

Accreditation: AVMA Board Perspective

Critics of the Council on Education have been busy commenting on blogs and in professional news outlets, and now in three resolutions submitted to the House of Delegates that recommend significant changes to the current accreditation process. Although these individuals have been very active and vocal, our evidence suggests that the majority of the profession remains confident in the current accreditation process and the COE's commitment to continuous improvement, through stakeholder engagement. While we certainly respect everyone's right to express an opinion, we do disagree with some of the information that has been circulated without what we believe to be valid evidence to support such statements.

Stepping back from the current controversy, we are compelled by the very long and successful history of the COE and its contributions to maintain the high standards of veterinary education in the United States. Indeed, we have an accreditation system that others seek to emulate. The United States and Canada continue to be world leaders in veterinary medical education, due in large part to the diligent efforts of the COE and its predecessors sponsored by the AVMA. For the last 94 years, the Council has consistently applied the standards of accreditation to all schools that seek accreditation.

As evidenced in the commentary that follows, the COE follows its published policies and procedures with great care throughout the accreditation process. Council members spend hundreds of hours annually gathering, validating, and studying information related to the accreditation of veterinary colleges. The Council, which by regulation includes a balance of private practitioners and academic veterinarians, as well as three public members, weighs all the evidence and thoughtfully applies the standards of accreditation in accordance with the provisions of the [COE manual](#). We hope the evidence and accompanying facts provided below will be useful as you prepare for the upcoming discussion.

RESOLUTION #11-2015

RESOLVED, that the AVMA Board of Directors consider recommending to the Council on Education that the COE enact a one year moratorium on all new veterinary school accreditation actions.

Rationale:

- 1. The profession has been torn apart by the issue of accrediting foreign and domestic schools**

How divisive is this issue?

A relatively small group of our colleagues launched a campaign to publicly discredit the current accreditation system. The group has reached out to all sectors of the profession with opinions based on assumptions, partial information, misinformation, and workforce concerns. The group was able to generate 750 to 900 negative comments to the US Department of Education (USDE). The majority of the letters came through a web site established to send a form letter to the Department by simply entering a name; the same tactic is now being used to lobby the HOD to pass several resolutions. Not all commenters were veterinarians, and those who are represent a very small percentage of the approximate 100,000 veterinarians in the US.

In contrast, the AVMA conducted a carefully-designed, statistically valid performance survey in 2014 to determine member expectations and satisfaction with AVMA programs and services. The results of that survey ranked accreditation among the most important services sponsored by the AVMA on behalf of the profession and also gave it an overall performance rating above 70% (3.55/5.0), one of the higher ratings among AVMA programs and services. Would we like that to be higher? Of course, and we're working toward that goal.

The COE also conducts a comprehensive, statistically valid, survey of stakeholders to confirm the validity and reliability of the accreditation standards every four years. The latest survey was completed last fall. Satisfaction with each standard was above 80%. Just last year, the House of Delegates defeated a resolution to end the accreditation of foreign veterinary schools by a vote of 80% to 20%.

Although the minority dissenting group has been very active and vocal, the evidence suggests that the vast majority of the profession remains confident in the current accreditation process and the commitment to continuous improvement, through stakeholder engagement. And although we do respect their right to express an opinion, we disagree with much of the information that has been propagated, based on the evidence cited above and that which follows.

- 2. The profession would be well served to stop all new veterinary school accreditation while the COE takes the time necessary to address the remaining issues of USDE non-compliance.**

What are the remaining issues of non-compliance with the USDE recognition guidelines and what is the status?

Section 602.13

The agency (in our case, the COE) must demonstrate wide acceptance among educators and practitioners.

Acceptance by practitioners and educators is the intended outcome of the process required under section 602.21(a)(b) listed below, that is, a written review process that clearly provides the opportunity for all relevant stakeholders to provide input in the review process is required.

Status: The evidence provided by the COE at the time of the NACIQI hearing adequately demonstrated the wide acceptance among educators and satisfied this part of the USDE requirement. However, the USDE required additional evidence to demonstrate acceptance by practitioners. In response, the COE review process has been greatly expanded.

- The COE held open listening sessions at NAVC and WVC and had transcripts posted on the AVMA website.
- A listening session was held for veterinary students at the SAVMA Symposium this spring
- An open online survey was conducted to assess the validity and reliability of the accreditation standards and to complement the much larger random sample, statistically valid survey to assess the standards conducted every four years.
- A joint COE/AVMA reporting and listening session has been scheduled at the AVMA Convention to report on actions taken to address stakeholder concerns, including rationale, and to gather stakeholder feedback.
- The COE re-formatted and increased the publication of its newsletter, the COE Standard, to keep members better informed; the COE Standard content is also repurposed for the AVMA@Work blog, which is accessible to the public.
- The AVMA recently distributed a large, random sample, statistically valid performance survey to the membership to assess member understanding and satisfaction with the accreditation process; the survey is open through the end of June 2015.

This overall plan was discussed with USDE staff at a face-to-face meeting with AVMA volunteers and staff on April 22, 2015. USDE staff were pleased with this approach and complimentary of the efforts.

602.16(a)(1)(i)

The agency must ensure it has and applies a compliant student achievement standard.

USDE staff had difficulty interpreting how the NAVLE pass rate was being used to evaluate foreign and domestic veterinary schools and whether all schools were being treated the same way. The Council edited Standard 11, Outcomes Assessment, at its spring 2015 meeting. However, the proposed changes must be circulated to all stakeholders for review and comment, followed by Council consideration of the comments, final editing, and approval prior to publication. Stakeholder comments are currently under consideration.

In addition to the NAVLE pass rate, the analyst also expressed concern about the evaluation of graduate placement rate and course completion rate for each accredited school. Placement and

completion rates at accredited schools are consistently high, making both parameters ineffective measures of program quality. Nonetheless, the Council subsequently established thresholds and appropriate consequences if they're not met. Stakeholder feedback on the proposed changes is under consideration. In addition, the 2015 AVMA Employment Survey conducted by the AVMA Economics Division provided additional evidence that the COE-accredited veterinary medical school attended has no impact on placement rate (or salary).

602.21(a)(b)

The agency must have compliant written policies for its systematic program of review and demonstrate that it involves all of the agency's relevant constituencies in the review and affords them a meaningful opportunity to provide input into the review.

The deficiency was discussed above under section 601.13. The COE's written policy on the program review is being revised to include additional efforts to involve relevant constituencies. The current version is available [online](#), and includes regular surveys to evaluate the standards.

602.21(c)

The agency must ensure that it has compliant written policies for its revision of standards.

The Council's [written policies](#) were not actually out of compliance with this section. The appropriate timeline for addressing stakeholder concerns was already included in section 17.3 of the COE policies and procedures manual, but was simply overlooked by USDE staff during their review.

602.15(a)(6)

The agency administrative capability, specifically, that it applies clear and effective controls against conflicts of interest, or the appearance of conflicts of interest, by the agency's Council under 602.15.

This deficiency was added at the NACIQI hearing in response to opinions expressed by a former COE member regarding dismissal from the Council. The COE Conflict of Interest policies, including the Code of Conduct and a comprehensive review of the circumstances surrounding the dismissal and result of the subsequent appeal, will be submitted to the USDE for consideration.

In summary, the COE and AVMA have made extensive efforts to reach out to members and stakeholders to listen to their concerns. Substantial changes have been made to address several of these concerns and all remaining areas of non-compliance with USDE recognition guidelines. The USDE did not feel the remaining issues warranted a moratorium on new COE accreditation activity and instead complimented the diligent, cooperative efforts of the Council in its progress and efforts to reach full compliance.

Due to a change in the Higher Education Act, the UDSE will no longer evaluate individual foreign veterinary medical colleges after July 1, 2015 for the purposes of awarding Title IV federal financial aid to US citizens who choose to attend. Instead, the USDE established a new program to evaluate the standards and accreditation processes of accrediting agencies that accredit foreign veterinary medical schools. The new approval program is separate from the USDE recognition process for domestic accrediting agencies. Under the new program, any accrediting agency, foreign or domestic, can apply to the USDE for acceptance as an accreditor. The COE and several foreign accrediting agencies submitted applications for acceptance. The COE was recently notified that its standards and accreditation processes are acceptable to the Department.

3. What would a one-year moratorium on accrediting new schools accomplish?

It's not clear whether the proposed moratorium was intended to apply to new schools already in the pipeline or not. An accreditation site visit to review the proposed new veterinary medical

school at the University of Arizona is the only site visit scheduled at a non-accredited school through 2016; the moratorium may prevent an action to approve or disapprove a Letter of Reasonable Assurance based on evaluation of the proposed plan to create the school.

A one year moratorium on accreditation actions would have no impact on the new veterinary medical schools at Lincoln Memorial University or Midwestern University other than limiting the Council's ability to initiate Terminal Accreditation status, if either school failed to comply with the accreditation standards during the moratorium. If the aim is to allow time for Resolution #12-15 to be implemented, it is important to know that **no** recognized accrediting body, independent or not, would be allowed to artificially raise accreditation standards, arbitrarily limit class size, or refuse to consider applications from new schools. Accreditation simply cannot legally be used to exclude educational programs that meet established, minimum quality standards or to control the workforce. It has a single purpose, to assess educational quality based on objective peer-review using standards established to ensure that graduates are prepared to meet societal needs at an entry level.

Based on consultation with outside legal counsel, the AVMA believes that there is good reason to believe that such action by the COE may subject the AVMA to potential legal liability and/or administrative action by the USDE.

RESOLUTION #12-2015

RESOLVED, that the AVMA Board of Directors consider establishing an Independent Review Board, comprised of 10 individuals (3 stakeholders selected from the HAC, 3 stakeholders from both the AAVSB and AAVMC [excluding Deans of Veterinary Colleges] and 1 stakeholder from the Canadian VMA). This IRB shall be tasked with the responsibility of determining the new governance, financial and legal structure of a new autonomous Council on Education, with the ability to sustain operations on or before January 1, 2017.

Rationale:

- 1. A sturdier firewall between the COE and AVMA is needed.**

Is there any evidence of undue influence on the COE by the AVMA Board of Directors?

Critics have expressed concerns about perceived conflicts of interest regarding the interactions of the COE and the AVMA Board of Directors. The centerpiece of this argument is the belief that the AVMA Board of Directors forced the COE to accredit the Western University of Health Sciences (WUHS) College of Veterinary Medicine under threat of lawsuit. The basis for this belief is the fact that the lawsuit was dropped shortly after the College received a Letter of Reasonable Assurance (LRA) from the Council indicating the proposed program was feasible, if executed as planned. ***In fact, the LRA was denied twice by the Council and both subsequent appeals failed before the LRA was finally granted.*** Each time the WUHS plan was reviewed and denied due to non-compliance with one or more accreditation standards, the University made adjustments. Each attempt resulted in compliance with additional accreditation standards. By the third review, the University had addressed all of the Council's concerns and earned the LRA. The COE never stopped working with the University in accordance with its published policies and procedures. Instead of receiving preferential treatment, the College actually received far greater scrutiny due to the use of a non-traditional curriculum that included 100% problem-based learning (PBL) for didactic courses and a distributed model of clinical education. Since first proposed in 2000, the College has been visited by the COE more than any other accredited college (five focused and four comprehensive site visits) over the same length of time. Graduate outcomes have been very good. In fact, we've seen comments from members who, despite expressing the belief that the College was "substandard," stated that the graduates with whom they had worked were competent and knowledgeable.

The Board of Directors has taken a number of steps to reduce *perceived* conflicts of interest relative to the COE in response to stakeholder input over the past several years, including the following:

- Eliminated the requirement for Board approval of changes to COE policies and procedures (2007) and the accreditation standards (2013),
- Initiated changes that share responsibility for sponsoring the COE with the AAVMC that were modeled after the medical education accreditation system, the Liaison Committee on Medical Education (LCME), which is jointly sponsored by the AMA and Association of American Medical Colleges (AAMC).
- At its April meeting:
 - Terminated the Board liaison position with the COE
 - Agreed to fund independent legal counsel for the Council
 - Received notice from the COE that the opportunity for Board members to observe accreditation site visits was being eliminated.
- Pending approval at the July 8th Board meeting, the COE Selection Committee will include two former COE members and three At-Large members. Members of the Committee will not be allowed to serve simultaneously on the Board of Directors or House of Delegates.

The firewall established by the AVMA BOD and HOD to ensure the autonomy of the COE is more robust than those in place to safeguard the Commission on Dental Accreditation (CODA) from the influence of its sponsor, the American Dental Association, and on par with those in place to ensure the autonomy of the LCME from its sponsors, the AMA and AAMC. Like the COE, the CODA and LCME are autonomous entities ***housed within the sponsoring organizations***. Neither is a completely independent entity as commonly misrepresented by critics.

The [expressed aim](#) of those criticizing the current accreditation process is to “fix” it so that only those schools that meet their concept of an acceptable veterinary school can become accredited. A related objective expressed by many critics is to control the size and number of accredited schools to limit the number of graduates. These objectives demonstrate a fundamental misunderstanding of the higher education accreditation system in the United States. Contrary to all the assumptions and misinformation, a separate recognized accrediting agency would not be able to artificially raise accreditation standards above entry-level, limit class size, or refuse to consider applications from new schools. The AVMA is being criticized for effectively insulating the COE from undue internal or external influence, but it appears that some critics merely want to replace the perceived influence of the AVMA with their own.

Does the COE staff support exert undue influence on the COE?

The AVMA provides the primary support staff for the COE. The AAVMC also provides a staff member to support the Council in addition to those designated by the AVMA. COE staff members attend Council meetings and site visits to support Council members and COE site visitors. The responsibility of staff is not to create policy or to make accreditation decisions. Rather, it is to provide sufficient background information to allow members to make informed decisions and to execute those decisions. Staff serve strictly an administrative role. They have no vote and limited voice during Council meetings. Staff provide a source of institutional memory and member training to ensure continuity and consistency in the accreditation process.

Staff is obligated to follow COE policies and procedures first and foremost when carrying out their responsibilities. It is not always apparent to every COE member that staff works through the COE Chair and Executive Committee to serve the Council on a day to day basis, which can lead to misperceptions regarding how staff functions. If there is any question about the interpretation of COE policies and procedures or a COE decision, the Chair is always consulted. If the issue is time sensitive and the Chair believes the decision or interpretation of existing policy requires wider input, the COE Executive Committee is consulted. If the Chair and/or the COE Executive Committee believe the situation calls for consultation with the entire Council, then e-mails are sent or a conference call is scheduled. Staff notifies the full Council of any significant decisions

or actions taken between meetings at the direction of the Chair. Decisions that are not time sensitive automatically go on the agenda for consideration by the full Council at the next regularly scheduled meeting.

2. **The dental, human medical and engineering professions have all gone in the direction of establishing separate autonomous accrediting organizations.**

How is COE different from, or similar to, the accrediting body for dentistry (CODA)?

The Commission on Dental Accreditation is a semi-autonomous agency of the American Dental Association. The duties of CODA as noted in the ADA Bylaws ensure that CODA has full autonomy related to its accreditation program and process; in this regard, CODA and the COE are similarly governed.

The COE budget is prepared by AVMA staff based on the expenses incurred the previous year and the number of site visits scheduled. It is approved by the AVMA Board of Directors. However, the Board of Directors has placed no limit on expenditures related to accreditation activities of the Council and has paid all outside legal and consultant fees without restriction. Similarly, CODA's budget is prepared by CODA staff, reviewed and approved by the ADA Board of Trustees with final approval by the ADA House of Delegates. CODA has authority to modify its Evaluation and Operational Policies and Procedures Manual (CODA's version of the COE's P&P Manual) in all matters related to the accreditation program, e.g. accreditation standards, accreditation policies and procedures, and the appeal process. CODA's Rules of Operation, included in the CODA Evaluation and Operational Procedures Manual, which describe the Commission's mission, composition, powers, duties, meetings, quorum, appeal board, accreditation program, and officers may be changed through submission of a resolution, and achieve a majority approval vote, through the ADA House of Delegates. The COE, like the CODA, has complete autonomy to change the standards of accreditation and its policies and procedure without approval from the AVMA Board of Directors or AVMA House of Delegates. Its charge and structure are described in the AVMA Bylaws.

The 2008 ADA Task force on CODA Report and Recommendations stated that benchmarking revealed "that CODA is less autonomous in regard to the ADA than other agencies are to their sponsoring organizations."

It is correct that a white paper, published by CODA in August 2014, discussed a potential transition to an independent agency under ADA Bylaws, as part of a strategic planning process; however, there are no immediate plans for separation from the ADA as CODA is still in the discovery phase.

How is COE different from, or similar to, the accrediting body for human medicine (LCME)?

There are similarities and differences between the two accrediting bodies. Like the COE, the Liaison Committee on Medical Education (LCME) is supported by the professional organization (AMA) and by the organization of medical schools (Association of American Medical Colleges [AAMC]); but unlike the COE, which is largely funded by the AVMA and fees charged to colleges, the LCME is financially supported 50/50 by the AAMC and AMA. Both LCME and COE are programmatic accreditors, and both have been recognized by USDE since the first list of accreditors was published in 1952. The COE is also recognized by the Council for Higher Education Accreditation (CHEA), but the LCME is not. CHEA recognition is based on best practices for accreditation.

Both accrediting bodies have autonomy in their decision making; accreditation decisions are made by the accrediting body itself, with no input or approval from the governing bodies of the associations.

The process of member selection is similar for COE and LCME. The AMA Council on Medical Education selects seven members of the LCME and one student member. The AAMC also selects seven professional members and one student member. The LCME selects two public members. The new AVMA COE Selection Committee selects eight COE private-practitioner members and the new AAVMC COE Selection Committee selects eight academic members. The COE selects three public members.

Both the COE and LCME have a representative from Canada; chosen by the organization they represent (the Canadian Veterinary Medical Association and the Committee on Accreditation of Canadian Medical Schools, respectively). All current professional members of the LCME are deans (9) or associate deans (5) of medical schools except the Canadian member (professor). The academic members of the COE currently include one dean and three associate deans of veterinary medical schools, including the Canadian member.

Both accrediting bodies accredit schools in Canada. The COE accredits schools in nine countries outside of Canada and the U.S. The LCME currently accredits one medical school in Puerto Rico; a school in the U.S. Virgin Islands has applied for LCME accreditation.

Both the COE and LCME accredit distributive-model schools.

The AVMA shares the cost of accreditation of domestic veterinary schools with the accredited colleges. The schools pay 50% of the direct and indirect costs of accreditation plus 100% of the site visit expenses. New domestic schools and foreign schools pay 100% of the direct and indirect costs associated with accreditation, including all site visit expenses. The LCME charges developing programs for the accreditation process, but the accreditation process is free for established schools. The ADA charges accreditation fees to help defray the cost of accreditation.

Engineering accreditation uses a different operational model.

The Accreditation Board for Engineering and Technology (ABET) is a federation of 34 engineering societies, that serves the interests of its member societies. The member societies set policy, develop strategy, and conduct accreditation activities worldwide on behalf of their professions. ABET accredits approximately 3,400 programs at nearly 700 colleges and universities in 28 countries. Each year, over 2,200 volunteers from 34 member societies contribute to the accreditation of programs in applied science, computing, engineering, and engineering technology education, serving as program evaluators, committee and council members, commissioners, and members of the ABET Board of Directors. Directors are selected and appointed by their Member Societies, with each society appointing at least one but not more than three Directors. The ABET Board establishes the vision and direction for the organization. It approves changes to the ABET Constitution, Bylaws, Rules of Procedure and accreditation criteria. It adopts policies and approves programs and initiatives to support its Vision, Mission and Strategic Plan. The Board reviews and approves accreditation criteria and decides appeals of accreditation decisions. It also elects its officers, and approves the annual budget and fees, the assessment formula, and financial policies.

ABET operates four Accreditation Commissions that lead and conduct its accreditation activities. Each commission reviews programs related to different sectors of the technical disciplines:

- Applied Science Accreditation Commission
- Computing Accreditation Commission
- Engineering Accreditation Commission
- Engineering Technology Accreditation Commission

Each commission is responsible for reviewing educational programs and making the final accreditation decision for each program. Their members make final decisions about all program accreditation actions, except for appeals, which fall to the Board of Directors. Each accreditation

commission is responsible for the continuous review and enhancement of its particular criteria, policies, and procedures. All changes to the accreditation criteria and policies require the Board's approval. ABET is not recognized by the USDE. It maintains recognition by the Council on Higher Education Accreditation (CHEA) only.

Is the COE accreditation process different from, or similar to, other accrediting bodies?

The basic elements of the accreditation process differ little among all professional accreditors, including the COE and LCME; that is, submission of a self-study by the college, on-site visit by a peer review team, site visit report, accreditation decision by committee of peers, and periodic review between site visits.

For further comparisons, we've created a chart that includes the accrediting bodies for the veterinary, dental, medical, pharmacy and physical therapy professions.

3. The AVMA hasn't articulated why this transparent, autonomous and independent model, which has succeeded in overcoming the types of concerns that currently divide and distract the veterinary profession, should not be emulated.

As the evidence cited above demonstrates, the firewall between the COE and AVMA is very similar and no less effective than the firewalls used by the dental and medical professions to insulate their accreditation entities from internal influence. Certainly, entirely independent models are used by some programmatic accreditors, but critics of the COE have failed to produce any evidence that the perceived conflicts of interest have not been adequately addressed or how the proposed entities would be an improvement. At the same time, creation of the new entities would result in a multiyear disruption, no guarantee of USDE recognition, and likely result in significant costs increases for the colleges.

Is there any evidence that the quality of graduates has decreased?

All evidence suggests that the quality of graduates has remained high. There is no evidence that the quality of education received at any accredited veterinary school is substandard or has diminished over time. Concern has been expressed that it is simply not possible for some of the more recently accredited schools (2008 to present) to provide an adequate veterinary medical education. By all indications, this concern is based on misperceptions and assumptions rather than evidence.

The accreditation of established schools requires review of a 100-page self-study with multiple links to online information, an in-depth on site visit that consists of a comprehensive facility inspection including all core clinical instruction sites (not elective externship sites), interviews with students, faculty, staff, administrators, and alumni, as well as the results of graduate and employer surveys. The accreditation process for new schools is similar, although entry into the process is based on submission of a plan to develop a new school over, typically, a 6-8 year period that is deemed feasible by the COE. The Council requires a self-study explaining how each accreditation standard will be met and conducts multiple site visits, including facility tours, and interviews with administrators, initial faculty, and any collaborators in order to evaluate the initial plan.

The Council also reviews results of the North American Veterinary Licensing Examination (NAVLE) for graduates of each accredited college who take the NAVLE. The NAVLE is a rigorous, nationally standardized test designed to assess graduate preparedness at an entry level. It is prepared by the National Board of Veterinary Medical Examiners in conjunction with the National Board of Medical Examiners. Graduates of more recently accredited schools have consistently performed at or above the national average for all graduating seniors from accredited schools. In fact, a recent AVMA/AAVMC survey indicates that their graduates compete successfully for internships and residencies at other accredited veterinary schools. Further, there

is no indication that their graduates entering clinical practice have received a disproportionate number of complaints from any state veterinary licensing board.

Accreditation standards are established to ensure graduates are capable of meeting societal needs for the services they provide. Accreditation is a pass/fail system, not a ranking system designed to distinguish elite from adequate programs. It is primarily based on the assessment of graduate and program performance or outcomes. The COE uses a variety of widely utilized outcome assessment measures that also help validate whether or not the accreditation standards have been established and applied appropriately (e.g., graduate and employer surveys and student attainment of the nine clinical competencies). The 2015 AVMA Veterinary Employment Survey found that 2008 and 2012 graduates of US veterinary medical schools reported no significant differences among clinical competencies (practice preparedness) regardless of the school attended. The availability of a standardized, national licensing exam provides an important check and balance to ensure accreditation standards have been established and applied appropriately. The NAVLE is based on formal job analysis that establishes entry level achievement requirements across a broad range of learning domains. When accreditation standards are established and applied appropriately, graduates of accredited schools should perform very well on the NAVLE. ***The pass rate on the NAVLE among graduates of COE-accredited veterinary medical schools consistently averages over 90%. The pass rate among graduates of non-accredited schools consistently averages at or below 40%.***

Why does the AVMA COE accredit distributive-model schools?

All accredited colleges are required to meet the same standards of accreditation; however, they are not required to use identical methods to do so. The accreditation standards are designed to have enough flexibility to allow innovation and creativity, as required by the USDE recognition guidelines. This flexibility is what allows higher education to advance and adapt to changing societal needs. The USDE recognition process is focused on evidence of student achievement, that is, has the educational process prepared graduates to meet the needs of society at an entry level. The COE accreditation standards also focus on outcomes, as required, but not without evidence that the resources needed to prepare entry level graduates are in place, including adequate administrative capacity, finances, facilities, clinical resources, admission requirements, faculty, curricular management, and research programs.

The Council goes to great lengths to ensure the effectiveness of the distributive model of clinical education and has placed [rigorous requirements](#) on its use from inception. It is the responsibility of the veterinary faculty to establish learning objectives, appropriate assessment rubrics, and acceptable levels of student achievement for all core clinical rotations. Preceptors (practicing veterinarians) must receive appropriate training and student progress must be monitored closely during each core rotation. Practices used in the *core* (non-elective) curriculum (equivalent to an on-site veterinary teaching hospital) must meet the requirements established for an on-site teaching hospital. The majority of *core* clinical sites used to date are specialty practices. Students are involved in daily clinical rounds on-site. The Western University of Health Sciences College of Veterinary Medicine also uses weekly virtual rounds with a veterinary faculty member, and each student must do case presentations and demonstrate an acceptable level of progress in meeting the specific learning objectives established for the rotation. A faculty member visits each core clinical site during every core rotation. A faculty member also conducts a separate facility inspection annually to ensure the quality of each core clinical site is maintained. The COE visits each core site (currently 51 at Western; 28 at Calgary) during each comprehensive site visit, which occur at the beginning of each accreditation cycle (7 years, if fully compliant). The Council may require a site visit whenever an annual report or complaint necessitates an on-site inspection. The [standardized form](#) used to evaluate each core clinical site is published on the AVMA COE web site, as well as the [rubric](#) used to conduct a comprehensive site visit. The Council also developed a special set of requirements for Colleges that use the distributive clinical with or without a veterinary teaching hospital on site. Careful review of the requirements placed on the use of distributed clinical education demonstrates that it is entirely different that learning

through an apprenticeship or vocational school education. Almost all accredited veterinary colleges require some off-site clinical instruction in order to provide adequate clinical resources to cover all the major domestic species. And, in fact, colleges that use the distributive model also provide some supervised clinical experience on campus.

We've heard statements that distributive-model schools are "substandard," but the statement is often qualified with a follow-up statement complimenting the quality of the graduates. It is common sense that a "substandard" school would not produce competent graduates; however, the evidence supports the fact that these schools produce competent, entry-level veterinarians, as do all currently accredited schools. We also hear similar unfounded criticisms of traditional-model schools that are often based on anecdotal information about a bad experience with one or two graduates of that program.

Does sponsorship of the COE limit the AVMA's ability to advocate on behalf of its members?

No. The AVMA sponsors the COE, but an effective firewall separates the AVMA from the accreditation process. Antitrust law applies to the AVMA whether it sponsors the COE or not. The AVMA must not engage in anti-competitive activities or any violations of antitrust laws. What AVMA can do is exactly what it is doing: collecting, analyzing and publishing in depth information on the economic health of the profession in order to identify, promote, and implement programs and services that protect and enhance the economic well-being of its members. The AVMA recently published information that accurately quantified the amount of excess capacity in the veterinary workforce for the first time. The AVMA Economics Division continues to monitor and report on this baseline, as well as detailed analysis of the factors driving the veterinary economy. Articles on the net present value of the veterinary degree demonstrate the financial challenges associated with major clinical practice areas.

The purpose of academic accreditation in the US is to assure educational quality. Accrediting agencies are not allowed to use accreditation to manipulate the workforce; ***the mandate of accreditation is limited to the quality of education***. Therefore, no accrediting agency can make accreditation decisions designed to limit the number of schools or graduates, as long as the quality of education is maintained. Such activity would be viewed as anti-competitive.

Is the profession divided over the issue of changing the current accreditation system?

As stated above, a relatively small group of our colleagues launched a campaign to publicly discredit the current accreditation system. The group has reached out to all sectors of the profession with opinions based on assumptions, misinformation, and workforce concerns. Although the minority dissenting group has been very active and vocal, the evidence, including statistically valid surveys and HOD action, suggest that the vast majority of the profession remains confident in the current accreditation process and its commitment to continuous improvement through stakeholder engagement.

What would creation of an IRB and independent accrediting agency accomplish?

Accreditation is a dynamic quality assurance process that closely monitors and responds to ongoing changes at accredited colleges. Accredited colleges are required to report substantive changes to the COE immediately and must submit compliance reports annually or more frequently, as directed. The quality assurance provided by the COE is dependent on continuous monitoring and enforcement. Once a new accrediting entity is created, the COE would no longer exist. The validity of accredited status among COE-accredited colleges would diminish rapidly without ongoing monitoring and enforcement of the accreditation standards. This leaves unanswered questions: How long will it take for the new accrediting agency to establish valid accreditation standards and effective policies and procedures in order to become fully operational? Once established, how long will it take for the new entity to evaluate and accredit

the colleges currently accredited by the COE? Will state veterinary medical licensing boards accept the evaluation of the new entity without evidence of effectiveness? Will the graduates of veterinary colleges be allowed to sit for licensure in the interim; if so, for how long? Will the AVMA be expected to continue to fund the COE until the new entity proves its effectiveness? Will the colleges be expected to pay the fees for both accrediting agencies indefinitely?

Once disbanded, the COE would immediately lose its USDE recognition and veterinary students would no longer be eligible to receive federal financial aid through the Health Professions Student Loan program (HPSL). The USDE has made it very clear in recent communications with AVMA staff that the COE would be considered a new accrediting agency if any significant changes were made to the Council's structure, standards, policies, or processes as part of a separation process. The new agency would need to re-apply when it becomes eligible. Any new accrediting agency is required to have been involved in accreditation activities and made decisions on granting or denying accreditation or pre-accreditation for a period of time (2-year minimum), and must demonstrate acceptance by licensing agencies, academia, and the profession in order to comply with eligibility requirements for USDE recognition. USDE recognition also requires a link to a federal financial aid program; therefore, a new accrediting agency would have to be written into the regulations governing the Title VII, Health Professions Student Loan program to establish a link. In the interim, veterinary students would lose eligibility to participate in the federal HPSL program.

Beyond these basic eligibility requirements, USDE recognition requires compliance with 100 pages of guidelines. The new entity would be required to demonstrate that it has established and applied minimum quality educational standards appropriately, as noted above. It would not be possible for the new entity to limit class size or the number of accredited schools that meet the accreditation standards. The new entity would be required to demonstrate that it has appropriate safeguards in place to limit conflicts of interest and undue external influence on the accreditation process. Finally, it would have to demonstrate that it had experienced knowledgeable staff and sufficient financial resources to sustain the operation.

Why does COE seek USDE recognition?

USDE recognition is a voluntary process and is not required for the COE to accredit veterinary medical colleges, but it's important to the Council, the AVMA, and the profession. Continued recognition by the USDE is important to the COE for a number of reasons, not the least of which is the eligibility for veterinary students to receive [Health Professions Student Loans](#) (HPSLs) under Title VII of the U.S. Public Health Service Act. Last year, the HPSL program distributed about \$12M dollars to approximately 12% of US citizens attending veterinary school. It is this link to a federal program which allows COE to meet one of the eligibility requirements for recognition by the USDE. Another significant reason is that the AVMA and COE highly value and plan to preserve their vital role in assuring the quality and integrity of veterinary medical education – a role it has proudly served since 1921 when the Essentials of an Approved Veterinary College were first established by the AVMA Committee on Intelligence and Education, which became the COE in 1946.

What does CHEA recognition mean?

In addition to the recognition by the U.S. Department of Education for the purposes of federal student aid eligibility and quality assurance, the AVMA Council on Education (COE) is recognized by the [Council for Higher Education Accreditation \(CHEA\)](#). CHEA is a national association of 3,000 degree-granting colleges and universities and serves as a national advocate for self-regulation of academic quality through accreditation. The council currently recognizes 60 institutional and programmatic accrediting organizations in the United States. Like USDE recognition, the CHEA recognition process is voluntary. The COE was recognized by a CHEA precursor, the National Commission on Accrediting, in 1949 and has been recognized continuously since then. [Recognition by CHEA](#) “affirms that standards and processes of

accrediting organizations are consistent with quality, improvement, and accountability expectations that CHEA has established.” Recognition by CHEA involves a peer-review process to ensure that the accrediting agency meets a number of [strict criteria](#). The Council completed a full CHEA recognition review in 2011 with no deficiencies. A mid-term review was completed in June; once again, recognition was continued with no deficiencies.

RESOLUTION # 13-2015

RESOLVED, that the AVMA Board of Directors consider establishing an accrediting entity that operates independently from the AVMA with its own bylaws, budget, Board of Directors, and staff.

Rationale:

- 1. To address concerns voiced by the USDE National Advisory Committee on Institutional Quality and Integrity (NACIQI).**

As outlined above under Resolution #11-2015, item 2, Substantial changes have been made to address stakeholder concerns and remaining areas of non-compliance with USDE recognition guidelines.

- 2. To establish effective controls against conflicts of interest**

These concerns are addressed above under Resolution #12-2015, items 1 and 2.

- 3. To address issues of transparency and consistency**

The COE meets the transparency requirements of the USDE, CHEA and the Code of Good Practice published by the Association of Specialized and Programmatic Accreditors ([ASPA](#)). From the COE policies and procedures manual published on the AVMA web site:

The COE provides written notice of its accrediting decisions to the USDE, appropriate state licensing or authorizing agency*, appropriate accrediting agencies**, and the public*** according to the following requirements of the USDE:*

(A) Within 30 days:

- (1) A decision to award initial accreditation or pre-accreditation to a veterinary school*
- (2) A decision to renew or provide initial accreditation or pre-accreditation to a veterinary school*

*(B) At the same time the school is notified, but no later than 30 days after the decision:****

- (1) A final decision to place a school on probationary accreditation*
- (2) A final decision to deny, withdraw, suspend, revoke, or terminate the accreditation or reaccreditation of a veterinary school*****

** The USDE and appropriate state licensing or authorizing agency will be notified by letters sent electronically or by mail.*

*** Accrediting agencies are notified by posting written notice on appropriate list serve for regional and programmatic accreditors.*

**** Please note: All public notification is provided in the public area of the AVMA web site and will include the date of the COE meeting the decision was made. This is done within 24 hours of notification of the program for (B) (1) and (2).*

***** Not later than 60 days after any final decision to deny, withdraw, suspend, revoke, or terminate the accreditation or pre-accreditation of a veterinary school, the COE will notify the USDE, state and other authorizing agencies, and public with a brief statement summarizing the reasons for the agency's decision and the official comments that the affected school may wish to*

make with regard to that decision, or evidence that the affected school has been offered the opportunity to provide official comment.

The COE will provide written notice to the USDE, appropriate state licensing or authorizing agency, appropriate accrediting agencies, and, upon request, the public if:

- (1) A school decides to withdraw voluntarily from accreditation or pre-accreditation, within 30 days of receiving notification from the school that it is withdrawing voluntarily from accreditation or pre-accreditation; or*
- (2) Lets its accreditation or pre-accreditation lapse, within 30 days of the date on which accreditation or pre-accreditation lapses.*

Information related to currently accredited veterinary medical colleges and schools, the accreditation status, and the date of the next accreditation or pre-accreditation site visit is published annually in the AVMA House of Delegates Report and on the AVMA website (at www.avma.org) in the public access area. The COE does not provide the AVMA with non-public information regarding accreditation decisions, except to the extent such information constitutes privileged legal information.

When the accreditation decision is finalized, each college of veterinary medicine must notify the public of its performance in educating veterinarians by posting on its website 1) the accreditor (AVMA COE), accreditation status of the college, and the date of the next site visit; 2) an explanation of the reasons for non-compliance if probationary accreditation has been assigned and the college must provide an evaluation of the impact of non-compliance on the enrolled students; 3) the NAVLE pass rate for the college compared to the pass rate required by the COE standard for Outcomes Assessment (currently 80%); and 4) any other outcomes information that the college feels would educate the public regarding the quality of education at the specific institution. Information released to the public must be readily accessible. The information released to the public must be sent to the COE for verification in the annual report of each college.

Concerns regarding consistent interpretation and application of the accreditation standards are addressed above under Resolution #12-2015, items 1 and 3.

4. To secure acceptance among members of the profession

These concerns are addressed above under Resolution #11-2015, item 1.

5. The independent accrediting agency would be under the umbrella of the AVMA with a separate Board of Directors that represents a broad spectrum of the profession.

These concerns are addressed above under Resolution #12-2015, item 3. There is no evidence the current accreditation system is broken or that implementing this resolution would add value over the existing system. However, the formation of an independent entity under the AVMA umbrella would ensure that knowledge and experience with the rules and regulations attendant to higher education accreditation were fully understood.