



12 October 2018

Arthur B. Epstein, O.D.
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Via Email

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Dear Dr. Epstein:

I read your column, *Optometric Physician*, every week and I appreciate your passion for and dedication to our profession. Recently, however, some of your columns have given me pause, especially because I detect some apparent misunderstandings of the role of various organizations that are involved in optometric education. In my role as Dean of the Michigan College of Optometry at Ferris State University and the President of the Association of Schools and Colleges of Optometry (ASCO), I feel it is my responsibility to write you this open letter to clarify these roles and to offer my perspective on the important issues you have raised.

Unfortunately, your call for ASCO, the AOA, and the Accreditation Council on Optometric Education (ACOE) to “discourage new and existing programs that fail to meet the needs of the public and the profession” in your editorial of September 24 betrays a significant misunderstanding of what our organizations’ roles are. Please allow me to clarify for your readers the responsibilities and mission of those three independent organizations, and a fourth organization that plays a role you appear to have missed.

The AOA is the main advocacy arm for the optometry profession. Their advocacy efforts, on behalf of their members and the profession as a whole, are dedicated to the betterment of all doctors of optometry and our patients. This can include, but is not limited to, legislating to make acquiring contact lenses without a prescription illegal, testifying on Capitol Hill to receive funding for vital research, and maintain a powerful voice in the national conversation as the healthcare landscape changes and evolves.

The ACOE establishes, maintains, and applies standards all optometric institutions in the United States and Canada must meet to maintain academic quality and continuous improvement in programs that grant the doctor of optometry degree, as well as all optometric residency programs and optometric technician programs. The U.S. Department of Education oversees the accreditation efforts of the ACOE and, in order to maintain their status as an accrediting body, their decision-making process must remain completely independent and cannot be dictated by the AOA, even though they operate under the auspices of the AOA.

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ASCO's mission is to advance optometric education and research to enhance the health and well-being of the public. ASCO is essentially a trade organization whose members are the optometric education institutions in the United States and Puerto Rico. ASCO is regulated by anti-trust laws and regulations and cannot actively undertake any effort that would be construed as restraint of trade, such as acting as a gatekeeper on the number of new schools and colleges. Therefore, ASCO cannot actively discourage the development new schools or offer opinions on the number of schools there will be in the future. ASCO cannot have any influence on how many seats are available at any of our member institutions. In fact, there is nothing that dictates that an institution that offers the degree doctor of optometry needs to join ASCO. Of course, to date every U.S. institution that grants the OD degree is a member of ASCO because they see the value, and for that we are grateful. We believe it is in all of our interests to have every institution be part of the dialogue on best practices that will continue to move our profession's educational endeavor forward.

The final organization that plays a role is the Association of Regulatory Boards of Optometry (ARBO). Their members are the licensing boards in various jurisdictions throughout the United States and in some other countries. Like ASCO, they are more of a trade association in that their members are not individuals, but the boards responsible for protecting the public from those who cannot meet a jurisdiction's standards for the practice of optometry, whether upon entry into the profession or later on in their career.

Dr. Epstein, you have expressed concern over the decreased numbers of applicants applying to optometry school. We absolutely share your concern. In fact, we are putting our money where our mouths are on this issue. ASCO has recently embarked on a public relations campaign to educate the public about optometry and all the wonderful things the profession has to offer. We are in very early stages of the campaign production but I can share with you that the goal is to appeal to high school and college-aged students who are interested in a career in health care or STEM, and to recruit high quality applicants to the profession. We have asked others to join us in this effort and would welcome their participation.

This campaign is by no means all ASCO is doing. Our staff works tirelessly with volunteers every day to ensure faculty and staff at our member institutions remain highly engaged and qualified in our pursuit of creating excellent, successful doctors of optometry. Several of our board members are also working on a white paper that will realistically portray the realities of today's applicant pool situation, so that any institutions that are considering opening a new program understand the current marketplace.

You have expressed concerns for the future of optometry, and I completely agree with your opinion that the primary duty of our institutions should be to ensure our graduates are capable clinicians. In fact, I agree with most of your stated opinions on the direction our profession needs to take in order to survive the future of healthcare. I would disagree, however, with your contention that it is our institutions' "obligation" to ensure all graduates achieve financial independence. Certainly, everyone involved in our students' education wants them to be

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successful professionally but I'm sure you agree that their attainment of financial independence is largely their own responsibility. In fact, I believe if you asked optometry students what financial independence even means to them, you would get many different answers. Of course, if our graduates have unreasonable student loan debt upon graduation, that would hamper their ability to become successful clinicians, and all our institutions strive to keep our student debt as low as possible for a four-year, doctoral level education.

I am gratified to read that you have not "declared a holy war on optometric education" because, while I do acknowledge we are facing challenges, I believe that the extraordinary group of individuals we have on our board of directors, the presidents and deans of all of our member institutions, will come up with even more creative ways to build a better future for our students and our profession. We welcome your help in this endeavor and all your readers' help and engagement. The future of our profession is at stake.

Sincerely,

A handwritten signature in black ink, appearing to read "David A. Damari". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

David A. Damari, O.D., FCOVD, FAAO
ASCO President

Cc: Lisa Fennell, ARBO
Jon Hymes, AOA
Bill Kekevian, *Review of Optometry*
Joyce Urbeck, ACOE