



NORTH AMERICAN VETERINARY ETHICS COUNCIL

Reform or Replace.

A NAVEC PUBLIC ADVOCACY PAPER

An Open Call to Build

Why Veterinary Medicine Needs a Second Pathway Now

North American Veterinary Ethics Council (NAVEC)

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Classification: Public Advocacy Paper — For State Boards, Attorneys General, Deans, Funders, and the Profession

Abstract

Every veterinarian in the United States and Canada passes through a single examination gate that no licensing board can independently verify, and every foreign-trained veterinarian through a universal pathway owned by the profession's trade association. This paper is a public call to build the alternatives now: two independent organizations — an Examination Council governed by the state boards and a Credentials Commission on the model medicine has run for decades — deployable in nine to twelve months (six at the emergency minimum) for combined capital of roughly \$3.3–5.5 million, with fees launching 40–45 percent below the incumbent examination's \$825. It states what is asked of each audience by name — boards, Attorneys General, deans, funders, and the profession — and what the North American Veterinary Ethics Council (NAVEC) contributes and forgoes: the blueprints, the convening, the outside monitoring, and no seat, veto, contract, or financial interest of any kind.

A note on method: every load-bearing claim herein is sourced to primary public records or expressly attributed to the named party advancing it; figures identified as estimates state their assumptions.

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Implementation status. These documents are policy blueprints, not existing institutions. Implementation requires founding boards, funders, deans, vendors, and counsel-reviewed transition mechanisms. NAVeC holds — and will hold — no seat, veto, contract, or financial interest in any institution proposed here. Figures identified as estimates are pending Phase 0 validation.

The Problem, Stated Plainly

Every veterinarian in the United States and Canada passes through one gate. One examination, the North American Veterinary Licensing Examination (NAVLE), run by one organization, International Council for Veterinary Assessment (ICVA), required in every jurisdiction¹, with no alternative anywhere. One credentialing pathway for foreign-trained veterinarians carries universal acceptance, and it is owned by the profession's principal trade association.

Here is the part that should stop every regulator cold: no licensing board in America can currently verify that the examination it requires is fair, accurately scored, or properly maintained. Not because unfairness has been proven. Because the system provides no way for any board to know. That is NAVEC's own position, and we have put it in writing to state Attorneys General. A board's duty runs to the public. A board cannot discharge that duty through an instrument it has no means of checking.

This paper is not a complaint. It is a call to build — two independent organizations, on a nine-to-twelve-month default schedule, for capital a small consortium can raise. The designs are complete. What is needed now is founders.

What the Record Shows

We are careful about what we claim in our own voice and what we attribute, so here is both, kept separate.

What NAVEC says: verification is impossible today. ICVA publishes an annual report and a brief technical summary of roughly a dozen pages.² Compare the professions next door: nursing's examination body publishes quarterly statistics, annual data volumes, technical briefs, and a passing-standard review on a published three-year cycle³; medicine's examination boards run standing, published research programs. No third-party accreditation — neither National Commission for Certifying Agencies (NCCA) nor ANSI/ISO 17024, both routine for high-stakes credentialing programs — attaches to the NAVLE⁴. After an audit controversy documented in VIN News reporting, ICVA announced an external review by a

¹International Council for Veterinary Assessment, "ICVA Annual Report 2024–2025," icva.net, https://www.icva.net/image/cache/ICVA_Annual_Report_2024-2025_FIN.pdf (verified July 5, 2026). Source for administration volume, item counts, testing windows, delivery vendor, and co-development arrangements.

²ICVA, "NAVLE Technical Report 2024–2025," icva.net, https://www.icva.net/image/cache/2024-2025_NAVLE_Technical_Report.pdf (verified July 5, 2026). The document runs approximately thirteen pages; compare the peer documentation cited below.

³NCSBN, "NCLEX Statistics" (quarterly pass rates; annual statistics volumes), <https://www.ncsbn.org/exams/exam-statistics-and-publications.page>; NCSBN, "2024 NCLEX Examination Statistics" (verified July 5, 2026).

⁴Institute 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> (verified July 5, 2026).

psychometric firm — engaged, per the public record, through outside litigation counsel, with results expected in early 2027.⁵ Whatever that review eventually says, it gives no board a means of verification now, and a review routed through the audited party's lawyers, on the audited party's schedule, is not what independent verification means anywhere else in licensure. The problem is not that ICVA publishes nothing; it is that boards do not receive peer-level public documentation, independent scoring audits, or any verification mechanism sufficient for mandatory reliance.

What others say, cited as facts about the environment and not as our conclusions: on December 15, 2025, the U.S. Department of Justice Antitrust Division filed a Statement of Interest in *Lincoln Memorial University v. American Veterinary Medical Association (AVMA)* — the federal government engaging the competitive structure of veterinary gatekeeping.⁶ In October 2025, Lief Cabraser Heimann & Bernstein, a major national plaintiffs' firm, sent a pre-litigation notice to the AVMA, ICVA, and National Board of Medical Examiners (NBME) raising allegations about the NAVLE's administration. Those allegations are theirs to prove. The notice's existence is a fact.⁷

Why Waiting for Reform Is Not a Plan

Reform may come. We hope it does, we have asked for it, and we will credit every real increment of it. But three things are true regardless.

Reform runs on the incumbents' clock. The announced review reports in 2027. The AVMA Council on Education's federal re-recognition arrives in Winter 2027. Institutional reform of gatekeeping bodies is measured in years — and every one of those years, thousands of graduates pass through a gate no one can check.

Reform of a monopoly is not a substitute for alternatives. Even a perfectly reformed sole gatekeeper is still a sole gatekeeper: a single point of failure for an entire profession's workforce pipeline. The 2020 test-center closures⁸ — which disrupted NAVLE administration along with everything else — made the case empirically. Critical infrastructure gets redundancy. A profession's only licensure gate is critical infrastructure.

⁵Lisa 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) (verified July 5, 2026).

⁶U.S. Department of Justice, Antitrust Division, Statement of Interest, *Lincoln Memorial University v. American Veterinary Medical Association*, No. 3:25-cv-00282 (E.D. Tenn., filed Dec. 15, 2025); press release and filing at <https://www.justice.gov/atr/case/lincoln-memorial-university-v-american-veterinary-medical-association> (verified July 5, 2026).

⁷See Vet Candy, "Law firm puts AVMA, ICVA and NBME on notice over NAVLE administration" (Nov. 19, 2025), <https://www.myvetcandy.com/newsblog/2025/11/19/law-firm-notice-navle>, and follow-up coverage (June 19, 2026), <https://www.myvetcandy.com/newsblog/2026/6/19/navle-litigation-update> (verified July 5, 2026). The pre-litigation letter itself has not been made public; the allegations are the claimants' to prove.

⁸ICVA and state board notices regarding 2020 Prometric test-center closures affecting NAVLE administration; see, e.g., Louisiana Board of Veterinary Medicine NAVLE notices, <https://lsbvm.org> (verified July 5, 2026).

Two pathways is already the norm — including in this profession. Medicine has run two complete licensing examinations, the United States Medical Licensing Examination (USMLE) and the Comprehensive Osteopathic Medical Licensing Examination (COMLEX), side by side for decades⁹; every state medical board accepts either; concordance between them has been studied and published; the sky has never fallen. Veterinary credentialing itself accepts two foreign-graduate pathways, Educational Commission for Foreign Veterinary Graduates (ECFVG) and Program for the Assessment of Veterinary Education Equivalence (PAVE), today.¹⁰ The one-exam, one-owner arrangement is not the natural order of licensure. It is the anomaly.

What to Build

Two organizations, designed in full in the companion white papers, with working names their founders will replace.

The Examination Council: a national veterinary licensing examination governed the way nursing governs its own — the state licensing boards as voting members, a Delegate Assembly that elects the directors, ratifies the passing standard, and approves the fees. Transparency written into the bylaws, not promised: published annual technical reports, an independent third-party scoring audit every year, published standard-setting on a fixed cycle, school pass rates, no lifetime attempt limits without published validity evidence, and third-party accreditation within three years. A 300-scored-item examination built by veterinarian committees — every item authored of record by the experts who approve it, with modern tools accelerating the drafting and humans deciding everything — field-tested nationally, launching below \$500 on a published fee schedule that steps toward the high-\$300s as adoption grows — against the incumbent's \$825 — and paired with a stated thirty-six-month development program: accreditation, pool growth, and fee reductions, published in advance.

The Credentials Commission: an independent foreign-graduate credentialing body on the model medicine has run since 1956 — primary-source verification contracted to existing infrastructure, established English assessments, and a distributed clinical-competence model that replaces a single bottleneck examination with a network of calibrated sites, at an all-in candidate cost of \$2,000–3,500 instead of several times that.

The construction schedule is nine to twelve months to first administrations as the default — six at the emergency minimum, with the tradeoffs stated in the companion papers — using the three-layer continuity architecture detailed there: an architecture that also means enforcement

⁹Federation 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/> (verified July 5, 2026); on score concordance, see published USMLE/COMLEX concordance research.

¹⁰American 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> (verified July 5, 2026).

remedies on any timeline, should Attorneys General and courts choose them, are operationally survivable. And if any legally authoritative action — a court order, a consent decree, a federal agency action, an enforcement outcome — ever determines that continued reliance on the incumbent gate is unlawful or indefensible, state licensing rules become implementation mechanics rather than the threshold question; the implementation manual is in the companion papers. Enforcement decisions belong to those offices, not to us. Our contribution is that feasibility objections are answered: continuity cannot be the excuse for delaying accountability.

Combined capital to reach first administrations: approximately \$3.3–5.5 million, sized deliberately for a consortium — state contributions, philanthropy, or both — with no single funder positioned to dominate governance. All figures are estimates with assumptions stated in the companion papers.

What We Are Asking, By Name

State licensing boards: open dual-pathway rulemaking now. Most states set the required examination by regulation or board policy; the amendment is ordinary rulemaking, and the language is simple — "an examination approved by the board." You do not have to abandon the NAVLE to adopt it. You have to stop being structurally forbidden from ever accepting anything else. And send a delegate: the Examination Council's governance is yours by design.

Attorneys General: the enforcement questions are yours, and the record before you speaks for itself. What we add is narrow and material: the continuity plan means feasibility objections no longer hold. Whatever remedy the law supports, on whatever timeline you choose, the profession's pipeline survives it.

Deans: one coordinated field-test window with roughly two thousand volunteer final-year students¹¹ is the single cooperation that makes a defensible new examination possible in months instead of years. Your students are also the ones paying an \$825 examination fee¹² to a program no one can audit.

Funders: this is a rare shape of philanthropy — a few million dollars, a permanent institution, self-funding within its first operating years, and a governance design that structurally prevents your capture of it.

¹¹Association of American Veterinary Medical Colleges, "Annual Data Report" (graduating class volumes), <https://www.aavmc.org/about-aavmc/public-data/> (verified July 5, 2026).

¹²ICVA, "Frequently Asked Questions," [icva.net, https://www.icva.net/faqs/](https://www.icva.net/faqs/) (\$800 fee, 2025–2026 cycle; \$55 approval fee); Louisiana Board of Veterinary Medicine, "Exams – NAVLE," [lsbvm.org, https://lsbvm.org/applying-for-licensure/examinations-navle/](https://lsbvm.org/applying-for-licensure/examinations-navle/) (publishing ICVA's announced 2026–2027 fees: \$825 testing fee) (both verified July 5, 2026).

The profession: item writers, committee members, standard-setting panelists, public members. The peer professions built their examination institutions out of exactly this volunteer expertise. So will this one.

What NAVEC Contributes — and What It Does Not

The blueprints, the research beneath them, the convening of first conversations, and outside monitoring afterward — applied to the new institutions with the same rigor as to the incumbents. No seat. No veto. No contract. No financial interest. The same entanglement rules that bar the trade associations from these organizations' governance bar us. An alternative captured by its advocates would reproduce the disease it was built to cure.

Honest Limits

The first two years are the hardest; early-adopter states carry real weight, and we say so rather than pretend otherwise. A first-year examination launches on field-test data with a provisional standard confirmed as data accumulates — which is how every new licensing examination in history has launched, and which will be documented in published technical reports from administration one: more psychometric evidence in public view in month six than the incumbent program has published across its history. And the incumbents may reform — genuinely, substantially. Good. We will say so in public when they do. It will not change the conclusion, because the conclusion was never about any one organization's virtue. No profession should have to trust. Every profession should be able to verify — and the surest guarantee of a trustworthy gate is the existence of another one.

The Ask, In One Sentence

Boards: open the rulemaking. Deans: pledge the field test. Funders: capitalize the consortium. Attorneys General: know that feasibility objections are answered. The designs are finished, the default schedule is nine to twelve months, and the only remaining question is whether this profession's gateway will be verifiable because someone built the alternative — or unverifiable because everyone waited.

Working designations ("the Examination Council," "the Credentials Commission") are placeholders; naming, incorporation, and governance belong to the founders. Figures are estimates with assumptions stated in the companion white papers. Characterizations of legal claims are attributed to the parties advancing them; descriptions of ICVA's publications and announced review reflect the public record as of July 2026. NAVEC is a nonprofit and holds no seat, veto, contract, or financial interest in the organizations proposed.