



NAVEC RESEARCH REPORT · JULY 2026

Despite Equal Merit

An Examination of the Evidence and Allegations of Racial and Ethnic Targeting in the North American Veterinary Licensing Examination

This is not a study of demographic disparities. The evidence examined here is of a different kind: specific allegations and documented irregularities of score outcomes correlated with race and ethnicity among candidates of demonstrated equal merit and academic readiness — candidates who trained at accredited programs, passed the examiner's own official predictive instrument, and were failed by an examination no party outside the examiner can inspect, rescore, or appeal.

This report documents effects, structures, timelines, and statistical patterns from public records. It asserts no intent and alleges no proven misconduct. Contested claims are attributed to their named sources and are theirs, not NAVEC's.

NORTH AMERICAN VETERINARY ETHICS COUNCIL

A nonprofit for fairness, transparency, and accountability in veterinary licensing

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Executive Summary

This report examines a question narrower and harder than diversity: whether the private gatekeepers of the American veterinary profession operate scoring and accreditation mechanisms whose exclusionary effects concentrate along racial and ethnic lines despite documented equal merit — and whether anyone outside those institutions is in a position to know. The distinction matters, and this report holds it throughout. A disparity study asks whether outcomes differ between groups; group differences can arise from many causes, and the profession's institutions have long answered such findings with references to preparation, resources, and pipeline. The evidence examined here is of a different kind. It concerns candidates whose merit is documented on the gatekeeper's own instruments — graduates of AVMA-accredited programs, candidates who passed ICVA's own official practice examination, students of a school whose exam-preparation investment appears in ICVA's own published reports — who nonetheless failed the North American Veterinary Licensing Examination at rates, in patterns, and with a directional uniformity that ordinary variation cannot produce. When merit is held constant and the residual still sorts by ethnicity, the question stops being about the candidates and becomes a question about the instrument. That question cannot currently be answered, because the NAVLE has no published technical manual, no published differential-item-functioning analysis, no rescore, and no appeal.

Three bodies of evidence anchor the examination. First, the Tuskegee University case: the only veterinary school at a historically Black university — source of more than 70 percent of the nation's African-American veterinarians — saw its first-time NAVLE pass rate fall from 91 percent (2018, per figures cited in Dr. Crystal Heath's public reporting) to 51

percent (2024, per VIN News Service), a 40-point collapse against a 7-point national dip, beginning immediately after the examination's 2018 restructuring, at a school whose preparation investment ICVA itself documented — and ending in terminal accreditation proceedings that the school's own federal filing alleges denied it due process. Second, NAVEC's replicated calibration study: across two independent testing windows a year apart, ICVA's official Self-Assessment over-predicted actual NAVLE scores for 62 Latino candidates from an accredited program by a pooled mean of 96 points; 58 of 62 scored below their predicted midpoint, none above their range, with pooled probabilities of chance occurrence on the order of 10^{-16} to 10^{-60} — the textbook statistical signature of differential prediction that professional testing standards direct examiners to investigate. Third, the score-integrity record: ICVA's own January 18, 2024 announcements, corroborated by VIN News, establish that NAVLE score reports were misassembled across candidates, pulled, corrected, and re-issued within a single day — demonstrating that a hands-on administrative layer stands between "machine scoring" and what candidates receive, that candidate-to-report linkage is a proven failure point, and that scores are mutable when ICVA initiates it, in a system where candidates may initiate nothing.

Around these anchors, the report assembles the complete public chronicle: the 1889–1948 exclusion baseline; the AAVMC's own 2021 finding that Hispanic applicants were significantly less likely to receive admission offers; ICVA's own published group differentials; the Western University decline and the attributed surname allegations; the October 2025 pre-litigation notice alleging, in its authors' words, targeting of Spanish-surnamed candidates and Tuskegee graduates, including a whistleblower account its authors quote as "I will keep the brown ones out"; LatinxVMA's formal request for an independent psychometric review; a federal discrimination docket involving a then-ICVA board member; the Department of Justice's December 2025 declaration that veterinary accreditation is subject to antitrust scrutiny; and ICVA's own commissioning of an independent audit, with results expected in the first quarter of 2027. Every contested claim is attributed. Every documented fact is sourced. The report's conclusion is deliberately modest and, for that reason, difficult to dismiss: the pattern is real, the mechanisms are unverifiable by design, the burden of production now rests with the institutions that hold the data, and the remedy is not a verdict but verification — published disaggregated data, an audit with differential-item-functioning analysis in scope, and active supervision by the state authorities in whose name these private bodies gatekeep a profession.

1. The Question Precisely Stated: Targeting, Not Disparity

Every institution examined in this report has, at some point, answered disparity evidence with an explanation that locates the cause in the candidates: preparation, language, resources, pipeline. Those explanations are legitimate hypotheses for a disparity study. They are not available here, because the evidence this report examines was constructed to exclude them.

Consider what "equal merit and academic readiness" means concretely in each body of evidence. The Latino candidates in NAVEC's calibration study trained at a program that held AVMA-COE accreditation — the same accreditor, the same standard, as every U.S. veterinary college — and each of them sat ICVA's own official NAVLE Self-Assessment, an instrument built from retired NAVLE items, in English, to the NAVLE blueprint, which ICVA states is predictive of NAVLE performance. Their projections were passing-range projections. Whatever preparation and English proficiency they possessed is already measured inside those projections, because the predictor tests the same constructs in the same language as the examination. Tuskegee's students trained at a school that had posted a 91 percent first-time pass rate as recently as 2018, whose preparation infrastructure — Self-Assessment purchases, the Veterinary Educational Assessment, a Teaching Learning Center, a comprehensive qualifying examination — is documented in ICVA's own reports and the school's own catalog, and whose dean states that student quality, curriculum, and faculty did not change as the rate collapsed. The plaintiffs described in the October 2025 pre-litigation notice are characterized by its authors as candidates with honors designations and top-tier clinical evaluations at accredited U.S. schools who performed at or above pass thresholds on predictive practice assessments.

That is the common structure: merit documented on the gatekeeper's own instruments, readiness certified by the gatekeeper's own accreditor — and failure anyway, concentrated in identifiable ethnic populations, in patterns that replicate. This report therefore does not ask why groups differ. It asks a forensic question: when the inputs are held constant and the output still sorts by ethnicity, what is happening inside the instrument — and why is the instrument built so that no one outside it can find out? The first half of that question only ICVA can answer. The second half is answerable from the public record, and Sections 4 and 5 answer it.

What this report does not claim

This report asserts no intent, alleges no proven misconduct, and reaches no conclusion that the NAVLE is scored wrongly. Allegations of targeting, fraud, and discrimination appear in this report because named parties — plaintiffs' counsel, a professional association, named individuals — have made them on the public record; each is attributed and remains its author's. NAVEC's own claim is structural and, within its limits, certain: the documented patterns are the recognized statistical signature of the problem professional testing standards call differential prediction; the data that would confirm or dispel it exists; ICVA and NBME alone hold it; and no candidate, school, board, or researcher can currently check it.

2. The Central Case: Tuskegee University

2.1 What Tuskegee is

Tuskegee University College of Veterinary Medicine was founded in 1945 by Dr. Frederick D. Patterson — a veterinarian, and the founder of the United Negro College Fund — as the direct institutional answer to exclusion: between 1889 and 1948, roughly 70 African

Americans in total graduated from any U.S. or Canadian veterinary program.^[1] It is the first and only veterinary program at a historically Black university, the most racially, ethnically, and culturally diverse veterinary school in North America by its own description, and it has educated more than 70 percent of the nation's African-American veterinarians and approximately 10 percent of its Hispanic and Latino veterinarians.^[2] Per U.S. Bureau of Labor Statistics data as of January 2025, about 1.2 percent of U.S. veterinarians are Black and 8.5 percent Hispanic or Latino.^[3] One school carries the pipeline; what happens to it happens, arithmetically, to the pipeline itself.

2.2 The pass-rate collapse, 2018-2025

Per figures cited in Dr. Crystal Heath's public reporting, 91 percent of Tuskegee's class passed the NAVLE on the first attempt in 2018.^[4] VIN News Service independently documented the subsequent decline: 79 percent in 2020, falling steadily to 51 percent in 2024 — the school's fifth consecutive year below the accreditation standard, and six straight years below 80 percent.^[5] Student-compiled and school data indicate intermediate years of roughly 70 percent (2021), 64 percent (2022), and 57 percent (2023); Tuskegee's own accreditation page reports a 2025 recovery to about 72 percent.^[6] The national composite was 95 percent in 2020, bottomed at 86 percent in 2023, and recovered to 88 percent in 2024.^[5] The arc — 91 to 51 in six years, a 40-point collapse against a 7-point national dip, beginning immediately after the examination's 2018 restructuring — is the central documented fact of the case.

A 40-point collapse against a 7-point national dip

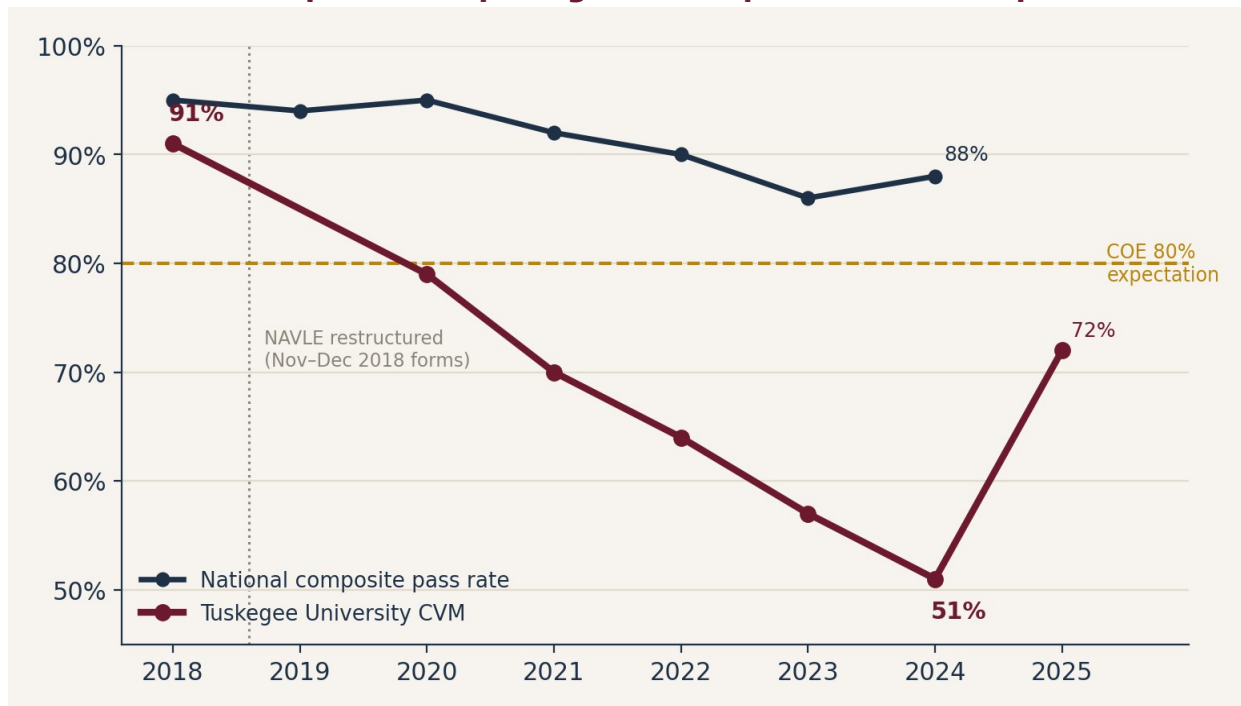


Figure 1. Tuskegee first-time NAVLE pass rate against the national composite, 2018-2025. Sources: 2018 per Dr. Crystal Heath's public reporting [4]; 2020-2024 per VIN News Service [5]; intermediate years per student-compiled and school data; 2025 per Tuskegee's accreditation disclosures [6].

2.3 Merit held constant: what did not change

Three explanations must be tested against the record. Student quality, curriculum, and faculty: according to Dr. Ruby Perry, dean through the entire period, none changed in ways that could account for the decline (her full attributed account appears in Section 6.4). Preparation: ICVA's own 2019 Report to Veterinary Academia documents Tuskegee purchasing NAVLE Self-Assessments for its students — 67 in 2017–18, 116 in 2018–19 — and administering ICVA's Veterinary Educational Assessment from 2015–16 onward, placing the school on ICVA's own published list of programs investing in ICVA's preparation products during the precise years its rates collapsed.^[7] The school's 2016–17 catalog documents the surrounding infrastructure — a 95 percent NAVLE goal, a Teaching Learning Center, peer tutorials, a comprehensive Qualifying Examination, a clinical-competency database — and records the school's earlier improvement from 78 percent (2007) to 95 percent (2010).^[8] The exam: per ICVA's own reporting, a practice analysis began in 2016, items were recoded to a new blueprint in fall 2018, and new-blueprint forms were built for 2019 — the decline begins immediately after.^[7] COVID-19 is a genuine confound in the national data, and deans and ICVA attribute part of the 2020–2024 national decline to pandemic-era cohorts; but Tuskegee's collapse was far steeper, began with the restructuring rather than the pandemic, and did not recover with the national trend. Western University of Health Sciences, another highly diverse program, fell from 89 percent (2023) to 72.1 percent (2024); its dean, Dr. John Tegzes, told VIN News: "We had a sharp decline. It wasn't a subtle one."^[5]

2.4 Two accreditation cycles, two processes

Tuskegee has been through COE scrutiny before, and the earlier cycle is the control case. After a fall 2013 site visit, the COE placed the school on probationary accreditation; a focused visit followed in January 2016; and the Council restored full accreditation at its September 2016 meeting — deficiencies named, guidance given, problems fixed.^[9] The current cycle is different in every documentable respect. At its March 2022 meeting the COE cited major deficiencies in Standard 2 (Finances), Standard 4 (Clinical Resources), and Standard 11 (Outcomes Assessment — the NAVLE standard).^[10] By November 2025, the school had been moved to terminal accreditation — a fact first disclosed publicly through Tuskegee's own emergency federal filing of November 10, 2025 (M.D. Ala., No. 2:25-cv-00890), which sought to block a December 5 hearing and alleged four procedural defects: exclusion of expert testimony (including Purdue dean Dr. Willie M. Reed and former Florida and Michigan State dean Dr. James W. Lloyd); exclusion of evidence of unequal treatment relative to other institutions; refusal to disclose internal AVMA records; and a hearing limited to just over two hours. The filing also states the AVMA had not returned to campus since 2021. Tuskegee withdrew the suit on November 14 after the AVMA agreed to reconsider its procedures, stating it welcomed the commitment "to providing robust due process."^[11]

Under the COE's methodology, the Outcomes Assessment standard expects 80 percent of graduating seniors to have passed the NAVLE, and a school whose upper 95-percent exact binomial confidence limit falls below 85 percent for four consecutive years is placed on terminal accreditation for cause — the calculation adopted in 2014, per an AVMA statement to VIN News, initially to accommodate international programs with few test-

takers. [5] The Council's most consequential act is thus hard-wired to the output of an examination it does not administer and cannot inspect. Five programs sat below 80 percent in 2024 — Michigan State, St. George's, Tuskegee, the University of Arizona, and Western University [5] — and one, the HBCU, is in terminal proceedings. Whether that difference reflects materially different treatment is precisely the comparison Tuskegee's filing says it was barred from presenting, and Section 8 states the disclosure that would settle it.

3. The Machinery: How the Gate Works, in ICVA's Own Words

3.1 The examination

The International Council for Veterinary Assessment — successor to the National Board of Veterinary Medical Examiners — is a 501(c)(3) organization that has administered the NAVLE since 2000. The examination is required for licensure in every U.S. and Canadian jurisdiction: 360 multiple-choice items developed and scored under contract with the National Board of Medical Examiners, scaled 200–800, passing score 425, with a reported standard error of measurement of 28 points, under criterion-referenced standard setting.

^[12] ICVA states: "The NAVLE is a secure, proctored licensing examination administered only to human candidates. No artificial intelligence system has taken or achieved a score on the NAVLE." Per ICVA, "NBME generates all NAVLE score reports and posts them on an NBME portal for candidates to access." ^[13]

3.2 What candidates may not do

ICVA's policy language is categorical: "NAVLE candidates are not permitted to review their tests, and there are no rescues or appeals of NAVLE results." ^[14] Candidates face a lifetime attempt limit. ICVA publishes no technical manual, no differential-item-functioning analysis by ethnicity or any demographic group, and no subgroup performance data of any kind — a disclosure contrast with the USMLE and NCLEX programs that is documentable from the face of the respective organizations' publications. ^[15]

3.3 The accreditor and its recognition history

The AVMA Council on Education is the sole federally recognized accreditor of U.S. veterinary schools, housed within the profession's trade association. In December 2013, a NACIQI panel continued the COE's recognition while requiring it to address conflict-of-interest and "wide acceptance" concerns cited since 2012; of more than 1,000 written comments, over 900 opposed continued recognition, with critics — six state veterinary medical associations, AVMA past presidents, and the president of Cornell — arguing the Council "acts at the whim of the professional association." The AVMA and AAVMC subsequently began making COE appointments jointly; the Council describes itself as functionally autonomous, as 34 C.F.R. Part 602 requires. ^[16] On December 15, 2025, the structural concern acquired a federal voice: the Department of Justice Antitrust Division

filed a Statement of Interest in *Lincoln Memorial University v. AVMA*, No. 3:25-cv-00282 (E.D. Tenn., Dkt. 45), arguing the AVMA "is not exempt from the antitrust laws merely because states often require practitioners to graduate from an accredited school," with Deputy Assistant Attorney General Dina Kallay warning that accreditors cannot "erect anticompetitive hurdles." The Department took no position on LMU's allegations and noted it consulted the Department of Education in preparing the brief.^[17]

The legal frame, attributed to the case law

In *North Carolina State Board of Dental Examiners v. FTC*, 574 U.S. 494 (2015), the Supreme Court held that a licensing body controlled by active market participants is not immune from the antitrust laws unless actively supervised by the state. State boards condition veterinary licensure on the NAVLE and rely on COE accreditation, yet no state supervises how the examination is scored or how the Council applies its standards. The active-supervision doctrine is the bridge between the patterns documented in this report and the state authorities with power to demand answers.

4. The Scoring Forensics: Mutability, Opacity, and the January 2024 Incident

The public narrative around the NAVLE — machine-scored, mechanical, untouchable — carries an implication: that between a candidate's final click and the score report lies nothing a human hand could shape or a human error could corrupt. This section examines that implication against ICVA's own documentation and conduct, and finds it contradicted in three documentable ways: the length and silence of the release window, the demonstrated mutability of issued reports, and the demonstrated fallibility of the candidate-to-report pipeline. The contradiction is worth stating carefully, because the precise question — what a human can and cannot touch in the NAVLE — is where the machine-scoring narrative meets its limits.

4.1 What ICVA says human judgment does — and does not — touch

Precision matters here, because public allegations (Section 6) reference a NAVLE "grader," and ICVA's rebuttal rests on the claim that no human touches an individual candidate's result. Per ICVA's published materials the examination is machine-scored; no human grades answer sheets. Human judgment, on ICVA's own account, enters only upstream, at defined points: subject-matter experts write items; NBME performs technical review; volunteer committees conduct annual item-pool and form reviews; and a criterion-referenced standard-setting panel sets the passing score.^[12] The documentable human discretion, in ICVA's telling, lies in item selection, form assembly, equating decisions, and standard-setting — not in the scoring of any individual candidate. That is the claim this section tests. And the testing matters in both directions: an account of a human reaching in to alter one candidate's answer sheet is inconsistent with the process ICVA describes — but the events of January 2024, examined below, show that a human

administrative layer does stand between the scoring engine and the candidate, that this layer can and did rewrite issued individual score reports, and that it did so through exactly the kind of undocumented, unauditable discretion ICVA locates safely upstream. The narrative that no human hand shapes the individual result is, on ICVA's own record, more porous than it sounds.

4.2 The four-to-five-week silence

ICVA's published language: scores are released "approximately four (4) to five (5) weeks after the testing window closes," to state licensing boards and candidates; the Candidate Bulletin adds only that "a final quality control check is performed to verify the scores and score report prior to posting."^[18] A fixed-form, machine-scored multiple-choice examination produces raw scores essentially instantly; multi-week windows exist across the licensing world for the human-governed processes that follow — key validation, item performance review, decisions to drop or rescore items, equating, pass-point application, and quality holds. That wait is industry-normal, and this report does not treat it as suspect. What distinguishes the NAVLE is not the wait but the silence: every comparable program publishes what its wait is for. NBME — the same organization that scores the NAVLE — publishes for the USMLE a full description of aberrant-response analysis, equating adjustments ("small score increases... to examinees who see somewhat more difficult sets"), and final quality assurance. NCSBN explains the NCLEX verification steps and still delivers unofficial results in as little as 48 business hours. NCBE confirms MPRE score accuracy "multiple times." For the NAVLE, ICVA publishes a single sentence.^[19]

Program (body)	Published release window	Publishes what the wait is for?
NAPLEX — pharmacy (NABP)	≈ 7 business days	Yes — QA process documented
PANCE — physician assistant (NCCPA)	Up to two weeks; most within ~4 business days	Yes — equating and Angoff standard-setting documented
NCLEX — nursing (NCSBN)	Official ≤ 6 weeks; unofficial Quick Results in as little as 48 business hours	Yes — "extra verification process... test irregularities, missing payments, or flagged exams"
USMLE — medicine (NBME/FSMB)	Typically 2-4 weeks	Yes — aberrant-response analysis, equating, "final quality assurance procedures" documented
COMLEX L1/2 — osteopathic (NBOME)	2-6 weeks	Yes — "thorough quality assurance process" documented
MPRE — law ethics (NCBE)	Typically within 5 weeks	Yes — "score accuracy is confirmed multiple times... standard quality control"
NAVLE — veterinary (ICVA)	"Approximately four (4) to five (5) weeks after the testing	No — only "a final quality control check is performed"; no

	window closes"	technical manual, no equating or item-analysis disclosure
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Table 1. Published score-release windows and post-administration disclosure, machine-scored licensing examinations — each program's own materials [18][19].

The wait is normal. The silence is not.

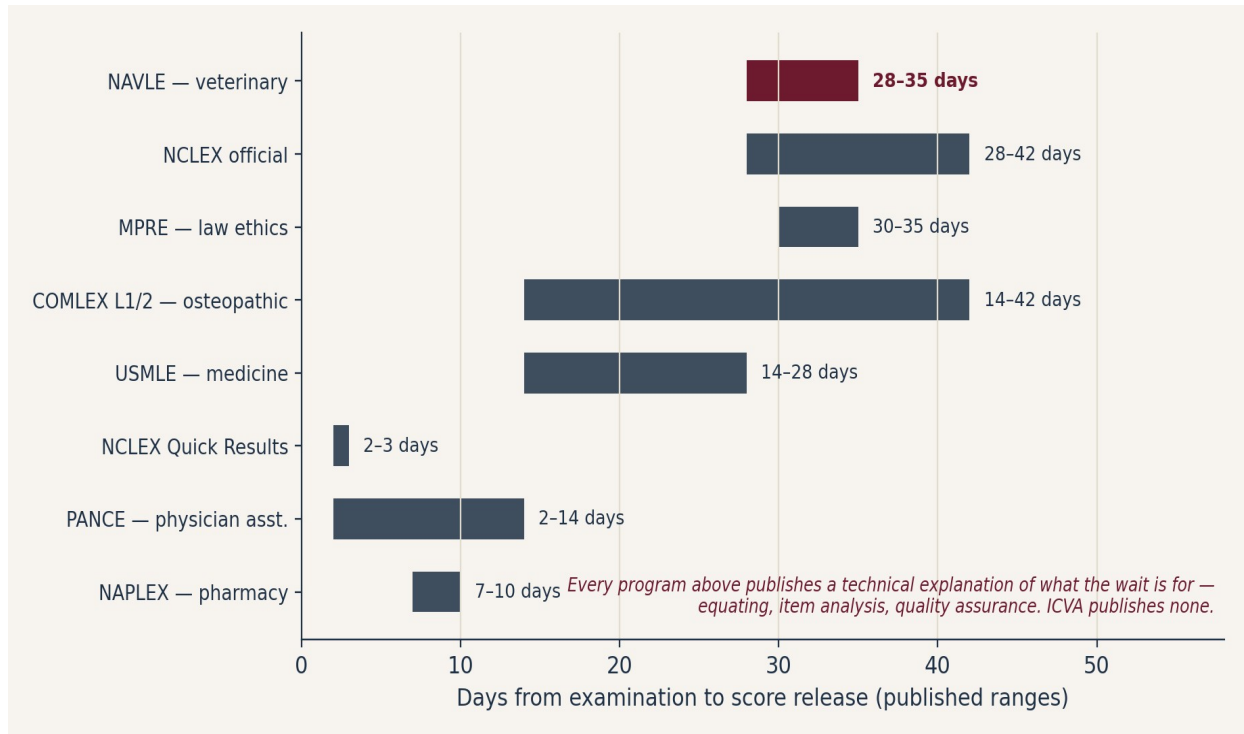


Figure 2. Published score-release windows across machine-scored licensing examinations. The NAVLE's window is at the slow end but industry-normal; the absence of any published technical explanation of the interval is not [18][19].

4.3 January 18, 2024: the day the reports were pulled

The strongest evidence that a hands-on administrative layer stands between the scoring machine and the candidate is an episode ICVA itself published. The timeline, reconstructed from ICVA's announcements and VIN News Service reporting: original score reports for the November 1 - December 16, 2023 window were released in mid-January 2024. On January 18, ICVA posted a first announcement — "NAVLE Score Report Update" — stating: "ICVA learned earlier today that a technical glitch occurred in the generation of the NAVLE score reports. As soon as this glitch was discovered, access to all reports from the portal was terminated so that NBME could resolve the issue. NBME has committed to providing updated corrected score reports by 5:00 pm Eastern time on Thursday, January 18, 2024." A second announcement the same day — "Additional NAVLE Score Report Update" — stated: "NBME has confirmed that no NAVLE candidate saw or received any other candidate's score or pass/fail outcome in the original score reports. The only information that was accidentally shared with less than 1.3% of the candidates was another candidate's name, NAVLE ID, and a generalized comparison of how the other candidate performed on the NAVLE by species and competency relative to the entire pool

of candidates."^[20] Corrected reports were issued by end of day; NBME wrote to examinees on January 19 describing changes to prevent future mix-ups; and ICVA's chief executive, Dr. Heather Case, confirmed resolution to VIN News the following Tuesday.^[21]

VIN News reported the concrete scope: "Around 80 of the 6,491 examinees enrolled to take the NAVLE during the November-December session received the misdirected messages," per the ICVA, and quoted NBME communications manager Jill Heagerty: "all scores and pass/fail outcomes were correct as originally reported," with the problem lying in "the assembly of a small number of NAVLE candidates' score reports." VIN noted ICVA became aware through calls and emails from test-takers who saw information that did not belong to them.^[21] Candidate forum accounts, attributed as such, describe a wider felt scope. On Student Doctor Network's results thread, contemporaneous posts read: "They've retracted everyone's... there were a lot of people getting reports that didn't have their name on it. I think they scrambled and shut everything down. I could see my report for 20min and now it's gone," and "Logged in on my phone ~30min ago and was able to get a score report. However, the top banner was not my name, but the bottom banner was my name... Now it's locked." Candidates called the failure surprising for "an automated process... they've been using for years," observed that "the mismatched names on pages of reports is particularly strange," and one raised an uncorroborated claim that a prior year's cohort had received score attachments bearing other students' results. Several noted that a comparable incident on the SAT, MCAT, or GRE "would be all over the news."

[22]

What the incident establishes is not misconduct — ICVA disclosed it, corrected it in a day, and NBME states the underlying scores were accurate. What it establishes, from the institutions' own words and actions, is structural: issued score reports are mutable — they were pulled, edited, and re-issued within hours once the error became public; the pipeline that links a candidate to a report is a demonstrated failure point — it misattributed names and identifiers across candidates at scale; the institutional scope statement ("less than 1.3%"; about 80 of 6,491) stands against candidate accounts of portal-wide retraction and widespread mismatches — a documentable gap between institutional statement and user reports, recorded here without resolving it; and no published root-cause analysis, independent incident review, or state-board notification could be located. A system that can correct itself in hours when its error is public, but permits no correction ever when a candidate alleges one, has made a documentable choice about whom its quality-control serves.

4.4 The asymmetry, in ICVA's own words

ICVA reserves for itself broad unilateral powers over issued scores. Its published provisions state that "if the integrity of the examination process appears to have been jeopardized, the ICVA reserves the right to invalidate all or any part of an examination or to withhold scores even if it cannot prove that you personally engaged in ethical behavior violations"; that ethical-behavior investigations may result in "eligibility suspension, withholding of scores, or the rescinding of scores pending investigation"; that eligibility-status changes may "result in the cancellation of your NAVLE score results"; and that in payment disputes "your scores may be withheld, and any scores that have been reported may be rescinded."^[23] Set beside the candidate-facing rule — no review, no rescore, no

appeal, ever — the asymmetry is complete and documented: scores are revisable in one direction only. By contrast, NCSBN offers NCLEX candidates whose results are cancelled without a finding of irregular behavior an appeal or a free retest, and the USMLE and MPRE programs offer paid score rechecks.^[24]

5. The Statistical Record: Merit Controlled, Residual Unexplained

5.1 NAVEC's replicated calibration study

NAVEC's July 2026 report, "When the Practice Test Passes but the Exam Fails" (second edition), examined ICVA's official Self-Assessment against actual outcomes for two anonymized cohorts of Latino candidates from a program that held AVMA-COE accreditation during their education: 30 who sat the NAVLE in April 2025 and 32 in April 2026.^[25] The Self-Assessment over-predicted actual scores by a pooled mean of 96.1 points; 58 of 62 candidates scored below their own predicted midpoint; 46 of 62 below their entire predicted range; none above it. Sixty-eight percent were projected to pass; 12.9 percent did. The pooled test against zero error returns $t(61) = -10.79$, $p \approx 8.8 \times 10^{-16}$; the probability that 46 of 62 would fall below a correctly calibrated 95-percent band by chance is approximately 3.7×10^{-60} . The two windows are statistically indistinguishable (Welch $t = 0.29$, $p = 0.78$): the failure replicated, at the same magnitude, across independent administrations a year apart. A U.S. comparison group compiled from public candidate forums ($N = 39$) shows the instrument behaving as ICVA advertises — 95 percent scored within or above their projected range, and not one reported a passing-range projection followed by a failing score.

Same instrument, opposite calibration

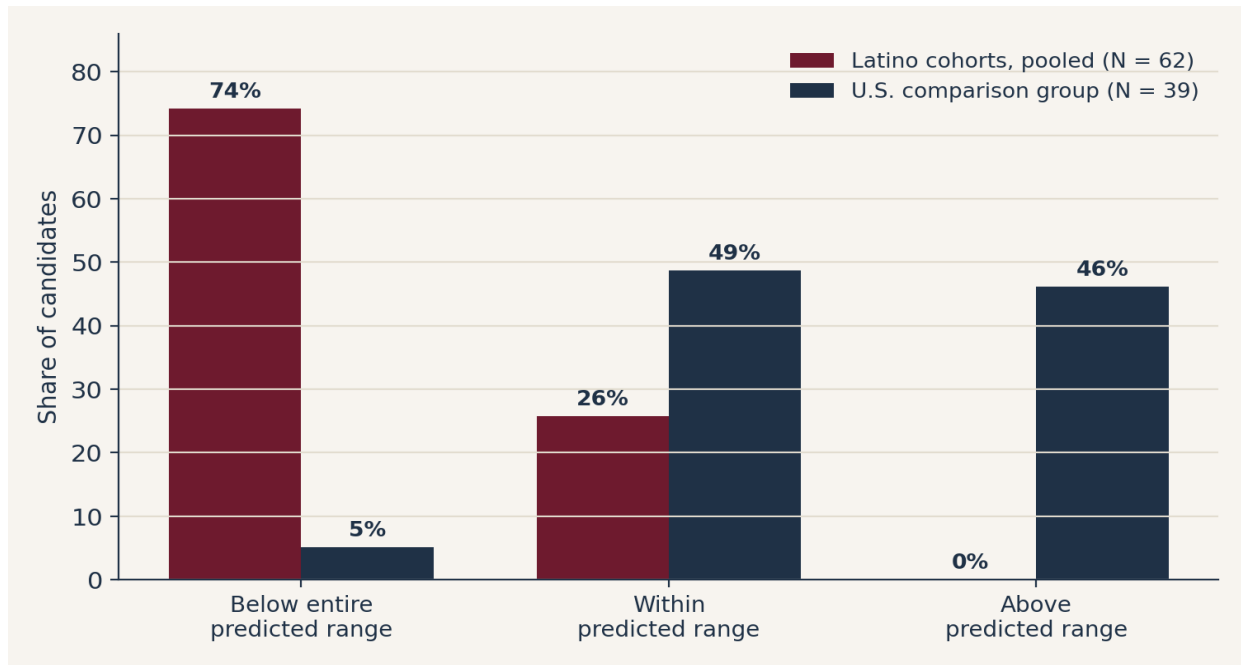


Figure 3. Actual NAVLE outcome relative to the ICVA Self-Assessment projection: pooled Latino cohorts (N = 62) versus the U.S. comparison group (N = 39). Source: NAVEC, July 2026 [25].

The instrument ranked these candidates moderately well (pooled $r \approx 0.67$) but did not calibrate them: the pooled predicted-to-actual slope is 0.43 rather than 1.0, and on that line a projection of 600 maps to an actual score of 425 — the passing line itself, with zero margin. Preparation and English proficiency cannot explain the gap: the predictor is built from the same items, in the same language, to the same blueprint, so those variables are already inside the projection. Exam-day conditions cut the wrong direction: every difference between the shorter, lower-stakes practice test and the real examination should, if operative, appear as under-prediction in the U.S. record, where the opposite appears. And the second window forecloses the one-bad-window account. What remains is the recognized statistical signature of differential prediction — the pattern the AERA/APA/NCME Standards for Educational and Psychological Testing (Standard 4.10) direct examiners to investigate through documented differential-item-functioning analysis for major examinee groups, ethnicity canonically among them. ^[26]

Ranked, but not calibrated

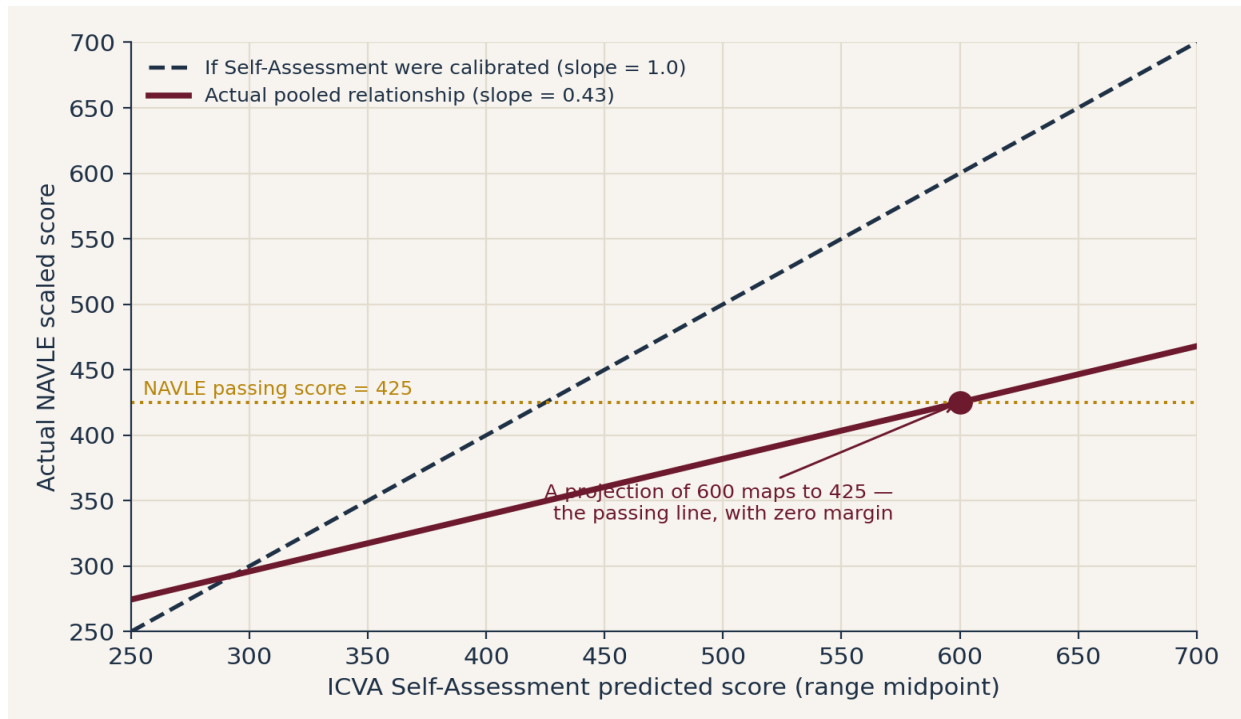


Figure 4. The pooled predicted-to-actual relationship for the Latino cohorts (slope 0.43) against calibration (slope 1.0). A projection of 600 reaches only the passing score. Source: NAVEC, July 2026 [25].

5.2 The differentials ICVA itself publishes — and the one it does not

ICVA's 2019 Report to Veterinary Academia published NAVLE failure rates by examinee group: for November–December 2017, 10.4 percent of the criterion group failed, against 28.1 percent of the non-criterion group and 58.6 percent of the non-accredited group (mean scale score 412, $n = 268$); for April 2018, 21.1, 39.4, and 59.6 percent respectively (non-accredited mean 411, $n = 334$).^[7] The non-accredited group — by ICVA's definition, graduates and senior students of foreign schools not accredited by the AVMA COE — reaches the examination through the ECFVG and PAVE foreign-graduate pathways, credentialing routes that add roughly \$1,875–\$2,125 in certification fees to the NAVLE's own \$740 fee and \$355 international surcharge, frequently a clinical year that can exceed \$25,000–\$40,000, and two to four years of time; the population served is, by the pathways' nature, overwhelmingly foreign-trained. (Ross University and St. George's University, though majority-international in enrollment, hold COE accreditation and are not in this group.)^[27] ICVA publishes breakdowns by accreditation status. It publishes none by race or ethnicity — in any report, in any year. This report located essentially no NAVLE performance data disaggregated by race or ethnicity anywhere. That absence is the single fact on which everything else in this report converges: the data that would confirm or dispel ethnicity-correlated disparity exists, and only ICVA and NBME hold it.

The differentials ICVA itself publishes

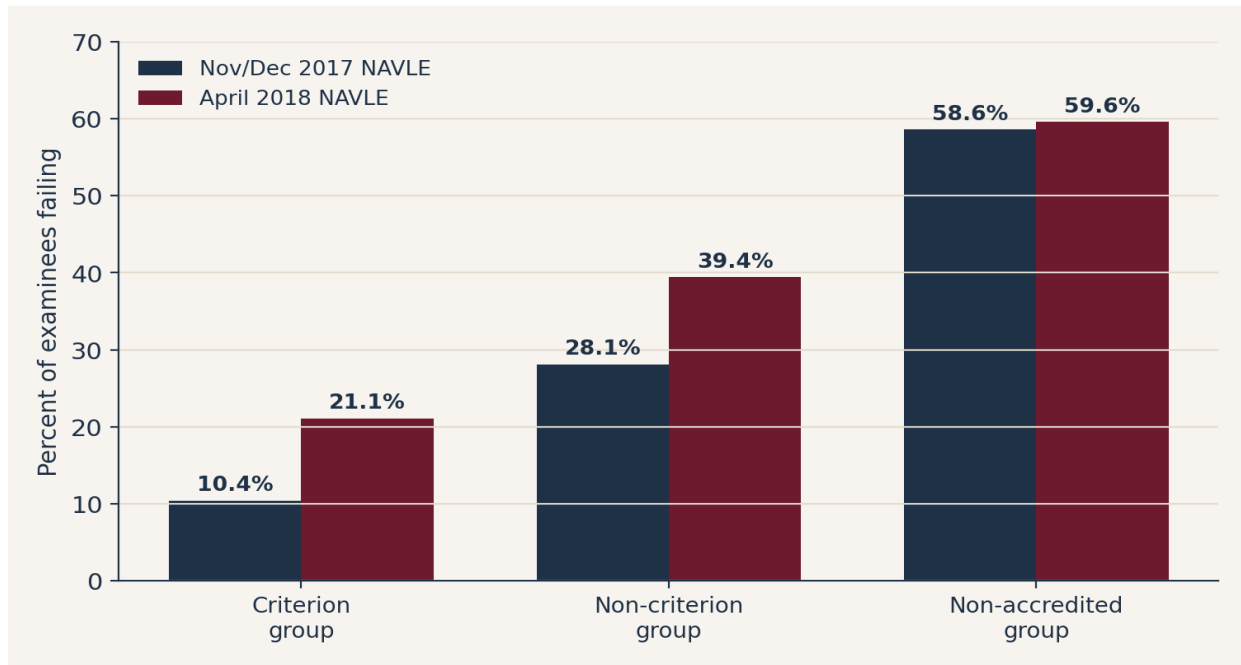


Figure 5. NAVLE failure rates by examinee group as published in ICVA's 2019 Report to Veterinary Academia, for the Nov/Dec 2017 and April 2018 windows [7]. No comparable breakdown by race or ethnicity has ever been published.

5.3 The admissions gate: the AAVMC's own findings

The pattern does not begin at licensure. The AAVMC's 2021 analysis by Dr. James W. Lloyd and Dr. Lisa M. Greenhill, from 2018–2019 application-cycle data, found admission offers "tended to be higher for candidates who were white, male, [and] grew up in suburban communities"; Hispanic applicants were significantly less likely to receive an offer; and African-American applicants reported a mean of 1,048 veterinary experience hours against 1,576 for white and Asian peers — the mechanism by which experience-hours requirements, which measure access to unpaid opportunity rather than aptitude, function as socioeconomic and ethnic filters. The authors: "these findings signal a very real need to reexamine admission processes." [28] Published research has separately found no correlation between pre-veterinary experience hours and performance in veterinary coursework — the filter screens for opportunity, not merit. [29]

6. The Attributed Allegations

Everything in this section is an allegation or first-person account belonging to a named source, reported because it is part of the public record or was provided to NAVEC for attribution. NAVEC does not adopt these claims as findings.

6.1 The October 2025 pre-litigation notice

In October 2025, a San Francisco plaintiffs' firm sent a pre-litigation notice to the AVMA and ICVA on behalf of veterinary graduates and licensing candidates who took and failed the NAVLE, alleging the examination may be "potentially anticompetitive, fraudulent, and discriminatory." As circulated and reported, the notice alleges: pronounced, persistent, and unexplained outcome disparities tied to race and ethnicity, specifically among Spanish-surnamed examinees and Tuskegee graduates; exam questions varying among same-date test-takers; opaque scaling untethered to pre-specified criteria; nonsensical or off-blueprint content and items with multiple correct answers; the absence of the technical manual, independent audit, differential-item-functioning analysis, and appeal process that comparable examinations maintain; an industry understanding, in the letter's characterization, that Spanish-surnamed candidates are targeted; clients advised by peers to alter Hispanic-sounding names; and a whistleblower account of a person involved in the NAVLE process stating he would "keep the brown ones out." The firm stated it reviewed records, interviewed examinees, and analyzed public data; the supporting data were not publicly released. ICVA rejected the allegations; its chief executive, Dr. Heather Case, stated ICVA responded through counsel and that the accusations "have no factual basis." As of this writing no lawsuit on these claims has been located; the notice remains pre-litigation, and every allegation in this paragraph is its authors'.^[30] One point of precision from the public record: because the NAVLE is machine-scored (Section 4.1), the "grader" account, if accurate, would concern a role in item development, review, or standard-setting — the upstream stages where undocumented human discretion resides — which sharpens rather than dulls the case for audit access.

6.2 LatinxVMA's formal request

In late 2025, the Latinx Veterinary Medical Association sent a formal letter urging the AVMA board to support, and asking ICVA to commission, an independent psychometric review of the NAVLE, citing concerns about question clarity, item construction, and potential cultural and linguistic bias. Its president and co-founder, Dr. Mitsie Vargas: "A third-party audit affirms that every candidate's pathway to licensure is grounded in fairness and free from bias."^[31]

6.3 The Department of Justice and Lincoln Memorial University

The DOJ's December 15, 2025 Statement of Interest (Section 3.4) is the record's most consequential third-party statement: the Antitrust Division of the United States, in a filed court document, stating that veterinary accreditation standards and procedures are subject to antitrust scrutiny and that the AVMA is not exempt merely because states require graduation from accredited schools. LMU's June 2025 complaint alleges the AVMA restricts accreditation of new and existing schools through arbitrary and impossible-to-meet requirements and seeks structural separation of the COE from the AVMA; LMU's Tennessee program has been on probation since fall 2024. Both remain pending; the allegations are LMU's, and the Department took no position on their veracity. [17]

6.4 Dr. Ruby Perry, former Dean of Tuskegee

Dr. Ruby L. Perry — the first African-American woman board-certified in veterinary radiology, a past president of the AAVMC, and co-chair of the AVMA-AAVMC Commission for a Diverse, Equitable and Inclusive Veterinary Profession — served as Tuskegee's dean from 2015 (interim from 2014) until her 2025 retirement, spanning both accreditation cycles and the entire decline.^[32] In an account provided to NAVEC for attribution, Dr. Perry states: that COE inspections were historically collaborative and solution-oriented, with cited issues in the earlier cycle resolved through direct dialogue with the Council chair; that beginning around 2017, NAVLE scores dropped without any change she could identify in student quality, curriculum, or faculty; that the school invested heavily in consultants, examination experts, and preparation resources while rates fell regardless; that students became unusually fearful of discussing even general examination experiences — behavior she later connected to the NAVLE Candidate Agreement's confidentiality terms, which in her view intimidated enough students to impair the school's ability to identify problems; that in the recent cycle, Council leadership changed and feedback became opaque — "these changes are inadequate," without details or guidance — with direct dialogue no longer possible; and that she believes Tuskegee was targeted, legal action never having been considered earlier because everyone assumed the NAVLE was a standard multiple-choice examination. These are Dr. Perry's attributed statements. What the public record independently corroborates is the frame around them: the collaborative resolution of the earlier cycle, the timing of the decline, the documented preparation investment, and the adversarial procedural posture alleged in Tuskegee's own filing.

6.5 The Daniel v. LSU docket and the ICVA board overlap

One federal docket places allegations of racial bias and ICVA governance in the same public record. Dr. Joseph Taboada served as Associate Dean for Student and Academic Affairs at the LSU School of Veterinary Medicine (2001–2018), then Associate Dean for Academic Affairs and Accreditation (through 2020), and served on the ICVA Board of Directors, appearing on the roster in ICVA's 2021–2022 Annual Report.^[33] In *Daniel v. Board of Supervisors of LSU*, No. 3:20-cv-00081 (M.D. La.), Dr. Annie J. Daniel — a Black woman with a doctorate in education who directed instructional design at the veterinary school and reported to Dr. Taboada — alleged he made racially offensive statements, including "I didn't know you were black because you didn't sound black on the phone," and remarks that Black students "don't do well" and that a historically Black university was academically weak. Dr. Taboada denied the statements. At summary judgment, LSU conceded the statements had to be taken as true for purposes of the motion, and the chair of the school's own diversity committee testified she had heard some of them and considered them racist. The district court nonetheless granted summary judgment on August 25, 2021, holding the remarks legally insufficient — "stray remarks" — absent a qualifying adverse employment action; the Fifth Circuit affirmed in an unpublished per curiam opinion, No. 21-30555 (April 8, 2022), holding the alleged remarks not "sufficiently severe or pervasive" and no adverse action shown. The disposition is dismissal, affirmed; there is no finding of liability.^[34] NAVEC states only what the dockets state: serious allegations, partly corroborated in sworn testimony, dismissed on legal-sufficiency grounds — concerning an official who simultaneously held admissions and accreditation

authority at a major veterinary school and a governance seat at the organization that owns the licensing examination. The simultaneity of roles is a documented fact; no inference is drawn from it, and no public record connects Dr. Taboada to the origination of experience-hours admissions requirements.

6.6 Dr. Crystal Heath's public reporting

Dr. Crystal Heath, a California veterinarian and executive director of the advocacy nonprofit Our Honor, has publicly amplified the fairness questions, including in a video presenting the Tuskegee timeline (91 percent in 2018 to 51 percent in 2024), the pre-litigation notice's whistleblower allegation, a claimed pattern at Western University in which, per her account, students with Hispanic surnames did not pass on the first attempt, and the May 2025 peer-reviewed UK study (King, Cardwell, et al., BMC Psychology; Royal Veterinary College, London South Bank University, and the British Veterinary Ethnicity and Diversity Society) finding racism a persistent problem in the UK veterinary sector. Her Tuskegee figures for 2020–2024 match VIN News's independent reporting; the Western surname claim has no located confirming public dataset and is presented solely as her attributed account. ^[35]

7. The Chronicle: Every Documented Entry, 1889–2026

The chronicle below assembles, in one dated sequence, every publicly documented statistic, institutional record, attributed allegation, and first-person account connecting NAVLE, ICVA, or AVMA COE gatekeeping to racial or ethnic disparity or targeting. Each entry is tiered by evidence class; attributed allegations remain their authors' and are marked as such.

Date	Entry	Class
1889–1948	≈70 African Americans graduate from all U.S./Canadian veterinary programs across six decades — the exclusion baseline. [1]	Documented statistic
1944–1945	Dr. Frederick D. Patterson envisions and founds the Tuskegee veterinary program as the institutional answer; first DVMs 1949. [2]	Institutional record
2013–2016	COE places Tuskegee on probation (2013 visit); focused visit Jan 2016; full accreditation restored Sept 2016 — the collaborative control case. [9]	Institutional record
2016–2019	NAVLE practice analysis (2016); items recoded to new blueprint (fall 2018); new-blueprint forms built (2019). [7]	Institutional record
2017–2018	ICVA publishes group differentials: non-accredited group fails at 58.6% (Nov/Dec 2017) and 59.6% (Apr 2018) vs. 10.4%/21.1% criterion. No race/ethnicity breakdown published, then or since.	Documented statistic

	[7]	
2018	Tuskegee first-time pass rate 91%, per figures cited in Dr. Crystal Heath's public reporting. [4]	Attributed figure
2020–2024	Tuskegee declines 79% → 51% (VIN News); six straight years below 80%; national composite dips 95% → 86% and recovers to 88%. [5]	Documented statistic
Aug 2021 / Apr 2022	Daniel v. LSU: summary judgment for LSU (M.D. La.); Fifth Circuit affirms, unpublished (No. 21-30555). Allegations partly corroborated in testimony; no liability found. Defendant-supervisor simultaneously an ICVA board member. [33][34]	Institutional record / docket
2021	AAVMC (Lloyd & Greenhill): Hispanic applicants significantly less likely to receive offers; Black applicants average 1,048 experience hours vs. 1,576. [28]	Documented statistic
Mar 2022	COE places Tuskegee on probationary accreditation: Standards 2, 4, and 11 cited. [10]	Institutional record
Jan 18, 2024	NAVLE score-report misassembly: reports pulled, corrected, re-issued same day; ICVA says <1.3% (~80 of 6,491) received another candidate's name/ID/comparison data; candidate accounts describe portal-wide retraction and widespread mismatches; no root-cause analysis published. [20][21][22]	Institutional record / forum accounts
2024	Western University falls 89% → 72.1%; Dean Tegzes: "It wasn't a subtle one." Five programs below 80%. [5]	Documented statistic
2025	Attributed claim (Dr. Heath): Western students with Hispanic surnames had zero first-time passes — no confirming public dataset located. [35]	Attributed allegation
Apr 2025 / Apr 2026	NAVEC calibration study: 62 Latino candidates, replicated –96-point over-prediction; 58/62 below midpoint; 0 above range; $p \approx 10^{-16}$ – 10^{-60} . [25]	NAVEC finding
Jun 18, 2025	LMU v. AVMA filed (E.D. Tenn., 3:25-cv-00282): accreditation used to restrict entry; structural separation sought. [17]	Attributed allegation / docket
Oct 2025	Pre-litigation notice to AVMA/ICVA: Spanish-surname and Tuskegee targeting alleged; "keep the brown ones out" whistleblower account; name-alteration advice; off-blueprint items. ICVA: "no factual basis." [30]	Attributed allegation
Late 2025	LatinxVMA formally requests an independent psychometric review of the NAVLE (Dr. Mitsie Vargas). [31]	Attributed request
Nov 10–14, 2025	Tuskegee v. AVMA (M.D. Ala., 2:25-cv-00890): emergency filing discloses terminal accreditation; four procedural defects alleged; withdrawn after AVMA agrees to reconsider procedures. [11]	Institutional record / docket
Dec 1, 2025	ICVA announces independent third-party audit and a one-time	Institutional record

	retake-policy reset (five new attempts from March 2026); AVMA issues supporting statement Dec 12. [36]	
Dec 15, 2025	DOJ Antitrust Division files Statement of Interest in LMU v. AVMA: accreditation subject to antitrust scrutiny; accreditors cannot "erect anticompetitive hurdles." [17]	Institutional record
Jun 4, 2026	ICVA names auditor: ACS Ventures, Inc., selected via RFP managed by Dorsey & Whitney LLP; results expected Q1 2027; findings to be released publicly. Trade coverage notes the six-month gap and distinguishes the audit from the separate 2026 practice analysis (Data Recognition Corporation). [37]	Institutional record

Table 2. The chronicle. Evidence classes: documented statistic; institutional record (an institution's own publication, filing, or action); attributed allegation or figure (a named party's claim, not adopted); forum account (candidate first-person report); NAVEC finding (NAVEC's own published statistical work).

8. The Remedy: Verification, Not Verdict

ICVA has itself moved toward the remedy. Its December 1, 2025 announcement committed to an independent third-party audit; its June 4, 2026 update named ACS Ventures, Inc. as auditor, selected through a request-for-proposals process managed by the law firm Dorsey & Whitney LLP, with completion expected in the first quarter of 2027, findings to be released publicly, and an explicit commitment that the auditor will reach its findings independently.^[37] Separately, ICVA is conducting a 2026 NAVLE practice analysis with Data Recognition Corporation — a blueprint-validation exercise, not a fairness audit; the two must not be conflated. And ICVA's earlier external touchpoint, the 2020 review by California's Office of Professional Examination Services, was a suitability-and-linkage study for California licensure that, on the available record, did not examine ethnicity-based fairness or conduct differential-item-functioning analysis.^[38]

8.1 Benchmarks the audit must meet

An audit that does not answer the questions the record has raised will not close them. The benchmarks are specific. The audit must include differential-item-functioning and differential-prediction analyses disaggregated by race and ethnicity and by school, covering the post-2018 examination forms and the Self-Assessment's calibration by subgroup. Its methodology, data access, and findings must be published in full, not summarized behind privilege — the audit is managed by a law firm, and the profession is entitled to know whether its output will be a public report or a privileged one. Any prior relationship between the managing firm and ICVA should be disclosed. ICVA should publish a technical manual meeting the AERA/APA/NCME Standards, as the USMLE and NCLEX programs do, and should publish what occurs during the four-to-five-week release window. And the January 2024 incident should receive a published root-cause analysis. If the audit omits ethnicity-based DIF analysis, that omission should itself be treated by regulators and the profession as a material finding.

8.2 What state authorities can do now

State veterinary boards are state actors and the NAVLE's end users; state attorneys general supervise the delegation of licensing power under the active-supervision doctrine. Either can request, directly and without litigation, the race- and ethnicity-disaggregated performance data, the DIF documentation the testing standards already call for, and the technical documentation of the scoring pipeline. The threshold that changes the posture is simple: if ICVA cannot produce a validated DIF analysis demonstrating the absence of disparate item functioning, then every state that conditions licensure on the NAVLE is conditioning a livelihood on an instrument whose fairness it cannot confirm.

8.3 The five-school comparison

Because five programs sat below the 80-percent threshold in 2024 and only one — the HBCU — is in terminal proceedings, the single most decision-relevant disclosure available to any regulator is an apples-to-apples account of how the COE applied Standard 11 and its confidence-interval methodology across all five: deficiencies cited, guidance given, timelines allowed, site visits conducted, and procedural treatment on appeal. Tuskegee's own filing alleges that evidence of unequal treatment was excluded from its hearing; the comparison would substantiate or dispel that allegation on the record. If treatment was materially different, that is a documentable disparate-treatment fact. If it was not, disclosure costs the Council nothing and settles the question.

8.4 Conclusion

The record assembled here supports five statements, none asserting intent. The patterns are real and documented: a 40-point collapse against a 7-point dip at the school that carries the Black veterinary pipeline; a replicated 96-point over-prediction concentrated in Latino candidates who passed the examiner's own instrument; group differentials the examiner itself publishes beside the one breakdown it never has. The mechanisms are unverifiable by design: no technical manual, no DIF publication, no rescore, no appeal — and a demonstrated administrative layer that can pull and rewrite issued reports in hours while candidates may request nothing, ever. The structural conflict is federally recognized, in a filed statement of the United States. The burden of production sits with the gatekeepers, who alone hold the data that would resolve every question here. And the remedy is verification, not verdict: the disaggregated data, the audit with ethnicity in scope, the five-school comparison, the published pipeline, and active state supervision. An examination and an accreditor that cannot be independently checked should not stand as the sole gates to a profession — not because they are necessarily unfair, but because, as matters stand, no one outside them can confirm that they are fair.

9. Scope, Method, and Limitations

Sourcing. Every public claim is anchored to a verifiable public record: ICVA's own website, announcements, candidate bulletin, and reports (with archive captures preserved, since

live pages have changed); federal court dockets and filings; Department of Justice publications; AVMA COE published accreditation actions; university publications; peer-reviewed literature; and independent trade journalism, principally VIN News Service. Candidate forum accounts are used only as attributed first-person reports, never as established fact. Where a figure's public anchor is a named individual's reporting — the 2018 Tuskegee rate of 91 percent, per Dr. Crystal Heath — the attribution is stated at each use. Dr. Ruby Perry's account was provided to NAVEC for attribution and is labeled as such throughout.

Discipline. This report documents effects, structures, timelines, and statistical patterns. It asserts no intent, coordination, fraud, discrimination, or antitrust violation in NAVEC's voice; those characterizations belong to the named parties who made them, and ICVA's denial of the pre-litigation allegations is recorded. The Daniel case ended in dismissal, affirmed on appeal, with no finding of liability, and this report says so. The pre-litigation notice is a demand, not a filed complaint. The four-to-five-week release window is industry-normal and is not treated as suspect; the documented issue is the absence of technical disclosure. The January 2024 incident was disclosed and corrected by ICVA itself; the documented issues are its demonstration of report mutability and pipeline fallibility, the unresolved gap between institutional scope statements and candidate accounts, and the absence of a published root-cause analysis. NAVLE pass-rate declines are multi-causal; ICVA's chief executive has described the national trend as not yet attributable to any single source, and the chronicle records the disparities without asserting causation.

Limitations. NAVEC's calibration study is the sponsoring organization's own prior work, reported as such and framed as requiring independent replication with the item-level data only ICVA holds. The non-accredited-group failure figures are specific to the November-December 2017 and April 2018 windows and are cited only as such. The prior-year score-misattribution claim is a single uncorroborated forum account. The Western University surname claim is a single attributed account without a located confirming dataset. The intermediate Tuskegee years (2021–2023) rest on student-compiled and school data because no official longitudinal series is published — itself part of the transparency problem this report documents. Four live processes should be tracked through any republication: the ACS Ventures audit (results expected Q1 2027); LMU v. AVMA post-Statement-of-Interest; Tuskegee's reconvened accreditation proceedings; and any complaint filed by the pre-litigation group. A filed suit, a state action, a board inquiry, or the audit's release would each change this report's posture, and NAVEC commits to updating it accordingly.

Notes on Sources

- [1] Kansas State University, "A Historical Overview of African American Veterinarians," and published histories of the profession (≈70 African-American graduates from all U.S./Canadian programs, 1889–1948).

- [2]** Tuskegee University, College of Veterinary Medicine, "About Us" and Accreditation pages, tuskegee.edu (founding by Dr. Frederick D. Patterson, 1945; first DVMs 1949; "more than 70 percent" of African-American veterinarians; ≈10 percent of Hispanic/Latino veterinarians; most-diverse characterization).
- [3]** U.S. Bureau of Labor Statistics, Labor Force Statistics from the Current Population Survey, as of January 2025 (1.2% Black, 3.6% Asian, 8.5% Hispanic or Latino among veterinarians).
- [4]** Dr. Crystal Heath (DVM; executive director, Our Honor), public video reporting, "'I Will Keep the Brown Ones Out' — Is the Veterinary Profession Racist?" (YouTube, @crystallynheath), including the 2018 Tuskegee first-time pass rate of 91 percent.
- [5]** VIN News Service, "NAVLE pass rates ticked up in 2024, stemming slide," news.vin.com, doc id 12516859 (Tuskegee 79% in 2020 to 51% in 2024, fifth year below standard; national composite 95%→86%→88%; the five programs below 80% in 2024; the COE 80-percent expectation and 2014 confidence-interval methodology per AVMA statement; Dean Tegzes quotation; ICVA CEO Dr. Heather Case on the trend not yet attributable to a single source and April 2024 retake figures).
- [6]** Tuskegee University, Accreditation disclosures, tuskegee.edu/Accreditation.html (2025 rate ≈72%).
- [7]** International Council for Veterinary Assessment, 2019 ICVA Report to Veterinary Academia / Report for Veterinary Schools (performance by examinee group for Nov/Dec 2017 and April 2018, including non-accredited group failure rates of 58.6% and 59.6% and group definitions; practice-analysis timeline 2016–2019; NAVLE Self-Assessment purchases by school, Tuskegee 67 in 2017–18 and 116 in 2018–19; VEA administration list including Tuskegee from 2015–16; fee schedule).
- [8]** Tuskegee University, 2016–2017 Course Catalog/Bulletin, School of Veterinary Medicine section (95-percent NAVLE goal; improvement from 78 percent in 2007 to 95 percent in 2010; Teaching Learning Center; Qualifying Examination; clinical-competency database).
- [9]** AVMA Council on Education, published accreditation actions, 2013–2016 Tuskegee cycle (fall 2013 comprehensive site visit; probationary accreditation; January 2016 focused site visit; restoration announced December 14, 2016).
- [10]** AVMA Council on Education, published accreditation actions, March 2022 meeting (Tuskegee probationary accreditation; Standards 2, 4, 11).
- [11]** Tuskegee University v. American Veterinary Medical Association, No. 2:25-cv-00890 (M.D. Ala., filed Nov. 10, 2025; withdrawn Nov. 14, 2025), and contemporaneous coverage (WRBL, "Future of Tuskegee's Veterinary School sparks Federal Court fight"; WSFA, "Tuskegee University drops lawsuit against veterinary accreditation association") (terminal-accreditation disclosure; the four alleged procedural defects; excluded witnesses Dr. Willie M. Reed and Dr. James W. Lloyd; "has not returned to our campus since 2021"; withdrawal statement).
- [12]** ICVA, icva.net, NAVLE program pages and annual reports (exam structure; NBME role; 200–800 scale; 425 pass point; SEM 28; criterion-referenced standard setting; ICVA as NBVME successor administering the NAVLE since 2000; 501(c)(3) status per IRS Form 990, EIN 36-3992537).
- [13]** ICVA, icva.net (statements: "No artificial intelligence system has taken or achieved a score on the NAVLE"; "NBME generates all NAVLE score reports and posts them on an NBME portal for candidates to access").

- [14]** ICVA, NAVLE Score Report page and candidate policies, icva.net/score_report ("NAVLE candidates are not permitted to review their tests, and there are no rescues or appeals of NAVLE results"); lifetime attempt limit per candidate bulletin.
- [15]** Federation of State Medical Boards/NBME (USMLE) and NCSBN (NCLEX), published technical documentation and examination statistics (disclosure contrast).
- [16]** NACIQI, December 2013 panel proceedings on AVMA COE recognition; contemporaneous reporting (1,000+ comments, 900+ opposed; six state VMAs; "acts at the whim of the professional association"); joint AVMA-AAVMC appointment reforms; 34 C.F.R. Part 602.
- [17]** U.S. Department of Justice, Antitrust Division, Statement of Interest, *Lincoln Memorial University v. AVMA*, No. 3:25-cv-00282 (E.D. Tenn.), Dkt. 45 (Dec. 15, 2025), justice.gov/atr/media/1420886 ("not exempt from the antitrust laws merely because states often require practitioners to graduate from an accredited school"; consultation with the Department of Education), and DOJ Office of Public Affairs release of the same date (Deputy AAG Dina Kallay; "erect anticompetitive hurdles"); LMU complaint filed June 18, 2025 (Tennessee program on probation since fall 2024).
- [18]** ICVA, 2024-2025 NAVLE Candidate Bulletin of Information, icva.net (release "approximately four (4) to five (5) weeks after the testing window closes"; "a final quality control check is performed to verify the scores and score report prior to posting").
- [19]** Comparator programs' own published materials: NCSBN/NCLEX Results page, nclex.com/results.page (official within six weeks; Quick Results in as little as 48 business hours; verification-process description); NBME/USMLE score-reporting documentation (two-to-four-week window; aberrant-response analysis; equating; final quality assurance); NCBE/MPRE (five weeks; "score accuracy is confirmed multiple times"); NCCPA/PANCE (up to two weeks, most within about four business days); NBOME/COMLEX (two to six weeks; quality-assurance statement); NABP/NAPLEX (≈7 business days).
- [20]** ICVA, "NAVLE Score Report Update" and "Additional NAVLE Score Report Update," January 18, 2024, icva.net/news-and-updates (both announcement texts quoted; "less than 1.3%" scope statement; 5:00 pm ET commitment; archive captures preserved).
- [21]** VIN News Service, "'Technical glitch' causes veterinary licensing exam mix-up," news.vin.com, doc id 11894612 (≈80 of 6,491 examinees; NBME communications manager Jill Heagerty: scores "correct as originally reported," problem in "the assembly of a small number of NAVLE candidates' score reports"; discovery via candidate calls and emails; NBME January 19 letter; CEO Dr. Heather Case confirming resolution).
- [22]** Student Doctor Network, "NAVLE 2024 Results" thread, forums.studentdoctor.net (contemporaneous candidate accounts of portal-wide retraction, mismatched names, prior-year claim, and privacy concerns — attributed forum accounts).
- [23]** ICVA, candidate agreement and published score policies (integrity-invalidation provision; ethical-behavior investigation consequences including withholding and rescinding of scores; eligibility-change cancellation; payment-dispute withholding and rescission).
- [24]** NCSBN (NCLEX candidate appeal or free retest where results are cancelled without a finding of irregular behavior); USMLE and NCBE/MPRE published score-recheck procedures.
- [25]** NAVEC, "When the Practice Test Passes but the Exam Fails," 2nd ed., July 2026, navec.org, with both underlying datasets published at navec.org.

- [26]** American Educational Research Association, American Psychological Association, and National Council on Measurement in Education, *Standards for Educational and Psychological Testing* (2014), Standard 4.10.
- [27]** ECFVG (AVMA) and PAVE (AAVSB) program pages and published fee schedules (≈\$2,125 and ≈\$1,875 respectively; NAVLE \$740 plus \$355 international surcharge; clinical-year cost ranges; multi-year duration); St. George's University accreditation page (five-year NAVLE average 84.3%).
- [28]** Lloyd, J.W., and Greenhill, L.M., "AAVMC Admissions: Report of 2019 Student Survey Analysis," AAVMC monograph (March 2021), aavmc.org, with coverage in *dvm360* and *Bovine Veterinarian* (offer differentials; experience-hours figures; "very real need to reexamine admission processes").
- [29]** Kortum et al., "Lack of Correlation Between Pre-veterinary School Experience Hours and DVM Course Performance," *Education in the Health Professions* 5(1):4-12 (2022).
- [30]** Pre-litigation notice to AVMA/ICVA (October 2025), as reported in trade coverage (*Vet Candy*, "ICVA Chief Executive Officer Announces Independent Audit of NAVLE Following Allegations of Bias") and as circulated in leaked form (allegations enumerated; ICVA response through counsel; CEO Dr. Heather Case: accusations "have no factual basis"). NAVEC's sourcing attributes the letter to Lieff Cabraser Heimann & Bernstein LLP (partner Kelly M. Dermody), dated October 23, 2025. All described claims are the firm's and its clients' allegations.
- [31]** LatinxVMA formal letter to the AVMA board and ICVA (late 2025) requesting an independent psychometric review; President/Co-Founder Dr. Mitsie Vargas quotation, as reported in trade coverage.
- [32]** Tuskegee University and AAVMC biographical materials for Dr. Ruby L. Perry; Tuskegee news release (November 2025) on the appointment of Dr. Ebony Gilbreath as dean. Dr. Perry's account was provided to NAVEC for attribution.
- [33]** LSU School of Veterinary Medicine faculty and administrative records (Dr. Joseph Taboada's roles and dates); ICVA 2021-2022 Annual Report, board of directors roster.
- [34]** Daniel v. Board of Supervisors of Louisiana State University, No. 3:20-cv-00081-SDD-SDJ (M.D. La.), Ruling on Motion for Summary Judgment, Aug. 25, 2021 (govinfo.gov, USCOURTS-lamd-3_20-cv-00081); affirmed, No. 21-30555 (5th Cir. Apr. 8, 2022) (unpublished per curiam; panel Stewart, Clement, Elrod; 5th Cir. R. 47.5.4).
- [35]** Dr. Crystal Heath biographical and organizational materials (Our Honor); King, Cardwell, et al., "It shreds me from within': thematic analysis of the impact of racism on veterinary professionals and students in the United Kingdom," *BMC Psychology* (May 2025), with Royal Veterinary College research news release (June 2025).
- [36]** ICVA announcement, December 1, 2025 (independent third-party audit; one-time retake-policy reset effective March 2026); AVMA supporting statement, December 12, 2025.
- [37]** ICVA update, June 4, 2026 (ACS Ventures, Inc. selected via RFP managed by Dorsey & Whitney LLP; results expected Q1 2027; public release and independence commitments); *Vet Candy* coverage, May 14, 2026 ("The Independent Audit of NAVLE That Was Promised in December 2025 by ICVA — and Has Yet to Begin") and December 28, 2025, noting open questions on timing and the distinction from the 2026 practice analysis (Data Recognition Corporation).

[38] California Department of Consumer Affairs, Office of Professional Examination Services, review of the NAVLE presented to the California Veterinary Medical Board (October 2020; OPES Chief Heidi Lincer) (suitability-and-linkage scope).

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