



SENT VIA EMAIL AND REGULAR MAIL

July 12, 2016

Dr. Shane C. Burgess, Dean
School of Veterinary Medicine
University of Arizona
1140 E. South Campus Drive
Tucson, AZ 85721-0036

Dear Dr. Burgess:

The AVMA Council on Education met on June 13, 2016 to consider the request from the University of Arizona for a Letter of Reasonable Assurance. The Council reviewed the school's most recent self-study, the preliminary report of evaluation (ROE) of the site team, the school's response to the preliminary ROE, and the school's response to the Council's April 20, 2016 letter deferring the decision. The Council voted to deny the University of Arizona School of Veterinary Medicine's request for a Letter of Reasonable assurance. The Council found that the school's plan, when implemented, will not permit the school to be in compliance with Standard 2 Finances, Standard 4 Clinical Resources, Standard 6 Students, Standard 8 Faculty, and Standard 10 Research.

Specific concerns raised by the Council and listed in the directives section of the report, along with the Council's assessment of the school's response include:

Standard 2 Finances

1. The school must provide a more detailed assessment of the proposed financial structure of the school, so that the proposed tuition model, which relies heavily on year 1 undergraduate tuition, demonstrates long-term financial sustainability of the school.

Council's assessment: The SVM provided a revised budgetary table under Standard 1 Organization; however, the revised budget fails to define all sources of income, in particular Clinical Practice Partnerships and their sustainability, as major sources of funds for the SVM. Further, there appears to be uncertainty with regard to the one-time State of Arizona award in which the self-study stated \$5M and \$2M were requested for facility renovations as compared to the revised budget indicating an \$8M State of Arizona one-time award.

2. The school must continue to report on progress in securing administrators and faculty to meet the educational needs of the professional program.

Council's assessment: The SVM addressed the search for a dean, but failed to provide a comprehensive plan for recruiting other administrators and faculty.

Standard 4 Clinical Resources

1. The school must develop a more detailed assessment of the number of diseased animals available to deliver clinical training.

Council's assessment: The SVM response appears to provide exposure to adequate numbers of healthy animals, but the response fails to provide the details for the number and species of diseased animals, particularly as related to how the curriculum will provide adequate access to the clinical learning environment in associated specialty practices.

2. The school must implement a medical records system that is retrievable and searchable.

Council's assessment: The SVM response with regard to medical records system appears to provide a plan that will meet requirements; however, it is unclear how veterinary students will have access at private practices.

Standard 6 Students

1. The school must have adequate numbers of faculty to ensure faculty have the appropriate time to develop and deliver the new curriculum, and concurrently fulfill requirements for scholarly activity.

Council's assessment: The SVM plan for the overall projected 113 faculty and their course assignments, contact hours, and distribution for teaching, service and research are not clearly developed and adequately planned to develop and balance the curriculum for the pre-clinical and clinical programs of the three year professional program.

Standard 8 Faculty

1. The school must have adequate numbers of faculty to ensure faculty have the appropriate time to develop and deliver the new curriculum, and concurrently fulfill requirements for scholarly activity.

Council's assessment: It is not clear how the increased numbers of faculty members being counted will interact in the curriculum. There is an additional concern that during the 4th year specialty discipline areas may be covered by only a single specialist. The SVM plans to address specialty discipline education by contracting off-campus specialty practices, and how students will participate with these off-campus specialties is not defined.

Standard 10 Research

1. The school must develop a plan to establish a substantial, high quality research program within the SVM.

Council's assessment: While the SVM's response reports on the extensive University of Arizona research programs, it is unclear if and how the SVM will develop a substantial, high quality research program that is integrated within the SVM. The SVM plan is also unclear on how veterinary students will be connected with, and engaged across the UA campus to provide an integrated environment of research activities. In addition, the plan fails to describe how SVM faculty will demonstrate continuing scholarly productivity when the majority of SVM-related research will be performed in other colleges at UA.

See the final report of evaluation for additional comments and suggestions.

Denial of reasonable assurance is an adverse decision and the school has the right to appeal an adverse decision. As stated in section 10.12 of the *Accreditation Policies and Procedures of the AVMA Council on Education*, May 2016

http://www.avma.org/ProfessionalDevelopment/Education/Accreditation/Colleges/Documents/coe_pp.pdf:

In the event of an adverse decision by the COE, the affected college may appeal the decision on the grounds that the Council 1) has ruled erroneously by disregarding established AVMA criteria for accreditation, 2) failed to follow its stated procedures, or 3) failed to consider all the evidence and documentation presented. No other grounds for appeal will be allowed. When a college appeals an adverse decision, the following procedures will apply:

Not later than 30 calendar days after receipt of notification (registered mail, return receipt requested) of an adverse decision, the college shall notify the AVMA Board of Directors in writing, through the Executive Vice President, that it intends to appeal the decision. Not later than 60 calendar days after the date of notification of the adverse decision, the college shall submit documentation (one original and 15 copies) supporting its appeal and a \$10,000 deposit to be applied to the expenses of the hearing. Expenses shall be paid by the appellant college, and any balance remaining from the deposit shall be returned to the college, or the college will be invoiced for additional expenses.

The Board of Directors shall appoint a hearing panel comprised of seven persons, none of whom shall be current members of the Council on Education or AVMA staff. The hearing panel will include veterinary educators and practitioners, and one public member who have completed service on the Council within the last seven years (one accreditation cycle). Hearing panel members will be credentialed using the same procedures used to credential COE members. As a refresher, panel members will receive the same training provided new Council members, and specific training to review all changes made in the COE policies and procedures since their service on the Council to

ensure panel members have the requisite knowledge and understanding to make decisions consistent with the policies and requirements of the Council on Education. The Board of Directors shall designate the chair of the panel. Hearing panel members are required to sign a Conflict of Interest Statement.

A hearing shall be held at or near the AVMA office in Schaumburg, not more than 120 calendar days following receipt by AVMA of the documentation supporting the college's appeal. The Executive Vice President will schedule and organize the hearing and notify the hearing panel, the college, and the members of the Council on Education by mail not less than 10 or more than 40 calendar days prior to the date of the hearing. The notification will include the date, time and place for the hearing, as well as a list of the members of the hearing panel.

At any hearing, an officer or other representative of the appellant college and a member of the Council on Education shall have the right to present witnesses and to submit documents and other written materials pertinent to the case. The appellant college and the Council may be represented by legal counsel who may make the presentation on behalf of the appellant college and the Council, respectively. The appellant college shall be responsible for all fees and expenses related to its legal counsel. The hearing panel may also have legal counsel present to advise it with respect to procedural matters. Following presentations by the appellant college and the Council, the hearing panel will allow opportunity for response and rebuttal by the appellant college. Before permitting testimony relating to the character or general reputation of anyone, the panel shall satisfy itself that the testimony has a direct bearing on the case at issue.

The hearing shall be restricted to a review of documents and testimony relevant to the standard(s) on which the adverse accreditation or reasonable assurance decision was based, or a review of the process and procedure used to arrive at a recommendation as appropriate, depending on the basis of the appeal. Documentation may include extracts from the college or school self-study, with appendices or attachments, and from the report of evaluation of the site visit team. All documentation and testimony shall be relevant to conditions existing at the college or school during the dates on which the site visit was made or on which the adverse decision was based.

The hearing panel may either affirm, amend, or reverse an adverse decision, or remand the adverse decision to the Council for further consideration. If the hearing panel reverses or amends the Council's decision, the hearing panel will remand the matter to the Council with specific instructions to implement the hearing panel's decision. If the hearing panel remands an adverse action for further consideration by the Council, the hearing panel shall identify specific issues that the Council must address. In all cases where a decision is implemented by or remanded to the Council, the Council shall act in a manner consistent with the hearing panel's decision and instructions. The conclusion of the panel shall be produced in the form of a written report and become a permanent record of the Council on Education. The chief executive officers of the college and the university will be provided with copies of the hearing panel report. The panel report will be confidential to the Council. All questions will be referred to the college which may respond as deemed appropriate.

An appeal is not a de novo hearing, but a challenge of the Council's decision based on the evidence before the Council at the time of its decision. The Council's decision should not be reversed by the appeal panel without sufficient evidence that the Council's decision was plainly wrong or without evidence to support it. Accordingly, the appeal panel should not substitute its judgment for that of the Council merely because it would have reached a different decision had it heard the matter originally.

The accreditation status of the petitioning college shall remain unchanged during the review; there shall be no public notice of the adverse decision until the review is complete and a final decision rendered. The fact the college has filed an appeal will, however, be a matter of public record.

At the discretion of the hearing panel or upon advance request in writing by either the petitioning college or the Council, a transcript of the proceedings may be made. The transcript will be shared by all parties.

The report of the hearing panel will be considered at the next regular meeting of the Council on Education. The Council must act in a manner consistent with the hearing panel's decision and instructions. All deliberations of the Council and the factors considered prior to the final decision shall be confidential to the Council. The appealing college will be notified in writing of the final accreditation status assigned by the COE.

If the decision by the COE is upheld, the appellant will be responsible for all expenses associated with the appeal. If the decision by the COE is reversed in its entirety, the appellant will be responsible for all expenses associated with transportation, food, and lodging for the college representatives; legal fees associated with college representation; and any other expenses incurred by the college in making the appeal. All other costs associated with the hearing including, but not limited to, panel and COE transportation, lodging, and food; legal counsel for the panel and/or the COE; conference telephone calls; mailings; meeting facilities; and a transcript of the proceedings will be shared equally by the college and the AVMA.

A school that is denied Reasonable Assurance following an evaluation by the Council may not apply for reconsideration for 12 months following the date of the Council's decision.

If you have any questions regarding this action of the Council, please contact Dr. Karen Martens Brandt, Director of the AVMA Education and Research division at 1-800-248-2862, ext. 6674 or e-mail kbrandt@avma.org.

Sincerely

A handwritten signature in blue ink, appearing to read "John R. Pascoe", with a long horizontal flourish extending to the right.

John R. Pascoe BVSc, PhD, Diplomate ACVS
Chair, Council on Education

JRP/db