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KENTUCKY BOARD OF VETERINARY EXAMINERS

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Secretary Lind McMahon
U.S. Department of Education
Office of Postsecondary Education
Lyndon Baines Johnson Building
400 Maryland Ave. SW
Washington, DC 20202

Submitted via <https://www.regulations.gov/commenton/ED-2025-OPE-1042-0002>

RE: Comment on Doc # [ED-2025-OPE-1042](#) – Proposed changes to 34 CFR part 602 regarding existing accrediting agency recognition

Dear Secretary Linda McMahon,

Please accept this correspondence as providing comments on behalf of the Kentucky Board of Veterinary Examiners (“KBVE” or “Board”) regarding Federal Register (FR) Document # ED-2025-OPE-1042, *Accreditation, Innovation, and Modernization: The Secretary’s Recognition of Accrediting Agencies: Institutional Eligibility Under the Higher Education Act of 1965, as Amended, Student Assistance General Provisions*.

The KBVE appreciates the Department of Education’s efforts to examine the accreditation system and promote quality, accountability, innovation, and reduced administrative burden. However, the Board has significant concerns regarding the potential effects of the proposed changes on professional programs, state licensing authorities, students seeking professional licensure, and the public.

Background. The Kentucky Board of Veterinary Examiners is vested by the Kentucky General Assembly with the authority to administer and enforce the provisions of KRS Chapter 321 and to establish and evaluate the qualifications of applicants for licensure, certification, permitting, and registration relating to the practice of veterinary medicine in Kentucky. The Board’s primary responsibility is protection of the public through the regulation of the veterinary profession. This responsibility includes establishing and evaluating minimum qualifications for individuals seeking to practice veterinary medicine and ensuring that individuals entering the profession possess the education, training, knowledge, and skills necessary to provide competent veterinary services.

Because veterinary medicine is a highly specialized profession, Kentucky relies upon subject-matter experts who are educated, trained, and licensed in veterinary medicine to assist in establishing



appropriate educational, examination, licensing, and regulatory standards. Accreditation of professional veterinary education is an important component of this system because educational requirements and professional licensure are closely interconnected. The Department's proposed rule itself recognizes that programmatic accrediting agencies may play a significant role in professional fields because their accreditation may be used not only for Federal program purposes but also in connection with educational requirements for professional licensure.

The Board's comments are therefore focused specifically on the potential effects of the proposed changes on state licensing authorities and their responsibility to determine whether applicants have received education sufficient for safe entry into professional practice.

Comments Regarding the Proposed Changes. The KBVE respectfully requests that the Department carefully consider the implications of the proposed changes for state professional licensing boards and the professions they regulate.

1. Additional costs and administrative burdens for state licensing boards.

State licensing boards have finite resources and are charged with protecting the public within their respective jurisdictions. If the proposed changes result in a larger number of federally recognized accrediting agencies operating within fields connected to professional licensure, state licensing boards may need to devote substantial additional resources to evaluating and determining which accrediting agencies provide sufficient assurance of educational quality for purposes of professional licensure.

For a profession such as veterinary medicine, this evaluation cannot be based solely upon whether an accrediting agency satisfies Federal requirements for recognition. State licensing boards must also consider whether the educational standards used by an accrediting agency adequately prepare graduates to meet the requirements for professional practice and licensure.

This could require boards to undertake additional rulemaking, statutory interpretation, legal review, consultation with subject-matter experts, and development of criteria addressing which accrediting agencies will be accepted for purposes of licensure.

These activities would create costs and administrative burdens for state agencies that are already operating with limited resources. More importantly, the process of developing and implementing new state standards could take considerable time, potentially creating uncertainty for educational institutions and students during the transition.

2. Potential disruption to professional licensure mobility.

The proposed changes would remove geographic restrictions on accrediting agencies and make it easier for institutions and programs to change accrediting agencies or utilize multiple accrediting agencies.

Although increased flexibility may provide benefits to some institutions, it may also create significant complications for professions in which accreditation is connected to eligibility for professional licensure.

If institutions or professional programs are able to select among a larger number of accrediting agencies, state licensing boards may not necessarily recognize all accrediting

agencies as providing equivalent assurance of educational preparation. Individual states could therefore reach different conclusions regarding which accrediting agencies satisfy their educational requirements for licensure.

This may increase the potential for interstate inconsistency in eligibility for professional licensure.

For example, a graduate of a professional program accredited by one agency could potentially satisfy the educational requirements for licensure in one state but not another, depending upon the accrediting agency recognized or accepted by each state. Such differences could impede professional mobility and create additional barriers for licensed professionals seeking to practice across state lines.

The consequences would extend beyond administrative inconvenience. Students could make substantial educational and financial investments without having a clear understanding of whether their chosen program will satisfy the educational requirements for professional licensure in the states in which they ultimately intend to practice.

3. Need for clear standards addressing professional and programmatic accreditation.

The proposed rule recognizes the distinct role of programmatic accrediting agencies and the relationship between programmatic accreditation and professional licensure. The Department has also noted that there are often only one or two programmatic accrediting agencies serving a particular field or occupation and that such accreditation may be used to establish educational requirements for professional licensure.

The KBVE respectfully submits that this distinction warrants particular consideration in the final rule. For a state licensing board, programmatic accreditation can serve a function distinct from institutional accreditation by providing a profession-specific evaluation of whether an educational program addresses competencies relevant to entry into regulated professional practice.

Professional programs are not interchangeable with general academic programs. In fields such as veterinary medicine, accreditation standards may address specialized clinical education, faculty qualifications, facilities, equipment, clinical experiences, curriculum, patient and public safety, and other profession-specific competencies.

A regulatory framework that increases the number and flexibility of accrediting agencies should therefore also ensure that state licensing authorities retain sufficient ability to determine whether a particular accrediting agency's standards adequately address the competencies necessary for entry into the profession.

4. Importance of subject-matter expertise and professional participation.

The proposed regulations would remove the current requirement in 34 CFR § 602.15(a)(4) for programmatic accrediting agencies to include educators, practitioners, and/or employers on certain evaluation, policy, and decision-making bodies. The Department proposes instead to require agencies to have competent and knowledgeable individuals qualified by education or experience.

The KBVE encourages the Department to consider whether this change could unintentionally reduce the role of practicing professionals in establishing and evaluating profession-specific educational standards.

For highly specialized professions, meaningful participation by qualified practitioners and educators provides an important connection between educational standards and the actual knowledge and skills required for safe professional practice. State licensing boards should not be placed in the position of having to independently recreate this professional expertise when determining whether graduates of an accredited program are appropriately prepared for licensure.

The Board therefore encourages the Department to preserve a clear expectation that programmatic accreditation in regulated professions includes meaningful participation by individuals with profession-specific education, subject-matter expertise, and experience relevant to contemporary professional practice

5. Need to protect students from uncertainty regarding licensure eligibility.

Students entering professional programs need reliable information about whether their education will satisfy the requirements for professional licensure. This is particularly important because professional education frequently requires substantial financial investment and several years of study.

The Department's proposal includes additional provisions concerning disclosures to students regarding whether programs meet State educational requirements for licensure or certification. The KBVE supports transparency for students but believes disclosure alone may not adequately address the underlying problem if the accreditation marketplace becomes fragmented among multiple accrediting agencies with differing standards.

The regulatory framework should therefore minimize the possibility that students enroll in programs without a clear understanding of the relationship between the program's accreditation and the educational requirements for licensure in the states where they may ultimately seek to practice.

Request for Additional Consideration. The KBVE respectfully requests that the Department conduct additional analysis of the potential effects of the proposed rule on **state professional licensing boards, professional programmatic accreditation, interstate licensure mobility, and students pursuing regulated professions.**

In particular, the Department should consider mechanisms that would:

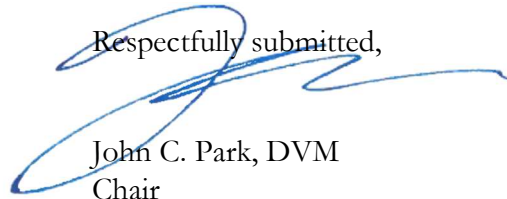
1. Protect students from enrolling in programs whose accreditation may not satisfy the educational requirements for licensure in the jurisdictions where they intend to practice;
2. Preserve meaningful participation by qualified practitioners and educators in the development and evaluation of profession-specific accreditation standards;
3. Recognize the distinction between institutional accreditation for Federal program eligibility and specialized programmatic accreditation that may serve as a component of professional licensure requirements; and

4. Provide sufficient implementation time for state licensing boards to evaluate the effects of any changes and, where necessary, amend statutes, regulations, policies, or procedures.

Conclusion. The KBVE recognizes the Department's interest in promoting competition, innovation, transparency, and accountability within the accreditation system. However, changes to Federal accreditation policy can have significant downstream consequences for professions in which accreditation is closely connected to state professional licensure. For veterinary medicine and other regulated professions, accreditation is not simply an institutional matter. It can directly affect whether graduates are eligible to enter a profession and whether licensed professionals can move between jurisdictions. The KBVE therefore respectfully requests that the Department give additional consideration to the effects of the proposed rule on state licensing authorities, professional programs, students, and interstate professional mobility before implementing changes to the existing accreditation framework.

Thank you for considering the Kentucky Board of Veterinary Examiners' comments and for providing an opportunity for state licensing authorities to address the potential implications of these proposed changes. Should you have any questions about these comments, please contact KBVE Executive Director, Michelle Shane, at Michelle.Shane@ky.gov or 502-564-9905.

Respectfully submitted,



John C. Park, DVM
Chair

Kentucky Board of Veterinary Examiners

Figure 1: KBVE Chair signature John C. Park, DVM