May 8, 2014

Dear Colleagues,

This letter is in response to a recent communication from Dr. Robert Marshak relative to accreditation of veterinary medical colleges. Dr. Marshak is a highly distinguished academician and valued member of our profession. Based on this communication to all state veterinary medical associations and other veterinary organizations, it is apparent that he has some strongly held positions relative to veterinary education. As much as we respect his opinion and believe his concerns for the profession are sincere, the AVMA takes exception with him on this issue.

The AVMA Council on Education (COE) is recognized by the US Department of Education to provide independent review and certification of the accreditation process. The USDE only recognizes accrediting bodies that follow their strict operational guidelines. Through this process, the COE must demonstrate that accreditation decisions are independent of the AVMA and are not influenced by any partner organization or recognized affiliate organizations. The USDE guidelines require evidence that the COE has clearly documented accreditation standards that address all areas of the DVM program, the standards are applied evenly and fairly to all colleges seeking accreditation, and students are provided with accurate information regarding the program with reasonable assurance of successful completion. The AVMA, through the activities of the COE, has been recognized as an accrediting body for veterinary medicine by the USDE since 1952.

The AVMA COE goes to great lengths to ensure the quality of its accreditation process beyond the stringent requirements of the USDE. The COE has voluntarily maintained recognition with the Council on Higher Education Accreditation (CHEA), a highly respected, non-profit organization that assists accrediting bodies like the COE to ensure adherence to the highest quality standards in the accreditation process. In accordance with CHEA guidelines, the COE assesses the appropriateness of the educational program, the adequacy of the resources and organization used to deliver the program, and specific educational outcomes to ensure program objectives are met on an ongoing basis. The AVMA COE has been recognized by CHEA and its predecessors as an accrediting body for veterinary medicine since 1949. The COE completed full review by the CHEA Committee on Recognition in March 2012; no deficiencies were found.

Additionally, the COE is a member of the Association of Specialized and Professional Accreditors (ASPA) and adheres to its Code of Good Practice.

The USDE reviews accrediting bodies every five years. The AVMA COE was re-recognized in 2006 with no deficiencies. Since that time, the legislation governing the recognition process (Higher Education Act; HEA) was re-authorized (2008). Regulations promulgated by the USDE in response to the new Act resulted in changes
to the recognition guidelines and extensive re-interpretation of existing regulations by USDE staff. Like the AVMA COE, all but two of over 40 accrediting agencies evaluated by USDE between 2008 and 2012 received a similar one-year extension to make a number of technical changes to existing policies and procedures. All of the changes requested of the AVMA COE have been implemented and we feel confident they will satisfy the current USDE requirements.

In addition to these changes, USDE staff asked the Council to consider 13 public comments received during the recognition process; all of these were submitted by Dr. Marshak and others who have similar concerns. The majority of public comments were addressed effectively in oral testimony by the President of the Association of American Veterinary Colleges (AAVMC) and in a letter presented to the USDE review panel by the AAVMC CEO in support of the COE.

The most significant remaining public comment was a request for a governance system similar to the Liaison Committee on Medical Education (LCME) sponsored jointly by the American Medical Association and the Association of American Medical Colleges. Although the positioning of the COE within the AVMA and the selection process for COE members by the House of Delegates was not cited by the USDE, the AVMA worked with the AAVMC to develop a new selection process for COE members similar to the LCME, which was approved by the AVMA Executive Board and House of Delegates. Contrary to Dr. Marshak’s interpretation, the Executive Board and House of Delegates were simply adhering to the USDE request to consider his public comments; this change was done voluntarily. The new AVMA and AAVMC COE Selection Committees were configured by mutual agreement to mirror each other.

The COE's Accreditation Policies and Procedures manual has been published on the AVMA web site for many years. These guidelines are followed 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. Consistent application of the standards is a primary concern; however, the interpretation and application of the standards is a dynamic process. The standards of accreditation are reviewed regularly and updated with input gathered from across the profession. The COE is dedicated to its mission, which includes assuring the public that accredited programs provide a quality veterinary education, protecting the rights of students, and assisting schools in improving veterinary education. Council members are committed to continuous improvement of the accreditation process. 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 at the AVMA for more than 100 years.

In light of Dr. Marshak’s comments, it is important to note that the COE includes eight academic members, many of whom are curricular experts. For example, at the time the schools in question, (Western University of Health Sciences, University of Calgary, Ross University, St. George’s University, and UNAM) were accredited, the Council included three sitting deans and three associate deans from US veterinary schools. They had the opportunity to personally visit the schools and/or review extensive evidence validated by direct observation during multiple site
visits by other Council members. After considering all of the evidence, it was their considered opinion that these schools met the standards of accreditation.

It also is worth noting that Caribbean graduates were entering the US for years prior to accreditation without the benefit of the Clinical Proficiency Exam provided by the Educational Commission on Foreign Veterinary Graduates (ECFVG). The COE denied accreditation to these schools throughout this period. During that time, both schools spent millions of dollars to improve their facilities, faculty, and curriculum to meet the standards of accreditation. The desire to become accredited drove a process of continuous improvement which eventually allowed the schools to meet the standards. Accreditation is not a one-time event. It provides accountability through continual monitoring of compliance with an established set of quality standards and the expectation of continuous quality improvement.

For the last 92 years, the Council has consistently applied the standards of accreditation to all schools that seek accreditation. Accredited colleges are not required to use identical methods to meet the standards. The standards are designed to have enough flexibility to allow innovation and creativity (as required by the recognition guidelines). This is what allows higher education to advance and adapt to changing societal needs. This process appears to be quite successful. The average NAVLE pass rate for graduates of accredited schools, domestic or foreign in the 2012 academic year, was 92%; the NAVLE pass rate for graduates of non-accredited schools was only 37%.

The AVMA, working closely with AAVMC, is committed to maintaining the highest quality of veterinary medical education. If you or members of your organization have any questions or concerns about the AVMA COE accreditation process, please do not hesitate to contact us.

Sincerely,

[Signature]

W. Ron DeHaven, DVM, MBA
CEO and Executive Vice President