 5

The area of specialization shall be one in which schools of optometry and/or other organizations offer recognized advanced education and training programs



to those seeking advanced knowledge and skills in the area of specialty practice.

This criterion addresses ADVANCED EDUCATION TRAINING PROGRAMS.

Guidelines for Petitioners

1. Identify graduate programs relative to this special interest area.
2. Identify residency and fellowship programs relating to this special interest area.
3. Identify any other advanced education or training programs, i.e., internship, preceptorship, etc.

CRITERION 6

The area of specialization shall be one in which there is an adequate educational and scientific base to warrant transmission of knowledge through teaching clinics and a body of professional, scientific and technical literature immediately related to the specialty.

This criterion relates to CONTINUING EDUCATION AND RESEARCH.

Guidelines for Petitioners

1. Identify journals, periodicals and other literature devoted to this area of special interest.
2. Identify within the last five years symposia, conferences, seminars, etc., devoted to this area of special interest.
3. Identify fellowship and other activities that recognize competency within this area of specialty.

4. List articles published pertaining to the specialty area within the last year and submit selected samples for the year five years prior, to show growth and interest in this area.
5. Describe the current sponsored research in this specialty area.

#### CRITERION 7

The area of specialization in the practice of optometry shall be one in which there exists a significant and clear health demand to provide the necessary public reason for certification.

This criterion emphasizes DEMAND.

#### Guidelines for Petitioners

1. Submit evidence of demand by practicing doctors of optometry who are not practicing within the speciality, i.e., articles, testimonials.
2. Submit evidence of demand by non-O.D. practitioners, i.e., articles, testimonials.
3. Submit evidence of community, governmental or non-health professional demand for specialists in this area.
4. Give evidence of acceptance of specialty by the general public.
5. Discuss current referral patterns for the services provided by this special interest area.

#### CRITERION 8

The area of specialization shall include a reasonable number of individuals who devote much of the time of their practice to the specialty area.



This criterion relates to the NUMBER OF PRACTITIONERS AND TIME spent in the practice of the specialty.

#### Guidelines for Petitioners

1. Estimate the number of specialty practitioners currently existing and time distribution and the percentage of time devoted to the specialty.
2. Estimate of the number of practitioners whose practices are limited to special interest areas.

#### 2B. CRITERIA FOR CERTIFYING BODY

##### Introduction

The purpose of this document is to delineate the criteria for identifying the certifying body for a recognized specialty.

The certifying body will be an independent entity, or an administratively independent entity within an existing organization. The purposes of the body include the development of the requirements for certification within a specialty area, the administration of examinations and the evaluation of the qualifications of individuals seeking certification. The certifying body, in carrying out its responsibilities with respect to testing the competency of candidates for certification, may use the services of independent testing organizations.

The Commission expects that certifying bodies accept the obligation to promote and improve the practice of the specialty which it represents and to stimulate the further development of improved training standards for the specialty. The Commission also expects that certifying bodies will make recommendations to the Commission for improvements in the policies and procedures governing specialties in optometry.

Any group seeking recognition as a certifying body for a specialty area must demonstrate to the satisfaction of the Commission that it meets the following criteria:

A. Statement of Purpose

1. It shall have as one of its purposes the evaluation of those individuals who wish to advance in the specialty area, through the certification process.
2. It shall demonstrate that practice standards are revised and updated as needed to reflect contemporary responsibilities and functions within the specialty.
3. It shall provide evidence that programs exist for individuals to acquire requisite skills and knowledge through education, residencies or experience.

B. Structure of Certifying Body

1. It shall be non-governmental, and not-for-profit
2. It shall have a governing body which includes individuals from the specialty area.

C. Resources of Certifying Body

1. It shall provide evidence that the body has the financial resources to conduct the certification activities properly.
2. It shall provide evidence that it has the appropriate staff, consultants and/or arrangements with testing organizations to conduct the certification program.

D. Evaluation of Certifying Process

1. It shall provide evidence that the procedures used to evaluate individual competence are objective, fair and based on the knowledge, skills, and practice standards established for that specialty.
2. It shall have a formal policy of periodic review of the evaluation procedures.
3. It shall provide evidence that appropriate measures are taken to protect the security of all examinations.
4. It shall provide evidence that pass/fail levels are established in a fair and reasonable manner.

5. It shall provide evidence that the evaluation procedures include evidence of attempts to establish both reliability and validity.

E. Public Information Provided by Certifying Body

1. It shall publish a document which clearly defines the certification responsibilities of the body and outlines any other activities of the body that are not related to certification;
2. It shall make available general descriptive materials on the procedures used in test construction and validation, and the procedures of administration and reporting of results.
3. It shall publish a comprehensive summary or outline of the information, knowledge and functions covered by the test.
4. It shall publish at least annually, a summary of certification activities, including number of candidates tested, number passing, the number failing, and the number recommended for certification and recertification.

F. Responsibilities to Applicants for Certification

1. It shall not discriminate among applicants as to age, sex, race, religion, or national origin, and shall include a statement of non-discriminatory policy in announcements of the certification program.
2. It shall provide all applicants with copies of the formalized procedures for application-examination, and attainment of certification, and shall provide evidence to the Commission that such procedures are uniformly followed and enforced for all applicants.
3. It shall have a formal policy for the periodic review of application and testing procedures to assure that they are fair and equitable, and shall give evidence to the Commission of the implementation of the policy.
4. It shall publish nationally on an annual basis, appropriate data concerning the certification program, including eligibility requirements and dates and places of examination.
5. It shall provide evidence that competently proctored testing occurs at least once annually.



6. It shall publicize the specific education and/or experience required for certification.
7. It shall provide evidence of prompt reporting of test results to applicants.
8. It shall provide evidence that applicants failing the examination are given information on general areas of deficiency.
9. It shall provide evidence that each applicant's test results are held confidential.
10. It shall have a formal policy on appeal procedures for applicants questioning examination results and shall publish this information in examination announcements.

#### G. Recertification

1. It shall have a plan for periodic recertification.
2. It shall provide evidence that any recertification program is designed to assure that individuals continue to meet the qualifications for certification.

#### H. Responsibilities to the Commission

1. It shall provide the Commission on a regular basis copies of all publications related to the certifying process.
2. It shall advise the Commission of any change in purpose, structure or activities of the certifying body.
3. It shall advise the Commission of any changes in testing techniques or in the scope or objectives of the test.
4. It shall undergo re-evaluation by the Commission at five-year intervals.
5. It shall provide the Commission names of those individuals recommended for certification and recertification.

### 3. PROCEDURES FOR CONSIDERING PETITIONS

The following sequence is a procedural outline with appropriate time frame regarding the CmOSP consideration of individual petitions.

1. A one-time non-refundable fee of \$500 is to accompany the initial petition for specialty recognition.
2. One petition will be accepted in each specialty area. Cooperation is encouraged among groups within a single specialty area in the preparation of the petition.
3. Petitions must be received by January 1 to be considered in that year.
4. Preliminary screening for completeness will be accomplished and a response sent within 30 days.
5. As part of the full review, the CmOSP will complete the following:
  - a. Publish announcements in the AOA News concerning the petition and requesting written comments regarding the petition.
  - b. Inform optometric associations. All comments must be in writing and filed with the CmOSP 60 days following notification.
  - c. Schedule a hearing on the merits of the petition at the times of the AOA Congress.
6. Final evaluation and decision will be completed by December 31.
7. The CmOSP will conduct a proceeding to consider new data and information if requested by the petitioner within one hundred twenty (120) days of denial of the petition.
8. If the CmOSP acts to deny a petition, the petitioner may appeal. The appeal must be in writing and filed with the Secretary/Treasurer of the American Optometric Association (AOA) within 30 days of receipt of notice of the CmOSP's action. The petitioner in its appeal shall allege with all necessary documentation that the CmOSP ruling is clearly erroneous on its construction of the facts or on its interpretation of the Petitioners Guide for Specialty Recognition.

A petitioner may not appeal to argue that the facts upon which the CmOSP based its action have changed; this type of argument must be made to the CmOSP in a reconsideration request.

Within 30 days of receipt of the appeal, the President of the AOA will name three persons to an ad hoc Appeals Panel, and three alternates, no one of whom shall be a member of the CmOSP, or a member of the Board of Trustees of the AOA, or have had affiliation with the petitioner filing the appeal. The Manager of the CmOSP will determine the willingness to serve of the designated principals and alternates and notify the petitioner of the names of the three principals. If the petitioner shows good cause why a named principal is unacceptable, an alternate will be selected who is acceptable to both parties.

The Appeals Panel shall meet within 90 days of the date on which the petitioner is notified of the adverse decision by the CmOSP or on a date which is mutually acceptable to the petitioner, the Appeals Panel and the CmOSP. The petitioner may have one representative appear before the panel to make oral and/or written presentations and to respond to questions from the panel. The Chairman of the CmOSP shall designate a representative to appear before the Appeals Panel to support the decision of the CmOSP and to respond to questions of the panel. Either party may be represented by counsel; however, the proceedings shall be conducted on an informal basis.

The purpose of the Appeals Panel is to review the record to determine whether prejudicial error has occurred--not to completely rehear de novo the entire matter. Therefore, only if the Appeals Panel concludes that the ruling of the CmOSP was clearly erroneous may the Appeals Panel inform the CmOSP as to the action it considers appropriate which shall be binding on the CmOSP.

The cost related to appeal procedures shall be underwritten by the petitioner and the CmOSP on an equal basis.



#### 4. INSTRUCTIONS TO PETITIONERS

##### A. Who May Petition

Any individual or group of individuals may petition the CmOSP to recognize a specific area of optometric practice as a specialty. Any individual or group interested in filing a petition with the CmOSP is encouraged to communicate with all individuals in the proposed specialty area who may have an interest in filing a similar petition, to consolidate resources and coordinate information so that one complete and comprehensive petition is submitted for a proposed specialty.

##### B. Numbers of Copies

The petitioner shall submit at least fifteen (15) copies of the petition to the Commission on Optometric Specialties. Furthermore, the petitioner shall be responsible for providing copies of the petition to all interested parties who request such.

##### C. Signatures

The petition shall be accompanied by no less than one-hundred (100) signatures or letters of support from individuals practicing in the proposed specialty. Signatures must be identified by address, title and place of practice.

##### D. Structure

The petition should be structured to coincide with the Criteria for Special Interest Areas. The petition should clearly demonstrate to the CmOSP that the proposed area of specialization meets the criteria by providing data, assessment and other documentation as provided in the guidelines.

The CmOSP emphasizes to petitioners that the petition must make its case effectively if it is to receive favorable consideration. The CmOSP will conduct an open hearing, at which petitioners and other

interested parties may comment directly to the CmOSP with regard to the merit of recognizing a proposed specialty. Travel and other expenses associated with filing the petition and appearing at hearings will be borne by the petitioners or other interested parties.

E. Mailing of Petitions

Send 15 copies of the petition to:

Ellis S. Smith Jr., M.S.  
Manager  
Commission on  
Optometric Specialties  
243 N. Lindbergh Boulevard  
St. Louis, MO 63141

5. PROCEDURES FOR CONSIDERING APPLICATIONS FROM ORGANIZATIONS TO BE RECOGNIZED AS A CERTIFYING BODY
  1. Following the recognition of a special interest area in optometry, the CmOSP will consider applications from appropriate organizations or agencies to serve as the Special Interest Certifying Body for the recognized special interest area.
  2. The CmOSP would prefer to receive and consider one application from a single organization or agency or a consortium of organizations and agencies that desire to be the recognized certifying body. If there are more than one group that desires to serve as the Certifying Body, the CmOSP encourages them to consolidate their efforts so that one application is submitted to the CmOSP.
  3. Applications will be screened for completeness within 30 days of receipt.
  4. As part of the full review, the CmOSP will complete the following:
    - a. Publish announcements in the AOA News concerning the application, requesting written comments regarding the application.

- b. Inform optometric associations and solicit their comments. All comments must be in writing and filed with the CmOSP within 60 days following notification.
5. The application will be judged on the extent to which the organization meets the criterion for a Certifying Body as adopted by the AOA House of Delegates.
6. The CmOSP will conduct a proceeding to consider new data and information if requested by the applicant.
7. If the CmOSP acts to deny an application, the applicant may appeal. The appeal must be in writing and filed with the Secretary/Treasurer of the American Optometric Association (AOA) within 30 days of receipt of the notice of the CmOSP's action. The applicant in its appeal shall allege with all necessary documentation that the CmOSP ruling is clearly erroneous on its construction of the facts or on its interpretation of the Petitioners Guide for Special Interest Recognition.

An applicant may not appeal to argue that the facts upon which the CmOSP based its action have changed; this type of argument must be made to the CmOSP in a reconsideration request.

Within 30 days of receipt of the appeal, the President of the AOA will name three persons to an ad hoc Appeals Panel, and three alternates, no one of whom shall be a member of the CmOSP, or a member of the Board of Trustees or AOA, or have had an affiliation with the applicant filing the appeal. The Manager of the CmOSP will determine the willingness to serve of the designated principals and alternates and notify the applicant of the names of the three principals. If the applicant shows good cause why a named principal is unacceptable, an alternate will be selected who is acceptable to both parties.

The Appeals Panel shall meet within 90 days of the date on which the applicant is notified of the adverse decision by the CmOSP or on a date which is mutually acceptable to the applicant, the Appeals Panel and the CmOSP. The applicant may have one representative appear before the panel to make oral and/or written presentations and respond to questions from



the panel. The Chairman of the CmOSP shall designate a representative to appear before the Appeals Panel to support the decision of the CmOSP and to respond to questions from the panel. Either party may be represented by counsel; however, the proceedings shall be conducted on an informal basis.

The purpose of the Appeals Panel is to review the record to determine whether prejudicial error has occurred--not to completely rehear de novo the entire matter. Therefore, only if the Appeals Panel concludes that the ruling of the CmOSP was clearly erroneous may the Appeals Panel inform the CmOSP as to the action it considers appropriate which shall be binding on the CmOSP.

The cost related to appeal procedures shall be underwritten by the applicant and the CmOSP on a shared basis.

#### 6. CmOSP MEMBERSHIP ROSTER

CRAIG F. WILLOTH, O.D., Chairman  
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St. Louis, MO 63141



MEMORANDUM

DATE: June 23, 1986

SUBJ: Commission's Report

TO: American Optometric Association House of Delegates

FROM: Craig F. Willoth, O.D.  
Chairman  
Commission on Optometric Specialties (CmOSP)

The American Optometric Association House of Delegates, in 1984, directed the AOA Board of Trustees to create a Commission on Optometric Specialties to establish policies and procedures for organizations that certify individuals in optometric special interest areas; grant recognition to no more than one agency to conduct certification and recertification; and report annually to the House of Delegates.

This constitutes the CmOSP's 1986 annual report.

In 1985, I reported to the AOA House of Delegates concerning the Commission's progress to that date. Today, I am pleased to report that the Commission has completed all developmental work and is prepared to accept petitions from individuals or groups to recognize special interest areas in optometric practice.

The copy for the CmOSP Petitioners Guide for Special Interest Recognition is in the House of Delegates' handbook. The Guide contains all the elements that the 1984 AOA House of Delegates requested the Commission to develop. It contains the criteria For Special Interest Area Recognition, Guidelines for Petitioners Who Seek to Meet Those Guidelines, the CmOSP Procedures for Considering Petitions, Instructions to Petitioners, and CmOSP Procedures for Considering Applications from Groups to Serve as Certifying Bodies.

The Commission has worked diligently these past two years to develop criteria and procedures that are credible and defensible. It has gone to great lengths to assure that views and concerns of AOA members have been considered in carrying out the Commission's charge. The CmOSP conducted an open forum at the 1985 Annual Congress. We will conduct an open forum at this Congress on Monday, June 23. This past Sunday, June 22, I spoke with the presidents of state optometric associations, and last May 16, I addressed the Ohio Optometric Association.

I would be pleased to answer delegates' questions concerning the elements contained in the Petitioner's Guide and any other related issues in which the delegates may have interests.

pm