



MEMORANDUM

DATE	October 6, 2020
TO	Veterinary Medical Board
FROM	Jessica Siefertman, Executive Officer
SUBJECT	Agenda Item 9.C. Section 2010.1, Article 2, Division 20, Title 16 of the CCR Regarding Eligibility Evaluation - National Veterinarian Examination

Background

To obtain a veterinarian license in California, applicants must first demonstrate competency through examination. Pursuant to Business and Professions Code (BPC) section [4848](#), subdivision (a)(2), the veterinarian license examination has three parts: 1) a national examination known as the North American Veterinary Licensing Examination (NAVLE); 2) the California State Board Examination (CSBE); and 3) the Veterinary Law Examination (VLE).

In order to complete the CSBE and NAVLE, applicants must do the following:

1. Apply with the Board to determine eligibility to take the CSBE. The Board administers the CSBE.
2. Apply with American Association of Veterinary Regulatory Boards (AAVSB) Veterinary Examination Eligibility Review ([VEER](#)) to determine NAVLE eligibility. The NAVLE is administered by the International Council for Veterinary Assessment ([ICVA](#)). Once eligibility is established, AAVSB notifies ICVA that the California applicant can sit for the NAVLE.

NAVLE and CSBE eligibility requirements are outlined in California Code of Regulations (CCR) sections [2010.1](#) and [2023](#), respectively. While applicants are currently required to apply with the Board and AAVSB, Board staff believes these are duplicative reviews, since the same documentation is required for both applications. In addition, the Board requires similar documentation when applicants apply for licensure, pursuant to CCR section [2024](#). A side-by-side comparison of the NAVLE, CSBE, and license documentation requirements is attached.

Out of the 62 jurisdictions under AAVSB, California is the only jurisdiction requiring applicants to apply with AAVSB to determine NAVLE eligibility. ICVA performs eligibility reviews for 34 states and requires the same documents as the Board and AAVSB. The other jurisdictions determine eligibility in-house.

Board staff was unable to obtain historical documentation as to why AAVSB began determining NAVLE eligibility for California; however, AAVSB representatives believe the requirement stemmed from a potential conflict of interest concern raised by the Board’s Executive Officer in

2005. Since ICVA administers the NAVLE, there was a perceived financial benefit to approving applicants for the examination. However, according to ICVA, their only potential financial benefits from license applicants are as follows:

1. ICVA provides study materials to all NAVLE candidates. Some items are free (such as the NAVLE Competencies List, the NAVLE Species Diagnoses List, the NAVLE Sample Questions, and the NAVLE tutorial), while others (such as the NAVLE Self-Assessments) have a fee - currently \$50 for each form of the standard Self-Assessment, and beginning this month there will be a form with expanded feedback available for \$65.
2. ICVA charges the same amount of money for a candidate to retake the test as when they take the test for the first time, because their expenses (Prometric fees, test development and administration costs, etc.) remain the same each time a person tests.
3. ICVA charges the same amount of money (\$55) as an examination eligibility fee, because the same amount of time and effort is used by staff to ensure that the documentation is in order and the person is eligible to take the test each time they apply. This is similar to the VEER process and fees currently charged by AAVSB.

ICVA notes that there are a small number of candidates in each exam administration (approximately 5-10 each time) who fail to first apply through AAVSB as required for California licensure and, therefore, must wait until the next testing window to re-apply. According to ICVA, this delay occurs even though ICVA informs California license candidates on their website the requirement to apply through AAVSB as the Board's designated NAVLE processor.

Although ICVA e-mails follow-up messages to candidates who are not listed on the AAVSB's weekly approval spreadsheets, some candidates do not apply with the AAVSB or submit their required documentation to the AAVSB by the appropriate deadline. For license candidates of other state boards, ICVA is able to greatly reduce the number of candidates who are not approved each exam administration, because ICVA is able to make the application process as streamlined and simple as possible, with the exam application and eligibility documentation going to a single location.

The Board regularly reviews and reports on NAVLE pass rates during Board meetings, which are posted on the Board's website. In addition, Board members from various states, including California, maintain representation on the ICVA Board. As demonstrated in the Board's Administrative Procedures Manual, the Board believes membership on the ICVA Board is critical to California since it provides representation in the development and administration of the NAVLE.

The ICVA collaborates with stakeholders in academia, licensing boards, and practicing veterinarians to ensure their tools can effectively assess the knowledge and skills required for veterinary practice. The AAVSB has four elected representatives on the ICVA Board of Directors. Ms. Bowler is currently serving in her second term as an AAVSB Representative to the ICVA. Ms. Bowler was elected to an initial three-year term on the ICVA Board in September 2015 and was reelected to a second term in September 2018.

Further, the Board contracts with DCA's Office of Professional Examination Services (OPES) to conduct in-depth, thorough reviews of the NAVLE. The Board's review of NAVLE pass rates and

examination, along with Board member participation and representation on ICVA matters, appear to provide sufficient checks and balances to ensure ICVA properly determines NAVLE eligibility for California license candidates.

Board staff believes consumers are adequately protected without the duplicative AAVSB examination eligibility process in CCR section 2010.1, because no individual will be issued a license to practice veterinary medicine without passing the required examinations and submitting proof of graduating from an AVMA accredited school/college or a non-AVMA accredited school college with an ECFVG or PAVE certification. There does not appear to be any added consumer protection benefit to requiring applicants to apply to AAVSB prior to applying to ICVA to take the NAVLE.

Accordingly, Board staff recommends repeal of CCR section 2010.1. If CCR section 2010.1 is repealed, then veterinarian license candidates would submit the NAVLE application to ICVA, who would determine the candidate's eligibility to take the NAVLE. This proposal will streamline the NAVLE process for veterinarian candidates who would send the eligibility and exam application to a single place and alleviate confusion stemming from who to contact with eligibility and examination questions.

Board Action:

Please consider the information provided and decide if CCR section 2010.1 is necessary for consumer protection. If the Board believes consumers are adequately protected without CCR section 2010.1, please entertain a motion to repeal the regulation, direct the Executive Officer to take all steps necessary to initiate the rulemaking process, authorize the Executive Officer to make any technical or non-substantive changes to the rulemaking package, notice the proposed text for a 45-day comment period and, if no adverse comments are received during the 45-day comment period and no hearing is requested, adopt the proposed regulatory changes, as modified.

VETERINARY MEDICAL BOARD
 Comparison of California Veterinarian License
 Examination and Licensure Eligibility Requirements

AAVSB Review (VEER) (CCR section 2010.1)	CSBE Review (CCR section 2023)	ICVA Review (NAVLE Application)	Licensure Eligibility (CCR section 2024)
<p>(a) Applicants from an American Veterinary Medical Association [AVMA] accredited college of veterinary medicine must submit proof of senior status and of being within eight months of graduation.</p> <p>(b) Applicants from a veterinary college not recognized by the board shall submit supporting documents to substantiate either:</p> <ol style="list-style-type: none"> 1. certificate of completion of the Educational Commission for Foreign Veterinary Graduates program (ECFVG) or 2. certificate of completion of the Program for Assessment of Veterinary Education Equivalence (PAVE). 	<p>a) A graduate of a recognized veterinary college or a person who is within eight (8) months of his or her anticipated graduation from a recognized veterinary college.</p> <p>(b) A person from a non-recognized veterinary college who is within eight (8) months of graduation and 1) who is enrolled in the ECFVG or PAVE program and 2) has passed the basic sciences examination requirements of the ECFVG or PAVE program.</p> <p>(c) A graduate of a non-recognized veterinary college who possesses a certificate from either the ECFVG program or the PAVE.</p>	<p>Proof of one of the following:</p> <ol style="list-style-type: none"> 1. A graduate of AVMA accredited veterinary schools, 2. A senior student at AVMA accredited schools, 3. A foreign graduate enrolled or have completed either the ECFVG or PAVE program 	<p>In addition to the application requirements outlined in Section 2010, an applicant applying for licensure in California must submit the appropriate initial licensing application and fee and the following documentation:</p> <p>(a) Graduates of a recognized veterinary college must submit a diploma as proof of graduation.</p> <p>(b) Graduates of non-approved veterinary colleges must submit (1) a diploma and (2) a certificate of completion from either ECFVG or PAVE. Diplomas submitted in a language other than English must be accompanied by a certified translation into English.</p>