



September 20, 2026

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Submitted via regulations.gov

U.S. Department of Education  
Office of Postsecondary Education  
400 Maryland Ave. SW  
Washington, DC 20202  
Attn: Mr. Aaron Washington

**Re: Comments on Notice of Proposed Rulemaking, Accreditation, Innovation, and Modernization: The Secretary's Recognition of Accrediting Agencies, 91 Fed. Reg. 53940 (Aug. 20, 2026)**

Dear Mr. Washington:

The American Association of Veterinary Medical Colleges (AAVMC) is a membership organization of colleges and schools of veterinary medicine, including all programs accredited by the American Veterinary Medical Association's Council on Education (AVMA COE). AAVMC has been in existence for 60 years, serving as a collective of dedicated veterinary educators teaching students and preparing them to work on the front lines of practice, industry, and government, in service to society. We appreciate the opportunity to comment on the Notice of Proposed Rulemaking, Accreditation, Innovation, and Modernization: The Secretary's Recognition of Accrediting Agencies, 91 Fed. Reg. 53940 (Aug. 20, 2026).

The AAVMC agrees with the Department's stated rationale for "a comprehensive modernization of the regulations for recognition of accrediting agencies, one that focuses on student achievement and provides a high-quality education." As a collective of professional educators, we agree that accreditors must operate effectively and efficiently, in service to institutions and accredited programs that are equally accountable for the quality of education provided, the outcomes their graduates achieve, and the public's confidence in graduate competence.

Our comments focus on areas in the proposed rule where we believe language could be enhanced to better achieve the Department's own stated goals. These areas are: (1) the definition of "related, associated, or affiliated trade association" in § 602.3(b) along with the application of "separate and independent" requirements at § 602.14(b), conflict of interest rules at § 602.15(e) and anti-trust conduct in § 602.31(d); (2) how the "separate and independent" requirements at § 602.14(b) and the conflict of interest rules at § 602.15(e) apply to standard-setting as distinct from individual accreditation decisions; and (3) the need for an explicit transition period to protect students, institutions, and the public from a period in which no accreditor is recognized in the veterinary field.

**1. §§ 602.3(b), 602.14(b), 602.15(e), 602.31(d) — "Related, Associated, or Affiliated Trade Association", Separate and Independent Requirements, Conflict of Interest Rules, and Anti-Trust Law**

AAVMC's mission is to inspire innovation and promote excellence in veterinary education worldwide, and our history includes developing the AAVMC Competency-Based Veterinary Education (CBVE) model, an outcomes-based framework that has been broadly, electively adopted into the curricula of veterinary programs, both inside and outside of our membership. This includes training at the veterinary technician, veterinary practitioner and veterinary specialist levels. One of AAVMC's concerns is that, if the organization meets the criteria in the proposed definition of "related, associated, or affiliated trade association" in § 602.3(b), we may be limited in our ability to collaborate

with all veterinary accrediting agencies in the future, including supporting their uptake of this outcomes-based framework in their standards. AAVMC is also concerned that § 602.31(d)'s consideration of "anticompetitive conduct" as a "negative factor" in the evaluation of an accrediting agency may be interpreted to include the agency's use of the publicly published, voluntarily adopted, outcomes-based competency framework and assessment tools created by AAVMC's volunteers. We ask the Department to clarify that "anticompetitive conduct" would not include the voluntary adoption of the CBVE model by institutions or accrediting agencies.

The AAVMC acknowledges and supports the proposed rule that "requires an accrediting agency to operate 'separate and independent' of any related, associated, or affiliated trade association." For context and disclosure: the AAVMC is a funding and administrative partner of the American Veterinary Medical Association (AVMA), a membership trade organization of more than 111,000 veterinarians, in support of the AVMA COE's accreditation activities. Currently, the AVMA COE is the only recognized accrediting entity for colleges of veterinary medicine in the United States. A 2016 memorandum of understanding between the AVMA and AAVMC includes provisions that allow the AAVMC to appoint half of the AVMA COE's members, and to provide operational support for the AVMA COE. For example, the AVMA provides physical space for the AVMA COE staff. The AAVMC retains a single consultant that assists with staff functions of the AVMA COE and advises our AAVMC members on accreditation processes and procedures. The AAVMC supports the direction of § 602.14(b) and § 602.15(e), and we are prepared to work as necessary to allow AVMA COE to meet the conflict-of-interest requirements of the proposed rule. Our concern is timing, which we address in Section 3 below, not the underlying policy.

## **2. §§ 602.15(c) and 602.15(e)(2) — Practitioner and Administrator Participation in Standard-Setting**

We ask the Department to reconcile these two provisions that we believe are currently in tension within the proposed rule.

The AAVMC is concerned with the Department's proposal to prohibit representatives from institutions or programs from voting on decision-making bodies at accrediting agencies. The Department's proposed standard § 602.15(a)(2), that agency representatives be "competent and knowledgeable individuals, qualified by education or experience... as appropriate for their roles" supports the inclusion of practitioner and administrator voices, rather than excluding them. AAVMC requests the Department revise § 602.15(e)(2) to permit officers, directors, or employees of accredited institutions or programs to vote on the setting of field-wide standards or policies, while retaining the requirement that they recuse themselves from any vote on their own institution's or program's individual accreditation or pre-accreditation status.

## **3. Requested Transition Period**

A principal concern with the proposed rule as a whole is the timeline for compliance. Achieving full separation and independence under § 602.14(b) if required and entering into full compliance with the conflict of interest requirements under § 602.15(e) by modifying operational structures and processes, and working with state licensing boards to update state practice acts, are each major undertakings. In the veterinary profession, approximately fifty state practice acts currently name the AVMA COE in their professional licensure requirements. Other programmatic accreditors play a comparable role for other professions. The AAVMC requests additional time to avoid an "accreditation gap" — a period in which any field's current accreditor is no longer recognized and no successor is yet fully operational. Several new and innovative programs are currently being evaluated for initial accreditation by the AVMA COE, and a gap would jeopardize the progress of these new programs, as well as the continued standing of currently accredited programs scheduled for review. All of this would occur at a moment when veterinary graduates are needed to address a national workforce shortage including to meet critical needs in rural America, public health responses, and food safety challenges.

The Department has recognized the need for lead time with the proposed one-year delay of the effective date to allow for implementation of § 602.15(e)(4)'s office-space-sharing requirement. The AAVMC requests that the Department delay the effective date of the full set of separate and independent requirements under § 602.14(b) and conflict of interest rules under § 602.15(e). AAVMC suggests phasing implementation of these requirements to each accrediting agency's next scheduled recognition renewal, rather than requiring full compliance for all accrediting agencies on a single effective date. AAVMC also suggests including an explicit provision confirming that a state

practice act's reference to a currently recognized accreditor by name does not lapse, and does not affect a graduate's licensure eligibility, during a Department-approved transition to a successor accreditor or accreditors.

In summary, we respectfully ask the Department to:

1. Clarify that § 602.31(d)'s anti-trust "negative factor" does not include the publicly published, voluntarily adopted, outcomes-based competency framework and tools created by AAVMC.
2. Revise § 602.15(e)(2) to permit officers, directors, and employees of accredited institutions or programs to vote on profession-wide standards, while retaining the existing requirement that they recuse themselves from votes on their own institution's or program's accreditation status.
3. Adopt an explicit, multi-year phased transition schedule for the separate and independent requirements under § 602.14(b) and conflict of interest rules under § 602.15(e), based on each accrediting agency's recognition renewal cycle, and confirm that state practice acts referencing a current accreditor by name remain effective for licensure purposes throughout an approved transition.

Thank you again for the opportunity to comment. We look forward to continuing to work with the Department and our fellow educators to protect students, the public, and the workforce our profession serves throughout this transition.

Sincerely,



Emma Read, CEO on Behalf of AAVMC's Board of Directors