**Association for Education and Rehabilitation for the Blind and Visually Impaired Accreditation Council (AERAC)**

**Policy and Procedure Manual**

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# Introduction

## A. Introduction to Accreditation

Continuous learning, improvement and striving for best practices is a goal of the very best organizations. Accreditation enables the organization to demonstrate to their constituents and to the general public that their programs have met the stringent standards set by the accrediting authority.

Accreditation is used to describe both a status and a process.

As a status, it denotes a third-party’s validation of an organization’s conformity with specific standards as set forth by an accrediting authority. The scope of an accreditation is determined by the specific services being assessed.

As a process, accreditation symbolizes an organization’s sustained commitment to self-monitoring and continuous quality improvement.  The process begins when an organization or higher education program applies, pays the fee, and undertakes an internal self-study to assess its conformity with specific standards and other normative attributes that are described for accreditation. This self-study consists of a thorough and systematic process that documents the organization’s conformity to recognized standards for service infrastructure, administration, and performance.

The process continues with independent verification by reviewers using a systematic, documented approach to evaluate the organization’s self-reported conformity to the specific standards, outcomes data and other normative attributes that are described for accreditation.

The overarching goal of this process is to provide the valuable experience of self-review to the higher education program, and to support the program’s pursuit of academic excellence and innovative responses to the needs of professionals and individuals who are blind or visually impaired in a constantly changing world.

Achieving accreditation demonstrates that an organization has met relevant standards and confers on the organization the obligation to document its self-monitoring and continuous quality improvement by submitting the AER Annual Report. This report is a requirement for maintaining accreditation status through the entire term and will be made public in a folder that can be accessed on the AER Accreditation webpage. When an Annual Report is not submitted, AERAC may revise full accreditation status to provisional accreditation status.

AER Accreditation Program provides public access to information regarding:

* The performance of AER Accreditation Program in the U.S. in terms of fairness, transparency, support for innovation and improvement, communication on standards and acceptable documentation, quality of reviewers and reviews, timeliness and responsiveness, and in promoting academic quality.
* The performance of AER Accreditation Program in Canada and other international entities in terms of fairness, transparency, support for innovation and improvement, communication on standards and acceptable documentation, quality of reviewers and reviews, timeliness and responsiveness, and in promoting academic quality.
* The performance of accredited institutions or programs as measured by transparent reporting of accreditation status of higher education programs, and performance regarding completion, graduation, retention, success with academic transfer, success with entry to graduate school, and success in moving into the world of work.
* Higher Education programs and Organizations/Schools serving individuals who are blind and those with low vision are encouraged to make this information available in aggregate form on their own websites.

Transparency and public access to information helps ensure that AER Accreditation Program itself as well as higher education programs and organizations/specialized schools that serve individuals who are blind and those with low vision or that educate practitioners serving that population all have a clearly articulated purpose and will further ensure a setting that is accessible, functional, and safe for consumers, students, visitors, staff, and volunteers.

## B. Purpose of Accreditation—AERAC Mission Statement

**The mission of AERAC** is to advance excellence in the field of blindness and low vision services by ensuring that:

* organizations and specialized schools that provide direct services to individuals who have a visual impairment deliver high quality direct services, and
* institutions of higher education prepare professionals to provide services of the highest quality to individuals who have a visual impairment.

The AER Accreditation Council has been established for the purpose of accrediting organizations and specialized schools that provide direct services to individuals who are blind and those with low vision; and higher education preparation programs in the disciplines that prepare teachers and practitioners working with children and adults who are blind and those with low vision.  The AER Accreditation Council shall have complete autonomy in:

* Establishing, approving, and administering accreditation standards,
* Developing and implementing policies, regulations, and procedures for conducting accreditation reviews,
* Making accreditation decisions, and
* Administering an appeal process.

## C. History of AERAC

The movement toward professionalizing services for children and adults who are blind began during the late 1930’s. In 1940 the American Association of Instructors of the Blind (AAIB) introduced a national certification program for teachers of children who are blind. The following year the American Association of Worker for the Blind (AAWB) launched a similar program for home teachers of adults who are blind, now known as vision rehabilitation therapists.

In the 1950’s the AAWB adopted a code of ethics and a standing committee was empowered to issue a "Seal of Good Practice" to agencies that voluntarily submitted evidence of adhering to this code. While the intention was good, few agencies subscribed to the seal.

The concerns in field of work for the people who are blind were supported in general rehabilitation by the Hamlin Report which emphasized that the public needed objective information about the purpose, program content, administration, physical facilities, board structure and function, personnel, financing and budgeting and relations with other agencies in the community. These issues were also being given attention in public education.

To address the process of establishing standards, an AD Hoc Committee on Accreditation was appointed by the American Foundation for the Blind in 1962. The recommendation from this committee in 1963 was for the establishment of an autonomous commission that would be responsible for both the development of standards and the creation of a permanent accrediting body. Thus, was born the independent organism known as COMSTAC: The Commission Standards and Accreditation of Services for the Blind. From this commission came the COMSTAC Report which called for the establishment of the National Accreditation Council for Agencies Serving the Blind and Visually Handicapped. NAC was established on January 1, 1967.

The field had been slow to voluntarily adhere to the standards which were originally published or to updates of them. By the 1980's 104 facilities were accredited. Other agencies who did not pursue accreditation gave lack of funding or opposition from the National Federation of the Blind (NFB) as reasons for not becoming accredited. In the ensuing years, the economic conditions of the country and opposition by NFB lead to a withdrawal of financial support from major supporters. This led to a corresponding decline in the number of agencies and specialized schools seeking accreditation.

Various efforts were made to reverse this trend including moving the NAC headquarters from New York City to Cleveland, Ohio. At that time, the Sterling Group was hired to determine steps that would be necessary to ensure the continuation and strengthening of NAC. The Sterling recommendations included the following:

* Forge a national partnership
* Create a new image
* Modernize outdated standards
* Streamline the accreditation process
* Develop new products
* Spread the word

Under new leadership, the Sterling recommendations were implemented. As part of this effort, invitations to join the board were sent to eleven of the most important national organizations. By 2006, the internal and external environment for NAC improved. NAC realized an increase in membership and achieved financial stability and began to look to the future.

Nevertheless, the number of accredited agencies did not increase to earlier levels and continued to decline. Faced with this dilemma, the board of NAC eventually voted to discontinue the organization. Knowing the importance of accreditation to the provision of quality services, Association for Education and Rehabilitation of the Blind and Visually Impaired (AER) assumed the accreditation program previously managed by the National Accreditation Council for Blind and Low Vision Services (NAC) July 1, 2017. Since that time, AER has worked to develop a program that reflects best practices in accreditation programs. The Accreditation Council has examined and made modification to the previous standards with the goal of identifying and setting standards which reflect a strong focus on quality and outcomes of services.

The Executive Director of AER appointed a working committee of Council members who represent organizations, university programs, and the AER Board, to revise the standards and streamline the accreditation process. Major attention was given to changing the system from examining inputs and outputs to a focus on outcomes and program evaluation. In addition to accrediting organizations and specialized schools, the Council also assumed the responsibility of accreditation for the college and university programs that had up to this point depended upon AER for a review process.

Parallel with the evolution of accreditation of agencies and schools in the field of visual impairment was the development of accreditation of college and university programs that prepare practitioners and teachers who serve children and adults who are blind. The previously mentioned COMSTAC report also called for a committee to establish standards for quality Orientation and Mobility Services. In 1967 the American Association of Workers for the Blind (AAWB) established a certification program for Orientation and Mobility Specialists which in 2000 was to become an independent certification body known as the Academy for Certification of Vision Rehabilitation and Education Professionals. In 1975 as new university programs were starting to emerge, the AAWB sought a means to judge the quality of those programs.

That year at the AAWB meeting in Atlanta a committee was commissioned to draft a curriculum proposal for the developing universities in Orientation and mobility. In 1977 at the AAWB convention in Portland a proposal addressed the need for an accreditation process to review and approve orientation and mobility training programs in higher education. A formal review process was recommended to help programs meet the proposed standards. Between 1977 and 1979 additional input was sought and the standards were modified and approved in 1979. At that time, review of the university programs required a two to three-day onsite review of each college or university program. Shortly thereafter the process was extended to Vision Rehabilitation Therapy preparation program and later to programs for Teachers of Students with Visual Impairments. The process resulted in a listing of programs approved by the professional organization. After the consolidation of AAWB and the Association for the Education of the Visually Handicapped into AER, the guidelines were again revised and a regular update for each of the approved programs was instituted.

Many of the university programs that prepared professionals were small and had small budgets. They found it difficult to support the cost of onsite visits required by the approval process. The requirement for onsite reviews made the process too expensive for many universities and the number of reviews began to dwindle. Therefore in 2010, AER revised its standards and its procedures to no longer require onsite visits. Instead, the review panels held teleconferences to review submitted documents and to interview faculty, administrators, and students from the applying institutions. As the review process began to grow, standards were developed for Clinical Low Vision Therapy and Assistive Technology programs.

In 2017, when AER assumed the accreditation program from NAC, the review of colleges and universities was folding into the larger effort and was transformed from an approval process to an accreditation process. This added an additional level of independence since the accreditation process had its own board that was independent from the professional organization. The new accreditation process for colleges and universities was brought into alignment with the policies and procedures of the AER Accreditation Council. It was decided, however, that onsite reviews would not be required of the universities unless questions about an institution remain unanswered and could only be resolved with a physical review of the campus.

In July 2018, the AER membership approved an amendment to the AER Bylaws which gave the AER Accreditation Council legal and functioning authority.

This Policy and Procedure Manual is the governing instrument for the AER Accreditation Council and in cases where other materials conflict with this document, this Policy and Procedure Manual will be the deciding reference.

# Accreditation Council

A. Purpose: To accredit organizations including specialized schools providing direct services to individuals who are blind and those with low vision; and higher education preparation programs in the disciplines that prepare teachers and practitioners working with children and adults who are blind and those with low vision. The Accreditation Council shall have complete autonomy in establishing, approving, and administering standards to evaluate these entities; developing and implementing policies, regulations, and procedures for conducting accreditation reviews; making accreditation decisions; and administering an appeal process.

The Accreditation Council has chief responsibility for setting and enforcing standards set forth in the Accreditation Program. The Council acts as the overseeing body that ensures that the standards are current, relevant, and advance excellence in service delivery and that those entities seeking accreditation meet the standards. The primary responsibilities of the Council include:

* Approve and or deny accreditation.
* Define standards and criteria for evaluation of entities and programs and assure compliance to the standards.
* Develop methods for measuring the effectiveness of standards and the accreditation process.
* Establish guidelines and policies applicable to the accreditation and approval process.
* Hear and decide appeals related to the denial of full accreditation.
* Establish the re-evaluation of standards cycle and make improvements to the standards as needed.

## B. Members:

 **1. Responsibilities:** Council members have two primary responsibilities:

a. Ensure that standards are current, relevant and reflect the highest level of quality.

b. Render final accreditation decisions. Accordingly, Council members are required to:

(1) Fully review the final reports of each pending accreditation in advance of casting an accreditation decision vote.

(2) Ensure that policy and procedures are followed and announce any conflicts of interests that might exist prior to casting an accreditation vote and if required agree to be recused.

(3) Review, discuss and uphold the integrity of each standard by casting an accreditation decision vote that merits and validates adherence to quality, continuous improvement and optimal client and student outcomes.

(4) Uphold the following guiding principles: accountability, transparency, outcomes focused, and provide fair and equitable consideration.

**2. Council Composition:** The Council is comprised of up to 12 members including the Council Chair. The AER Executive Director serves as the Council Chair and has chief authority to validate and send invitations to pending, nominated, and approved Council members.

**3. Representation:** The goal of the Council is to have a representation that permits successful governance and oversite of the accreditation standards and accreditation granting processes; and shall consist of Fixed and Term representatives. Fixed representatives are non-termed members and Term members serve a 3-year term and up to 2 consecutive terms.

a. Fixed Representatives:

(1) AER Executive Director (AER ED) (1)

(2) Accreditation Chief Program Manager (CPM) (1)

b. Term Representatives: Every effort will be made to identify individuals to serve on the Council who are blind and those with low vision having experience related to administration, program management, accreditation, or certification.

(1) Consumer Group (3)

(2) Higher Education Accreditation Commission (HEAC) Chair or its designee (1)

(3) Organizations and Specialized Schools Chair and one other (2)

(4) Field Related Professionals/Experts (3)

(5) Public (1) \*

\*A public representative is an unpaid person who is not associated with AER or the vision services field and has experience related to administration, program management, accreditation, or certification.

**4. Qualifications:** Term members must have a minimum of 2 years of experience in the related and respective classification.

**5. Terms:** Term Council members shall be staggered and serve a 3-year term and an optional 3-year additional term. Council members cannot serve more than 2 consecutive terms. Fixed Council members seats are held until the person no longer holds the respective AER position.

**6. Recruitment:**

a. The Council Chair has the primary responsibility for recruiting and appointing Council members; and within 90 days of the expiration of the current terms should:

1. Seek in writing notifications of continuation from current Council members.

2. Seek recommendations from current Council Members.

3. Seek nominations from organizations and specialized schools.

4. Seek nomination or an appointee from the Higher Education Accreditation Commission.

5. Seek nominations from an open call for nominations per approved recruitment policy (See Section T)

b. The Council Chair must hold an election within 30 days of the expiring term. Nominee information and ballots shall be provided to each Council member within 15 days of the election. Council Chair shall schedule a Council meeting for the election. Note: the election can be held during a regularly scheduled Council meeting if the meeting falls within the 30 days of the term expiration date. If not, a special meeting shall be scheduled.

**7. Resignations:** Council membership is voluntary and can be ended at will. If a term is ended via resignation, the Council Chair shall seek nominations to fill the vacancy. The nomination(s) are presented to the seated Council members and voted upon during the next scheduled meeting. The term in such cases will be truncated to reflect the

remaining time in the current term.

**8. Removal:** Any member who misses more than 3 consecutive meetings or 50 percent of the meetings in one year commencing from July 1- June 30 can be removed from the Council at the discretion of the Council Chair. Should it be necessary to remove a member of the Council for a reason(s) other than absenteeism prior to the expiration of his or her term, a private vote will be held and will require a majority vote for removal. If it is deemed necessary to seek removal of a Council member, a written request must be made to the Council Chair. The Council member will be contacted by the Chair for proper due diligence prior to the vote.

##  C. Chair:

1. The AER Executive Director shall serve as Chair of the Council.

2. The duties and responsibilities of the Chair:

a. To notify Council members of regular and special meeting.

b. To set and send the agenda and required documents for regular and special meetings.

c. To preside at all Council meetings.

d. To maintain minutes of meeting including decisions on accreditation decisions.

 e. To notify organizations including specialized schools and higher education programs of the decision of the Council regarding accreditation status.

f. To recommend to the Council the names of individuals for appointments to the Council and committees, including the chairperson for each committee.

g. To represent Council, as needed, in discussions with other organizations, and at special events or to appoint other Council members to do so.

h. To serve as a spokesperson for the Council as needed and with guidance from the Council members as the opportunity permits.

## D. Meetings:

 **1. Regular Meetings**

a. The Council shall have at least six regular meetings a year.

b. The time and place of a regular meeting shall be designated at least 30 days before the meeting date by electronic or telephonic transmission to Council members.

c. The meeting agenda and required documents will be prepared by the Chair and sent to Council members one week before the meeting.

d. The Council may invite any person to a meeting to advance the business of the Council.

e. The Council may permit any or all Council members to participate in regular or special meetings by, or conduct the meetings through, the use of any means of communication by which all Council members participating may simultaneously hear each other during the meeting.

 **2. Special Meetings**

a. Special meetings of the Council may be called by the Chair or any three members to address specific issues.

b. Council members shall be notified by electronic or telephonic transmission of the date, time, place, and purpose of the meeting at least 1 week before the date.

c. Only business as stated in the call may be transacted at the special meeting.

 **3. Quorum and Voting**

 a. A simple majority of all voting members shall constitute a quorum.

 b. If a quorum is present when a vote is taken, the affirmative vote of a majority of the members present shall be an act of the Council.

4. The Council shall keep records of accounts and minutes of the proceedings of the Council.

E. Standards Revision: Within 5 years after new accreditation standards are adopted, the Council will appoint individuals to serve on the Standards Review Committee. These committees will conduct a complete evaluation on:

1. Standards for organizations including specialized schools who provide services to individuals who are blind and those with vision loss, and

2. Higher education programs for each program which offers accreditation.

## F. Standards Review and Revision Timeline:

The following is a suggested review and revision timeline. The actual timeline to be followed may be expanded as needed.

**Year One:**

 1. First meeting of the Standards Review Committee:

1. Develop a timeline and methodology for the Standards Revision Process.
2. Review recommendations for change made by Council.
3. Review other comments and feedback received from stakeholders.
4. Review Standards for compliance with current Council for Higher Education Accreditation (CHEA) criteria for recognition if appropriate.

2. Publish an article on the AER Website and in relevant publications announcing the revision of the Standards and describing the process and schedule for Standards review/revision. Disseminate a call for comment (with timeline indicated for comment) to all communities of interest and outline the procedure for those wishing to provide input to the Standards Review Committee.

3. Second meeting of the Standards Review Committee:

a. Review the data collected from all evaluation instruments.

b. Review any correspondence, e-mails, or telephone calls received by the Council regarding the Standards.

c. Identify Standards determined to have greatest concerns.

d. Prepare draft Standards for the Council review and discussion.

 4. Council meeting:

a. Review and discuss the draft Standards.

b. Provide feedback to the Standards Review Committee.

**Year Two:**

 5. Third meeting of the Standards Review Committee:

a. Revise the draft Standards based on input from the Council.

b. Develop an online survey for comment and feedback on the draft Standards.

6. Publish a draft of the revised Standards on the AERAC Web site and disseminate with a survey instrument to invite feedback from all communities of interest.

 7. Hold a Standards Open Hearing that is open to the public and send Council representatives to a variety of meetings to present identified Standards issues and request input on the Standards revision.

8. Fourth meeting of the Standards Review Committee:

a. Review feedback regarding the draft revised Standards.

b. Revise the draft Standards based on input.

 9. Council meeting: Review and discuss the draft Standards.

10. Fifth meeting of the Standards Review Committee:

a. Finalize the draft Standards based on Council input.

b. Submit new Standards to the Council for approval.

11. Council meeting:

a. Approval of New Standards: The Council will vote on approval of the new Standards and establish a transition timeline (usually a minimum of 18 months). Typically, an implementation date of July 31st is set so that each academic year of on-site evaluations (August-July) is conducted using the same set of Standards.

b. AER will not accept new accreditation or re-accreditation applications within 45 days of implementing new and revised standards.

c. Implementation for Programs Undergoing Initial Accreditation: During the transition period, programs undergoing initial accreditation will be reviewed under the standards that are in effect at the time the application is submitted and accepted by AER.

d. Implementation for Programs Undergoing Reaccreditation: Programs scheduled for reaccreditation will be reviewed under the standards that are in effect at the time the application is submitted and accepted by AER.

12. Post the new Standards on the AERAC Web site and send an e-mail announcement to all communities of interest regarding the new Standards.

13. Provide workshops to program directors and all accreditation reviewers on implementing the new Standards.

14. Begin assessing compliance with the new Standards as part of the regular interim report review process.

**ONGOING REVIEW**

Once the new Standards have been adopted, the ongoing review of the Standards becomes the responsibility of the Standards Committee, a standing committee of AERAC. This Committee is responsible for review of the feedback obtained through the Standards Evaluation Forms and other evaluation instruments to determine:

1. The need for an immediate change to the Standards. If the Council determines, at any point during its systematic program of review, that it needs to make changes to the Standards, the Council will initiate action within 12 months to make the changes and will complete that action within a reasonable period of time. Before finalizing any changes to the Standards, the Council will provide advance public notice of proposed new or revised Standards. The Council will provide adequate opportunity for broad comment from the academic community and the public prior to adoption of proposed changes to AERAC Standards.

2. The need for a change to any of AERAC’s policies, procedures, or forms.

G. Committees:

The Council may establish and dissolve committees, working groups, commissions, and other entities necessary to conduct the Council business, and designate and change their charges and determine their size, member qualifications, and terms.

1. General Duties of Committee Chairperson

a. To work with the Council Chair as requested in selecting members for the committee.

b. To work with the Council Chair to formulate a work plan for the committee and to develop specific goals,

c. To orient the committee members to the charge and goals of the committee.

d. To provide leadership to the committee in deciding how the work of the committee will be carried out, whether through meetings, telephone conferencing, internet, or other means.

e. To maintain communications with the Council Chair to prepare status reports for the Council immediately prior to each scheduled meeting of the Council, including any requests for Council action recommended by the committee.

f. To prepare and maintain adequate records of all committee meetings and activities and to share these with committee members and the Council Chair.

g. To share with the succeeding committee chairperson a complete record of the committee's actions and pending issues and to help orient the new chairperson to the role and responsibilities of the committee.

2. Standards Committee: Responsible for review of the feedback obtained through the Standards Evaluation Forms and other evaluation instruments.

3. Appeals Committee: Applicants for accreditation who believe that the process has not resulted in an accurate appraisal of the entity, have the right to request an appeal. An appeal may only be based upon violation of the AERAC procedures or an accreditation decision thought to be arbitrary and capricious and in substantial disregard of the documented evidence. The Appeals Committee will conduct an independent review of the documents that were submitted during the self-study and any materials from the onsite visit.

The Appeals Committee consists of five members who are not members of the AERAC or any of its other committees. They are appointed by the Council Chair to represent the following categories:

a. At least one member of either an Accredited Organization serving people who are blind OR at least one member from an Accredited specialized school for  students who are blind OR at least one member from an Accredited Higher Education program

b.  Consumers of services

c.  A Public Representative

The Appeals Committee is independent from the AERAC and has the responsibility of reviewing the self-study materials submitted by the applicant and any materials from the (virtual or actual) onsite visit to determine if they in fact address the deficiencies identified by the AERAC in its previous review and status determination. Once completed, a report is sent to the AERAC Chair with a recommendation to uphold the denial or provisional status, or to reconsider and grant a new accreditation status. The final decision on the appeal remains with the AERAC.

## H. Commissions

1. Higher Education Accreditation Commission (HEAC): Responsible for the coordination of the higher education function of the AERAC. The HEAC is a seven-person body which includes one-member from each of the AER divisions that represent the disciplines being accredited: Orientation and Mobility, Teachers of Students with Visual Impairment, Vision Rehabilitation Therapy, Low Vision Therapy, and Assistive Technology. There is one member at large on the Commission. The chair of the Commission is a member of one of these disciplinary Divisions and a member of the Personnel Preparation Division. The HEAC will have a chairperson and a secretary both selected from within the HEAC and by the members of the HEAC. The chairperson or designee will also serve as a member of the AER Accreditation Council.

The HEAC has the responsibility of appointing the panels for each of the reviews. It receives the evaluative data and recommendation from each review for its consideration. The HEAC through its chairperson presents a recommendation regarding accreditation status to the AERAC. A subset of the Commission membership also comprises the Standards Committee for development and revision of standards relating to higher education programs.

Members hold three-year staggered terms. New members are nominated according to the AERAC approved policy in Section T.

2. Organizations and Schools Accreditation Commission (OSAC): Responsible for the coordination of the organizations and schools accreditation function of the AERAC. The OSAC is a five-person body which includes at least one member from a specialized School for the Blind, and one member from an organization providing direct services to adults who are blind or visually impaired. The chair of the Commission is selected from the membership of the OSAC commission. The chairperson or designee will also serve as a member of the AER Accreditation Council.

The OSAC has the responsibility of appointing the panels for each of the reviews. It receives the evaluative data and recommendation from each review for its consideration. The OSAC through its chairperson presents a recommendation regarding accreditation status to the AERAC. A subset of the Commission membership also comprises the Standards Committee for development and revision of standards relating to higher education programs.

Members hold three-year staggered terms. New members are nominated according to the AERAC approved policy in Section T.

## I. Accreditation Approval Levels:

**1. Full Accreditation:** The organization meets or exceeds each of the AERAC Core/Management Service Standards and demonstrates substantial conformance to the remaining standards. The organization engages in program evaluation which documents improvements of previous conditions identified by the accreditation process. The organization demonstrates a high level of quality in providing the services for which it is being accredited.

**2. Provisional Accreditation:** The purpose of accreditation is to identify those organizations that meet or exceed quality standards and to stimulate the growth of quality services in organizations that have a commitment to quality but need improvement in specific areas. Organizations that are close to meeting all the standards but fall short in a limited number of areas can be granted provisional accreditation when they pledge to improve those services within a one-year time period. Provisional accreditation is granted for one year after which a follow-up review is conducted to determine if deficiencies have been ameliorated.

**3. Non-accreditation:** The organization has failed to meet a number of the Core/Management Service Standards and also lacks compliance in various area specific standards. Organizations with provisional accreditation status will also fall into this classification if they do not demonstrate compliance in areas identified by the previous review within one year.

A HEAC program or Organization/School pursuing re-accreditation that fails to meet the Core/Management Standards and/or Curricular/Service Standards requirements has up to 2 years to re-submit documentation to be re-considered for re-accreditation. During that time, the program will be recorded as “on probation.” The time on probation will be subtracted from the award of a 5-year term if full accreditation is achieved within that two-year probationary period.

A HEAC program or Organization/School that fails to meet the Core/Management Standards and/or Curricular/Service Standards requirements when applying for initial accreditation will have the usual one-year time period to respond, if granted provisional status. No time limit is set if the HEAC program or Organization/School is determined to have non-accredited status. (See also L. Appeals.) Program or Organization/School will continue to be listed as non-accredited. AER will maintain communication with the program to ensure sufficient support for their success.

## J. Reviewers:

**1. Qualifications:** The accreditation program shall seek individuals with strong core competencies to review organizations and specialized schools that provide services for individuals who are blind and those with low vision and higher education preparation program. Reviewers shall be responsible for evaluating service delivery systems and operations against a set of accreditation standards.

Reviewers have an ethical obligation to review programs objectively and to render their decision based on the information gathered in the review process. Any personal or professional opinions on areas outside the review process should not affect their decisions. Reviewers who fail to objectively review programs may be removed from the review panel. Reviewers have a responsibility to recuse themselves from a review if they have a conflict of interest. Given the small size of our field, simply knowing a faculty member at a program does not constitute a conflict of interest. A significant relationship with a program or someone related to a program would lead to an inability to objectively evaluate a program and is considered a conflict of interest. Higher Education programs and Organizations/ Schools may request that a member of a review team be replaced if the program believes that person has a conflict of interest.

Reviewers shall meet the following requirements:

a. Three or more years of recent (i.e. within the last 5 years) related field and/or administrative experience or at least 10 years of prior related experiences.

b. No conflict of interest with the organization or higher education institution seeking accreditation.

c. Completion of the reviewer training and exam with a “passing” score of 80 or better.

d. Excellent oral and written communication skills.

**2. Recruitment:** AER shall seek reviewers annually starting in July and more frequently based on demand and need. An open call shall be commissioned by AER staff. Interested persons shall submit an application; applications shall be screened by staff. Applications shall be accepted ongoing.

**3. Training:** Qualified applicants shall complete the AER Accreditation Reviewer Training- Organizations and Specialized Schools (OSAC) or the AER Accreditation Reviewer Training- Higher Education Programs (HEAC). OSAC training materials are developed by AER staff. OSAC training sessions shall be held virtually or during an AER International Conference; and shall be administered by AER staff. HEAC training materials are developed by HEAC. HEAC training sessions shall be held virtually or during an AER International Conference; and shall be administered by the HEAC Chair. Council members might be asked to contribute to training sessions.

**4. Examination:** The OSAC examination shall be developed by the OSAC chair. The HEAC examination shall be developed by the HEAC chair. OSAC and HEAC exams shall be administered and scored by AER staff; and exam records shall be held by AER.

## K. Review Panel:

**1. Purpose:** A panel of peers referred to as Reviewers shall be selected for each program, specialized school or higher education program that is seeking accreditation. The Panel shall be responsible for reviewing all materials submitted by the entity, evaluating those materials against the accreditation standards, and making a recommendation for accreditation.

**2. Members:** Review Panels shall consist of 2-4 reviewers. All HEP panels shall consist of four members of which one will be a university educator, two will be practitioners from the discipline, and one will be from a related discipline. The size of the OSS panel depends on the size and operation of the organization or specialized school. The panel for HEP shall have 4 reviewers. Each panel shall have a team leader referred to as the Panel Chair. Where applicable, the Panel Chair or if needed an additional member of the panel shall serve as the onsite reviewers or shall select reviewers from the panel to serve as the onsite review.

**3. Process:** A panel shall be selected. The names of each reviewer shall be provided to the organization, specialized school or higher institution that is seeking accreditation. The entity shall have 5 business days to advise if there is a conflict of interest or opposition to a reviewer by sending an email to **accreditation@aerbvi.org**. Materials and instructions shall be provided to each reviewer electronically. Reviewers shall have ideally 30 days to complete the review.

Each OSS and HEP panel shall have at least 4 scheduled calls. Call 1 which is the launch call shall be held within 7 business days of confirming the panel. Call 2, which is the mid-point call, shall be held within 15 days of starting the review. Call 3 shall be held after 30 days and all reviewed materials will be discussed. Call 4 shall be the Determination Call and shall be held, where applicable, after the onsite review has been completed. Calls shall be scheduled by AER staff.

**4. Report:** The Panel Chair shall be responsible for submitting the final written report and the accreditation recommendation to the Council Chair within 45 days of completing the full review and discussion for organizations, schools, programs, or institutions of higher education. The Council Chair shall forward the HEP report to the HEAC for consideration and recommendations.

**5. Recommendations:** Based on the qualitative and quantitative data reviewed, the Panel Chair shall seek a recommendation from the panel members and present along with the report to the Council Chair. If there is not a consensus on a decision, the Panel Chair shall contact the Council Chair. A meeting shall be held with the panel members and the Council Chair; and the disputed data, records or issues shall be presented to the Chair in advance of the meeting.

L. Onsite Review: An onsite visit is conducted for each organization or specialized school, and when necessary for institutions of higher education. The purpose of the on-site review is to verify compliance with the AERAC standards and to assess any factors that were not adequately described in the self-study. Onsite visits to higher education programs are only conducted when there is a specific concern that cannot be satisfied through written documentation that must be further investigated by a visit to the facility.

The size and composition of the onsite review team will vary based upon the size and operation of the programs to be reviewed. Review teams for organizations and specialized schools will typically consist of two to four individuals, while higher education programs will have one to two panel visitors. Each panel review team has a Panel Chair who is responsible for coordinating the visit and submitting a final report. Members of the review team are volunteers who have received online training to evaluate specific types of programs. They may not be affiliated with the organization to be evaluated or with a closely aligned organization. The entity to be reviewed will have an opportunity to examine the names and affiliations of proposed reviewers and provide feedback regarding any potential conflicts of interest.

The key components of an onsite visit include the following:

1. Verify the information provided in the Self-Study Report and the entity’s compliance with the applicable AERAC standards.

2. Investigate specific issues identified during the review of the Self-Study Report.

3. Interview consumers, stakeholders, governance board members, financial management staff, executive director/CEO, program staff, program evaluation staff/contractor, higher education faculty members, higher education students, and higher education administrators.

4. Visit key facilities.

5. Examine records and other documentation.

## M. Appeals

Grounds for Appeal: In situations where an organization, specialized school, college, or university disputes the validity of an accreditation decision an appeal can be made in writing to the AERAC within 30 days of the date of the accreditation letter. The letter of appeal must state the rationale for the appeal citing evidence that was provided within the materials that were originally submitted. Appeal letters should be emailed to: accreditation@aerbvi.org.

The Appeals Process: Upon receipt of the letter of appeal, the accreditation manager will form an Appeals Committee for approval by AERAC within 30 days of receipt of the written request. The Appeals Committee will review all self-study materials that were originally submitted and any materials from the (virtual or actual) onsite visit.  The Committee will prepare a report with a recommendation to AERAC as follows: “The decision to deny accreditation should be upheld”/ “The decision to accord provisional accreditation should be upheld” Or “The decision should be amended.”  The report will be presented to AERAC at its next meeting for a final determination.  (See also Appeals Committee in Section G).

Costs Associated with an Appeal:  There is no charge to make an Appeal.  In the event the decision to deny accreditation is upheld, there is an application fee equal to a re-accreditation fee for OSAC – currently $350 -- or to *half*the cost of one program for HEAC -- currently $1750.

## N. Release of Information:

Purpose: to provide the public with objective information regarding professional and organizational practices that lead to improved educational and rehabilitative outcomes for individuals with visual impairment and blindness.

AER Accreditation Program pages on [www.aerbvi.org](http://www.aerbvi.org/) will list the names of accredited organizations, specialized schools, or higher education programs along with the expiration date of said accreditation.

AER Accreditation Pages will provide a link to all AERAC decision statements. These documents will report Full, Provisional, or Denied accreditation status of all Organizations, specialized schools or higher education programs who have undergone an accreditation review.

Accredited organizations will be encouraged to issue a press release announcing their accomplishment and to display the AER Accreditation logo on their websites and other communications with the public.

## O. Concerns or Complaints Regarding Compliance with Standards, or Accusations of Inappropriate Conduct:

AERAC has a commitment to the highest standards of professional conduct. Organizations that are accredited by AERAC are expected to operate within an ethical milieu and abide by the principles of effective administration and quality service delivery. It is expected that employees will exhibit personal integrity in carrying out their responsibilities and in meeting the mission of the organization. When evidence to the contrary is presented by consumers, employees, or the public at large, AERAC has a mechanism in place to investigate legitimate public concerns and complaints about a higher education program, organization/school serving individuals who are blind or low vision, or AER accreditation program itself.

A concern or complaint report must be submitted in writing to the AER Accreditation Council describing the nature of the concern as follows:

1. Explain the reasons compliance with standards is being questioned, or facts of the incident(s)
2. Provide the name or names of the alleged participants
3. Provide the dates during which the alleged activities occurred

Upon receipt of the concern or complaint report, the Council Chair will appoint a Review Committee of three members of AERAC within 30 days of receipt.

The Review Committee will conduct its investigation in as confidential a manner as possible. Those named in the alleged activities will have every opportunity to explain the circumstances under which the actions occurred and their motivation for their activities. The Review Committee will submit a report to the full AERAC indicating that the alleged concern or complaint is valid or not valid and will provide appropriate recommendations for consideration by the full AER Accreditation Council.

In the case of accredited programs or organizations, consequences may include continued monitoring over a time-specific period, or reclassification to Provisional Accreditation status or withdrawal of accreditation. The accredited program or organization will receive a letter specifying the areas of violation and given a time frame to complete corrective action.

In the case of concerns or complaints about the AER Accreditation Program itself, consequences may include personnel actions, policy changes or specific remedies as appropriate. In the case of illegal activities, the appropriate authorities will be notified.

Appropriate communication to the party expressing the concern or complaint will be provided by the Chair of the Council or Chair of HEAC/OSAC, as appropriate, at the conclusion of the review.

P. Confidentiality, Disclosure, Conflict of Interest, Code of Conduct:The Council has clearly delineated policies regarding confidentiality and disclosure. All members of the Council must sign a Confidentiality, Non-Disclosure and Conflict of Interests Agreement and AER Accreditation Council Code of Conduct.

**1. Statement on Confidentiality:** The Council maintains the confidentiality of information collected during the accreditation process. Materials such as Reports of Self-Study, Plans of Correction, Progress Reports, and Interim Reports to Council are considered confidential and are accessible only to AER Accreditation Department staff and members of the evaluating bodies of the Council. Written permission must be secured from the authorities of the organizations including specialized schools and the educational institution prior to release of this information to any other individual or group, except when this released information does not disclose the identity of the organizations including specialized schools and educational institution.

During discussions related to review and evaluation of specific programs, strict safeguards of confidentiality are maintained. These meetings are closed, and the minutes are kept confidential. Meetings may be open during discussion of general accreditation procedures. During open meetings, participants avoid references to specific programs by name or through elaborate descriptions.

**2. Statement on Disclosure:** Information regarding the Council: The scope, policies, procedures, standards, and decisions of the Council are described in official documents and are available to the public through the Accreditation Program Pages on the [www.aerbvi.org](http://www.aerbvi.org) website. Relevant policies and procedures are disseminated to organizations including specialized schools and educational programs on a regular basis.

Information relevant to decisions on accreditation status: Lists of all AERAC-accredited, developing, and applicant organizations including specialized schools and educational programs are available to the public through the AERAC Web site. Each program listing includes complete contact information for the program, the level(s) of the program accredited, and the year of expiry of the current accreditation term. Information regarding organizations, specialized schools and higher education programs with provisional status or denied accreditation is available on the website through a link to AERAC decisions. All decisions including for approving Full Accreditation is provided on this link.

**3. Statement on Conflict of Interest:** Council member will inform the Council Chair of any conflicts or personal interests that exist with any entity seeking accreditation. Council member will not take gifts, money, or any form of payment directly or indirectly that are or can be construed as an offering for favorable decisions and or support related to an accreditation applicant.

**4. Code of Conduct:** In performance of his or her role as a Council member, each member is expected to carry each responsibility with the highest standards of ethical conduct and fulfill each duty to the best of his or her ability and judgement.

## Q. Administrative Procedures:

**1. Fiscal:**

Fees and Budgets

Accreditation fees and budgets are established by AER’s central office staff annually and approved in December by the AER Board of Directors; and fall outside the jurisdiction and scope of work of the Council. Budgets must include all related and applicable expenses and clearly identified revenue projections. Annual accreditation fees will be due each December for accredited organizations and specialized schools. Invoices will be emailed in November or December of each year. Please refer to the Appendix for a list of fees.  New fees will go into effective January 1 and will apply to all applications submitted after January1.

**2. Staff:** Accreditation program staffing is established and managed by AER and fall outside the jurisdiction and scope of work of the Council. The AER Executive Director assigns staff to manage and coordinate the functions of the program; and the related work is performed according to the policies and procedures that govern AER employees.

**3. Record Retention:** All applications and documents submitted to AER will be maintained for 5 years for each accreditation and re-accreditation application via Drop Box.  Final reports, approval letters and related records will be maintained by AER for the life of the accreditation program.

## R. Promoting the Accreditation Programs

AER will strive at all times to promote the value and existence of the accreditation program through timely and professional communications. An accreditation page will be included on the AER web site that communicates general information about the program and applicable contact information. AER will seek to use other mediums to communicate and advance the Accreditation Program that include but not limited to info-graphs, e-flyers, and conference presentations. Promotional materials are created and maintained by AER’s central office staff and must align with the AER brand. Person’s wishing to speak or present on behalf of the program to advance its mission can do so with authorization from the Council Chair or the AER Executive Director; and will be required to submit documentation requested by the Chair or Executive Director, if any.

## S. Policy on Diversity, Equity, Inclusion, and Accessibility

AERAC is committed to a diverse, inclusive, equitable, and accessible environment where all board members, staff, volunteers, and members feel respected and valued regardless of ability, gender, age, race, ethnicity, national origin, sexual orientation or identity, education, or any other bias.

We are committed to being nondiscriminatory and providing equal opportunities for employment, volunteering, and advancement in all areas of our work.

We respect the value that diverse life experiences bring to our board and leadership and we strive to listen to their views and give them value.

## T. Recruitment of Committee and Commission Members

For the purpose of assuring transparency and establishing a committee that is well qualified and reflects the diversity of the population served by those organizations seeking accreditation, the Committee(s) shall take the following steps to publicize open positions and establish a pool of outstanding and qualified prospects for the committee(s):

1. Provide notice of open positions through all AER communication channels when slots are available;

2. Provide a notice for recruitment of new members through the national consumer groups representing people who are blind and visually impaired; i.e., in monthly magazines like the *Braille Forum* for the American Council of the Blind, and the *Braille Monitor* for the National Federation of the Blind;

3. Share announcements of open positions with other groups focused on the employment and rehabilitation of people who are blind and visually impaired, such as Blinded Veterans Association, National Industries for the Blind, and Vision Serve Alliance; and focused on education as well.

4. List members of existing committees, who can serve as a resource for those with questions, and provide information on the committee roles and responsibilities on the AER website;

5. Task an individual to collect resumes of interested individuals and track data pertaining to demographics for reporting purposes.