Resolution 1: The AVMA will no longer accredit foreign veterinary schools, defined as those schools located outside the United States and Canada

Resolved, that the House of Delegates recommend to the Executive Board that the American Veterinary Medical Association (AVMA) will:

1. Initiate steps to cease the accreditation of foreign veterinary schools by the AVMA Council on Education (COE). Foreign veterinary schools are defined as those schools that operate outside the United States and Canada.

2. Permit foreign veterinary schools currently accredited by the COE to maintain their accreditation until such time as that accreditation expires. Upon expiration, there will not be an opportunity for said schools to be re-accredited unless said school meets the criteria set forth in paragraph 3 below.

3. Permit those students currently enrolled in a foreign AVMA COE-accredited program to complete their education and upon graduation, be considered graduates of an AVMA COE-accredited program. For those schools whose COE-accreditation expires prior to the graduation of their freshman class, a one-time accreditation extension will be granted until the time of graduation of that freshman class.

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NYSVMS Leadership (attending)

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Alternate AVMA Delegate - Laurel Kaddatz, DVM
NYSVMS President-Elect - Dean Snyder, DVM
NYSVMS Past President - Eric Bregman, VMD
NYSVMS Executive Board Member - Susan Wylegala, DVM
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The NYSVMS submitted Resolution 1 to the AVMA Winter 2014 House of Delegates meeting in response to member concerns about the AVMA’s plans for continued accreditation of foreign veterinary schools. After the release of the final report by the AVMA’s Task Force on Foreign Veterinary School Accreditation, the NYSVMS Executive Board voted unanimously to press forward. Our resolution calls for the AVMA’s Council on Education to discontinue foreign accreditation and instead focus on improving the quality of the graduates, programs and institutions in Domestic and Canadian veterinary colleges.

The debate before us today is a philosophical one. The veterinary profession stands at a unique crossroads, as does the AVMA, in examining its role in a global world. If we are truly to believe in the OneHealth concept, then within the greater amphitheater of that ambition comes the responsibility of being inclusive and not a unilateral decision maker. The NYSVMS strongly agrees that the AVMA should be “seated at the table” to serve as the North American voice of the global veterinary medicine community. But we do not believe that the accreditation of foreign veterinary schools is the best pathway to do this.

Today we are not interested in discussing workforce issues. We appreciate the AVMA’s comprehensive response to our resolution, however they continue to direct the dialogue to issues of workforce, and have not addressed our primary concerns. If graduates of foreign schools are good students, graduating from quality educational programs, then they should be armed with the resources and talent to successfully pass any licensure or clinical exams required to practice veterinary medicine. And if they successfully pass those exams and receive a license, the NYSVMS openly welcomes them to practice in New York State. This is how the process of becoming a professional veterinarian is supposed to work. And, this concept was adopted without the idea of end-running the procedures via accreditation.

This resolution is about non-adherence to the quality and application of the AVMA/COE’s standards to foreign veterinary schools. While the AVMA Executive Board’s opinion is that the NYSVMS is taking a short-sighted view, we believe much of our position is firmly planted in the future while addressing important short-term considerations.

When discussing the possibility of ending foreign school accreditation, one of the AVMA’s primary concerns is the threat of lawsuits from entities losing accreditation. The NYSVMS believes that by moving forward with foreign school accreditation, those threats, real and perceived, are going to increase. As you widen the pool of schools requesting accreditation, especially next year if the Higher Education Act amendments affecting federal student loans go into effect, it is only logical that the AVMA will have opened itself up to greater risk for legal liability.

Why should we continue to put our professional association in this situation? Why keep playing this game of being held hostage to the AVMA Executive Board’s choice to accredit foreign schools? The U.S. Department of Education made note of the fact, in their 2012 report and subsequent public hearing, that the AVMA/COE has never denied any school from
accreditation, nor has it ever “punished” a school for non-adherence to the standards.

This is an untenable position to be in. It has been stated before by others—the AVMA has ensnared itself in its own trap. The only solution the NYSVMS can bring to the table is the decision to exit us from the business of accrediting foreign schools.

In a letter to members posted June 11, 2013, Dr. Janver Krehbiel, chair, AVMA Executive Board, stated that the AVMA Executive Board “has the responsibility to garner input and advice from its volunteer leaders and its members, then weigh that advice carefully…discuss thoroughly…and ultimately make sound decisions based on fact and what will have the most positive impact on the veterinary profession as well as individual members.” The NYSVMS does not believe enough input from members has been considered in this decision. Here in New York, where we hold a fairly high percentage of foreign-trained professionals amongst our ranks, we believe more comprehensive dialogue and discussion must take place from a wider scope of colleagues, beyond the 18-member AVMA Executive Board.

During discussions with NYSVMS leaders, the AVMA leaders asked us “should we do what the masses think should be done, or should we do what is right?” At best, this does not reflect bottom-up leadership. This does not reflect representation of a member-driven association. At worst, it indicates that the opinions of a small group are held in greater regard than the majority of members’ opinions. The NYSVMS thinks the right thing to do is listen to what the masses of members are asking of its professional association and cease accrediting foreign veterinary schools.

As for the question of “who will do the accreditation if the AVMA does not?” The AVMA already points out that five foreign accrediting bodies exist, some of whom have been setting standards for their country over the past 170 years, predating the very existence of the AVMA.

- Royal College of Veterinary Surgeons
- European Association of Establishments for Veterinary Education (EAEVE)
- Australasian Veterinary Boards Council
- CONEVET
- Caribbean Accreditation Authority for Education in Medicine and Other Health Professions (CAAM-HP)

We are not suggesting the AVMA abdicate their role in working with other entities. Rather, the AVMA should be seated at the table as part of a greater global accreditation entity that works collaboratively with all of these groups.

As a science-based profession, we are compelled to examine the evidence-based facts when determining a course of treatment. Is there evidence that these standard-setting entities are inferior to

NYSVMS does not believe enough input from members has been considered in this decision. Here in New York, where we hold a fairly high percentage of foreign-trained professionals amongst our ranks, we believe more comprehensive dialogue and discussion must take place from a wider scope of colleagues, beyond the 18-member AVMA Executive Board.
the AVMA? And how would the world react to the U.S. if we advised them, based on our beliefs and not evidence-based facts, that our standards are superior to theirs?

The U.S. Department of Education recognizes the AVMA/COE as the official accrediting body for colleges and schools of veterinary medicine in the United States. However, the USDE has no oversight of the AVMA’s international accreditation efforts. This initiative to accredit foreign schools is the sole choice of the AVMA’s leadership. If the USDE, which sets strict guidelines to monitor all accrediting bodies across multiple medical professions, cannot govern or monitor the quality of foreign school accreditation by the AVMA, who will?

We do not believe the AVMA has provided factual information that the accreditation standards were not unfairly, or inconsistently, applied to the accreditation of foreign schools. We are uniformly told that we simply do not understand the process of accreditation well enough and that the explanations we seek can’t be provided.

The AVMA/COE references the concept of OneHealth and securing the safety of our importation of food sources as one key reason for assuring the quality of veterinary education in foreign schools. However, dating back to 1998 with the accreditation of the Royal College of London, the AVMA has yet to accredit a foreign school in countries that export the highest volume of food sources to the U.S. China, Japan, Brazil and South Korea are considered among the top ten exporters of food into the U.S. AVMA reports today do not indicate it has plans to accredit a school in any of these countries. With the AVMA’s stated timeline of six-to-10 years for a school to become accredited, coupled with only accrediting one-to-two schools a year, how is foreign school accreditation going to make a meaningful impact on this visionary goal of securing the safety of our food imports?

The Food and Drug Administration has introduced new rules aimed at making imported food safer through the Food Safety Modernization Act. The NYSVMS would urge the AVMA to continue voicing its gold standard within organizations like the FDA or the Global Food Safety Initiative, a project grown out of the Consumer Goods Forum, which represents 400 food retailers, manufacturers, service providers and food suppliers from 70 countries. The private-sector led GFSI works for the “harmonization of food-safety standards worldwide to reduce audit duplication in the supply chain through benchmarking and equivalency models for food safety.” Even associations like the American Spice Trade Association are establishing food safety standards to prevent the spread of salmonella contamination in global spice import/exports.

Could the AVMA collaborate with other associations who share our food safety concerns? While we are not suggesting these are the only entities to which AVMA should be aligned, we are simply identifying other pathways that are active today in working to establish global safety standards in both private and public sectors.

The accreditation of foreign veterinary schools is not the BEST place to achieve a significant impact on food safety standards, nor is it aligned with the AVMA’s mission of setting international animal health and welfare standards.

We face a crossroads for our profession. Henry J. Baker, editor-in-chief of JAVMA, asked the question that the NYSVMS asked ourselves - Is veterinary medical...
education in transition? The NYSVMS says yes, and requests that a national dialogue take place to examine the complex perspectives on veterinary education, and accreditation of foreign schools.

In its response to the now infamous New York Times article about the state of the profession, the AVMA acknowledged in a February 2013 statement that the “economics of the veterinary profession continues to be a top priority in our 2012-2015 strategic plan.” The NYSVMS was deluged with member comments and concerns following this article, voicing a general consensus that the AVMA is not listening to its constituents. Let’s shore up our domestic foundations and focus our resources toward providing a stable, successful veterinary profession for our existing graduates in the U.S. and Canada, before we venture off to accredit foreign veterinary schools.

Moving to the subject of standards, our resolution speaks to our belief that the AVMA/COE has not applied its 11 standards in a consistently fair method to all schools seeking accreditation. What we are not concerned with is the expansion of foreign veterinary graduating classes or the numbers of veterinarians re-entering the U.S.

Quoting from the AAVMC Dec. 12, 2012, statement in support of continued recognition of AVMA/COE accreditation, “the purpose of accreditation is to provide assurance that accredited colleges produce qualified entry-level veterinarians upon graduation.” How can the AVMA/COE assure us that the graduates of all foreign schools are “qualified entry-level veterinarians” if those graduates are attending a school without access to research-based teaching (AVMA/COE Standard No. 3: Physical Facility and Standard No. 10: Research Programs)?

Let us consider Standard 11: Outcomes Assessment. The NYSVMS believes the AVMA/COE is not in a position to fairly and objectively apply the same set of standards in foreign schools due to the naturally occurring diverse educational delivery systems and cultural diversity existing in their countries. We understand it may not be feasible to make everyone take the NAVLE exam. But, if a school wants to be accredited, and if the AVMA/COE is the sole entity to set the standards, then why can’t we require students attending all accredited schools to pass the NAVLE? If a school wants accreditation strongly enough, then they have to agree to make the NAVLE a requirement. This would result in the NAVLE becoming a more high-stakes exam, no different than that faced by U.S. students.

The NYSVMS is also disappointed in the AVMA/COE’s decision to allow internal self-assessments and employment surveys as a significant means of evaluating the quality of student’s competency. If the only responses received to the employment survey are from graduates who became employed, are there mechanisms in place to contact those students who do not respond and contrast those statistics against the others? These statistics are woefully inadequate and lack verifiable data.

With this resolution, the NYSVMS has attempted to separate its members’ concerns into two key points.

Issue No. 1 – the rationale of promoting and adhering to the same high standards of practice and teaching for all accrediting veterinary schools, regardless of location.

Issue No. 2 – the reality that international schools want to recruit U.S. students as a means to access taxpayer student loans.
Upon completion of the AVMA Task Force’s report, and its dismissal by the AVMA Executive Board, NYSVMS undertook its own study of foreign accreditation and identified several areas of concern. With this resolution, the NYSVMS asks the AVMA/COE to:

- Initiate steps to cease the accreditation of foreign veterinary schools by the AVMA Council on Education (COE). Foreign veterinary schools are defined as those schools that operate outside the United States and Canada.

- Permit foreign veterinary schools currently accredited by the COE to maintain their accreditation until such time as that accreditation expires. Upon expiration, there will not be an opportunity for said schools to be re-accredited unless said school meets the criteria set forth in the following paragraph.

- Permit those students currently enrolled in a foreign AVMA COE-accredited program to complete their education and upon graduation, be considered graduates of an AVMA COE-accredited program. For those schools whose COE-accreditation expires prior to the graduation of their freshman class, a one-time accreditation extension will be granted until the time of graduation of that freshman class.

The NYSVMS task force found that the accreditation of veterinary schools is a resource intensive process. “It requires a great deal of effort from AVMA members and staff as well as being logistically challenging. This is particularly true when accrediting a veterinary school in a foreign country, where English may not be the native language.”

The NYSVMS believes the focus of the Council on Education should be to continually improve the quality of the graduates, programs and institutions of Domestic and Canadian veterinary colleges. This is best accomplished by adhering to the Standards of Accreditation and ceasing to accredit foreign veterinary schools.

Uniformly Apply Standards

- Standard 1: Organization (Institution of Higher Learning)
- Standard 3: Physical Facilities and Equipment
- Standard 8: Faculty
- Standard 10: Research
- Standard 11: Outcomes Assessment

While all the Standards must be uniformly met to receive continued approval from the USDE within the United States; the NYSVMS believes these particular standards are especially challenging when taking into consideration the vast and varied models of foreign veterinary school programs.

As published in the final report of the AVMA’s Task Force on Foreign School Accreditation: “Recognition as a competent accrediting body of veterinary schools by the USDE and CHEA requires the COE to apply accreditation standards consistently across schools. The diversity among countries suggests that the COE encounters an ever wider programmatic variety in schools and ever greater complexity of applying a common set of standards to them. Lack of familiarity with the intricacies of the accreditation process can contribute to individual perceptions of uneven application of accreditation standards, and such misunderstanding can be exacerbated by
the necessary confidentiality adhered to by the COE.”

**Removing Accreditation from Existing Foreign Schools Will Punish Current Veterinary Students**

The NYSVMS is not looking to punish students that have chosen to go through an AVMA-accredited foreign school. The resolution will allow foreign veterinary colleges with AVMA accreditation to maintain that accreditation through the graduation of the current freshman class.

**Removing Pathways to Practice in the United States**

This resolution is not about workforce issues. The NYSVMS is not looking to restrict access to foreign veterinary graduates from practicing within U.S. borders.

Currently, there are existing paths in place for graduates of foreign veterinary schools to practice within the United States. These pathways, including the Educational Commission on Foreign Veterinary Graduates (ECFVG) or the Program for the Assessment of Veterinary Medical Education (PAVE), allow for intensive testing of English proficiency, clinical skills and knowledge. By allowing foreign accreditation, the NYSVMS is concerned that these quality measures will be circumvented.

**Role of NAVLE**

As noted by the AVMA’s Task Force, there is a contradiction in the role the NAVLE plays in accreditation.

“Although the NAVLE is not required for accreditation, there is a pass-fail threshold for those schools whose graduating seniors generally take the NAVLE. The Task Force believes this use of the NAVLE creates an inconsistency that the COE should address.”

“The NAVLE cannot provide comparative data across all COE-accredited veterinary schools because it is not a requirement for accreditation. With the exception of Ross University and St. George’s University, most graduates from accredited foreign schools do not take the NAVLE because they are not pursuing licensure in the United States or Canada. However, for schools whose graduating senior students normally take the NAVLE, the COE expects a pass rate of 80 percent or more.”

**If the AVMA Does Not Accredit These Schools, Who Will?**

The AVMA indicates in their report that five foreign accrediting bodies already exist and have been setting standards for the profession:

- Royal College of Veterinary Surgeons
- European Association of Establishments for Veterinary Education (EAEVE)
- Australasian Veterinary Boards Council
- CONEVET
- Caribbean Accreditation Authority for Education in Medicine and Other Health Professions (CAAM-HP)

We are not suggesting the AVMA abdicate their role in working with other entities. Rather, the AVMA should be seated at the table as part of a greater global accreditation entity that works collaboratively with all of these groups.

**Adding Financial Burden**

With an already immense financial burden on U.S. veterinary graduates, there is concern over the even greater exposure to debt that a foreign diploma provides. Accreditation by a U.S. body allows students access to the U.S. government’s
Health Professions Student Loans. These loans are limited only by the amount that eligible students need for tuition and living expenses, as opposed to the $138,500 limit for non-medical students.

VIN News reported in June 2013 that the AVMA’s role in student loans at foreign-based programs could change in July 2015, when amendments to the Higher Education Act require the federal government to choose an accrediting agency to evaluate these foreign programs before they offer students access to federal student aid. If this change is implemented, then the only way a foreign school could gain access to U.S. federal loan money is through accreditation. The NYSVMS believes it is likely that the number of foreign schools seeking accreditation will significantly increase because accreditation would be required in order to access the federal subsidies. As stated earlier, the NYSVMS believes this only deepens the concerns of the AVMA’s legal liability surrounding the cessation of foreign veterinary college accreditation. Where does it stop?

Concerns that Need to be Addressed by the AVMA, Following the Publishing of the Task Force on Foreign School Accreditation’s Final Report

- The Task Force believes the COE should clarify the criteria for determining whether a veterinary school is part of a larger institution of higher learning as required by Standard 1 or is a free-standing institution and thus not eligible for accreditation.
- Because the Task Force finds it unclear how clinical education and outcomes assessment standards are met across diverse institutions, the Task Force believes it is unclear how the COE-accredited foreign veterinary schools consistently matriculate graduates that are equal to U.S. entry-level veterinarians.
- Aside from the overall accreditation process, objective data to measure competency of graduates of accredited foreign and domestic programs are lacking.
- The Task Force sees a contradiction in the role of the NAVLE in accreditation. Although the NAVLE is not required for accreditation, there is a pass-fail threshold for those schools whose graduating seniors generally take the NAVLE. The Task Force believes that this use of the NAVLE creates an inconsistency that the COE should address.
- The NAVLE cannot provide comparative data across all COE-accredited veterinary schools because it is not a requirement for accreditation. With the exception of Ross University and St. George’s University, most graduates from accredited foreign schools do not take the NAVLE because they are not pursuing licensure in the United States or Canada. However, for schools whose graduating senior students normally take the NAVLE, the COE expects a pass rate of 80 percent or more.
Submitted by New York State Veterinary Medical Society

RESOLUTION 1 - THE AVMA WILL NO LONGER ACCREDIT FOREIGN VETERINARY SCHOOLS, DEFINED AS THOSE SCHOOLS LOCATED OUTSIDE THE UNITED STATES AND CANADA

Resolved, that the House of Delegates recommend to the Executive Board that the American Veterinary Medical Association (AVMA) will -

1. Initiate steps to cease the accreditation of foreign veterinary schools by the AVMA Council on Education (COE). Foreign veterinary schools are defined as those schools that operate outside the United States and Canada.

2. Permit foreign veterinary schools currently accredited by the COE to maintain their accreditation until such time as that accreditation expires. Upon expiration, there will not be an opportunity for said schools to be re-accredited unless said school meets the criteria set forth in paragraph 3 below.

3. Permit those students currently enrolled in a foreign AVMA COE-accredited program to complete their education and upon graduation, be considered graduates of an AVMA COE-accredited program. For those schools whose COE-accreditation expires prior to the graduation of their freshman class, a one-time accreditation extension will be granted until the time of graduation of that freshman class.

The accreditation of veterinary schools is a resource intensive process. It requires a great deal of effort from AVMA members and staff as well as being logistically challenging. This is particularly true when accrediting a veterinary school in a foreign country, where English may not be the native language. These concerns are exemplified in the reports by the AVMA’s Task Force on Accreditation of Foreign Veterinary Schools and the recent Staff Report to the Senior Department Official on Recognition of Compliance Issues by the U.S. Department of Education.

The focus of the Council on Education should be to continually improve the quality of the graduates, programs, and institutions of Domestic and Canadian veterinary Colleges. This is best accomplished by adhering to the Standards of Accreditation and ceasing to accredit foreign veterinary schools.

In July 2011, the AVMA House of Delegates passed a resolution for a Task Force to
evaluate the accreditation of foreign veterinary schools. The report of the Task Force on Foreign Veterinary School Accreditation was made available in March of 2013.

The Task Force listed a number of concerns in the conclusion of its report. Chief among those concerns is the following:

a. Recognition as a competent accrediting body of veterinary schools by the USDE and CHEA requires the COE to apply accreditation standards consistently across schools. The diversity among countries suggests that the COE encounters an ever wider programmatic variety in schools and ever greater complexity of applying a common set of standards to them. Lack of familiarity with the intricacies of the accreditation process can contribute to individual perceptions of uneven application of accreditation standards, and such misunderstanding can be exacerbated by the necessary confidentiality adhered to by the COE.

b. The Task Force believes that the COE should clarify the criteria for determining whether a veterinary school is part of a larger institution of higher learning as required by Standard 1 or is a free-standing institution and thus not eligible for accreditation.

c. Because the Task Force finds it is unclear how clinical education and outcomes assessment standards are met across diverse institutions, the Task Force believes it is unclear how the COE–accredited foreign veterinary schools consistently matriculate graduates that are equal to U.S. entry-level veterinarians.

d. Aside from the overall accreditation process, objective data to measure competency of graduates of accredited foreign and domestic programs are lacking.

e. The Task Force sees a contradiction in the role of the NAVLE in accreditation. Although the NAVLE is not required for accreditation, there is a pass-fail threshold for those schools whose graduating seniors generally take the NAVLE. The Task Force believes that this use of the NAVLE creates an inconsistency that the COE should address.

f. The NAVLE cannot provide comparative data across all COE-accredited veterinary schools because it is not a requirement for accreditation. With the exception of Ross University and St. George’s University, most graduates from accredited foreign schools do not take the NAVLE because they are not pursuing licensure in the United States or Canada. However, for schools whose graduating senior students normally take the NAVLE, the COE expects a pass rate of 80 percent or more.

In December of 2012, the U.S. Department of Education met to evaluate a Petition for Continued Recognition. The Department of Education recommended continuing the AVMA’s recognition as the accrediting body for only the next 12 months, as opposed to the typical five years. The AVMA is expected to come into compliance within 12 months of that report’s issuance.

Quoting from the report: “It does not appear that the agency (Council on Education) meets the following sections of the Secretary’s Criteria for Recognition.”

It appears obvious that if the USDE has questioned our methods of accreditation for domestic schools, we ourselves must question our criteria for the even more difficult task of effectively accrediting the ever-growing number of foreign veterinary schools.
The focus of the Council on Education should be to continually improve the quality of the graduates, programs and institutions of Domestic and Canadian veterinary colleges. This is best accomplished by adhering to the Standards of Accreditation and ceasing to accredit foreign veterinary schools.