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

**Policies and Procedures Manual**

**Contents**

[I. Introduction 2](#_heading=h.tyjcwt)

[A. Introduction to Accreditation 2](#_heading=h.17dp8vu)

[B. Purpose of Accreditation—AERAC Mission Statement 3](#_heading=h.3rdcrjn)

[C. History of AERAC 4](#_heading=h.2jxsxqh)

[II. Association for Education and Rehabilitation for the Blind and Visually Impaired Accreditation Council (AERAC) 7](#_heading=h.4i7ojhp)

[A. Purpose 7](#_heading=h.qsh70q)

[B. Members 8](#_heading=h.3as4poj)

[C. Chair 10](#_heading=h.1pxezwc)

[D. Meetings 10](#_heading=h.49x2ik5)

[E. Standards Review and Revision 11](#_heading=h.2p2csry)

[F. Committees 12](#_heading=h.147n2zr)

[G. Commissions 13](#_heading=h.3o7alnk)

[H. Accreditation Approval Levels 14](#_heading=h.23ckvvd)

[I. Reviewers 14](#_heading=h.ihv636)

[J. Review Panel 15](#_heading=h.32hioqz)

[K. Site Visit 16](#_heading=h.1hmsyys)

[L. Appeals 17](#_heading=h.41mghml)

[M. Release of Information 17](#_heading=h.2grqrue)

[N. Concerns or Complaints Regarding Compliance with Standards, or Accusations of Inappropriate Conduct 18](#_heading=h.vx1227)

[O. Confidentiality, Disclosure, Conflict of Interest, Code of Conduct 19](#_heading=h.3fwokq0)

[P. Administrative Procedures 20](#_heading=h.1v1yuxt)

[Q. Promoting the Accreditation Programs 20](#_heading=h.4f1mdlm)

[R. Policy on Diversity, Equity, Inclusion, and Accessibility 21](#_heading=h.2u6wntf)

[S. Recruitment of Committee and Commission Members 21](#_heading=h.37m2jsg)

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# I. 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 programs and direct-service organizations and schools for the blind. In the case of higher education programs, accreditation supports 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. For direct-service organizations and schools for the blind, accreditation supports strong management and programs benefiting from blindness professionals bound by codes of ethics and providing high quality instruction. In all cases, accreditation speaks to the needs of consumers of programs and services for independent assurance of quality.

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 Annual Higher Education Program Report or Annual Organization/Specialized School Program Report. This report is a requirement for maintaining accreditation status through the entire term. See HEAC or OSAC Handbook for details.

The 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** (or, the Council) 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 Council has been established for the purpose of accrediting the following: 1) organizations and specialized schools that provide direct services to individuals who are blind and those with low vision; and 2) 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;
* 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 the 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 following year, this committee recommended 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 organization known as COMSTAC: the Commission on 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). NAC was established on January 1, 1967.

The field had been slow to voluntarily adhere to the original standards or to updates of them. Agencies that 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 led to a withdrawal of financial support from major supporters. This, in turn, 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 key 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 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, the Association for Education and Rehabilitation of the Blind and Visually Impaired (AER) assumed the accreditation program previously managed by NAC July 1, 2017. Since that time, AER has worked to develop a program that reflects best practices in accreditation programs. The AER Accreditation Council (AERAC) has examined and made modifications 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 AERAC members who represented 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.

In 1975 as new university programs were starting to emerge, 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 was drafted to address 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 programs 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. In the 1990s, AER recognized that their certification programs should be independent from the membership focus of AER to ensure objective regulation of the profession. To this end, in 2000 the Academy for Certification of Vision Rehabilitation and Education Professionals was established.

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 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. With advanced technology, AERAC now relies on Site Reviews as shown in K., below.

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

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

# II. Association for Education and Rehabilitation for the Blind and Visually Impaired Accreditation Council (AERAC)

## 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 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.

AERAC is the governing body responsible for the standards and has final authority to award, deny or revoke accreditation. 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:

1. Ensure that standards are current, relevant and reflect the highest level of quality.
2. Render final accreditation decisions. Accordingly, Council members are required to:
3. Fully review the final reports of each pending accreditation in advance of casting an accreditation decision vote;
4. 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;
5. 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.
6. 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 oversight 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.

1. Fixed Representatives:
	1. AER Executive Director (AER ED) (1)
	2. Accreditation Program Manager (CPM) (1)
2. 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. After a period of 12 months, past Council members are eligible to apply for a new cycle of terms. Fixed Council Representatives seats are held until the person no longer holds the respective AER position. AERAC is the governing body responsible for the standards and has final authority to award, deny or revoke accreditation

6. *Recruitment*

1. 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, specialized schools and higher education programs.
	4. Seek nominations from the Higher Education Accreditation Commission (HEAC) and Organization of Schools Accreditation Commission (OSAC).
	5. Seek nominations from an open call for nominations per approved recruitment policy (See Section T)
2. 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. The 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

The AER Executive Director shall serve as Chairperson of the Council.

The duties and responsibilities of the Chairperson include:

1. To notify Council members of regular and special meetings;
2. To set and send the agenda and required documents for regular and special meetings;
3. To preside at all Council meetings;
4. To maintain minutes of meetings including decisions on accreditation decisions;
5. To notify organizations including specialized schools and higher education programs of the decision of the Council regarding accreditation status;
6. To recommend to the Council the names of individuals for appointments to the Council and committees, including the chairperson for each committee;
7. To represent Council, as needed, in discussions with other organizations, and at special events or to appoint other Council members to do so;
8. 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*

1. AERAC shall have at least six regular meetings a year.
2. 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 AERAC members.
3. The meeting agenda and required documents will be prepared by the Chair and sent to AERAC members one week before the meeting.
4. AERAC may invite any person to a meeting to advance the business of the council.
5. AERAC may permit any or all AERAC members to participate in regular or special meetings by, or conduct the meetings through, the use of any means of communication by which all AERAC members participating may simultaneously hear each other during the meeting.

 2. *Special Meetings*

1. Special meetings of AERAC may be called by the Chair or any three members to address specific issues.
2. AERAC 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.
3. Only business as stated in the call may be transacted at the special meeting.

3. *Quorum and Voting*

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

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

## E. Standards Review and Revision

Periodic assessment and review of the Standards occurs at 5 year intervals. The Higher Education Accreditation Commision (HEAC) and the Organization of Schools Accreditation Commission (OSAC) are charged with conducting regular reviews of the standards pertaining to their respective areas. Additionally, Standards may be reviewed and updated as necessary. This review may be initiated by professionals in the field or by AERAC.

Before finalizing any changes to the Standards, AERAC will provide advance public notice of proposed new or revised Standards. AERAC will provide adequate opportunity for broad comment from the academic community and the public prior to adoption of proposed changes to the Standards. Comments about the standards may be made to AERAC@aerbvi.org (Chair) or accreditation@aerbvi.org (accreditation manager) at any time.

## F. 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*

1. To work with the Council Chair as requested in selecting members for the committee;
2. To work with the Council Chair to formulate a work plan for the committee and to develop specific goals;
3. To orient the committee members to the charge and goals of the committee;
4. 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;
5. 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;
6. To prepare and maintain adequate records of all committee meetings and activities and to share these with committee members and the Council Chair;
7. 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. *Appeals Committee*

The Appeals Committee is independent from AERAC and has the responsibility of reviewing appeals. 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.

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:

1. 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
2. Consumers of services
3. A Public Representative

The Appeals Committee will conduct an independent review of the allegations in the appeal, and will also review the documents that were submitted during the self-study process, as they pertain to the appeal. Once completed, a report is sent by the Appeals Committee 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.

## G. Commissions

1. *Higher Education Accreditation Commission (HEAC)*

HEAC is 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 of AER. The HEAC will have a chairperson and a secretary both selected from within HEAC and by the members of HEAC. The chairperson or designee will also serve as a member of the Council.

The HEAC has the responsibility of appointing the panels for each of the program 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. HEAC is also charged with the development and revision of standards relating to higher education programs.

Members hold three-year staggered terms. Term limits, Recruitment, Resignations and Removal policies for AERAC also apply to HEAC. New members are nominated according to the AERAC approved policy in Section T.

2. *Organizations and Schools Accreditation Commission (OSAC)*

OSAC is responsible for the coordination of the organizations and schools accreditation function of the AERAC. The OSAC is a seven-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 chairperson of the Commission is selected from the membership of the OSAC. The chairperson or designee will also serve as a member of the AER Accreditation Council.

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. OSAC, through its chairperson, presents a recommendation regarding accreditation status to the AERAC. OSAC is also charged with the development and revision of standards relating to schools and organizations.

Members hold three-year staggered terms. Term limits, Recruitment, Resignations and Removal policies for AERAC also apply to OSAC. New members are nominated according to the AERAC approved policy in Section T.

## H. Accreditation Approval Levels

For information and processes of accreditation approval and approval levels, see HEAC and OSAC Handbooks, respectively.

## I. Reviewers

1. *Qualifications:*

AERAC 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 programs. 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 or administrator at a program does not constitute a conflict of interest. A significant relationship with a program or organization or someone related to a program or organization 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:

1. 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;
2. No conflict of interest with the organization or higher education institution seeking accreditation;
3. Completion of the reviewer training and exam with a “passing” score of 80 or better;
4. Documented excellent oral and written communication skills.

2. *Recruitment*

AERAC shall seek reviewers based on demand and need. An open call shall be commissioned by the AERAC Chairperson. Interested persons shall submit an application; applications shall be screened by AERAC. Applications shall be accepted on an ongoing basis.

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. AERAC members might be asked to contribute to training sessions.

4. *Examination*

The OSAC examination shall be developed by the OSAC chairperson with input from OSAC. The HEAC examination shall be developed by the HEAC chairperson with input from HEAC. OSAC and HEAC exams shall be administered and scored by AER staff and exam records shall be held by AER.

## J. Review Panel

1. *Purpose*

A panel of peers referred to as Reviewers shall be selected for each organization, 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. HEAC 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. OSAC panels shall consist of professionals in the field with experience related to the OSAC programs prosed for accreditation. The size of the OSAC panel depends on the size and operation of the organization or specialized school. Each panel shall have a team leader referred to as the Panel Chair.

3. *Process*

A panel shall be selected by the AER Accreditation Manager. The names of each reviewer shall be provided to the organization, specialized school or higher education program 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.

Each OSAC and HEAC panel shall have at least 4 scheduled meetings. The first meeting, which is the launch meeting, is held to introduce panel members, review the accreditation process and assign discipline-specific standards review. Meeting 2 shall be held to discuss the core/management standards. Meeting 3 shall be held to discuss curriculum/program standards. Meeting 4 shall be the Determination Meeting and shall be held after the site visit and interviews have been completed. Supplemental meetings may be held as necessary. Meetings shall be facilitated by the AER Accreditation Manager.

4. *Recommendations*

Based on the qualitative and quantitative data reviewed, the Panel members will prepare a report using the form provided by AERAC.

5. *Report*

The AER Accreditation Manager submits the review panel report along with the aggregate reviews of all self-study forms to the Chair of HEAC within 5 working days of receipt of the report from the review panel chair. HEAC reviews the materials at its next scheduled monthly meeting, prepares its recommendation and forwards this package to AERAC for a final decision at its next scheduled meeting (usually later in the same month as the HEAC meeting). The AER accreditation manager communicates the decision to the program and institution.

## K. Site Visit

Site visits consisting of a virtual tour and interviews are conducted for each organization or specialized school and for higher education programs. When requested by the institution, in person site visits may be arranged. In these instances, the institution is responsible for all costs associated with the visit.

The purpose of the site visit is to confirm and clarify information that has been documented in the self-study document, and to answer any additional questions that may have arisen during review panel discussions.

## L. Appeals

1. *Grounds for Appeal*

In situations where an organization, specialized school, or university program 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.

2. *The Appeals Process*

The AER Accreditation Manager will form an Appeals Committee for approval by AERAC within 30 days of receipt of the written request. The Appeals Committee will conduct an independent review of the allegations in the appeal and will also review the documents that were submitted during the self-study process, as they pertain to the appeal. Once completed, a report is sent by the Appeals Committee 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 AERAC. (See also Appeals Committee in Section F.)

3. *Costs Associated with an Appeal*

There is no charge to make an Appeal. In the event the decision to deny accreditation is upheld, the organization, specialized school or higher education program may reapply. In this instance, the application fee is equal to a re-accreditation fee for OSAC, currently $350, or to half the cost of one program for HEAC, currently $1750.

## M. Release of Information

The purpose of releasing information is to provide the public with objective data 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/) list the names of accredited organizations, specialized schools, or higher education programs along with the expiration date of said accreditation.

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

Accredited organizations, specialized schools and higher education programs 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.

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

AERAC has a commitment to the highest standards of professional conduct. Organizations, specialized schools and higher education programs 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 organizations, specialized schools and higher education programs exhibit integrity in carrying out their responsibilities and adhere to the standards throughout the accreditation period. 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 AERAC chairperson (AERAC@aerbvi.org) 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. When possible, provide the dates during which the alleged activities occurred.

Upon receipt of the concern or complaint report, the HEAC or OSAC will conduct a review. If it is determined to be necessary, a site review per Section K. may be conducted.

HEAC/OSAC will conduct its investigation in as confidential a manner as possible. The organization, specialized school or higher education program will have the opportunity to respond to the allegations. HEAC/OSAC will submit a report to the AERAC indicating that the alleged concern or complaint is valid or not valid and will provide appropriate recommendations for consideration by the Council.

In the case of accredited programs or organizations, consequences may include continued monitoring over a time-specific period, 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 AERAC 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.

## O. 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 Action, Annual Program Reports, and to Council are considered confidential and are accessible only to AER Accreditation staff and members of OSAC, HEAC, and the Council. Written permission must be secured from the authorities of the organizations, specialized schools or higher education programs prior to release of this information to any other individual or group, except when this released information does not disclose the identity of said institutions.

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 webpages 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, specialized schools and higher education programs are available to the public through the Accreditation Program webpages. 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 and the accreditation level.

3. *Statement on Conflict of Interest*

Council members will inform the Council Chairperson of any conflicts or personal interests that exist with any entity seeking accreditation. Council members 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 their roles as Council members, all members are expected to carry each responsibility with the highest standards of ethical conduct and fulfill each duty to the best of their ability and judgment.

## P. Administrative Procedures

1. *Fiscal*

Fees, Dues, and Budgets: accreditation application fees, annual dues, and budgets are established by AER’s central office annually and approved in December by the AER Board of Directors; this falls outside the jurisdiction and scope of work of the Council.

Budgets must include all related and applicable expenses and clearly identified revenue projections.

Invoices for annual accreditation dues are emailed to accredited organizations and specialized schools in November or December, for the 12 month calendar year beginning in the following January. Annual dues are due January 31. The list of accreditation/re-accreditation application fees is available on the AER website.

Accreditation application fees for organizations and schools are supplemented by the annual dues to bring the total contribution over the five year term of OSAC accreditations to a sustainable level for management. Fees for higher education programs are set to be sustainable for the full five year term of HEAC accreditations. Any changes in fees will become effective on January 1 and will apply to all applications submitted after January 1.

2. *Staff*

Accreditation program staffing is established and managed by AER and falls 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; 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.

Final reports, approval letters and related records will be maintained by AER for the life of the accreditation program.

## Q. Promoting the Accreditation Programs

AER strives to promote the value and sustainability of the accreditation program through timely and professional communications. An accreditation page is maintained on the AER website that communicates general information about accreditation and applicable contact information. AER seeks to use other mediums to communicate and advance the accreditation that include, but are 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; they will be required to submit documentation requested by the Chair or Executive Director, if any.

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

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

AERAC is committed to being nondiscriminatory and providing equal opportunities for employment, volunteering, and advancement in all areas of this work. The Council respects the value that diverse life experiences bring to our board and leadership and strives to listen and value all viewpoints.

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## S. 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; share announcements of open positions with organizations focused on education.
4. List members of existing committees on the AER website who may serve as a resource for individuals with questions, and may provide information on the committee roles and responsibilities;
5. Collect resumes of interested individuals and track data pertaining to demographics for reporting purposes.