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Ms. Robin Greathouse
Accreditation and State Liaison
Room 7105, MS 8509
U.S. Department of Education
1990 K Street, NW
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Dear Ms. Greathouse:

I am writing you to express my concerns with the recognition of the Council on Education (COE) of the American Veterinary Medical Association (AVMA) as the accrediting body for schools and colleges of veterinary medicine in the United States. However, before I detail these, I believe it would be helpful if I briefly outline my background.

I received my veterinary degree from Texas A&M University in 1964, a Masters of Public Health in 1966, and a PhD in microbiology in 1975. After a 26-year career in medical research, I joined the Louisiana State University (LSU) School of Veterinary Medicine (SVM) as a one of the school's six department heads. In 1995 I became Director of the Louisiana Veterinary Medical Diagnostic Laboratory in addition to my department head position. I became dean of the LSU SVM in April 1999 and served in that position until I retired on June 30th of this year. During my tenure at LSU, I participated in three COE accreditation site visits.

It would also be helpful for you to know that I was a member of the National Board Examination Committee (NBEC) for veterinary medicine for nine years (1993-2002). This organization now known as the National Board of Veterinary Medical Examiners (NBVME) is responsible for the writing and administration of the national veterinary licensing examination. Currently I serve as the NBVME representative to the Program for the Assessment of Veterinary Education Equivalence (PAVE). PAVE is a program of the American Association of Veterinary State Boards that provides a mechanism for the certification of graduates from non-AVMA accredited schools of veterinary medicine.

Also, I would like to make it clear that although I am the former dean of the LSU SVM and have been granted the honorary title of Dean Emeritus, this correspondence should in no way be construed as an official position of LSU or the LSU SVM. I am writing this as a concerned private citizen.

I was first made aware of the AVMA's almost obsessive desire to control anything to do with veterinary medicine in 1993 when I became a member of the NBEC. At that time, the development of the national licensing examination for veterinary medicine was controlled by the AVMA because the NBEC was a committee of the AVMA. In addition, the AVMA controlled the certification of graduates of non-AVMA accredited schools (frequently referred to as "foreign" graduates) through its Education Commission for Foreign Veterinary Graduates (ECFVG) program. Although licensure is a function of state regulatory boards, virtually all the states used the national board test for U.S graduates and the ECFVG program for graduates of non-AVMA accredited schools. Thus in 1993, the AVMA essentially had a monopoly on the accreditation of schools, the licensure of the graduates from those schools, and the licensure of graduates of foreign veterinary schools.

Any attempt to break the aforementioned monopoly has been met with resistance by the AVMA. In 1994 the NBEC (now known as the NBVME) members decided to incorporate and move to an independent status. At first this appeared to be an amicable separation, but late in the process of incorporation AVMA leadership appealed to the members to continue as a committee of the AVMA. The members refused, and the relationship between the NBVME and the AVMA has been strained ever since.

The AVMA is a not-for-profit association representing more than 73,000 veterinarians working in private and corporate practice, government, industry, academia, and uniformed services. The AVMA's primary mission is to act as an advocate for its members and the profession as a whole. Although I have never known the AVMA to abuse their recognition as the accrediting body for veterinary schools, I believe it is a potential conflict of interest for an organization whose primary mission is to represent and lobby for veterinary practitioners to serve in this capacity, and it has the potential for abuse. As far as I am aware, the American Medical Association does not accredit medical schools nor does the American Dental Association accredit dental schools.

Schools and colleges of veterinary medicine are very complex institutions and far more complicated than the usual school or college at a major state university. The LSU SVM resides in the state's flagship university, which has over 30,000 undergraduate students. The SVM is the largest budgetary unit on the campus and is 10% of the university's state-appropriated budget. The total SVM budget is over \$36M, half of which is derived from self-generated funds. The LSU SVM has approximately 85 faculty, over 300 staff, and approximately 400 students. The teaching hospital, which is vital to the education of the fourth-year students, treats over 18,000 animals a year (approximately 2/3's are referral cases) and faculty consult on the telephone throughout the state and nation on twice that number of cases. The school's clinical and research facilities rival that of many human hospitals. The school has digital radiography, computerized axial tomography (CAT scan), nuclear scintigraphy, and external beam radiation therapy machine that is superior to that found in many human hospitals, and the list goes on. The school's diagnostic laboratory receives over 30,000 accessions a year, most from practitioners in Louisiana, but some come from international sources. The school's federally funded research program is over \$5M a year.

I detail the complexities of a modern veterinary school to try and illustrate to you why it is so important that impartial, full-time professionals be responsible for accreditation. As you know, the COE of the AVMA is not a professional accrediting agency. Its membership is made up of part-time volunteers elected or appointed to six-year terms. The Council is managed by a non-voting senior AVMA staff member. COE membership consists of at least five veterinary medical college faculty members, at least six private practitioners, one at-large member, one veterinary researcher, one public health veterinarian, and one non-private practice, non-academic veterinarian. Additionally, the COE appoints three public members; one Canadian veterinarian is appointed and funded by the Canadian Veterinary Medical Association. Of the 18-19 voting members on the COE only the five veterinary college faculty members are remotely familiar with the complex educational issues of a modern veterinary school. Although veterinary college faculty would appear to be essential members of the COE, I wonder if some might believe it is a fundamental conflict of interest for a faculty member of one school to pass judgment on the educational environment of another school.

The process by which members of the COE are selected can be based more on politics than qualifications. The AVMA House of Delegates (HOD) elects the majority of the COE membership. The HOD is the legislative body of the AVMA and is made up of representatives from each state's veterinary organization and from constituent allied veterinary organizations, such as the American Association of Equine Practitioners. The HOD's responsibilities include electing the president-elect, the vice president, the president (when necessary), and council members. Because the election process is highly politicized with delegates trading votes to have their favorite candidates elected to office or council, little attention is paid to a candidate's qualifications to be a member of the COE.

As I mentioned above, the COE is essentially made up of unpaid volunteers, most with fulltime jobs. Most members of the COE participate in two to three accreditations per year. Each accreditation site visit entails at least four days away from home and work, and this does not include the time spent studying each school's self study of approximately 90-100 pages. Because COE members have limited experience in evaluating schools and colleges of veterinary medicine, and because most have little extra time to devote to the task, there is an inordinate dependency on the principal AVMA staff, chiefly Dr. Donald Simmons, Director of the Division of Education and Research.

Finally, COE is not consistent in the way it interprets the essentials of accreditation. There are numerous examples of this, but probably the most glaring of these has been the "reasonable assurance" of accreditation granted Western University of Health Sciences College of Veterinary Medicine in Pomona, California. Western has virtually no veterinary teaching hospital and no research program, two of the 11 essentials of accreditation.

Western University is a private non-profit university with a number of medical programs. The first students in the veterinary college are now entering their fourth year. This school is a radical departure from the 27 U.S. and 4 Canadian schools and colleges of veterinary medicine. In all other North American schools, the basic science education taught in the first two years are, for the most part, rigorous lecture and laboratory courses in physiology,

pharmacology, anatomy, histology, microbiology, parasitology, immunology, toxicology, and pathology.

Western University, on the other hand, uses the Problem Based Learning (PBL) system to train students in the first two years of their veterinary education. A series of 64 cases are used in the first 2 years. Students, working in small groups, are asked to work through these problems that have multiple learning objectives. Despite the fact that this system of learning failed when tried at Mississippi State University College of Veterinary Medicine, Western continues to pursue and promote PBL as a novel and superior method of educating veterinarians. Western, in fact, purchased many of the PBL problems from Mississippi State as they were phasing out the program.

Western University's approach to clinical training in the third and fourth years is even more radical. In U.S. and Canadian schools other than Western, the third year is largely clinical training in medicine and surgery. Specialists who are experts in their fields teach these courses. The fourth year (and in some cases part of the third year) is dedicated to hands on clinical care of animals in the veterinary teaching hospital. This is done under the close supervision of faculty and veterinary residents training in the various veterinary specialties. Students are permitted limited rotations through private practices that have been approved for clinical rotations by the school.

Because Western has no veterinary teaching hospital, third-year students are assigned to study and work in 16 different rotations of two weeks each in private practices or institutions in the southern California area. Fourth-year students are assigned to study and work in 8 different rotations of four weeks each. Students are required to satisfy pre-determined learning objectives and detailed skills checklists. The rotations are not limited by geography and may be national or international.

During the LSU SVM's last site visit by the COE, almost 50% of the committee's time was spent in the veterinary teaching hospital and clinics. The committee was critical of our equine isolation facility, the fact that students and clinicians had to go through the laundry room to access the companion animal isolation area, and even cracks in the floor of the equine surgery area. The prospect of the COE traveling to all the various clinics in southern California and around the nation and overseas to inspect isolation facilities, safety, and cracks in the floor is ludicrous. More importantly what will be the quality control of the education students receive at these remote sites? The COE has bent or ignored their very own standards to grant possible accreditation to the school.

In another example of the COE's inconsistency in the interpretation of the 11 essentials of accreditation, the Council has now scheduled accreditation site visits for offshore veterinary schools in the Caribbean. These schools have neither teaching hospitals nor research programs. I am told the justification for ignoring the teaching hospital requirement is that the schools all have arrangements with AVMA accredited U.S. schools for the fourth year training. I do not know what the rationale for ignoring the research requirement is.

In summary my objections to the AVMA functioning as the national accrediting agency for schools and colleges of veterinary medicine are as follows:

1. The AVMA is an organization whose principal purpose is to represent the interests, particularly financial, of the veterinary practitioner and not necessarily the concerns of veterinary education or the public.
2. The COE of the AVMA is not a professional educational accrediting agency. It is composed of volunteer members elected by the AVMA HOD.
3. The process by which members of the COE are selected is highly political and is not based on qualifications.
4. Because COE members are not professional evaluators and serve limited terms, the AVMA staff member who serves at the will of the AVMA leadership manages the COE and exerts undue influence on the process.
5. The volunteer members of the COE generally have full-time jobs, making it difficult to gain the experience needed to accredit a complex educational institution and devote the time required to adequately perform a site visits and other accreditation tasks.
6. The 11 essentials of accreditation are applied inconsistently.

I believe that the U.S. Department of Education should recommend establishment of an independent professional accrediting body for schools and colleges of veterinary medicine, such as has been done for both the medical and dental professions. This new organization should be separate and distinct from practitioner, state licensure, or national testing service organizations.

Thank you for your assistance.

Sincerely yours,

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