Letter to: State Veterinary Medical Associations: Presidents, Trustees & Board Members

From: Robert R. Marshak, DVM, DACVIM
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School of Veterinary Medicine, University of Pennsylvania
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Date: Spring 2014

Re: Urgent Opportunity to Request the US Department of Education’s National Advisory Committee for Institutional Quality and Integrity to Take Action regarding the AVMA Council on Education’s Accreditation Policies, Procedures, and Decisions

Dear Colleagues:

It is imperative that members of our profession, across both academia and the private sector, particularly including state veterinary medical associations, write to the US Department of Education’s National Advisory Committee for Institutional Quality and Integrity (NACIQI) to insist that the AVMA-Council on Education’s (COE) published accreditation standards, essential for safeguarding and building our profession, are rigorously upheld. This is essential if we are to ensure that veterinary medicine remains an economically viable and science-based profession retaining the respect of fellow health professions, agriculture, and the general public. Because NACIQI provides only a brief window (to be announced) for the submission of written comments, it is important to prepare now for the opportunity to write.

My strong belief that this year is an especially propitious time to submit letters to NACIQI is based on my experience at NACIQI’s last public meeting. Having received letters, prior to that meeting, signed by many distinguished veterinary educators and researchers critical of the COE, NACIQI Committee members, clearly concerned, spent almost the entire meeting questioning how the COE could continue to claim wide acceptance of its methods and decisions. At the meeting’s conclusion NACIQI recommended that the USDE continue COE recognition for one year instead of the usual five. For these reasons I believe that letters from veterinary medical associations, representing the profession’s largest sector, will have a powerful and favorable impact on how NACIQI responds at its 2014 meeting.

The AVMA Council on Education (COE) is currently recognized by the United States Department of Education (USDE) as the accrediting agency for American schools of veterinary medicine. Among the USDE’s criteria for continuing COE recognition in this role, the USDE requires that the COE must demonstrate that its standards, policies, procedures, and decisions 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.

The AVMA-COE has always assured NACIQI that its standards, policies, procedures, and decisions are widely accepted by all segments of the profession. However, during the past several years, two state veterinary medical associations (Pennsylvania & New York), many individual practitioners, former COE members, a distinguished cohort of veterinary educators and researchers, including members of the National Academies Institute of Medicine and a recipient of the National Medal of Science, the President of a major university with a veterinary school, veterinary school deans (past and present), and individuals in other domains of the profession have raised troubling questions about recent COE accreditations and a perceived weakening of COE standards. Concerns are centered on schools that received full accreditation despite what many believe is blatant evidence of non-compliance with the COE’s published standards. Of equal concern is the imminent accreditation of similar schools that receive the COE’s “reasonable assurance,” the first step towards full accreditation.

These schools share several undesirable characteristics. They generally lack teaching hospitals where teaching, research, technology, and patient care can be integrated, and they outsource their students to local practices and other sites for most of their clinical training. They lack an advanced research enterprise and faculty capable of offering students the contemporary basic science curriculum that is essential in preparing students for effective clinical training and for successful futures as practitioners.

A sound basic science grounding is critical at a time when biomedical knowledge, growing at a blistering pace, is transforming the practice of medicine, both animal and human. Although these schools without teaching hospitals or sophisticated research infrastructures have the lowest operating costs, their students pay the nation’s highest tuitions and graduate with the highest debt burdens. In essence, they are reverting to a vocational model, de-emphasizing science and embracing an apprenticeship system. Moreover, lacking graduate and residency training programs, they do not contribute to the production of veterinarian-scientists, clinical specialty development, and the new knowledge and novel tools without which a profession cannot progress. Further, the vocational-type schools lack educational and research programs that focus on such issues as emerging and endemic zoonotic diseases, food safety and security, and the problems associated with intensive livestock and poultry production medicine and its environmental impact. In these vital domains that safeguard the nation’s health, and economic and social stability no other profession has greater responsibility and expertise.

Also, at an astonishing pace, the COE has been accrediting foreign and for profit schools and schools that are not part of an institution of higher learning as required by COE Standard 1. Why this is unacceptable is articulated convincingly by the New York State Veterinary Medical Society’s Winter 2014 Resolution 1.

This proliferation of accredited vocational and foreign schools, and the increase in student numbers to make up for severe cut backs in funding for our traditional state supported schools, are adding significantly to the number of new graduates, many marginally trained, at a time
when there is already a surplus of veterinarians and the applicant pool as a whole appears to be diminishing, e.g., in one top-ranked state school there were only 1.8 applicants per available space (versus historic levels closer to 7:1). The negative financial impact of the growing workforce surplus on private veterinary practices, especially in an economy that may take decades to recover, cannot be overestimated.

It is also significant that among all health professions the ratio of debt to median income is the most unfavorable for veterinary medicine, significantly higher than optometry, pharmacy, dentistry, family medicine, etc. (see New England Journal of Medicine, Nov. 21, 2013, @nejm.org.); the authors speculate that, unlike medical education, veterinary medical education already may be in a bubble market and that the bubble will or has already burst as more prospective applicants recognize that the costs of education are not rational in the light of anticipated future incomes. Inevitably, some schools, particularly those with highest tuitions, will be obliged to accept poorly qualified or truly unqualified applicants or face closing, a distressing prospect for the profession’s future and public image. In addition, the chronic failure of our schools to attract applicants of both genders is a unique and worrisome omen for the profession’s future.

In ways rarely expressed and appreciated, even within the academic community, the COE’s standards, structure, policies, procedures, and decisions influence profoundly the nature and quality of veterinary medical education. Whenever published standards are weakened, ignored, applied loosely and inconsistently, or are subject to manipulation by political, commercial, or other interests, educational quality, the profession, and the public we serve are bound to suffer grievous harm, e.g., by the recent accreditation of a rash of vocational-type schools. It now seems clearly evident that once a new school submits a self-study document, receives a COE site visit, and is granted “reasonable assurance,” it is virtually certain to achieve full accreditation.

It is interesting to note that in the December 13, 2013 issue of The Chronicle of Higher Education, an article wasHeadlined Key US Senators Say Accreditors Are Ineffective And Beset by Conflicts of Interest. It brings to mind that the COE defends its decisions as infallible, i.e., they cannot be questioned because only the COE, acting in confidence, and on the basis of site visits and confidential documents, is in a position to judge whether or not a school meets its standards, and that great flexibility is necessary and appropriate because schools have different stated missions. The obvious fallacy in this argument lies in the fact that the primary mission of every veterinary school is, and always has been, the education and training of competent future veterinarians. No veterinary school in existence was founded on any other premise. Thus, if the primary mission of every school is to graduate competent entry level practitioners, and COE standards exist for the purpose of assuring the public that this is indeed the case, it is irrational to contend that the COE is free to decide that a standard can be ignored at will. To do so is to accept that, in veterinary education, the standards have little if any relevance to educational content or quality. It also contradicts a statement in JAveMA (May, 15, 2010) by a Director of AVMA’s Division of Education and Research that the standards are “non-negotiable”.

Dr. J. Krehbiel, Chair of the AVMA Executive Board, has written that “foreign schools are evaluated by the exact same standards as U.S. and Canadian veterinary schools.” Unfortunately, I believe that the application of these “exact same standards”, often ignored or applied with
confounding inconsistency, have made a travesty of the accreditation process. In my opinion, rather than improving the quality of global veterinary education, as Dr. Krehbiel posits, the COE's lax application of standards corrupts the basic concept of quality. It is also important to point out that some lower quality schools are only able to exist because administrators of leading American veterinary schools accept their students to do some or all of their clinical training. This has enabled and encouraged the proliferation of high-tuition substandard programs. In this way, some American schools, in concert with the AVMA-COE and also the Association of American Veterinary Medical Colleges (AAVMC) are complicit in the retrograde evolution of American veterinary medical education and the growing surplus of entry-level graduates.

In criticizing the COE's failure to rigorously apply its standards, I do not intend disrespect to the thousands of graduates of schools I have categorized as substandard or vocational. Although these colleagues generally paid the highest tuitions and bear the greatest debt burdens, our dysfunctional accreditation system failed to assure them a quality education.

To assure future generations of veterinary students that they will receive a quality education requires a vigorous broad-based movement within the profession, including individual veterinarians, but especially state veterinary medical associations, to convince the US Department of Education's NACIQI to withhold recognition of the AVMA-COE as the accrediting agency for veterinary medicine until the following or similar/equivalent reforms are firmly in place:

1) Akin to the successful model used by the Liaison Committee on Medical Education (LCME) for the accreditation of medical schools, the COE will conduct its evaluations and make its decisions with complete autonomy, with no discussion, review or participation by its sponsoring organizations, AVMA and AAVMC. (A resolution to this effect was passed overwhelmingly by the Trustees of the Pennsylvania Veterinary Medical Association in November 2012).

2) Except for public members, COE members will be chosen on the basis of their outstanding academic backgrounds and/or experience relevant to veterinary medical education. This will likely require establishment of a new independent Qualifications Committee similarly composed.

In a recent retrogressive bylaws amendment the AVMA Executive Board appears to have strengthened its hold on the COE, i.e., the COE Selection Committee will now include one member elected by the House Advisory Committee, two former COE members (private practitioners preferred) elected by the Executive Board, and two Executive Board members elected by the Board to serve three year staggered terms. One has to question on what basis these individuals are deemed qualified by academic backgrounds and/or professional experience to choose accreditors of institutions as complex as schools of veterinary medicine.

On a more encouraging note, and following the LCME model, nearly half of COE members will now be selected by the AAVMC, an organization better qualified to identify and select outstanding COE candidates. Judgment of its future actions is on hold, however, because past AAVMC leaders have been highly supportive of the accreditation of vocational-type schools.
Significantly, because USDE's first criterion for recognition of an accrediting agency requires that it must demonstrate *that its standards, policies, procedures, and decisions are widely accepted in the United States* by all domains within a profession, State Veterinary Medical Associations are in a powerful position to influence NACIQI to recommend withholding recognition of the COE pending the adoption of a restructured and wholly autonomous COE. The opportunity (occurs only once every 5 years) to weigh-in this year is extremely important and will come when NACIQI calls for written comments, probably in August or September, prior to its 2014 public meeting in Washington in December. It is therefore imperative for State Association Boards and Trustees to meet as quickly as possible to develop a position prior to the official call for written comments.

Please do not hesitate to contact me by email and/or telephone (conference calls are welcome) if you or colleagues require clarification or guidance on any of the issues discussed in this letter. I will be in touch with each Association as soon as NACIQI issues its call for written comments.
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,

W. Ron DeHaven, DVM, MBA
CEO and Executive Vice President
Letter to: State Veterinary Medical Association Presidents, Trustees & Board Members
From: Robert R. Marshak, DVM, DACVIM
Date: May 2014
Re: Response to Dr. Ron DeHaven’s Letter

I appreciate Dr. Ron DeHaven’s gracious gesture in sending me a copy of his letter to state veterinary medical associations in which he provides his response to my observations and assertions about deficiencies in the AVMA-COE’s accreditation policies, procedures and decisions. As an AVMA member (regular and honorary) for a total of 70 years I recognize that Dr. DeHaven is leading the organization during one of its most difficult eras and believe he deserves our patience and encouragement. Moreover, I do not doubt his sincerity in describing the COE and its decisions in glowing terms.

Nonetheless, the historical record and recent accreditations lead to a less sanguine assessment, i.e., that the COE’s decisions and mode of operation have caused real harm to the profession and the public it serves. That is why the integrity of the accreditation process should matter to all of us, whether we work as practitioners or academics, or in government or industry.

The consequences of the accreditation of substandard schools are already widespread and can only become direr as more of these schools come on-line. For practitioners, their existence profoundly affects economic status, the public they serve, the animal populations they care for, the quality of the entry-level graduates they hire, the general public’s perception of our profession, and the personal pleasure and pride in the quality and sophistication of our profession’s daily work. When schools, American and foreign, with inferior educational programs that produce large numbers of marginally trained graduates with huge debt burdens are granted full accreditation, the result is a growing oversupply of practitioners in a finite and increasingly competitive market. In challenging economic times many clients can’t, or choose not to, provide their animals with routine, or even essential, veterinary care. With less need for veterinary services, a surplus of disheartened, debt-burdened entry-level graduates face a diminished low-salary job market, and dashed hopes that one day they can afford a practice of their own or a home without a crushing mortgage. Established practitioners faced with fewer clients and less income suffer financial and emotional stress as they struggle to make ends meet and to retain valued associates, technicians, and clients.

While it is true that the COE cannot refuse to evaluate a new or existing school seeking accreditation on the grounds that there is a looming surplus of practitioners, it does have the right and responsibility to refuse to grant reasonable assurance or full accreditation to schools that clearly will not, or do not, meet its 11 published standards. In this the COE has failed the profession, demeaning and cheapening the DVM/VMD degree, and increasing substantially the annual output of marginally-educated entry-level graduates. The fact that foreign graduates, mainly American, come to practice in the US does not justify accrediting schools that do not meet the COE’s 11 standards, especially a Must-comply standard. It seems obvious to me that the COE is determined to continually weaken its standards to justify its accreditation of substandard schools, for example, by very recently replacing the fundamentally important MUST-comply standard 1—“that a school must be part of an institution of higher learning” with the ambiguous and essentially meaningless “a college must develop and follow its mission
"statement". This transparently duplicitous change makes no sense because the primary mission of every veterinary school is, and always has been, the preparation of students for competent entry-level clinical practice. Every existing veterinary school was founded on this basis. Each of the 11 standards, most are a copy of medical school standards, was deemed necessary in assuring the success of this primary mission. Being part of an institution of higher learning is the best guarantor that a school will strive to achieve and maintain excellence. Further, the AVMA Executive Board’s decision to accredit a rash of estimable foreign schools, on the basis of questionable premises, and despite pervasive opposition within the profession, is making yet another contribution to the oversupply of entry-level graduates.

In Dr. DeHaven’s letter he asserts that, throughout its history, as required by the US Department of Education’s (USDE) strict operational guidelines, the COE has demonstrated that its accrediting decisions are independent of and are not influenced by the AVMA. However, examination of how the COE has functioned under two Directors since the AVMA established its Division of Education and Research (E&R), in 1996, demonstrates clearly that COE autonomy and independence are false.

According to two former COE members, Dr. Donald Simmons, during his eleven years as E&R Director, dominated the COE with a heavy hand. He approved all consultative site visits, the first step in the accreditation process, after which, by virtue of the process during his tenure, the eventual granting of full accreditation was assured. He also chose the members and chairs of all site visit teams and accompanied COE members on site visits. He prepared and submitted reports to the USDE without consulting the COE membership.

Dr. David Granstrom, Dr. Simmons’ successor as E&R Director, was a ubiquitous presence at COE meetings and accompanied COE members on most site visits in the US and abroad, at times with a small team composed mainly of practitioners. Dr. Granstrom, rather than the COE chair and its members, prepared and submitted all required COE reports to the USDE. In an egregious violation of COE autonomy and confidentiality, members of the AVMA Executive Board, some taking notes, have been permitted to sit in on COE deliberations.

These observations do not support the contention that COE accreditation decisions have been independent of any AVMA influence and/or control as the USDE requires. I believe it is especially inappropriate for an E&R Director or any other AVMA officers, who report directly to the AVMA Executive Vice-President, to have any presence at COE deliberations, site visits, or preparation and submission of reports to the USDE.

In addition to the issue of COE independence, Dr. DeHaven cites many operational USDE and COE guidelines that he insists are meticulously adhered to or exceeded by COE participants, including the following:

The COE has clearly documented standards that address all areas of the DVM program and are applied evenly and fairly to all colleges seeking accreditation;

The guidelines are followed with great care throughout the accreditation process;

Consistent application of the standards is a primary concern; and for the last 92 years, the Council has consistently applied the standards to all schools that seek accreditation.
If the COE functioned as Dr. DeHaven describes, the profession would not now be confronted with a rash of fully accredited vocational-type schools in second or third-tier institutions that are characterized by large class size, high tuitions, inferior educational programs (low quality science), substandard clinical facilities (no teaching hospital), the outsourcing of students for most of their clinical training, and the absence of either a contemporary research enterprise or graduate and residency training programs.

To illustrate further the COE’s failure to follow the **strict guidelines** cited by Dr. DeHaven, it is worth examining how one such school (School-X) - I visited there on two occasions - achieved full accreditation. Based on several knowledgeable sources, a significant majority of COE members, including the COE chair, were strongly opposed to accreditation. A law suit on behalf of School-X was filed, and in response the AVMA Executive Board found a way to grant School-X full accreditation. In my opinion, this is a powerful example of how the AVMA Board lost sight of a fundamental responsibility – the protection, integrity, and future welfare of the profession – and compromised COE’s authority to decide whether or not School-X should be accredited.

School-X’s first two years, modeled after an educational system that was abandoned by another veterinary school, fail to give students the essential grounding for clinical training in years 3 and 4. Presented with 64 cases in a problem-based self-learning system, freshman and sophomore students are given the impossible task of extracting and retaining, *largely on their own*, the fundamentals of the essential and increasingly complex basic science disciplines that serve as the foundation for the science-based practice of clinical medicine. Most importantly, these students, deprived of a solid basic science foundation, are left without the platform needed to properly assess and successfully incorporate into their future practices the new technology and therapies that are emerging at a dizzying pace from academia and industry.

School-X’s on-campus clinical training is provided in a clinical facility built and administered by a corporate entity that owns hundreds of veterinary practices. With the possible exception of radiology, there are no on-campus boarded-specialists. Most of a student’s clinical training in years 3 and 4 takes place off-campus, mainly in private or corporate practices. The 4th year is especially chaotic. Students choose from a long list of possible off-campus sites where there is scant or any faculty oversight. At year’s end, prior to graduation, it is virtually impossible for faculty to be certain that each graduate has received at least minimal exposure to all essential clinical disciplines.

School-X has neither the human nor physical resources to offer a credible educational program in veterinary medicine. The on-campus faculty is sparse in most all disciplines and some essential disciplines, basic and clinical, are missing entirely. Nonetheless, despite the school’s vast and clearly evident deficiencies, Dr. Granstrom, and someone representing the American Association of Veterinary Medical Colleges (AAVMC), in response to questions from members of the USDE’s National Advisory Committee on Institutional Quality and Integrity (NACIQI), characterized School-X with such words as “outstanding”, “excellent,” and “fully qualified” for COE accreditation.

On the surface it is counterintuitive to accept that sitting deans, and other academics, including those associated with the AAVMC, who serve or have served on the COE, can defend the accreditation of schools with the characteristics of School-X. Based on experience as a dean at Penn for 14 years, I believe that sitting deans, to avoid the appearance of conflicts of interest, should recuse themselves from service on the COE. By virtue of their positions, deans are often exposed to pressures by political or commercial special interests. Moreover, in a profession with only 29 veterinary schools, a dean
serving on the COE, knowing that his/her own school will likely be evaluated by other deans, may consciously or sub-consciously tend to overlook deficiencies that might affect the COE’s decision to grant or withhold accreditation.

Although the process used in the selection of COE members has gained some credibility by significant AAVMC involvement (Note: The AAVMC has strongly supported, defended, and encouraged accreditation of School-X and all other substandard schools), I believe the selection process remains tainted by a perception of cronyism and concerns about the qualifications of those chosen to select the COE membership. According to a recent bylaws amendment the AVMA selection committee will consist of one member of the House Advisory Committee, two former COE members (private practitioners preferred) elected by the Executive Board, and two Executive Board Members elected by the Board. Unfortunately, the AVMA Executive Board provides no evidence that any of these individuals are qualified by academic backgrounds or other relevant experience or credentials to identify and choose outstanding accreditors for an institution as highly complex as a veterinary school. Without such backgrounds or relevant experience there can be no reasonable assurance that they will not choose cronies or others they know regardless of qualifications. Also, because Executive Board members on the selection committee are in a position to appoint like-minded individuals, their presence on the committee can be perceived as a conflict of interest. Further, I believe that the last 3 AVMA Presidents, all AVMA insiders, served as COE members before or around the time they took office. One of the Presidents, without any academic background or experience, brazenly campaigned on a platform that included the transformation of veterinary medical education. These facts contradict further the claim that the COE is wholly independent of AVMA influence.

Dr. DeHaven accurately states that the COE, an organization that accredits accreditors, has maintained recognition with the Council on Higher Education Accreditation (CHEA) since 1949. Although CHEA’s goal is to assure that an institution’s accreditation process advances academic quality and employs fair and appropriate procedures, it is difficult to understand how the AVMA-COE qualifies for CHEA recognition on the basis of the available evidence. Perhaps this is explained, in part, by the fact that CHEA personnel do not themselves examine self-study documents or conduct site visits and so are overly reliant on the word and testimony of the COE.

Finally, I believe that Dr. DeHaven, the AVMA Executive Board, and President of the AAVMC, acting together in good faith, have it within their power to remedy our presently dysfunctional accreditation system. I would respectfully suggest one approach, there are surely others, with two straightforward objectives: 1) Give the COE complete autonomy and independence; and 2) create a selection process that selects only highly qualified candidates for COE membership.

On the issue of genuine autonomy and independence allow the COE to function and make their decisions without the presence or participation in any form whatsoever by its sponsoring organizations, the AVMA or the AAVMC. The sponsoring organizations’ sole responsibility should be to provide the COE with an adequate budget and confidential work site, independent legal counsel, and its own dedicated staff sufficient to carry out all of its functions, including the preparation of all reports to the USDE. Such an arrangement would approximate the model adopted by the Liaison Committee for Medical Education to accredit medical schools and would assure the profession and the public that, except for exceptionally compelling reasons, all COE standards are applied rigorously, fairly and consistently.
To create a selection process that is capable of identifying outstanding, highly qualified candidates for COE membership, it is first necessary to create a selection committee composed of similarly qualified individuals, e.g., from veterinary academia, veterinarian members of the Institute of Medicine (soon to be re-named the National Academy of Medicine), and medical schools and industry where many excellent scientists hold the DVM/VMD degree. The composition and size of the COE, now rigidly fixed, also should be reconsidered to assure that there is significantly greater representation by basic scientists and academic clinicians.

I believe these are the essential reforms, however configured, that state veterinary medical associations and veterinary specialty colleges and organizations should lobby for by urging the USDE’s National Advisory Committee on Institutional Quality and Integrity (when it calls for written comments later this year) to withhold COE recognition until they are achieved.

Robert R. Marshak, DVM, DACVIM

Professor Emeritus of Medicine & Dean Emeritus, School of Veterinary Medicine.

University of Pennsylvania

rmashak@caltech.edu; Tel: 610-356-2244
May 9, 2014

Dear Colleagues,

Dr. Robert Marshak recently contacted state veterinary medical association leaders to ask them to provide written testimony to the U.S. Department of Education (USDE) National Advisory Committee for Institutional Quality and Integrity (NACIQI) opposing the continued recognition of the Council on Education (COE) as the official accrediting agency for professional veterinary medical programs.

It is important that you recognize that Dr. Marshak is not speaking on behalf of academic veterinary medicine as it is organized and represented through the Association of American Veterinary Medical Colleges (AAVMC). The AAVMC supports the continued recognition of the Council on Education as the official accrediting agency in academic veterinary medicine. The COE is broadly accepted throughout the educational community and widely recognized as the most appropriate accrediting agency in academic veterinary medicine.

Our position on this matter is based on a review and analysis that began in late 2012 when the COE filed a Petition for Continued Recognition with the USDE. As part of that process, AAVMC provided testimony in support of the COE during hearings held in Washington, D.C. on December 12, 2012. Following those hearings, USDE made several recommendations. The COE has responded to those recommendations and has taken action to assure it remains in strategic alignment with the changing needs of the profession and the society it serves.

Specifically, the selection process for COE members has been changed to a model more similar to the Liaison Committee on Medical Education (LCME), which accredits allopathic medical programs. The AVMA House of Delegates no longer elects COE Council members; instead, eight members representing the practitioner community are appointed by an AVMA selection committee made up of well-respected leaders in the veterinary profession, and eight members representing the academic community are appointed by an AAVMC selection committee. Both the AVMA and the AAVMC have established a nomination and selection process that requires a thorough review of the candidates’ credentials to assure that COE members have the necessary qualifications and experience to serve on the Council.

The COE must apply the standards of accreditation in a manner that assures that accredited colleges and schools of veterinary medicine produce qualified entry-level veterinarians. In contrast to Dr. Marshak’s assertion, it is not appropriate to use the accreditation process as a means to regulate or limit the number of veterinary graduates entering the workforce. We believe the composition of the Council (eight private-practicing veterinarians, eight veterinary academicians, one representative from the Canadian VMA, and three public members who are
not veterinarians) provides broad perspective, promotes reasoned discourse, and results in carefully considered decisions regarding accreditation of veterinary colleges.

Dr. Marshak is a distinguished educator who has made significant contributions to the veterinary medical profession. We respect his right to question the efficacy of the accreditation system and present his views and opinions regarding the need for change. However, important facts such as the size and quality of the applicant pool for admission to the nation’s schools and colleges of veterinary medicine must be presented clearly and accurately. Our data shows that the number of applicants per seat and the quality of the applicants has remained essentially unchanged over the past 10 years. When viewed from a broader historical perspective, there are no significant drops in the applicant pool over the past 30 years, and there was never a time during that period when there were seven applicants per seat as Dr. Marshak states. The pre-veterinary grade point average has steadily increased from 3.5 in 2004 to 3.6 in 2013. This information is available on the Public Data section of our website at http://aavmc.org/About-AAVMC/Public-Data.aspx

The present accreditation system is a standards-driven, evidence-based process. The COE is constantly evolving to meet the changing needs of the veterinary medical profession and it has demonstrated both the appropriateness and the capacity to consider evolving models of education in a rapidly changing world. Furthermore, we are confident that the COE operates freely and independently of any undue influences exerted by the AVMA, the AAVMC, or any other elements that would detract from the COE’s core mission to serve the public interest. We remain convinced that the existing system supports this process with integrity, effectiveness, and fidelity to the highest standards of public service.

I trust that you will carefully consider any action you choose to take with respect to the upcoming USDE hearings and I invite you to contact me directly with any questions or concerns you may have.

Sincerely,

Andrew T. Maccabe, DVM, MPH, JD
Executive Director
amaccabe@aavmc.org
202-371-9195, ext. 115
Letter to: State Veterinary Medical Associations, Specialty Colleges, and other Veterinary Organizations

From: Robert R. Marshak, DVM, DACVIM
Professor Emeritus of Medicine & Dean Emeritus
School of Veterinary Medicine, University of Pennsylvania

Date: May 26, 2014

Re: Response to Dr. Andrew Maccabe’s recent letter supporting the AVMA/AAVMC position on veterinary medical school accreditation. Dr. Maccabe is the Executive Director of the Association of American Veterinary Medical Colleges (AAVMC).

A CALL FOR ACTION

I write to address Dr. Andrew Maccabe’s recent letter which is aimed at discouraging recipients from writing to urge the USDE’s National Committee on Institutional Quality and Integrity (NACIQI) to withhold recognition of the AVMA-Council on Education (COE) as the accrediting agency for schools of veterinary medicine until the COE is granted complete autonomy and independence from its sponsoring organizations and until the process of selecting COE members is rid of cronyism and conflicts of interest. Such reforms are necessary to halt the proliferation and accreditation of more substandard vocational-type schools.

In countering Dr. Maccabe’s assertions it is relevant to note that he and the AAVMC have actively encouraged the full accreditation of veterinary schools that fail to meet AVMA-COE standards even as the standards have been weakened in what appears to be an attempt to justify retrospectively the accreditations of substandard schools. Aside from cheapening and debasing the DVM/VMD, the most serious consequences of these unfortunate accreditations will be felt far into the future as many thousands of marginally-trained entry-level graduates enter a market place that is already experiencing a surplus of practitioners.

Dr. Maccabe states that following the 2012 NACIQI hearings the COE responded to several USDE recommendations and “has taken action to assure it remains in strategic alignment with the changing needs of the profession and the society it serves.” I find it hard to believe that the changing needs of the profession and society are well served by encouraging and accrediting veterinary schools whose sole contribution to society is the mass production of poorly educated entry-level graduates.

I believe that most veterinarians would agree that the “changing needs” of the profession and society call for more, rather than less, top-quality science in the veterinary curriculum. Because we live in an age when biomedical science is advancing at a pace beyond anything witnessed in the history of mankind, veterinary school graduates without a solid platform in contemporary science and technology will be poorly prepared to understand and incorporate into their practices the remarkable developments in translational research, molecular medicine, genomics, stem cell biology, and so forth. Moreover, at a time when the AVMA and AAVMC are urging veterinary school graduates to consider non-practice careers, e.g., in research, academia, epidemiology, food safety and security, and industry, the COE is accrediting schools that do not prepare students to be able to consider seriously these exciting and important careers.
Dr. Maccabe and the COE are advocates of the distributive model of clinical education, believing that it obviates the need for the traditional teaching hospital and is in “strategic alignment with the changing needs of the profession and the society it serves.” Apparently they are not concerned that the substandard schools do not contribute to the creation of new knowledge, the discovery and cure of new diseases, the development of new procedures, and the education of the clinical and basic scientists we need to sustain our discovery-based medical profession.

Also, in advocating the distributive model as an acceptable substitute for the traditional teaching hospital, Dr. Maccabe and his COE colleagues fail to understand that outsourcing students for most or all of their clinical training has serious shortcomings. In the distributive model, who will be there to continually challenge and encourage students to question deeply, to cross boundaries between clinical disciplines, to make connections that produce deeper insights, to learn appropriate lessons from failure, to be consistent in doing their SOAPs, to experience the thrill of discovery and the potential for careers in research, and to appreciate that much of what they learn will be proven wrong a decade later?

In sum, I must conclude that Dr. Maccabe’s and the COE’s views are disconnected from and in extreme dis-alignment with the changing needs of the profession and the society it serves. Indeed, rather than “evolving to meet the changing needs of the veterinary medical profession” as Dr. Maccabe asserts, the COE’s decisions have slammed the brakes on the profession’s progress, moving us back towards an earlier, less science-based, era in veterinary medical education and practice.

Dr. Maccabe’s assertion that I believe it is “appropriate to use the accreditation process as a means to regulate or limit the number of veterinary graduates entering the workforce” is a gross misreading of what I have written on many occasions, i.e., that while the COE cannot refuse a school’s request to be considered for reasonable assurance, and eventually, for full accreditation, it is not obligated to grant either if it is determined that the school clearly cannot now or in the future meet the required standards.

Dr. Maccabe and Dr. DeHaven, AVMA Executive Vice-President, believe that the degree of COE autonomy and independence is comparable to that enjoyed by the Liaison Committee on Medical Education (LCME), the COE equivalent for medical school accreditation. Unfortunately, this not the case. The LCME conducts its evaluations and makes its decisions with “complete autonomy, with no discussion, review or participation by its sponsoring organizations” (AMA & AAMC). In contrast, the COE allows the Director of the AVMA’s Division of Education and Research, a position that reports directly to the AVMA Executive Vice President, to participate at COE meetings and to prepare and submit COE reports to the USDE. The COE does not have its own dedicated staff and legal counsel. It has also been customary for members of the AVMA Executive Board to sit-in during COE deliberations.

The composition of the COE is a related issue. Aside from the imbalance (a disproportionate number of COE members have no background, knowledge or experience in academic veterinary medicine or research), and the AVMA’s process for selecting COE members is rife with real or perceived conflicts of interest, e.g., the AVMA’s five person COE Selection Committee consists of one member chosen by the House of Delegates Advisory Committee and four members chosen by the AVMA Executive Board. It is hard to imagine that a committee so composed will select COE members who differ or deviate from AVMA’s policies and philosophy.

Finally, I believe it is evident that:
• The existing accreditation process is neither standards-driven nor evidence-based. It has failed our profession and the society we serve by degrading our educational system and thereby devaluing the DVM/VMD degree.

• Instead of evolving to meet the profession’s rapidly changing needs the AVMA, AAVMC, and the COE, seemingly unwilling to proactively address current realities and prepare for future opportunities, have set a retrograde course that is taking veterinary medical education back to the early and mid-years of the 20th century.

• To stop the further erosion of the American system of veterinary medical education it is imperative for state veterinary medical associations, other veterinary associations and organizations, including veterinary medical specialty colleges, and also individual veterinarians vote to prepare now to respond promptly to NACIQI’s call (expected in August or September) for written comments stating that they do not accept the COE’s present way of carrying out its functions and urging NACIQI members to recommend withholding recognition of the COE as the accrediting agency for schools of veterinary medicine until:

1. The COE is given complete autonomy and independence from its sponsoring organizations (the LCME model);

2. The committees selecting COE members are free of real or perceived conflicts of interest;

3. The composition of the COE is adjusted to include a greater proportion of members with outstanding backgrounds and experience in academia.

Please feel free to contact me with questions or comments by email (rmeshak@caltech.edu) or phone (610) 356-2244.
In the several letters I have sent to your VMA, you may recall that the USDE requires that continuing recognition of the AVMA’s Council on Education as the accrediting agency for veterinary medical schools is dependent on the veterinary profession’s wide acceptance of the Council’s decisions, policies and procedures. In these letters it has been my purpose to demonstrate that wide acceptance is no longer the case, and I am joined in this judgment by a rapidly growing number of colleagues in every sector of the profession including distinguished academics, veterinary members of the IOM, a recipient of the NMSci, former Council members, large and small animal practitioners, the president of Cornell, and a number of past and present deans.

I believe that the Council as presently constituted has clearly failed to act in the best interests of the profession by accrediting schools that don’t meet the COE’s 11 published standards – it is also quite clear that there has been a deliberate weakening of some standards in an apparent attempt to justify, retrospectively, the accreditation of these substandard schools. The unfortunate results of these actions include:

- The devaluation of the DVM/VMD degrees.
- The proliferation of more substandard veterinary schools.
- The production of increasingly large numbers of minimally educated entry-level graduates in a finite and increasingly competitive job market, a situation that will have profound long-term negative effects on the economic status of practitioners in private practice.
- And also the ultimate loss of our standing and prestige among the other health professions and in the eyes of the society we serve.

It also is critical to emphasize that these recently accredited schools contribute essentially nothing to the creation of new knowledge, to the discovery and cure of new diseases, to the development of new procedures, and to the education of the basic and clinical scientists we must have to sustain our discovery-based medical profession. Ask yourselves what our profession would look like if teaching hospitals became obsolete and our schools converted to the Western distributive model: there would be no academic referral hospitals, no research, no academic residencies, no diagnostic referral laboratories, no veterinary school outreach and continuing education programs, and each year, thousands of minimally
competent graduates who, as your potential new entry-level hires, would bring little of value to your practice.

In a recently established partnership, the AAVMC has joined the AVMA in the process of selecting members of the Council on Education. On the surface this appears to be a refreshing change because the AAVMC represents the academic side of veterinary medicine. Unfortunately, however, despite the fact that the present accreditation process is neither standards-driven nor evidence-based, the AAVMC has a history of welcoming and encouraging the accreditation of substandard schools and shares AVMA’s belief that the accreditation of such schools is in strategic alignment with the changing needs of both the profession and society.

I believe that the changing needs of the profession and society call for more, rather than less quality science in the veterinary curriculum, and with particular reference to a school’s clinical program. More than ever, veterinary students need to graduate with a solid platform in contemporary science and technology so that they can understand and incorporate into their current and future practices the phenomenal clinical advances that current work in translational research, molecular medicine, genomics, stem cell biology, and so forth, are already bringing to clinical practice. This trend is accelerating rapidly and will leave those who are minimally prepared further and further behind.

It defies simple reasoning that at a time when the AVMA and AAVMC are urging veterinary graduates to consider non-practice careers in research, academia, epidemiology, food safety and security, and in industry, the Council is defending the accreditation of schools that do not prepare students to be seriously considered for such careers.

Instead of evolving to meet the profession’s rapidly changing needs the Council, apparently unable to comprehend and to proactively address current realities and prepare for future opportunities, have set a retrograde course, taking our profession back to a much earlier era of low-quality science and apprenticeships.

To stop the further erosion of our educational system I am asking the NJVMA to vote today to respond promptly to the Department of Education’s National Advisory Committee for Institutional Quality and Integrity’s call for written comments, informing the National Advisory Committee that you do not accept
the Council’s present way of carrying out its accreditation functions and urging National Committee to recommend withholding COE recognition until 3 conditions are met:

1. The Council on Education is given complete autonomy and independence from its sponsoring organizations (the LCME model). What’s needed is a firewall that allows the COE to function and make decisions *without the presence or participation in any form whatsoever* by its sponsoring organizations, the AVMA or the AAVMC.

2. The committees selecting Council on Education members should be qualified by background and experience to choose outstanding individuals who are free of real or perceived conflicts of interest. This would exclude Executive Board Directors, AVMA and AAVMC officers, and other AVMA and AAVMC personnel. As an AVMA member for 70 years I have been struck by the observation that the AVMA operates by a continuous recycling of its active participants from year to year, from committee to committee, and from position to position, thus assuring that the AVMA philosophy and agenda are closely adhered to.

3. The composition of the Council must adjusted to include a greater proportion of members with outstanding backgrounds and experience in veterinary medical education.

Three final points:

- Substandard schools like to equate educational quality with their student’s high National Board Exam pass rates but fail to point out that these exams are specifically designed and structured to identify the minimally competent graduate. Moreover, The National Board Exam does not test a graduate’s knowledge of the basic sciences, the essential foundation of clinical practice.
- I do not accept that the AVMA is *The* voice of veterinary medicine; it is only one voice among many. Think AAHA, AAEP, the specialty college boards, state VMAs, etc.
Despite strong opposition from within the profession, the Executive Board voted to continue foreign school accreditations, a practice I believe exceeds the Council’s competence and is especially inappropriate when one considers the Council’s performance in the accreditation of North American schools. I prefer to believe that the AVMA is the American VMA, not the World VMA. I believe, therefore, that the COE would be wise to adopt the LCME’s policy of not accrediting foreign or for-profit schools and that it conserve and focus its energies and resources on the evaluation of North American schools, its original and sensible purpose.
June 13, 2014

Dear Colleagues,

This letter is in response to a recent communication from Dr. Robert Marshak requesting state veterinary medical association and other veterinary organizations to provide comments to the U.S. Department of Education (USDE) National Advisory Committee on Institutional Quality and Integrity (NACIQI) recommending withholding of AVMA Council on Education (COE) recognition. The COE respects Dr. Marshak’s contributions and long service to our profession; however, respectfully disagrees with his opinion on this issue.

The AVMA COE is committed to a quality accreditation process that ensures that all accredited colleges of veterinary medicine meet the Standards of Accreditation and that students enrolled in those colleges are prepared for entry-level positions in our profession. The members of the COE are dedicated individuals who provide broad representation of the many facets of our profession and include academic veterinarians, private practitioners, and members of the public, who are not affiliated with veterinary medicine. The Council understands that the needs of the profession are dynamic and evaluates all models of education based on the Standards of Accreditation.

Standard requirements for colleges of veterinary medicine have been developed with input from deans and faculty of colleges of veterinary medicine, veterinary practitioners, veterinary students, the COE, and the public. These standard requirements are also subject to ongoing review and revision, again with input from all stakeholders.

All colleges are evaluated at least every seven years and provide a detailed self-study to the COE which documents how the college is meeting the Standards of Accreditation and undergo an intensive on-site visit with trained site visitors to validate the information provided. In addition, colleges are monitored on an annual basis through detailed interim reports which update the Council on their progress in addressing issues identified on the last site visit or in previous interim reports and on any changes that may impact the Standards.

To ensure the quality of the accreditation process, the COE also voluntarily seeks recognition from CHEA and has been recognized as an accrediting body for veterinary medicine since 1949. The 2012 review by CHEA found no deficiencies. In addition, the COE is a member of the Association of Specialized and Professional Accreditors (ASPA).
The COE has been recognized by the USDE as the accrediting body for veterinary medicine since 1952. As part of the ongoing refinement of the accreditation process the COE initiated changes, which included the development of two selection committees to appoint members of the Council, the AVMA COE Selection Committee and the AAVMC COE Selection Committee. The Council continues to operate as an independent body in considering the accreditation status of veterinary colleges.

The Council is committed to maintaining the highest quality of veterinary medical education that will meet the needs of the profession and the public now and in the future.

Sincerely,

Council on Education Executive Committee

Dr. Jayne Jensen, DVM, Chair
Dr. Fred Derksen, DVM, PhD, DACVIM, Vice-Chair
Dr. John Pascoe, BVSc, PhD, DACVS
Dr. Nicole Roberts, MSEd, PhD