

A NAVEC BLUEPRINT FOR ACTION

Build the Alternative

A Construction Plan for Independent Veterinary Credentialing and Examination

No licensing board can currently verify the fairness or accuracy of the examination it requires — because the system provides no means of verification. The answer is not to wait for reform. It is to build: two independent organizations, on a nine-to-twelve-month default schedule, governed by the boards themselves.

No board can verify the examination it requires

NAVEC's own position, stated to state Attorneys General: as of today, no licensing board can independently verify that the examination it requires is fair, accurately scored, or properly maintained — not because unfairness has been proven, but because the system provides no means of verification. For a mandatory gate, non-verifiability is itself disqualifying.

WHAT EXISTS

The International Council for Veterinary Assessment (ICVA) publishes an annual report and a technical summary of roughly a dozen pages. Peer standard — the National Council of State Boards of Nursing (NCSBN) and the National Board of Medical Examiners (NBME): quarterly statistics, annual volumes, technical briefs, published triennial standard-setting, standing research programs. No third-party accreditation — NCCA (National Commission for Certifying Agencies) or ANSI/ISO 17024 — attaches to the North American Veterinary Licensing Examination (NAVLE). Limited materials exist; documentation sufficient for mandatory reliance does not.

THE REVIEW

After the audit controversy documented by VIN News (the Veterinary Information Network's news service), ICVA announced an external review — engaged, per the public record, through outside counsel, with results expected in early 2027. It is not a means by which any board can verify the examination today.

DEC 15, 2025

The U.S. Department of Justice Antitrust Division files a Statement of Interest in Lincoln Memorial University v. American Veterinary Medical Association — LMU v. AVMA (E.D. Tenn.) — federal engagement with veterinary gatekeeping, in the government's own voice.

OCT 2025

Lieff Cabraser Heimann & Bernstein issues a pre-litigation notice — per trade-press reporting — to AVMA, ICVA, and NBME raising allegations about the NAVLE's administration. Their allegations — cited as a fact about the environment.

Reform is welcome. It does not create verification today — and it never creates an alternative. Building one does.

Two pathways is the norm. One is the anomaly.

Medicine's proof

The United States Medical Licensing Examination (USMLE) and the Comprehensive Osteopathic Medical Licensing Examination (COMLEX) — two complete licensing examinations, two organizations — have run side by side for decades. Every state medical board accepts either. Concordance is studied and published. Coexistence produced discipline, not chaos.

Veterinary medicine's own proof

States already accept either of two foreign-graduate credentialing pathways — Educational Commission for Foreign Veterinary Graduates (ECFVG) and Program for the Assessment of Veterinary Education Equivalence (PAVE) — today. The dual-acceptance mechanism this plan needs is one the profession already operates.

Single point of failure

The 2020 test-center closures disrupted NAVLE administration nationally. Critical infrastructure gets redundancy as ordinary policy — and a profession's sole licensure gate is critical infrastructure.

NAVEC's structural position, held on the merits: no profession should route its only gateway through a single organization — and reform of a monopoly, however complete, is not a substitute for the existence of alternatives.

Two independent organizations — neither owned by NAVEC

THE CREDENTIALS COMMISSION

Foreign veterinary graduates

- Modeled on Educational Commission for Foreign Medical Graduates (ECFMG)/Intealth — medicine's independent commission since 1956
- Primary-source credential verification, contracted to existing infrastructure
- Distributed clinical-competence routes replace the single-exam bottleneck
- Target candidate cost: \$2,000–3,500 all-in (est.) vs. the current pathway's several-fold higher total

THE EXAMINATION COUNCIL

National licensing examination

- Modeled on NCSBN/National Council Licensure Examination (NCLEX) — the state boards themselves hold the votes
- 300 scored items; conventional, standards-compliant development
- Transparency written into bylaws: technical reports, independent scoring audits, third-party accreditation
- Published fee schedule (est.): \$450–495 at launch, stepping to \$375–425 as adoption grows — vs. the NAVLE's \$825 (2026–27)

Working names only — naming and incorporation belong to the founders: state boards, a compact, universities, philanthropy, and the profession.

The regulators own the gate.

Nursing, medicine, and pharmacy all place the state licensing boards inside examination governance. Veterinary medicine is the outlier. Both proposed organizations correct this by construction:

Member-board control

State veterinary boards are the voting members. Passing standards and fees are ratified by their assembled delegates — active supervision by state actors, embedded in the design (NC Dental v. FTC).

Entanglement prohibited

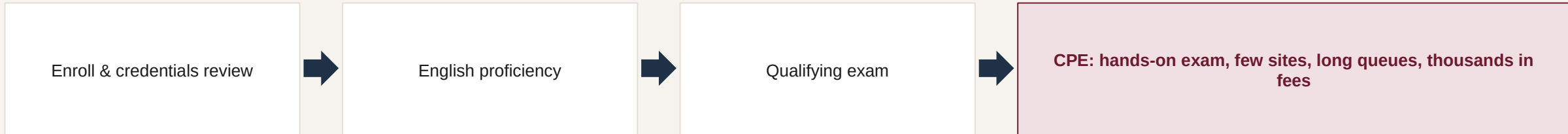
No shared personnel, facilities, or budget with any trade association — the standard the May 2026 rulemaking consensus set for accreditors, adopted here by charter from day one.

Public seats & separated powers

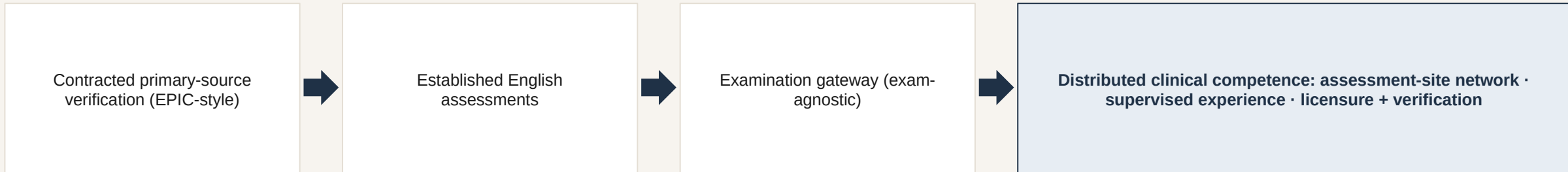
Public members on every board; exam development separated from eligibility and appeals; an audit committee chaired by a public member certifies transparency compliance annually.

The pathway, redesigned on medicine's evidence

TODAY — TRADE-ASSOCIATION PATHWAY



PROPOSED — INDEPENDENT COMMISSION



The precedent: medicine discontinued its centralized clinical skills exam in 2021 and replaced it with validated pathways (ECFMG). The bottleneck is a design choice — and multiple sites, one published rubric, calibrated assessors is the fix. Target all-in fees: \$2,000–3,500 (est.).

Eleven seats, capture-resistant by charter

4

State licensing board representatives, elected by participating boards

2

Public members — no financial interest in the profession or testing

2

Veterinary academicians (max one per institution)

2

Practicing veterinarians — at least one internationally trained licensee

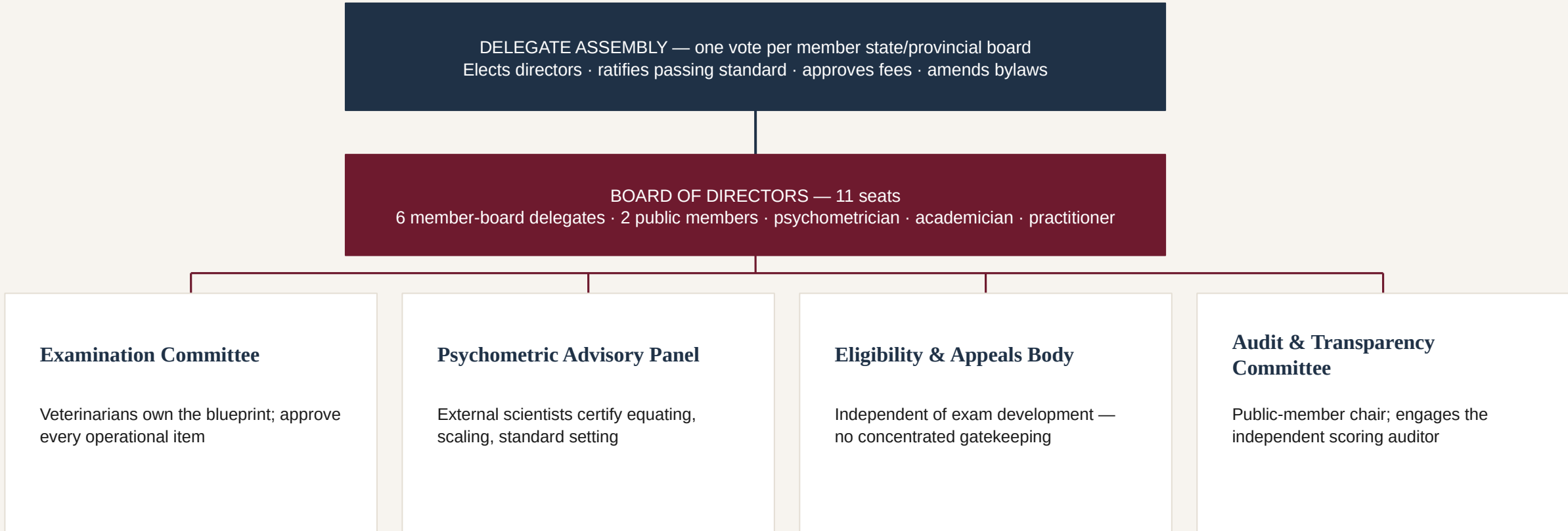
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Credentialing / measurement professional

Codified obligations

- Entanglement clause: no shared personnel, facilities, or budget with any trade association
- Three-year staggered terms, renewable once
- Published annual report: volumes, processing times, certification rates, outcomes
- Published fee schedule and audited financials
- Processing-time targets — with performance against them reported

The NCSBN model, applied to veterinary licensure



Separated powers: the people who build the test never decide who may sit for it — and a public member signs the transparency audit.

Obligations in the bylaws — not concessions

Annual technical report

Reliability, standard error, item-pool statistics, equating — the NBME/NCSBN standard.

Pass rates & policies

School-level pass rates (small-cell protected); every candidate policy published with its validity evidence.

Independent scoring audit

An external firm re-derives sample scores from response data, annually, published.

No unexamined attempt limits

No lifetime attempt cap absent published validity evidence — with a remediation-and-return pathway required.

Published standard setting

Full documentation of every passing-standard study, on a fixed review cycle.

Third-party accreditation

NCCA and/or ANSI/ISO 17024 within three operational years — converting promises into audited compliance.

Each is amendable only by the Delegate Assembly — the assembled state boards themselves.

Deploy in twelve months. Develop for thirty-six.

DEPLOY — MONTHS 0–12

MO 0–2	Governance + blueprint	Organizing committee of board delegates (AAVSB as convening option); Competency-Based Veterinary Education (CBVE)-crosswalk interim blueprint
MO 1–4	Item pool	10–15 domain committees in parallel; technology-assisted drafting, veterinarians author of record
MO 4–5	National field test	One coordinated window; ~2,000 volunteer seniors at cooperating schools
MO 5	Standard setting	Modified-Angoff panel; Delegate Assembly ratifies
MO 5–6	Delivery live	Direct Prometric-class test-center contract; security architecture
MO 6–12	First administrations	Month 6 minimum; months 9–12 the default — technical report published from window one

DEVELOP — MONTHS 12–36

- Full independent practice analysis → second-generation blueprint
- Operational pool grows past 800 items
- NCCA and/or ANSI/ISO 17024 accreditation
- Passing standard confirmed against accumulating data
- Published fee step-down as adoption grows
- Annual technical reports + independent scoring audits as standing cadence

Launch is month nine to twelve; six at the emergency minimum. Maturity is a published program — not a prerequisite.

Technology accelerates drafting. Veterinarians and psychometricians decide.

Establishment provenance

NBME's own research program has published on automated item generation for over a decade (Gierl & Lai line). Technology-assisted drafting is in documented use across large-scale assessment.

Unchanged safeguards

Every operational item's author of record is the veterinarian committee that reviewed and approved it. Separate bias-and-sensitivity review. No item is ever scored without acceptable pretest performance data.

The economics

Traditional development: ~\$1,500–2,500 per operational item (published estimates). Draft-stage assistance credibly cuts drafting-and-revision cost 30–50% — the budget assumes the conservative end.

The psychometric gold standard is item performance data — required here for every item, regardless of how its first draft was produced.

Lean capital in — self-funding out

PHASE 0 · FORMATION

Months 0–2

\$250–400K

- Practice analysis & blueprint
- Legal formation, bylaws, charter
- Convening the founding boards

PHASE 1 · BUILD

Months 1–12

\$2.2–3.6M

- 450–500-item launch pool via parallel committees + contractor surge
- Psychometrics: field-test analysis, equating, standard setting
- Delivery integration, security, national field test, core staff

PHASE 2 · OPERATIONS

Self-funding

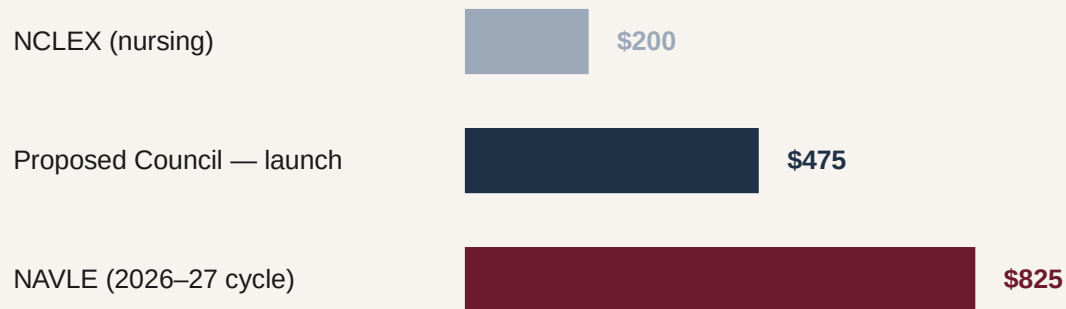
\$1.8–2.5M/yr fixed

- 5–6 core staff; contracted psychometrics
- Continuous item refresh + independent scoring audit
- Variable delivery ~\$75–100 per candidate

Total capital to launch the Examination Council on the twelve-month schedule: ≈ \$2.5–4M — sized for a consortium, with no single funder able to dominate governance. The Credentials Commission launches for ≈ \$0.8–1.5M on the same rules. All figures are estimates with stated assumptions.

Charge less — and publish the schedule

EXAM FEE COMPARISON



NCLEX at \$200 with high volume is the standing proof: fees in this class reflect volume and governance choices, not intrinsic cost.

The published fee schedule (estimates)

- Launch: \$450–495 — 40–45% below the incumbent's \$825, its third consecutive increase (\$760 → \$800 → \$825); founding-state launch contracts carry early volume by design
- At sustained volume above ~7,000 administrations: \$375–425, with surpluses returned as fee reductions by bylaw
- Why it works: direct Prometric-class delivery contracting, contracted psychometrics, technology-assisted drafting under expert review — a 2026 cost base. ICVA's own reports note NBME as the NAVLE's co-developer under arrangements dating to the exam's creation; a new program simply buys these functions from today's competitive market
- Self-sufficiency from fees alone ≈ 4,800–6,500 candidates/yr at the launch fee — vs. 9,301 NAVLE administrations reported in 2024–25

Three pathways — two chosen, one triggered

PATH B · PARALLEL PATHWAY — FIRST

- Most states set the required exam by regulation or board policy — the amendment is ordinary rulemaking
- Dual acceptance already works in veterinary licensure: states accept either ECFVG or PAVE today
- Candidates choose; the new instrument earns share on fee, transparency, and experience
- Plausible first movers: states already engaged (WI, TX, FL, PA among them) and shortage-declared states
- Working target: 5–8 adopting states within two years of launch

PATH A · FULL SUCCESSION — IF FAILURE PERSISTS

- The Delegate Assembly is the same body that decides what jurisdictions require — collective action is built in
- A veterinary licensure compact effort, supported by the American Association of Veterinary State Boards (AAVSB), is in development — if enacted, a future multi-state lever
- No federal approval needed: exam designation involves no Department of Education recognition
- Path B builds the operational record that makes Path A executable

PATH C · ENFORCEMENT-TRIGGERED — if a court order, consent decree, federal agency action, or Attorney General enforcement action makes continued reliance on the incumbent gate unlawful or indefensible, state rules become implementation mechanics — the Layer 1–3 continuity machinery executes the transition.

A sudden stop is a managed bridge — not a void

Unaffected

Every licensed veterinarian. Licenses are the property of the states, not of any examination vendor — renewal cycles do not run through ICVA.

Already protected

Every candidate with a passing score. Score reports are transmitted to the licensing boards, which hold them in their own files and license on the records in their possession.

The real question

The forward flow: roughly 3,500–4,500 new graduates a year (Association of American Veterinary Medical Colleges — AAVMC — data), plus foreign-pathway candidates, approaching application windows.

Enforcement decisions belong to Attorneys General and courts — and courts characteristically build transition terms into remedies for essential functions. NAVEC's contribution is feasibility: this architecture makes a remedy on any timeline, including immediate relief, operationally survivable. Feasibility objections are answered; continuity cannot be the excuse for delaying accountability.

Bottom line: the plan avoids a cliff edge — licensed veterinarians stay licensed, passed candidates keep their scores, and the forward flow is bridged by permits, supervised practice, emergency rules, and transition terms while examination-based licensure resumes: 9–12 months default, six at the emergency minimum.

Blueprint author. Convener. Outside monitor. Nothing more.

What NAVEC contributes

- This blueprint and the comparative research beneath it
- Convening first conversations among boards, funders, and the profession
- Public accountability monitoring — applied identically to the new institutions and the incumbents

What NAVEC does not hold

- No seat on any board
- No veto, contract, or financial interest
- Bound out by the same entanglement clause that binds the trade associations

A successor institution captured by its advocates would reproduce the disease it was designed to cure.

The hard parts, named

Adoption chicken-and-egg

States hesitate on an unproven exam; the exam can't prove itself without states. Mitigations: pilots, founding-state contracts, third-party accreditation. The first two years are the hardest part of this design.

Academic scrutiny of modern tools

Welcome it. Every item is veterinarian-approved, bias-reviewed, and empirically pretested — and documented in public technical reports the incumbent has never published. Engage the measurement community early; let evidence carry it.

Incumbent response

If a credible alternative triggers real reform — lower fees, published technical reports, governance change — that is a version of success. The blueprint loses nothing by making itself unnecessary.

Lean-budget execution

Contract, don't build: psychometrics, delivery, and verification purchased from established firms keeps the permanent organization small and the fixed-cost base survivable.

SOURCES

The record, verifiable by anyone

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- Lisa Wogan, VIN News Service, reporting on the NAVLE audit controversy and ICVA’s engagement of ACS Ventures through outside counsel (Dorsey & Whitney), with review results expected early 2027, <https://news.vin.com> (VIN membership may be required)
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- NCSBN, “NCLEX Statistics” (quarterly pass rates; annual statistics volumes), <https://www.ncsbn.org/exams/exam-statistics-and-publications.page>; NCSBN, “2024 NCLEX Examination Statistics”
- Pearson VUE / NCSBN, NCLEX registration fee (\$200 U.S.), <https://www.nclex.com/fees-payment.page>
- Federation of State Medical Boards and National Board of Osteopathic Medical Examiners: state medical boards accept either the USMLE or the COMLEX-USA for licensure; see <https://www.fsmb.org> and NBOME, <https://www.nbome.org/assessments/comlex-usa/>; on score concordance, see published USMLE/COMLEX concordance research
- USMLE, announcements suspending Step 2 CS (Mar. 16, 2020) and discontinuing it permanently (Jan. 26, 2021), <https://www.usmle.org/usmle-announcements>
- Educational Commission for Foreign Medical Graduates (est. 1956) / Intealth: history, certification requirements, Pathways (created 2020), and EPIC, <https://www.ecfmg.org> and <https://www.intealth.org>
- Institute for Credentialing Excellence, NCCA Accreditation, <https://www.credentialingexcellence.org/ncca>; ANSI National Accreditation Board, ISO/IEC 17024 accreditation for personnel certification bodies, <https://anab.ansi.org>
- American Association of Veterinary State Boards, “PAVE — Program for the Assessment of Veterinary Education Equivalence” (structure; participating jurisdictions; standards and policies), <https://www.aavsb.org/pave>
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- Texas: 22 Tex. Admin. Code § 571.11 (provisional licensure), <https://www.law.cornell.edu/regulations/texas/22-Tex-Admin-Code-SS-571-11/>; Pennsylvania: Veterinary Medicine Practice Act, 63 P.S. § 485.10 (temporary permits), <https://www.legis.state.pa.us> (both verified July 5, 2026)

Reform is welcome.

Alternatives are necessary.

Two organizations. Roughly \$3.3–5.5M in combined capital. Nine to twelve months to first administrations on the default schedule — six at the emergency minimum. Governed by the regulators, documented to the peer-profession standard — and verifiable from day one.

The full designs are set out in the two companion white papers; the call to action, in “An Open Call to Build.”

Policy blueprints, not existing institutions. NAVEC will hold no seat, veto, contract, or financial interest in what is proposed here. Figures are estimates pending Phase 0 validation.

North American Veterinary Ethics Council · navec.org · a nonprofit for fairness, transparency, and accountability in veterinary licensing