



NORTH AMERICAN VETERINARY ETHICS COUNCIL

Reform or Replace.

A NAVEC BLUEPRINT FOR ACTION

A National Veterinary Licensing Examination for the Public Interest

A Blueprint for an Independent, State-Board-Governed Examination
Council

North American Veterinary Ethics Council (NAVEC)

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Classification: Policy Blueprint — For State Veterinary Boards, Attorneys General, Deans, and the Profession

Abstract

No licensing board in the United States or Canada can currently verify that the examination it requires for licensure is fair, accurately scored, or properly maintained, because the system provides no means of verification. This paper responds with a construction plan: an independent examination organization — the Examination Council, a working designation — governed by the state licensing boards themselves on the member-board model long used in nursing. It specifies an eleven-seat governance architecture under a Delegate Assembly of regulators; transparency obligations codified in bylaws, including annual technical reports and independent scoring audits; a 300-scored-item examination built to the American Educational Research Association (AERA)/American Psychological Association (APA)/National Council on Measurement in Education (NCME) Standards on a nine-to-twelve-month default deployment schedule (six-month emergency minimum, tradeoffs stated) with a published thirty-six-month development program; a fee schedule launching at \$450–495 against the incumbent's \$825; three adoption pathways — state-by-state, full succession, and enforcement-triggered transition; and a three-layer continuity architecture under which enforcement remedies on any timeline remain operationally survivable.

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.

Executive Summary

Every veterinarian licensed in the United States and Canada must pass a single examination — the North American Veterinary Licensing Examination (NAVLE) — administered by a single organization, the International Council for Veterinary Assessment (ICVA). No alternative exists. No second pathway operates. And 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. That is the North American Veterinary Ethics Council's (NAVEC's) own position, stated consistently in its letters to state Attorneys General, and it is the reason this paper is no longer a contingency document. It is a construction plan: a complete design for an independent examination organization, governed by the state veterinary boards themselves, to be built now — in parallel with whatever reform the incumbent institutions undertake.

This is not a proposal NAVEC seeks to control. The organization described here — referred to throughout as "the Examination Council," a working designation its founders would replace — is designed to be governed by state and provincial veterinary licensing boards as voting members, on the model that nursing regulation has used successfully for decades. NAVEC's contribution is this blueprint, the underlying research, and continued public accountability monitoring from the outside.

The design rests on four commitments. First, member-board governance: the state boards that bear legal responsibility for licensure hold the votes, providing both democratic legitimacy and the "active supervision" by state actors that federal antitrust law rewards¹. Second, codified transparency: published technical reports, independent scoring audits, published passing-standard reviews, and third-party accreditation — obligations written into the bylaws, not left to discretion. Third, a conventional, standards-compliant examination built efficiently: a 300-item scored examination developed under the AERA/APA/NCME Standards for Educational and Psychological Testing², using modern technology to accelerate drafting while credentialed veterinarians author, review, and approve every item. Fourth, financial realism: a launch capitalization of roughly \$2.5–4 million on the recommended twelve-month schedule, an examination fee launching at \$450–495 on a published schedule that steps toward \$375–425 as adoption grows — against the NAVLE's \$825 fee for the 2026–2027 testing cycle — and self-funded expansion once candidate volume is established.

Three adoption pathways are developed in full. Path B is a parallel pathway: individual states amend their rules to accept either examination, and the new instrument earns adoption state by state. Path A is full succession: the boards collectively adopt the new examination and the

¹North Carolina State Board of Dental Examiners v. Federal Trade Commission, 574 U.S. 494 (2015), <https://supreme.justia.com/cases/federal/us/574/494/> (verified July 5, 2026).

²American Educational Research Association, American Psychological Association, & National Council on Measurement in Education, Standards for Educational and Psychological Testing (2014), <https://www.testingstandards.net> (verified July 5, 2026).

NAVLE is retired. Path C is enforcement-triggered transition: if a court order, consent decree, federal agency action, or other legally authoritative determination makes continued mandatory reliance on the incumbent gate unlawful or indefensible, state licensing rules stop being the threshold question and become implementation mechanics, and the continuity machinery of Section 5 executes the transition. Path B is the realistic opening move; Path A is where sustained institutional failure would lead; Path C is the contingency nobody chooses — and the design must survive it anyway. Underneath both sits a structural position NAVEC holds on the merits: no profession should depend on a single gatekeeper for its sole entry examination. Medicine has run two licensing examinations — the United States Medical Licensing Examination (USMLE) and the Comprehensive Osteopathic Medical Licensing Examination (COMLEX) — side by side for decades, accepted by every state medical board; veterinary credentialing itself already accepts two foreign-graduate pathways. Two pathways is the norm. One is the anomaly — and reform of a monopoly, however complete, is not a substitute for the existence of alternatives.

The build schedule and the continuity question are answered together. The construction schedule set out in Section 5 targets nine to twelve months as the default, with a six-month emergency minimum whose tradeoffs are stated plainly and a thirty-six-month development program beyond launch — and the same three-layer architecture demonstrates that an enforcement remedy on any timeline, including immediate relief, is operationally survivable. Feasibility objections are answered; continuity cannot be the excuse for delaying accountability. The layers rest largely on machinery that already exists: states from Texas (22 Tex. Admin. Code § 571.11) to Pennsylvania (63 P.S. § 485.10) maintain temporary or provisional permit provisions in their veterinary practice acts today — NAVEC's survey of practice acts identifies at least eighteen such states — emergency rulemaking acts in days, and the compressed build follows the same standards-compliant sequence as the full plan, accelerated by parallelization and coordination, not by cutting the safeguards.

1. Why Boards Cannot Wait: The Verification Gap

State licensing boards bear a statutory duty to protect the public, and the examination requirement is the instrument through which they discharge much of it. That duty is the foundation of this paper's central claim, which NAVEC states in its own voice and has stated consistently in its letters 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 through which every entrant to the profession must pass, non-verifiability is itself disqualifying. A board cannot delegate its public-protection duty to an instrument it has no way to check.

The inventory of what exists is a matter of public record, and fairness requires stating it precisely. ICVA publishes an annual report and a brief technical summary running roughly a dozen pages.³ Set that against the peer-profession standard: National Council of State Boards of Nursing (NCSBN) publishes quarterly examination statistics, annual statistics volumes⁴, technical briefs on the measurement model, and full documentation of a passing-standard review conducted on a published three-year cycle⁵; National Board of Medical Examiners (NBME) operates a standing, published research program.⁶ No third-party accreditation — National Commission for Certifying Agencies (NCCA) or ANSI/ISO 17024 — attaches to the NAVLE program, though such accreditation is routine for high-stakes credentialing examinations.⁷ Following the audit controversy documented in reporting by VIN News, ICVA has announced an external psychometric review by ACS Ventures — engaged, per the public record, through outside counsel, with results expected in early 2027.⁸ Whatever that review ultimately shows, two things are true today: it is not a means by which any board can verify the examination now, and a review commissioned through the audited party's litigation counsel, on the audited party's timeline, is not what the peer professions mean by independent, published verification. The problem, stated with precision, is therefore 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.

The sharper characterizations belong to others, and the record they have built is cited here as fact about the environment, not as NAVEC's conclusions. On December 15, 2025, the Antitrust Division of the U.S. Department of Justice filed a Statement of Interest in *Lincoln Memorial University v. American Veterinary Medical Association (AVMA)* in the Eastern District of Tennessee — the federal government weighing in on the competitive structure of veterinary gatekeeping.⁹ In October 2025, per trade-press reporting, plaintiff-side counsel at Lief Cabraser Heimann & Bernstein issued a pre-litigation notice to the AVMA, ICVA, and the National Board of Medical Examiners raising allegations concerning the NAVLE's

³ICVA, "NAVLE Technical Report 2024–2025," [icva.net, https://www.icva.net/image/cache/2024-2025_NAVLE_Technical_Report.pdf](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.

⁴NCSBN, "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).

⁵NCSBN, "NCLEX Passing Standard" (board-ratified; reviewed on a published three-year cycle), <https://www.ncsbn.org/exams/passing-standard.page> (verified July 5, 2026).

⁶See, e.g., M.J. Gierl & H. Lai, "Using automatic item generation to create multiple-choice test items," *Medical Education* (2012), and the NBME research program on automated item generation, <https://www.nbme.org/research> (verified July 5, 2026). Human review architecture retained throughout in the design proposed here.

⁷Institute 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).

⁸Lisa 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).

⁹U.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).

administration; the letter itself has not been made public, those are the claimants' allegations to prove, and the notice is cited because a formal legal notice from a major national firm — as reported — is itself a fact about the environment.¹⁰ And ICVA's own published materials establish the structural frame: a single examination required in every U.S. and Canadian jurisdiction, 9,301 administrations in the 2024–2025 cycle alone¹¹, and a five-attempt limit defended on test-security grounds — restructured effective with the March 2026 testing window so that attempts made before December 1, 2025 no longer count toward the limit, while the waiver process is eliminated entirely and no attempts are granted beyond the five, per ICVA's published policy.¹²

The regulatory ground is moving in one direction. The negotiated rulemaking consensus reached in May 2026 prohibits institutional entanglement between an accreditor and its sponsoring trade association¹³; the AVMA Council on Education faces its federal re-recognition review in Winter 2027.¹⁴ Reform of the incumbents may come, and NAVEC welcomes every increment of it. But reform runs on the incumbents' timeline, verification remains impossible while it runs, and even complete reform leaves the structural problem untouched: a profession whose sole gateway is a single organization has a single point of failure, whatever that organization's conduct. A board's duty runs to the public today. The remainder of this paper is the construction plan.

2. What the Peer Professions Built

Veterinary medicine is the outlier among the licensed health professions, not the norm. Every comparable profession has built examination governance with structural features the NAVLE lacks.

Nursing: the member-board model. The NCSBN is owned, in effect, by its members: the state boards of nursing themselves. Each board holds a vote in the Delegate Assembly, which elects the NCSBN Board of Directors, approves the passing standard framework, and holds

¹⁰See 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.

¹¹International Council for Veterinary Assessment, “ICVA Annual Report 2024–2025,” [icva.net](https://www.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.

¹²ICVA, “Frequently Asked Questions — NAVLE Retake Policy,” [icva.net](https://www.icva.net/faqs/), <https://www.icva.net/faqs/> (five new attempts effective with the March 2026 window; attempts before December 1, 2025 not counted; waiver process eliminated) (verified July 5, 2026).

¹³U.S. Department of Education, Accreditation and Innovation (AIM) negotiated rulemaking, consensus reached May 21, 2026; committee materials at <https://www.ed.gov/laws-and-policy/higher-education-laws-and-policy/higher-education-policy/negotiated-rulemaking-higher-education-2025-26> (verified July 5, 2026).

¹⁴U.S. Department of Education, Office of Postsecondary Education, accreditation agency list and NACIQI meeting materials for the AVMA Council on Education recognition cycle (Winter 2027 review), <https://www.ed.gov/accreditation> (verified July 5, 2026).

ultimate authority over the National Council Licensure Examination (NCLEX) examinations.¹⁵ The consequences of this structure are visible in its outputs. NCSBN publishes quarterly pass rates, annual examination statistics volumes (the 2024 NCLEX-RN statistics report alone details tens of thousands of candidates by jurisdiction and degree type), technical briefs on the examination's measurement model, and — critically — re-evaluates its passing standard on a published three-year cycle through a documented standard-setting process. When NCSBN rebuilt the examination as the Next Generation NCLEX, it did so through years of published research, public practice analyses, and open comment. That is what examination governance looks like when the regulators own the examination.

Medicine: co-governance and published science. The USMLE is governed jointly by the Federation of State Medical Boards¹⁶ and the National Board of Medical Examiners through a composite committee on which state-board representatives and public members sit. NBME publishes its research program, maintains standing test material development committees of practicing physicians, and subjects its processes to continuous external scholarly engagement.

Pharmacy. The National Association of Boards of Pharmacy — again, an association whose members are the state boards — administers the NAPLEX, publishes school-level pass rates, and documents its standard-setting and practice-analysis cycles.

The common architecture across nursing, medicine, and pharmacy: the state boards that carry statutory licensing authority sit inside the examination organization's governance, and transparency is an institutional output, not a concession. Veterinary medicine's arrangement — an examination council whose governance is not composed of the licensing boards, operating without published technical reports or independent scoring audits — is the anomaly this blueprint corrects.

It is worth noting that the natural convening infrastructure already exists. The American Association of Veterinary State Boards (AAVSB) is the membership organization of the licensing boards themselves; it already operates credentialing services (Program for the Assessment of Veterinary Education Equivalence (PAVE)), license portability tools, and continuing-education approval. Whether the Examination Council is incubated within AAVSB, chartered alongside it, or built independently by a coalition of member boards is a founders' decision. The essential feature is the same in every variant: the boards govern.

¹⁵National Council of State Boards of Nursing, "About NCSBN" (member boards; Delegate Assembly), <https://www.ncsbn.org/about.htm> (verified July 5, 2026).

¹⁶United States Medical Licensing Examination, "Governance" (FSMB/NBME composite committee), <https://www.usmle.org/about-usmle/governance> (verified July 5, 2026).

3. Governance Design

3.1 The Member-Board Council

The Examination Council's voting membership consists of the veterinary licensing boards of U.S. states and territories and, by mirror-image provision, Canadian provincial regulators. Each member board designates one voting delegate — a current board member or the board's executive officer. The Delegate Assembly meets annually and holds four reserved powers that cannot be delegated: election of the Board of Directors; approval of amendments to the bylaws, including the transparency obligations in Section 3.3; ratification of the passing standard following each standard-setting cycle; and approval of the examination fee schedule.

This structure is not merely democratic window-dressing. Under *North Carolina State Board of Dental Examiners v. Federal Trade Commission (FTC)*, market-participant-controlled licensing bodies receive antitrust immunity only when actively supervised by the state. An examination organization whose controlling members are the state licensing boards themselves — public bodies, acting in their regulatory capacity, with the passing standard and fee schedule ratified by their assembled delegates — is designed from birth to embody the supervision the doctrine demands, rather than to argue around it. Section 9 develops the legal architecture in full.

3.2 Board of Directors and Committee Architecture

The Board of Directors comprises eleven seats: six delegates elected from and by the member boards, staggered across three classes; two public members with no financial interest in veterinary medicine, education, or testing, one of whom must have consumer-protection or public-administration experience; one measurement scientist (psychometrician) who is not employed by any testing vendor under contract to the Council; one veterinary academician; and one practicing veterinarian in clinical practice. Directors serve three-year terms, renewable once. No director may simultaneously hold a governance position in any trade association, veterinary school, or commercial testing enterprise — a conflict-of-interest standard consciously modeled on the entanglement prohibitions adopted in the May 2026 accreditation rulemaking consensus.

Beneath the Board sit four standing bodies with deliberately separated powers:

The **Examination Committee** — practicing veterinarians appointed for content expertise across species and practice areas — owns the test blueprint and approves every item that enters the operational pool. The **Psychometric Advisory Panel** — external measurement scientists, majority unaffiliated with any vendor — reviews technical reports before publication, oversees equating and scaling, and certifies the standard-setting process. The **Eligibility and Appeals Body** operates independently of examination development: the people who build the test have no role in deciding who may sit for it or in adjudicating candidate disputes,

eliminating the concentration of gatekeeping functions in a single office. And the **Audit and Transparency Committee**, chaired by a public member, engages the independent scoring auditor and certifies each year that the bylaws' disclosure obligations have been met.

3.3 Transparency Obligations, Codified

The decisive difference between this design and the status quo is that transparency is written into the bylaws as enforceable obligation, amendable only by the Delegate Assembly. The Council must publish, on a stated calendar: an annual technical report covering reliability, standard error, item-pool statistics, and equating methods, at the level of detail NCSBN and NBME publish today; the results of an annual independent scoring audit, in which an external psychometric firm re-derives a sample of candidate scores from response data and attests to their accuracy; pass rates by school with appropriate small-cell protections; the full documentation of each standard-setting study, on a fixed review cycle of no more than five years; the fee schedule and audited financial statements; and all candidate-facing policies — including retake policy — with the validity evidence supporting them.

On that last point the bylaws take a specific position: **no lifetime attempt limit may be imposed absent published validity evidence demonstrating its necessity**, and any attempt limit adopted must include a documented remediation-and-return pathway. ICVA's five-attempt limit, defended in its materials on test-security grounds, was restructured effective with the March 2026 testing window: attempts made before December 1, 2025 no longer count toward the limit, and the waiver process is eliminated, with no attempts granted beyond the five, per ICVA's published policy. The reset is a genuine easing for previously excluded candidates and should be credited as such; the simultaneous elimination of any waiver or remediation route makes the cap, going forward, more absolute than before. The peer professions — nursing among them — protect security through item-exposure controls and pool rotation rather than permanent exclusion from the profession, and this Council would be bound by bylaw to the peer-profession approach unless evidence published for public scrutiny justified otherwise.

Finally, the Council commits in its charter to pursue third-party accreditation of the examination program — NCCA accreditation and/or ANSI/ISO 17024 — within its first three operational years. No such external accreditation currently attaches to the NAVLE. Submitting to an external accreditor converts every promise above from self-report into audited compliance.

4. Building the Examination: A Step-by-Step Plan

The examination itself is deliberately conventional in structure: 360 delivered items per candidate — 300 scored and 60 unscored pretest items — matching the NAVLE's current architecture so that state boards evaluate a like-for-like instrument. What differs is the governance around it and the efficiency with which it is built. The sequence below follows the

AERA/APA/NCME *Standards for Educational and Psychological Testing* at every step. The steps are presented as functions and their safeguards; the calendar — parallelized, twelve months — is set out in Section 5.

Step 1 — Practice analysis. A national survey of practicing veterinarians, stratified by species emphasis, practice setting, and career stage, establishes what entry-level practice actually requires. The practice analysis is published in full — as NCSBN publishes its triennial practice analyses — and becomes the validity foundation for everything downstream.

Step 2 — Test blueprint. The Examination Committee translates the practice analysis into a public blueprint: content domains, species distribution, and competency weighting. Publishing the blueprint is standard practice in every peer profession and is a bylaw obligation here.

Step 3 — Item development: modern tools, human judgment. The Council's item-development pipeline is the same sequence required of any high-stakes program: veterinarian item-writing committees draft to blueprint specifications; every item passes editorial review, content-validity review, and a separate bias-and-sensitivity review; and no item is ever scored until it has performed acceptably as an unscored pretest item in live administration.

Within that pipeline, modern drafting tools assist at one step only: **accelerating the production of first drafts for expert committees to edit, correct, or reject.** This is not a novel or fringe proposition. The National Board of Medical Examiners' own research program has published on automated item generation for well over a decade — the Gierl and Lai research line, much of it conducted with NBME collaboration, is the standard citation — and technology-assisted drafting is now in documented use across large-scale assessment. The safeguards that make an item defensible are unchanged from traditional practice and are where this design places its weight: **every operational item's author of record is the veterinarian committee that reviewed, edited, and approved it;** every item passes bias-and-sensitivity review by a separately constituted panel; and every item must prove itself empirically in pretest position before it counts toward any candidate's score. Technology accelerates drafting; veterinarians and psychometricians decide.

The economics justify the approach without overreliance on it. Published industry estimates place traditional item development at roughly \$1,500–\$2,500 per operational item once writing, committee review, editing, and pretesting are accounted for — implying \$600,000 to \$1.25 million for a 300–500 item pool developed conventionally. Draft-stage technology assistance, with the full human review architecture retained, is credibly estimated to reduce the drafting-and-revision portion of that cost by 30–50 percent, and the Council's budget in Section 6 assumes savings at the conservative end of that band. The target for launch is an operational pool of approximately 450–500 approved items — enough to field the 300-scored-item form plus rotation and exposure control — with a continuous pretest pipeline thereafter.

Step 4 — Field testing. Pretest items are embedded, unscored and unannounced in position, in pilot administrations arranged with early-adopter state boards and volunteer cohorts, following the embedded-pretest design every major licensure program uses. Items meeting statistical criteria — difficulty, discrimination, and differential item functioning screens — graduate to the operational pool.

Step 5 — Standard setting. A criterion-referenced passing standard is set by a modified-Angoff panel of practicing veterinarians and educators, facilitated by the psychometric contractor, documented in a published report, and ratified by the Delegate Assembly. The standard is reviewed on a published cycle thereafter.

Step 6 — Equating, security, and delivery. Multiple parallel forms are assembled and equated so that no candidate's outcome depends on which form they draw. Security architecture includes item-exposure controls, forensic response analysis, and web monitoring — the modern substitutes for exclusionary retake policies. Delivery is contracted to an established computer-based-testing network (Prometric, Pearson VUE, and PSI all operate suitable professional-licensure infrastructure; the NAVLE itself runs on Prometric, so secure seat capacity for this candidate population demonstrably exists). Per-candidate delivery costs in this market typically run in the \$60–\$100 range for a full-day administration, and the budget assumes the upper half of that band.

Step 7 — Pilot administration and first operational window. A supervised pilot with the first-mover states precedes the first operational administration. Run one step at a time, this sequence would fill two years or more — the deliberate pace of an unhurried founding, and not the recommendation here. The recommended calendar runs the steps in parallel: first operational administration in month six at the minimum, months nine to twelve as the default, per the deployment plan in Section 5.

5. The Construction Schedule: Continuity on Any Timeline

This section does double duty. It is, first, the recommended construction schedule: the nine-to-twelve-month default track — six months at the emergency minimum, with tradeoffs stated below — on which the Examination Council should be built beginning now — because where verification is impossible, waiting has no justification. It is, second, the answer to the question every cautious regulator asks about enforcement: what happens in the gap. The section therefore plans for the hardest version of the scenario — NAVLE administration halts through injunction, consent-decree collapse, organizational failure, or voluntary suspension, with no cooperation assumed from the incumbent. No item-bank access, no data escrow, no transition support. If continuity holds even there, it holds everywhere — and a schedule robust to the worst case is simply a good schedule.

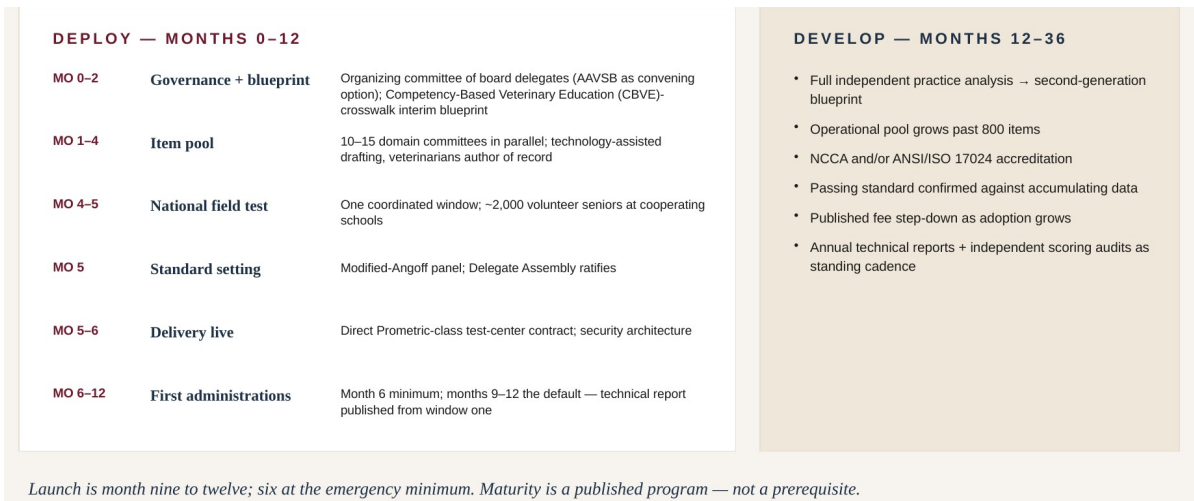


Figure 1. Deploy and develop: the two-track construction schedule, from the Build the Alternative summary deck.

Who a sudden stop does not affect. Every licensed veterinarian keeps practicing: licenses are the property of the states, not of any examination vendor, and renewal cycles do not run through ICVA. Every candidate who has already passed is likewise protected — score reports are transmitted to the licensing boards, which hold them in their own files and license on the records in their possession. The population actually at issue is the forward flow: the roughly 3,500–4,500 new graduates each year across U.S. and Canadian programs (Association of American Veterinary Medical Colleges (AAVMC) data), plus foreign-pathway candidates, approaching license-application windows without an examination to sit. Timing matters too. With three NAVLE testing windows now operating and most seniors testing in the November–December window before spring graduation, a stop's real-world bite depends on when it lands; in most timings, the majority of the imminent cohort already holds scores, and the true bridge period runs six to fourteen months before the next cohort is genuinely blocked.

Feasibility, not a timetable. Courts crafting remedies that touch essential credentialing functions do not, as a practice, order cliff-edge shutdowns; injunctive relief and consent decrees in such matters characteristically include wind-down periods, transition terms, or court-supervised continuity. Enforcement decisions belong to Attorneys General and to courts, and NAVEC does not presume to set their timetable. Its contribution is feasibility: the architecture below means a remedy on any timeline — including immediate relief — is operationally survivable. Feasibility concerns should never be the reason enforcement is deferred, and the existence of this plan is precisely what keeps the worst case from controlling any negotiation.

Layer 1 — days 0 to 90: designed so that nobody in the pipeline is stranded. Score portability for passed candidates is administrative fact, not aspiration. For everyone else, the interim machinery largely already exists in law. Temporary or provisional permit provisions allowing a graduate to practice under the supervision of a licensed veterinarian pending examination are on the books today — Texas by rule (22 Tex. Admin. Code § 571.11) and

Pennsylvania by statute (63 P.S. § 485.10) are worked examples, and NAVEC's survey of state practice acts identifies at least eighteen states with provisions of this kind.¹⁷ Where such provisions are absent, state administrative procedure acts provide emergency rulemaking that takes effect immediately and runs 90–180 days, renewable; the 2020 record shows boards and governors across the health professions enacting exactly such measures in days to weeks.¹⁸

Layer 2 — through roughly month nine: supervised provisional practice. New graduates practice under supervision on temporary permits, existing or emergency-issued, with conversion to full licensure conditioned on passing the examination once administration resumes. This is not an improvisation; it is defensible pedagogy with a recent national proof. In 2020, states including New York, New Jersey, and Massachusetts provisionally licensed medical graduates ahead of examination scores; the USMLE Step 2 Clinical Skills examination was suspended in March 2020 and permanently discontinued in January 2021 — an entire licensing-examination component eliminated while licensure continued without interruption; and Educational Commission for Foreign Medical Graduates (ECFMG) stood up emergency certification pathways in a matter of weeks. Provisional licensees under supervision, for a defined period, with conversion contingent on examination passage, is a structure the professions have already run at national scale.

Layer 3 — months one through twelve: the build itself. On the recommended construction schedule — funding in hand, workstreams parallelized — the standards-compliant sequence of Section 4 fits inside a year, because most of a conventional exam-development calendar is sequencing convention, not psychometric necessity. The blueprint compresses from months to weeks by crosswalking existing, profession-endorsed frameworks — the published Competency-Based Veterinary Education (CBVE) competency framework¹⁹ and the NAVLE's own public content outline²⁰ — as the interim blueprint, with the full independent practice analysis running in parallel for the second-year form. Item development compresses through structure: ten to fifteen domain committees working simultaneously rather than sequentially, professional item-development contractors engaged for surge capacity, and technology-assisted drafting under expert human review exactly as Section 4 specifies — veterinarian committees remain author of record on every item, bias-and-sensitivity review remains a separate panel, and no item is scored without pretest performance data. Field testing, the honest hard constraint, is solved by coordination rather than time: a single national field-test

¹⁷Texas: 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). NAVEC's survey of state practice acts identifies at least eighteen states with temporary or provisional permit provisions of this kind.

¹⁸See, e.g., New York Executive Order 202.10 (2020) and companion state actions provisionally authorizing 2020 health-professional graduates to practice under supervision before examination scores; state COVID-19 emergency licensure records (verified July 5, 2026).

¹⁹AAVMC Council on Outcomes-based Veterinary Education, "Competency-Based Veterinary Education (CBVE) 2.0," <https://cbve.org> (verified July 5, 2026).

²⁰ICVA, "NAVLE Exam Blueprint / Content Outline," [icva.net, https://www.icva.net/navle/](https://www.icva.net/navle/) (verified July 5, 2026).

window at cooperating veterinary schools — the deans reading this document are the reason it works — with roughly two thousand volunteer final-year students yields robust item statistics in one administration, and a randomly-equivalent-groups design requires no anchor items from the incumbent. Standard setting by modified-Angoff panel takes days once data exists. Delivery contracting with an established test-center network runs three to six months from signature to first seat — the National Conference of Bar Examiners and the states built and deployed an emergency examination in roughly four months in 2020²¹, and the failures of that episode were consumer-scale remote-proctoring failures, not item-validity failures; this plan uses Prometric-class secure centers.

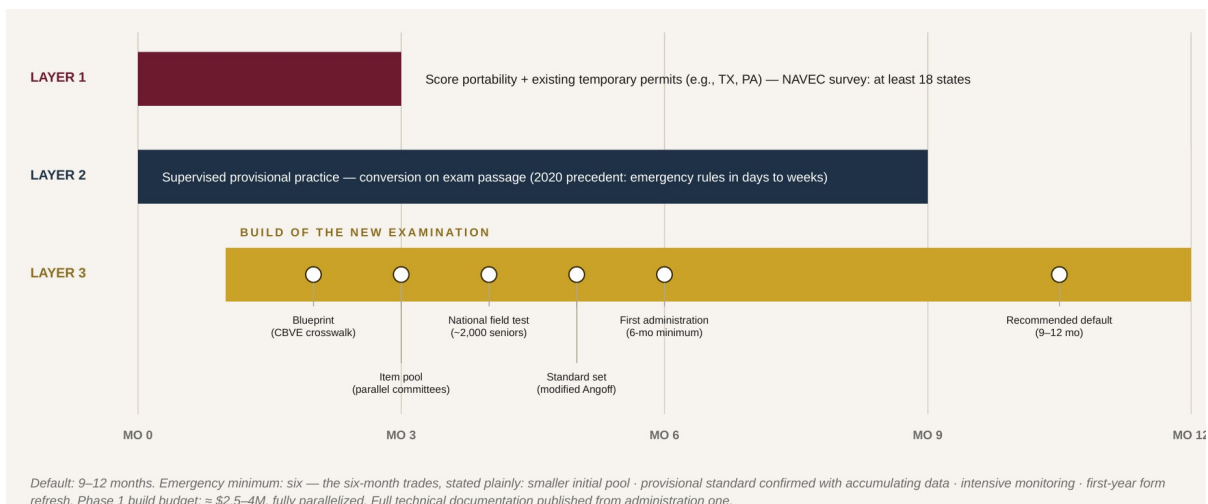


Figure 2. The three-layer continuity architecture: standing state-law bridges, coordinated interim measures, and the parallel build.

The honest fork: six months or nine to twelve. The six-month minimum — interim blueprint by month two, operational pool by month three, national field test in month four, provisional standard set in month five, first operational administration in month six — is achievable and AERA/APA/NCME-defensible, with the trades stated plainly: a smaller initial operational pool, a provisional passing standard confirmed against accumulating data, intensive post-launch monitoring, and a first-year form refresh. The nine-to-twelve-month schedule is the recommended default: a fuller pool, two field-test windows, and the standard confirmed before launch. Both commit to publishing complete technical documentation from the first administration — which would place more psychometric evidence in public view in month six than the documented record shows the incumbent publishing across its operating history. Every new licensing examination in history launched its first operational form on field-test data; that is how new examinations are born, not a corner cut.

The acceleration premium. Compression is bought, not wished for. The parallelized Phase 1 budget runs an estimated **\$2.5–4 million**, against roughly \$1.3–2.1 million for the same build run sequentially — the premium covering parallel committee operations, contractor surge

²¹National Conference of Bar Examiners, October 5–6, 2020 remote bar examination (administered in 20 jurisdictions, built in approximately four months), <https://www.ncbex.org> (verified July 5, 2026).

pricing, incentivized field-test administration, and accelerated delivery integration. Interim governance forms in weeks, not months: an organizing committee of volunteer state-board representatives, with the Delegate Assembly structure of Section 3 phased in behind it — and the fastest convening path may run through AAVSB, which already exists, already counts every licensing board as a member, and already operates credentialing infrastructure.

Months twelve through thirty-six: the development program. Launch is not maturity, and the difference is published rather than hidden. Across the first three operational years the Council runs a stated development program: a full independent practice analysis feeding a second-generation blueprint; growth of the operational pool past eight hundred items; NCCA and/or ANSI/ISO 17024 accreditation; the passing standard confirmed and re-documented against accumulating candidate data; and the published fee step-down described in Section 7 as adoption grows. None of this is a precondition of launch — it is what launch buys. The peer professions' examinations improve on exactly this cadence, in public; the plan here simply commits to the cadence in advance.

The bottom line, stated for the record. The plan is designed against a cliff edge, not around a promise. Even under a sudden stop with zero incumbent cooperation: licensed veterinarians remain licensed; candidates who have passed keep their scores; and the forward flow of new graduates is bridged through temporary and provisional permits, supervised practice, emergency rules, and — where a court or agency is acting — transition terms built into the remedy, while examination-based licensure resumes on the construction schedule, nine to twelve months as the default and six at the emergency minimum. The gap is not a void; it is a managed bridge with three redundant layers, most of which already exist in state law today. And the schedule that makes the worst case survivable is the same schedule this paper recommends running now — not as insurance, but as construction. Deploy on the default schedule; develop for thirty-six months.

6. Three Adoption Pathways

One framing governs this section. State rules do not answer the threshold question — whether mandatory reliance on an unverifiable examination is defensible — they implement the answer. If a legally authoritative action ever resolves that question against the incumbent arrangement, boards must adjust their licensing machinery, and the pathways below become mechanics rather than choices. Until then, the same machinery serves boards that move by choice, and it is deliberately light: in most states, adoption requires only board rulemaking under existing approved-examination authority, with no new statute.

Path B — the parallel pathway — comes first. Most states designate the required licensing examination at the regulation or board-policy level rather than in statute; where "NAVLE" is named in rule, the amendment pathway is ordinary rulemaking, and where statute controls, a short amendative bill substituting "a national examination approved by the board" restores

board discretion. The operational model for dual acceptance already exists inside veterinary licensure itself: states today accept either of two foreign-credentialing programs (Educational Commission for Foreign Veterinary Graduates (ECFVG) and PAVE) as equivalent, and before 2000 the profession routinely operated with multiple examination instruments. Under Path B, early-adopter boards amend their rules to accept *either* examination, candidates choose, and the new instrument earns market share on fee, transparency, and candidate experience. The plausible first movers are states whose attorneys general have already been engaged on these issues — Wisconsin, Texas, Florida, and Pennsylvania among them — along with states that have declared veterinary workforce shortages and have independent regulatory cultures. Five to eight adopting states within two years of launch is the working target, and Section 7 shows the finances at that volume.

Two pathways is the norm — one is the anomaly. The strongest precedent is the one medicine has been running for decades: the USMLE and the COMLEX, two complete licensing examinations²², developed by two organizations, both accepted by every state medical board, with published concordance research and no resulting chaos — only the discipline that the possibility of choice imposes on both. Veterinary credentialing itself already operates the model: states accept either of two foreign-graduate pathways today. And the 2020 test-center closures that disrupted NAVLE administration demonstrated the remaining argument on public-protection grounds alone: critical infrastructure gets redundancy as a matter of ordinary policy, and a profession's sole licensure gate is critical infrastructure. This is NAVEC's structural position, held on the merits and independent of any litigation outcome: 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.

Path A — full succession — is where sustained failure leads. If reform stalls and the documented record grows, the member boards can act collectively: the Delegate Assembly structure means the same body that governs the new examination is composed of the regulators who decide what their jurisdictions require. A veterinary interstate licensure compact effort, developed through AAVSB with the Council of State Governments, is in development; if enacted, a compact commission adopting the new examination as its recognized instrument would provide an additional coordination vehicle capable of moving many jurisdictions in a single act. Full succession requires no federal approval — examination designation, unlike accreditation, involves no Department of Education recognition — only the accumulated decisions of the boards themselves.

Path C — enforcement-triggered transition — is the pathway nobody chooses. Paths A and B describe what boards may elect. Path C describes what boards must implement if the election is made for them: a court order, a consent decree, a federal agency action, or an

²²Federation 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.

Attorney General enforcement action or settlement — or another determination carrying legal authority — concluding that continued mandatory reliance on the NAVLE or another gatekeeping instrument is unlawful, unreliable, or inconsistent with a board's public-protection duties. (Attorney General *opinions*, as distinct from enforcement actions, are binding on state agencies in only a handful of states and advisory in most, though they carry substantial persuasive weight with the boards they address.) In that event, the machinery of Section 5 is the implementation manual: emergency rulemaking, temporary and provisional permits, approved-equivalent language, supervised practice, legislative cleanup where a statute names a specific examination, and court-supervised transition terms. NAVEC advocates none of these triggers in this paper; the design obligation is narrower — that if any of them occurs, continuity is an engineering problem with a published solution rather than a reason for delay.

The three paths are sequenced, not alternative. Path B builds the operational record; Path A remains available if the incumbent system's trajectory makes it necessary; Path C ensures that an outcome imposed from outside the boards' own timetable lands on prepared ground.

7. Budget: Minimal Capital, Self-Funded Expansion

All figures below are estimates with stated assumptions, presented for founders to stress-test.

Phase 0 — Formation (months 0–2): \$250,000–\$400,000. Practice analysis and blueprint (\$120–180K, contracted psychometric firm); legal formation, bylaws, and member-board charter process (\$60–100K); convening and administration (\$70–120K).

Phase 1 — Build (months 1–12): \$2.2–3.6 million. Item development for a 450–500 item launch pool with technology-assisted drafting, full committee review, and contractor surge across ten to fifteen parallel committees (\$700K–\$1.1M — versus roughly \$0.9–1.25M under fully traditional sequential development, before the surge premium); psychometric contracting for field-test analysis, equating, and standard setting on the compressed calendar (\$450–650K); delivery-vendor integration, security architecture, and candidate systems (\$350–550K); the coordinated national field-test window and pilot administrations, including school-site incentives (\$250–400K); and the core staff — executive director, director of psychometrics, examination operations manager — hired at the start rather than the end (\$450–900K).

Combined capital requirement: approximately \$2.5–4 million on the twelve-month schedule — deliberately sized for a philanthropic consortium, a coalition of state-board or compact contributions, or a mixed model, with no single funder able to dominate governance.

Phase 2 — Operations and self-funding. The lean steady-state cost structure: core staff of five to six (\$1.1–1.4M loaded); contracted psychometrics (\$250–400K); continuous item-pool refresh (\$200–300K); security, audit — including the independent scoring audit the bylaws

require — legal, and insurance (\$150–250K); systems and administration (\$100–150K). Fixed costs of roughly **\$1.8–2.5 million annually**, plus variable delivery costs of approximately \$75–100 per candidate.

The fee is set by a published schedule, not a single point: a launch fee of **\$450–495** — 40 to 45 percent below the NAVLE's \$825 fee for the 2026–2027 testing cycle, the third consecutive annual increase (\$760 in 2024–25 and \$800 in 2025–26 per ICVA's published schedules; the 2026–27 figure per state licensing board notices of ICVA's announced fees)²³, and before the separate \$55 approval fee and jurisdictional add-ons — stepping to **\$375–425** once sustained volume exceeds approximately 7,000 administrations, with surpluses beyond a stated reserve target returned as fee reductions by bylaw rather than accumulated. The structural reason a lower fee is honest arithmetic rather than a loss leader is the cost base itself. ICVA's own annual reports note that the NAVLE is co-developed with the National Board of Medical Examiners under arrangements dating to the examination's creation²⁴; an organization assembled in 2026 purchases item-development support, psychometric services, and test-center delivery directly from a competitive modern vendor market — a Prometric-class delivery contract signed by the Council, contracted psychometrics, technology-assisted drafting under expert review — and carries no legacy layer. At the launch fee, self-sufficiency from examination revenue alone lands at approximately **4,800–6,500 candidates per year**; below that, the founding-state launch contracts described below carry the difference by design. For scale: ICVA reports 9,301 NAVLE administrations in the 2024–2025 cycle, and U.S. and Canadian graduating classes continue to grow as new accredited programs come online. Break-even therefore requires roughly 40–50 percent of current examination volume — demanding under Path B's early years, unremarkable under any broad-adoption scenario. Recovering Phase 0–1 capital in addition to operations extends the requirement to roughly 6,500–8,000 cumulative candidates across the first three operational years, after which fee revenue funds pool expansion, fee reductions, or reserves. The bridge for Path B's early low-volume years is handled structurally: launch contracts with first-mover states (flat annual amounts in exchange for founding-member fee locks) convert the volume risk into a shared public commitment rather than a candidate surcharge. The NCLEX — delivered at scale for a \$200 fee²⁵ — is the standing proof that examination fees in this class are a function of volume and governance choices, not intrinsic cost.

²³ICVA, "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).

²⁴ICVA, IRS Form 990 filings (EIN 36-3992537), via ProPublica Nonprofit Explorer, <https://projects.propublica.org/nonprofits/organizations/363992537> (verified July 5, 2026).

²⁵Pearson VUE / NCSBN, NCLEX registration fee (\$200 U.S.), <https://www.nclex.com/fees-payment.page> (verified July 5, 2026).

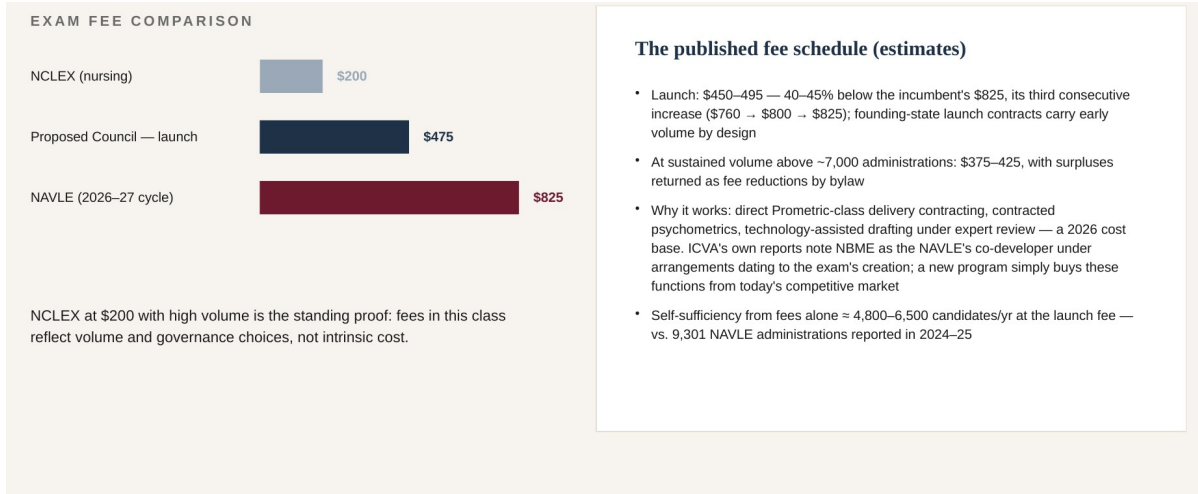


Figure 3. The published fee schedule against the incumbent: the \$200 NCLEX benchmark, a \$450–495 launch fee, and the NAVLE's \$825 (2026–27).

8. What NAVEC Contributes — and What It Does Not

NAVEC's role begins and ends outside the walls. It contributes this blueprint and the comparative research beneath it; it can convene the initial conversations among boards, funders, and the profession; and it will continue what it already does — public accountability monitoring, applied with the same standards to the new Council as to the incumbent. NAVEC holds no seat, no veto, no contract, and no financial interest in the organization described here. A successor institution captured by its advocates would reproduce the disease it was designed to cure; the governance rules in Section 3 — public members, entanglement prohibitions, member-board control — bind everyone, including the blueprint's author.

9. Legal Design

Three doctrines shape the architecture. First, *NC Dental* active supervision, addressed structurally in Section 3.1: the Council's controlling members are the state boards acting in regulatory capacity, its passing standard and fees are ratified by their assembled delegates, and its records are open to member-state review — supervision embedded in the design rather than asserted in litigation. Second, the standard-setting line of cases — *Allied Tube*, *Hydrolevel* — which teach that private standard-setting bodies invite liability when commercially interested actors capture their processes; the entanglement prohibitions, public members, and separation of examination development from eligibility decisions are the direct application. Third, and affirmatively: the creation of a second examination pathway is itself procompetitive conduct. Nothing in this design excludes, ties, or conditions; it adds an option where none exists, under governance more restrictive than the incumbent's. That is the posture antitrust law is built to protect.

10. Risks and Honest Limitations

"The technology-assisted development will draw academic criticism." It will, and the answer is in the architecture rather than the adjectives. The psychometric gold standard for any item is empirical performance data from pretesting — which this design requires for every item regardless of how its first draft was produced — plus human authorship of record, bias review, and published technical reporting. Critics should also weigh the counterfactual: the incumbent examination publishes no technical reports and undergoes no independent scoring audit. An examination whose every item is veterinarian-approved, empirically pretested, and documented in public technical reports withstands scrutiny that the status quo has never invited. The Council should engage the measurement community early — advisory seats, published methodology, conference presentation — and let the evidence carry the argument.

Chicken-and-egg adoption risk. States hesitate to adopt an unproven examination; the examination cannot prove itself without states. The pilot structure, founding-state launch contracts, and third-party accreditation commitment are the mitigations — and honesty requires saying that Path B's first two years are the hardest part of this entire design.

Incumbent response. Fee reductions, accelerated transparency, or genuine governance reform by ICVA in response to a credible alternative would be — by NAVEC's own lights — a version of success. This blueprint loses none of its value if its existence is what finally makes it unnecessary.

Candidate-pool fragmentation and dual-preparation burden. Under Path B, candidates in dual-acceptance states face a choice, not a burden — the blueprint is public, the fee is lower, and preparation for a practice-analysis-based examination is preparation for practice. But the Council must resist any temptation toward differential leniency to win volume; the passing standard is criterion-referenced, published, and ratified by regulators precisely so that "easier" can never be the sales pitch.

Execution risk on a lean budget. The mitigation is contracting: psychometrics, delivery, and verification are purchased from established firms rather than built, keeping the permanent organization small and the fixed-cost base survivable.

11. Conclusion

The examination that stands between every veterinary graduate and the profession should be governed by the public bodies accountable for licensure, documented to the standard its peer professions have met for decades, and priced at what governance-disciplined operations actually cost. None of that describes the current arrangement, and all of it is buildable — in roughly thirty months on the standard track, or within nine to twelve on the default construction schedule set out in Section 5 (six at the emergency minimum), for capital measured in the low

millions — by the state boards that already hold the authority. NAVEC's position is no longer reform first and build later. It is build now: where no board can verify the gate it is required to use, the alternative is not leverage to be held in reserve — it is infrastructure the public is owed. Reform by the incumbents is welcome, and it changes nothing about the need. A profession's sole gateway should never again be a single point of failure, and the surest guarantee of a trustworthy examination is the existence of another one.

Working designations used throughout ("the Examination Council") are placeholders; naming, incorporation, and final governance decisions belong to the founding member boards. Figures identified as estimates reflect stated assumptions and published benchmarks as of mid-2026 and should be independently validated during Phase 0. Characterizations of litigation positions are attributed to the parties advancing them; nothing herein asserts legal conclusions as NAVEC's own findings.