

U.S. Department of Education Staff Report

to the

Senior Department Official on Recognition Compliance Issues

Recommendation Page

1. **Agency:** American Veterinary Medical Association (1952 / 2016)
(The dates provided are the date of initial listing as a recognized agency and the date of the agency's last grant of recognition.)
2. **Action Item:** Compliance Report
3. **Current Scope of Recognition:** The accreditation and preaccreditation ("Provisional Accreditation") in the United States of programs leading to professional degrees (D.V.M. or D.M.D.) in veterinary medicine.
4. **Requested Scope of Recognition:** same as above
5. **Date of Advisory Committee Meeting:** 06/23/2016
6. **Staff Recommendation:** Continue the agency's recognition for one and one-half years
7. **Issues or Problems:** None

Executive Summary

PART I: GENERAL INFORMATION ABOUT THE AGENCY

The American Veterinary Medical Association (AVMA) was formed in 1863 to recognize the veterinary medical profession in the United States. It began accrediting schools of veterinary medicine in 1906 through its Committee on Intelligence and Education. In 1946, the AVMA was reorganized, and the Council on Education (COE) replaced the Committee on Intelligence and Education.

The AVMA is a programmatic accrediting agency that currently accredits 28 schools of veterinary medicine located in regionally accredited universities. These programs use the agency's accreditation to participate in the Health Professions Student Loan program offered through the U.S. Department of Health and Human Services. Recognition of the agency does not enable its programs to seek eligibility to participate in the Title IV funding programs. During this recognition period, the Department has received no complaints and over 200 third party comments for the American Veterinary Medical Association.

Recognition History

The COE of the AVMA was on the Commissioner of Education's first list of nationally recognized accrediting agencies published in 1952, and its recognition has been renewed periodically. The agency was last granted a period of recognition for five years in 2007.

The COE of the AVMA was last reviewed for recognition in December 2012. At that time, the senior Department official required the agency to come into compliance within 12 months, and submit a compliance report that demonstrates the agency's compliance with the issues identified in the staff analysis. The agency's compliance report is the subject of this analysis. Over 900 written comments were received regarding the agency's compliance report.

The agency was required to submit a compliance report in which the agency was granted an extension for good cause as noted in the March 2015 Senior Department Official's decision letter that was due to the Department in October 2015. This analysis is the subject of that report.

PART II: SUMMARY OF FINDINGS

602.13 Acceptance of the agency by others.

The agency must demonstrate that its standards, policies, procedures, and decisions to grant or deny accreditation are widely accepted in the United States by--

(a) Educators and educational institutions; and

(b) Licensing bodies, practitioners, and employers in the professional or vocational fields for which the educational institutions or programs within the agency's jurisdiction prepare their students.

dents.

Previous issue: When the agency's compliance report was reviewed in December 2014, Department staff and NACIQI found that the agency did not demonstrate wide acceptance of its standards, policies, procedures, and decisions to grant or deny accreditation by educators and practitioners.

Discussion: In response to the Department's findings, the agency submitted evidence demonstrating outreach to a variety of constituents soliciting their input in the form of transcripts from listening sessions at conferences, blog posts, electronic newsletters and the AVMA website. The agency provided evidence of logs from survey results, and an email response from one constituent. However, the agency documentation does not identify the targeted audiences of these efforts, in particular educators and practitioners.

Also, most of these activities appear to be limited to the standards review process and do not address the overall wide acceptance of the agency by educators and practitioners. In addition, the standards review survey and member satisfaction survey efforts appear to have occurred in 2014, which would not reflect outreach efforts since the agency was last reviewed for compliance in this area in December 2014.

Analyst Remarks to Response:

In response to the draft analysis and follow up communication with the agency, the agency provided additional information and documentation to address the previous concerns as evidenced in exhibits 1-14. Specifically, the agency has provided the Department several documents demonstrating outreach efforts over the past year for their targeted audiences review and comments. For example, exhibit 13 provides an excerpt from the Survey Research Laboratory (SRL) at the University of Illinois, who assisted the agency with a web-based survey to their over 15,000 members to better understand their perceptions of the processes and programs for establishing veterinary professional standards and the agency's role in these areas; exhibits 2-4 are blog post and the agency website postings for over 90,000 subscribers, including the agency stakeholders, requesting their participation in the agency survey to evaluate the reliability and validity of each standard individually and as a whole; and frequently asked questions (FAQs), evidenced in exhibit 5, on the agency website available to their over 68,000 members and COE blog post consisting of over 39,000 members. The agency also provided additional information on the three listening sessions conducted throughout 2015 at the various veterinary professional education meetings consisting of veterinarians, students, and veterinary technicians as attendees. The agency also conducted a fourth listening session limited to students at the annual Student American Veterinary Medical Association national meeting, to provide a safe environment for discourse for students. All other outreach efforts the agency conducted were open to all members of the profession. The agency also provided the Department with feedback from constituents as evidenced in exhibit 14 to demonstrate wide acceptance. The additional explanation and documentation provided for this criterion effectively demonstrates the agency's compliance.

602.15 Administrative and fiscal responsibilities

(6) Clear and effective controls against conflicts of interest, or the appearance of conflicts of interest, by the agency's--

(i) Board members;

(ii) Commissioners;

(iii) Evaluation team members;

(iv) Consultants;

(v) Administrative staff; and

(vi) Other agency representatives; and

Previous issue: When the agency's compliance report was reviewed at the December 2014 meeting, the NACIQI recommended that the AVMACOE demonstrate compliance with recognition criterion 602.15(a)(6), which is clear and effective controls against conflicts of interest, or the appearance of conflicts of interest, by the agency's board members and commissioners; as a result of oral testimony and the Senior Department Official's concurrence with this recommendation.

Discussion: In response to the Department's findings, the agency provided its conflict of interest policies and code of conduct requirement as evidence within the COE policies and procedures manual. The policies include attestations that must be signed by council members, site visitors and AVMA staff; however the agency did not provide site visit training documents or copies of signed conflict of interests and code of conduct forms to assess the adherence to its standards and this criterion. Therefore, the blank forms provided do not demonstrate implementation of the policy for the council members, AVMA staff, site team members and each person who participates in a site visit.

The agency also addressed the December 2014 meeting concerns as it relates to the removal of two sitting members of the council to illustrate that the agency controls against conflict of interest are effective. The agency did not provide any documentation demonstrating the process of the first case mentioned in the narrative of the council member removal. The agency provides the reason for removal but no documentation of the actions or processes that took place to remove the member.

For the second case of the member removal, the agency provides the reason, minutes of action to dismiss the member, who appealed the decision, and minutes of the reinstatement decision. However, the agency does not provide clear protocols for taking action to remove a member nor has the agency provided the decision of the appeals panel or the executive committee which took corrective action against the member during the appeal.

The agency states it's reviewing its process to codify the dismissal process and clarify the roles of the executive committee and the council as well as developing an independent appeal process for the dismissal of COE members. It is not clear to Department staff why these policies and procedures were not developed, approved and put in place before the end of the compliance review period. Since the agency has not established this process at this time, a compliance determination cannot be made without additional information.

Analyst Remarks to Response:

In response to the draft analysis and follow up communication with the agency, the agency provided additional clarity, information and documentation to address the previous concerns as evidenced in Exhibits 15-21. Specifically, the agency has provided the Department with an excerpt from the 2015 training materials for site visitors outlining roles and responsibilities (exhibit 15); and a sample of signed conflict of interest/confidentiality statements by site visitors (exhibit 16) demonstrating the implementation of agency policy for site team members and each person who participates in a site visit. The agency provided the Department with its code of conduct/conflict of interest policy for COE members along with signed conflict of interest/code of conduct forms of the members (exhibit 17). In addition to the signed conflict of interest documents, the agency provided the COE members conflict of interest training presentation (exhibit 18) as well. The agency provided additional clarity on the removal of the two COE members. The removal of the first member mentioned in the draft analysis was conducted outside of the recognition period of this review. The agency provided additional explanation and documentation on the removal of the second member which included further accounting of the circumstances surrounding the removal and recusal of the member (exhibit 19); the agency attesting to the confidentiality of the agreement between the two parties resulting from the appeals decision; and the reinstatement of the member. Lastly, after the conclusion of the appeals process and reinstatement of the second member, the COE researched and obtained separate legal counsel, who was appointed immediately before the due date of the compliance report and not discussed in the initial submission of the compliance report to the Department, to handle future issues of this sort. The agency provided COE meeting minutes from the discussion and vote on changes and revision to policies and procedures on the dismissal of members (exhibit 21), and the amended policy and procedures (exhibit 20) defining the terms and conditions for the removal of a member. The additional explanation and documentation provided for this criterion effectively demonstrates the agency's compliance.

602.16 Accreditation and preaccreditation standards

The agency meets this requirement if -

(1) The agency's accreditation standards effectively address the quality of the institution or program in the following areas:

(i) Success with respect to student achievement in relation to the institution's mission, which may include different standards for different institutions or programs, as established by the institution, including, as appropriate, consideration of course completion, State licensing examination, and job placement rates.

Previous issue: When the agency's compliance report was reviewed in December 2014, Department staff and NACIQI found that the agency's accreditation standards did not effectively address the quality of veterinary medical programs with respect to student achievement.

Discussion: In response to the Department's findings, the agency provided its revisions to its student achievement standards, in Standard 11. In addition, the agency provided some evidence regarding the review and analysis of student achievement data. For

example, the agency provided a site visit scoring rubric that demonstrates the application of the requirements of revised standard 11 for institutions who do not have any graduating seniors taking the NAVLE, which requires that student achievement during the pre-clinical and clinical curriculum and after graduation be included in outcomes assessment. The agency attests in the narrative that colleges must provide evidence of student assessment in the pre-clinical and clinical curriculum; evidence of attainment of the nine clinical competencies and evidence that the college has assessed students after graduation. However, the evidence provided by the agency does not demonstrate whether the program had any senior take the NAVLE or if other measures were used to assess student achievement per standard 12. The agency states that compliance with Standard 11 requires that 80% or more of graduating senior students who take the NAVLE pass the examination; and if a college has no graduating senior students taking the NAVLE, other measures are used to assess student achievement for a college that does not have any senior students sitting for the NAVLE, per revised Standard 11.

The agency did not provide documentation to demonstrate implementation for other revisions to Standard 11 (e.g. negative trends in absolute attrition and job placement rates) within in the U.S. rubric provided as evidence. The rubric provided for the foreign school is not evaluated for the U.S. Department of Education's review for compliance. More information is still needed regarding the agency's review and analysis of student achievement data, particularly as it relates to completion and job placement.

Based on the Department's findings, the agency was also required to clarify its use of binomial confidence interval in the review of NAVLE pass rates for its accredited programs, since it was unclear whether the agency relied on binomial confidence intervals for all programs or just foreign ones. The agency has since revised its standard 11 which provides clarity on the binomial percentage requirements to now apply to colleges not schools. However, a distinction between usage at U.S., Canadian, or foreign schools or programs is not clear from the revised language. In addition, the agency did not provide documentation of a program that failed to meet 80% NAVLE pass rate or 95% binomial confidence interval for Department staff to assess for compliance of with this standard or inform the Department that no institutions or programs have failed to meet the agency's student achievement standards.

Analyst Remarks to Response:

In response to the draft analysis and follow up communication with the agency, the agency provided additional information and documentation to address the previous concerns as evidenced in exhibits 22-29. Specifically, the agency provided the Department with a portion of the minutes from the 2015 council meeting approving revisions to Standard 11 as well as the council policy of a year adoption of the revisions to demonstrate the implementation of revisions to Standard 11. The agency provided additional clarity on its student achievement standards. The agency attests that the only student achievement standard used by the COE for US colleges of veterinary medicine is the North American Licensing Examination (NAVLE) pass rate. Exhibit 24 provides a summary of NAVLE school score reports from 2010-2015 for all US colleges in which passing the (NAVLE) is a requirement for licensure in all 50 states. The agency also confirms that for the past two successive years no US veterinary colleges have failed to achieve an 80% NAVLE pass rate or an upper limit binomial confidence interval less than 85%. The agency's requirements and review of attrition and placement rates, which is an analysis of five year trend data, is evidenced in exhibits 25-26. These rates are submitted to the agency through the annual report and self-study submitted by the institution to the agency prior to the site visit. Site teams then review student assessment in the pre-clinical and clinical curriculum; attainment of the nine clinical competencies; senior students completion of the NAVLE; and student preparedness, accessed by the institution, and employer satisfaction after graduation using employer and graduate surveys (exhibits 27-28). The site visit report, self-study, and annual report or then reviewed and evaluated by the COE and an accreditation decision is then made and communicated to the school via letter. An example of this is found in the agency's exhibit 29. The additional explanation and documentation provided for this criterion effectively demonstrates the agency's compliance.

602.21 Review of standards.

(b) The agency determines the specific procedures it follows in evaluating its standards, but the agency must ensure that its program of review--

(1) Is comprehensive;

(2) Occurs at regular, yet reasonable, intervals or on an ongoing basis;

(3) Examines each of the agency's standards and the standards as a whole; and

(4) Involves all of the agency's relevant constituencies in the review and affords them a meaningful opportunity to provide input into the review.

Previous issue: When the agency's compliance report was reviewed in December 2014, Department staff and NACIQI found that the agency must demonstrate how it involves all of the agency's relevant constituencies in the systemic program review and affords them a meaningful opportunity to provide input into the review.

Discussion: In response to the Department's findings, the agency has provided documentation demonstrating outreach to constituents through multiple surveys, conference listening sessions including transcripts, blog posts, and meeting minutes with regards to its systematic review of its standards. The agency also provided metrics of the email and survey responses distributed for feedback on the standards revisions, and the agency's response to the constituents that responded to the agency's outreach efforts. As noted in Section 602.13, these reported efforts to involve all of the agency's relevant constituencies in the standards review process appear to have occurred in 2014 (with the exception of the listening sessions in 2015), which were previously reviewed by the Department, and were found deficient. Specifically, the agency employed the use of a survey sample, which does not meet the requirements of this section to involve all of the agency's relevant constituencies in the standards review process and afford them a meaningful opportunity to provide input into the review. It is still unclear to the Department if the agency includes all relevant constituencies in the standards review process. The agency needs to provide evidence identifying the targeted audiences of the surveys and all entities involved in the standards review process.

However, the additional efforts made based on the revision of standards 10 and 11 are not clearly reflected in the agency's written policies and procedures as standard practice. The agency website appears to include the approved versions of standards 10 and 11, but has not included an approved version of its standards with the compliance report documents. For example, JAVMA and the AVMA web sites are cited as locations for publication of revisions and updates to standards (Exhibit 46-17.3 in 602.21(c)); yet the additional media outlets utilized for these revision discussions (i.e. blog posts, electronic newsletters, listening sessions, etc...) are not included in the Council on Education policies and procedures as standard practice, as stated in the narrative (the Council will continue to review the standards holistically using the methods described above). Also, a timeframe for responses is not included to determine whether or not a meaningful opportunity to provide input is afforded to constituents. The agency also states several hundred emails were distributed to constituents, but only provided one favorable response via email as evidence.

Analyst Remarks to Response:

In response to the draft analysis and follow up communication with the agency, the agency provided additional information and documentation to address the previous concerns as evidenced in exhibits 2-4, 11-12, 14, 22-23 and 30-33. The agency provided outreach efforts for the year to their targeted audiences to review and comment on the standards revisions. These efforts included conducting a survey sent to a random sample of the profession for evaluation by the Council and an additional open survey posted to the public section of the agency website for feedback from its subscribers which include veterinary educators, students and practitioners for comment (exhibit 2). In addition to the agency website, the survey availability was publicized to veterinary blogs and newsletters for agency stakeholders access (exhibits 3-4). The open survey that was available on the public section of the agency website targeted practitioners primarily; however, respondents included students, practitioners, and academics. To ensure comprehensive review of the standards on a cyclical basis, an opportunity to provide comments on the proposed revised standards was then published in the COE Standard and the agency blog consisting of over 68,000 subscribers, who are primarily practitioners. Comments were due back to the agency within two weeks, which does seem reasonable. The Council compiled and reviewed all comments received from the different sites and a response to stakeholder's feedback was then posted to the same venues (exhibits 11-12, 14 and 32). The agency provided exhibit 22, an excerpt from the council meeting minutes, to demonstrate the discussion of the standards and the revised standard within the agency's policies and procedures (exhibit 23). The agency has also revised its standards to include the use of the open survey, available to the profession and the public during the systemic review of the standards as quality assurance, in addition to the survey which is sent to a random stratified sample of the profession (exhibit 33). The additional explanation and documentation provided for this criterion effectively demonstrates the agency's compliance.

Before finalizing any changes to its standards, the agency must--

(1) Provide notice to all of the agency's relevant constituencies, and other parties who have made their interest known to the agency, of the changes the agency proposes to make;

(2) Give the constituencies and other interested parties adequate opportunity to comment on the proposed changes; and

(3) Take into account any comments on the proposed changes submitted timely by the relevant constituencies and by other interested parties.

Previous issue: When the agency's compliance report was reviewed in December 2014, Department staff and NACIQI found that the agency must revise its written policies to initiate action within 12 months from when the agency determines it needs to make changes to its standards, and to reflect its practices to give its constituencies opportunity to comment via its public website.

Discussion: In response to the Department's findings, the agency provided its revised policy. Specifically, the December 2015 version of the COE Policies and Procedures manual states in section 17.3 that "Initiation of action for revision of a standard(s) will occur within 12 months of the determination by Council that a revision is needed." Once the agency has conducted an annual review of its standards, four standards are chosen for in depth review to ensure the needs of the profession, students enrolled in colleges offering veterinary medical educational programs, and society are met. Provided for this review, the agency demonstrated its adherence to this standard by choosing standards 1, Organization; 2, Finance; Standard 10, Research Programs; and standard 11, Outcomes Assessment for in depth review. The agency review determined standards 10 and 11 needed revision.

The agency then provided the proposed changes to accreditation standards correspondence sent to stakeholders providing the following breakdown of comments from 35 deans of veterinary medical colleges, 20 comments from members of the academic community, and 6 comments from the profession and the public; adhering to the policies and procedures of the COE for proposed changes to the standards of accreditation requiring the change must be submitted to the public for review, comment, and/or suggestions before final approval. The agency response to the stakeholders was also provided as evidence capturing concerns.

Analyst Remarks to Response:

The agency did not need to provide a response to this criterion since this requirement was deemed compliant in the draft analysis.

PART III: THIRD PARTY COMMENTS

Staff Analysis of 3rd Party Written Comments

Over 210 comments were received regarding the agency's compliance report. Less than five percent of the comments received were in support of the agency, submitted on behalf of educational institutions and practitioners, in which all were veterinary medicine professionals.

Comments in support of the agency cited the agency's strengthened curricula and flexible delivery including the expansion of course offerings and new teaching methods, which primarily expresses the support of the agency's delivery of the 602.16(a)(1)(i) criteria as it relates to student achievement. The comments reference that the agency is broadly accepted throughout the educational community and widely recognized as the most appropriate accrediting agency for academic veterinary medical programs, adhering to the 602.13 criteria. Further comments assert that 602.21 criteria are followed, in that, the application and changes to standards of accreditation are handled in a manner that assures that accredited colleges and schools of veterinary medicine produce qualified entry level veterinarians.

The remaining 200+ comments oppose the agency's continued recognition and were largely from practitioners, educators and state veterinary medical associations. The consensus of most of the commenters concerns are summarized as follows:

- 1) The quality of veterinary medical education is declining;
- 2) The decision by the agency to accredit schools that do not meet published Council on Education standards is not supported by the majority of commenters;
- 3) Inconsistent application of standards, specifically some veterinary medical schools have inadequate clinical teaching facilities and/or research programs which is required by agency accreditation standards;
- 4) AVMA Board members exhibit undue influence on accreditation decisions;
- 5) AVMA's COE should be independent and autonomous; and
- 6) NACIQI should discontinue AVMACOE accreditation of schools of veterinary medicine.

The large volume of negative comments referencing the quality of veterinary medical education and the inconsistent acceptance and application of agency standards and processes is of great concern amongst commenters that include practitioners, educators and educational institutions. Particular concern in regards to the agency's adherence to wide acceptance and systemic review as described under sections 602.13 and 602.21 of the criteria were referenced and the Department has solicited additional information from the agency as it relates to these criteria.

Conflict of interest allegations regarding undue influence by AVMA board members is a concern that is also addressed in the compliance report response by the agency and the Department review as it relates to 602.15(a)(6). Processes for managing conflicts of interest are issues of concern for the Department and are addressed in this section of the report.

Comments regarding the agency's inadequate clinical teaching facilities and/or research programs which is required by agency accreditation standards has been reviewed in 602.16 (a)(1)(iv) by the Department and evidence of inconsistent application of standards was not found during the review. However, some commenters allege that the inconsistent administration of standards allows veterinary medical school teaching facilities and research programs to be inadequate resulting in the decline of the quality of veterinary medical education. AVMA members submitted 3rd party comments on efforts to address these issues indicating that the agency still issues degrees to poorly prepared graduates. Agency standards review processes under section 602.21, regarding review of standards to speak to these concerns. The present compliance report has cited the agency on criteria 602.21- systematic program of review- and it appears from its compliance report that it has taken measures to ensure meaningful input into its standards revision process to include its constituents input, however the Department has requested additional information from the agency to clarify their efforts.

Commenters also request that the AVMA's COE be independent and autonomous. However, the AVMA is a programmatic accreditor, so the "separate and independent" requirement as included in criteria for 602.14 (d) is not applicable. Finally, commenters have recommended NACIQI discontinue AVMACOE accreditation of schools of veterinary medicine. The Senior Department Official (SDO) is the only authorized party to make accreditation decisions. However, any recognition recommendations will take into account these comments.

Agency Response to 3rd Party Written Comments

Third-party comments have decreased significantly from the previous compliance report. Of 19 unique individuals who did not provide a form letter (80% of letters), 50% had commented previously. Those few academics or former academics commenting against recognition also commented previously. Most comments addressed the following assertions:

1) Quality of veterinary medical education is declining

The COE is unaware of any objective evidence to support this assertion, and the commenters provide no evidence to support their contention. The North American Veterinary Licensing Examination (NAVLE) is a comprehensive licensing examination developed by the National Board of Veterinary Medical Examiners (NVBME) in conjunction with the National Board of Medical Examiners, and is based on a job analysis of the tasks performed by veterinary practitioners and the knowledge required for competent task performance. For 2015, the reported pass rate for graduating seniors for all US COE accredited colleges, documented by NVBME in reports provided to colleges, was 97%, whereas the pass rate for graduates of non-accredited colleges was 43%. The pass rate for accredited colleges demonstrates that graduates have the entry level knowledge needed for practice.

The accreditation survey described in Section 602.13, asked respondents to rate the level of skill and knowledge they had at graduation. Of those surveyed (n=1,668), 48% rated their level of skill and knowledge at graduation as moderate, whereas 40% considered they had a lot of skill and knowledge, and 2.2% considered they had all the skill and knowledge needed. On a 5 point scale, the mean of all respondents for skill and knowledge on graduation was 3.4. Of 1,281 respondents who knew a recent graduate (within 5 years) from their veterinary college, 86% rated the level of skill and knowledge of those graduates as a moderate, a lot, or all, with a mean score of 3.3. When comparing to recent graduate (within 5 years) from a US veterinary college other than the college they graduated from, 86% also rated the level of skill and knowledge of those graduates as moderate, a lot, or all with a mean of 3.2. (Exhibit 13-Excerpt Accreditation Survey).

There is no evidence to support an increase in disciplinary actions by any regulating authority for recent graduates compared with earlier graduates, which may be expected if the quality of education were declining and graduates were not adequately prepared.

From the 2015 AVMA Economic Report on Veterinary Employment: "No statistically significant difference was found between schools in any of the outcome assessments of competencies, nor was there any significant difference in underemployment or income by school or associated with any specific competency. There was, however, no significant difference in unemployment between schools." (Exhibit 34-2015 Vet Employment_excerpt)

A review of the standards set by other countries show significant similarities between the standards of the COE and the standards that they have adopted (Exhibit 35-RCVS Minutes 2015_excerpt).

2) Non-support of the COE's decision to accredit specific schools

The COE consists of representatives of the public and veterinarians (practitioners and educators) tasked with making

accreditation decisions. A vocal minority within the profession, without benefit of the information and data available to the COE to make accreditation decisions, disagree with the COE's decisions. The COE, as it is tasked, used its professional judgement and the evidence provided by the colleges and the site team's report to determine that all accredited veterinary colleges meet the standards.

3) Inconsistent application of standards, specifically with regard to clinical teaching facilities and/or research programs
The Department stated that inconsistent application of standards was not found during the review. Third-party commenters consistently refer to colleges that use the distributive model of clinical education, a model commonly used in other health professions. There is only one accredited US veterinary college that uses this model of clinical education, and there is no objective evidence that its graduates are less well prepared. Graduates of that college are placed similarly to other colleges, and compete successfully for post graduate clinical specialty training programs and graduate academic (MS, PhD) programs. The 2015 AVMA Economic Report on Veterinary Employment found no statistically significant differences between colleges in any of the outcome assessments of competencies. One US college in development is planning on using a distributive clinical training program and will not have graduates until 2018.

The COE responded to stakeholder feedback and revised Standard 10, Research Programs in September 2015 (Exhibit 22-Sept 2015 Minutes_excerpt). The COE will implement assessment of this revised standard in September 2016.

4) AVMA Board members exhibit undue influence on accreditation decisions

As stated in the AVMA by-laws, the COE shall "Have autonomous authority to evaluate schools and colleges offering a professional degree in veterinary medicine, according to established standards; make accreditation decisions; and assign a classification of accreditation to each such school or college". The by-laws also give the COE authority over its policies and procedures. "The Board of Directors shall develop and approve policies and procedures for the operation of all councils, except for the manual titled Accreditation Policies and Procedures of the AVMA Council on Education that is established by that council." (Exhibit 36-AVMA Bylaws-Sect VIII)

The COE changed its site visit observer policy and no longer allows AVMA Board of Directors members to observe site visits (Exhibit 37-COE minutes Excerpt_Mar 2015). At the recommendation of the COE, the AVMA Board of Directors discontinued the liaison position to the COE (Exhibit 38-BOD liaison_blog).

The COE asserts that neither the AVMA Board of Directors, nor any other agency, or interest group does, or will, influence its accreditation decisions.

5) AVMA's COE should be independent and autonomous

Although the "separate and independent" requirement as included in criteria for 602.14 (d) is not applicable to the COE, it has the ability, as evidenced in the AVMA by-laws, to act in an independent and autonomous manner. This is reinforced by the staff analysis that the AVMA COE is a programmatic accreditor, so the "separate and independent" requirement (602.14 (d)) is not applicable. The COE has been continuously recognized by CHEA and its predecessors since 1949 and has met its separate and independent criteria.

Responses to the accreditation survey showed that 17-24% of respondents ranked average student debt, the number of veterinarians practicing in the United States, and the average salary of veterinarians as one of the three top items that should be considered when establishing and applying educational standards to US colleges of veterinary medicine. These opinions giving credence to the proposition that economic and work force concerns may be contributory in the decisions of those who have expressed concerns about the Council and its activities (Exhibit 13-Excerpt Accreditation Survey); however these are issues for the profession and not directly related to the assessment of educational program quality.