IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA

TUSKEGEE UNIVERSITY,

Plaintiff,

v.

AMERICAN VETERINARY MEDICAL ASSOCIATION,

Defendant.

Case No.:

JURY TRIAL DEMANDED

TIME-SENSITIVE MOTION FOR PRELIMINARY INJUNCTION RULING REQUESTED BY DECEMBER 4, 2025

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Pursuant to Federal Rule of Civil Procedure 65, Plaintiff Tuskegee University ("Tuskegee") respectfully requests that this Court preliminarily enjoin the American Veterinary Medical Association ("AVMA") from conducting an appellate proceeding that deprives Tuskegee of due process.

INTRODUCTION

This case is about an accrediting agency's failure to follow its own policies and procedures, thereby depriving one of its member colleges of a full and fair hearing. This Court should maintain the status quo and enjoin the AVMA from violating Tuskegee's due process rights.

Recently, the accreditation arm of the AVMA, the AVMA Council on Education ("AVMA COE"), erroneously assigned terminal accreditation status to Tuskegee for an alleged lack of compliance with three of its eleven Accreditation Standards ("Standards"). That status has yet to take effect, but it almost certainly will following an AVMA appellate façade scheduled for December 5, 2025.

In recent communications between Tuskegee and the AVMA, the AVMA has made it crystal clear that it is determined to flout its own policies and procedures ("Policies") in Tuskegee's appeal. The Policies are attached as Exhibit 1 to Tuskegee's Complaint ("Compl."). The Policies grant Tuskegee the right to present witnesses and submit documents pertinent to its case. Further, the Policies give Tuskegee the right to present evidence on appeal relevant to the AVMA COE's

process and procedure used to reach its accreditation decision. There are at least four ways in which the AVMA has breached the plain language of those Policies, although discovery would likely uncover more.

First, the AVMA will not allow Tuskegee to present evidence of the AVMA COE's disparate treatment as compared to other colleges of veterinary medicine. Second, the AVMA will not allow Tuskegee to present evidence that the AVMA COE disregarded its own accreditation criteria and failed to consider Tuskegee's evidence supporting accreditation. Third, the AVMA and AVMA COE refuse to disclose all relevant evidence related to the process and procedure utilized by the AVMA COE to place Tuskegee on terminal accreditation. Fourth, the AVMA has imposed a capriciously short time limitation on Tuskegee's appellate presentation, ensuring that Tuskegee cannot present the bulk of its evidence on appeal.

"It is axiomatic that an accrediting agency's failure to follow its own rules constitutes a violation of due process." *Bennett Coll. v. S. Ass'n of Colls. & Sch. Comm'n on Colls., Inc.*, 474 F. Supp. 3d 1297, 1307 (N.D. Ga. 2020). Thus, *each* of the AVMA's violations of its Policies deprives Tuskegee of its due process rights. Accordingly, Tuskegee is substantially likely to succeed on the merits of its case. And the equities could not be more in favor of Tuskegee, a historic veterinary college on the brink of unwarranted ruin, and against the AVMA, an accreditation agency that treats its own Policies as mere suggestions. Tuskegee needs an injunction from

this Court to maintain the status quo and prevent the AVMA from inflicting irreparable harm on one of America's most storied universities.

FACTUAL BACKGROUND

Tuskegee is a historic veterinary program that serves a vital, unique mission. Tuskegee has a distinguished eighty-year record as the only historically Black college of veterinary medicine. *See* Tuskegee University College of Veterinary Medicine, *The Historical Legacy*, https://www.tuskegee.edu/vetmed (last visited Nov. 5, 2025). Tuskegee's College of Veterinary Medicine was founded by Dr. Frederick Douglass Patterson in 1945, during the segregation era. *Id.* Today, veterinary medicine remains one of the least diverse fields of practice. There are about 127,000 veterinarians in the United States, but only 2% of that number are Black. *Id.* Of that 2%, 70% are Tuskegee graduates. *Id.* Thus, the AVMA, a trade association, and the AVMA COE, the sole accreditor of veterinary schools in the United States, will soon decide, in large part, whether minority participation in the field of veterinary medicine will enjoy continued success.

Recently, the AVMA COE made the gravely erroneous decision to place Tuskegee on terminal accreditation status for an alleged lack of compliance with certain aspects of the Standards. The AVMA is set to rubberstamp that decision on December 5, 2025, and make Tuskegee's terminal accreditation status effective. But the AVMA's hostile procedural actions in defining the scope of Tuskegee's appeal

have consistently violated the Policies, which in turn violate Tuskegee's due process rights.

I. The AVMA COE treated Tuskegee in a biased and unfair manner, and the AVMA refuses to consider evidence of that mistreatment in contravention of the Policies.

The AVMA COE's actions have reeked of bias and disparate treatment against Tuskegee as compared to its treatment of other colleges, and the AVMA appeals panel refuses to consider any evidence of that disparate treatment. Those actions are contrary to the Policies.

Under the Policies, the AVMA COE must apply its Standards "consistently and fairly to all colleges seeking accreditation." AVMA COE, Policies § 1.6.1. Tuskegee has evidence that the AVMA COE violated this section of its Policies in its placement of Tuskegee on terminal accreditation status.

For example, the AVMA COE placed Tuskegee on terminal accreditation for its purported lack of sufficient funding to replace or refurbish older clinical facilities. Conversely, Dr. Willie Reed¹ intends to testify that, during his tenure as Dean of

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¹ Dr. Reed holds a Doctor of Veterinary Medicine degree from Tuskegee University, and a Doctor of Philosophy degree from Purdue University. Exhibit 2 ¶ 4. Dr. Reed served as Dean of Purdue University College of Veterinary Medicine from 2007 to 2024. Id. Before his sixteen-year deanship, Dr. Reed served as the Acting Chair (1997–2001) and Chair (2001–2006) of Michigan State University's Department of Pathobiology and Diagnostic Investigation. Id. Between 1990 and 2006, Dr. Reed was the Director of the Animal Health Diagnostic Laboratory at Michigan State, which is one of the largest and most comprehensive diagnostic laboratories in the country. Id.

Purdue University College of Veterinary Medicine, that college was placed on probationary accreditation due to the need to replace its old and outdated hospital. Exhibit 2 ¶ 8(a). When Purdue contended that it had the financial ability to fund its \$108 million dollar project, the AVMA COE took its word at face value, and Purdue simply moved forward with construction and obtained an extension to its probationary status to complete the project. *See id.* ¶ 8(b). On the other hand, when Tuskegee provided written assurance of an unrestricted financial commitment from the University, the Chair of the University's Board of Trustees, the University's President, and a major financial institution, as well as design plans from the same architecture firm that Purdue used, the AVMA COE either ignored or distrusted those commitments and plans. *See id.* ¶ 8(b)–(c).

Similarly, Dr. James Lloyd²—an expert in the field of veterinary-medicine education—intends to testify that the AVMA COE has treated Tuskegee "differently"

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² Dr. Lloyd has spent his entire thirty-seven-year career "in veterinary medicine, economics, and animal health management." Exhibit 3 ¶ 4. Dr. Lloyd obtained a Doctor of Veterinary Medicine degree and a Doctor of Philosophy degree from Michigan State University. *Id.* ¶ 13. Dr. Lloyd previously served as the Dean of the University of Florida College of Veterinary Medicine (2013–2019) and Associate Dean at Michigan State University College of Veterinary Medicine (2007–2013). *Id.* ¶¶ 5, 7. Dr. Lloyd has also authored or co-authored over 200 scholarly publications and delivered nearly 400 scholarly presentations and workshops—a significant portion of which have been "devoted to issues at the intersection of economics and veterinary medical education/practice." *Id.* ¶ 14.

and "[d]isparate[ly]" than all other colleges of veterinary medicine he has been associated with in his thirty-seven-year career. Exhibit 3 ¶¶ 4, 65, 71, 83.

The AVMA COE's actions as illustrated by Dr. Reed and Dr. Lloyd evidence inconsistent and unfair treatment in contravention of section 1.6.1 of the Policies. And under section 2.5.4 of the Policies, Tuskegee has the right to appeal an adverse decision from the AVMA COE on the grounds that the AVMA COE "1) ruled erroneously by disregarding established AVMA COE criteria for accreditation, 2) materially failed to follow its stated procedures, or 3) failed to consider all the evidence and documentation presented." AVMA COE, *Policies* § 2.5.4. Tuskegee thus desires to submit the evidence described above to the AVMA appeals panel to show that the AVMA COE "materially failed to follow its stated procedures" regarding its commitment to treat colleges "consistently and fairly." *Id.* §§ 2.5.4 & 1.6.1.

On September 12, 2025, Tuskegee appealed the AVMA COE's decision to place it on terminal accreditation status as allowed by the Policies. Following Tuskegee's initial submission of its appellate materials, which included similar statements from Dr. Reed and Dr. Lloyd, counsel for the AVMA and Tuskegee exchanged various letters regarding the procedures that would govern Tuskegee's appeal. *See* Compl. ¶¶ 73–81. On October 20, 2025, the AVMA ultimately concluded

that Tuskegee is categorically barred from presenting the testimony of Dr. Reed and Dr. Lloyd at the December 5, 2025 appeals hearing. Exhibit 1-G at 6.

As grounds for its decision, the AVMA stated that Tuskegee may not offer this testimony because it "was not evidence before the [AVMA COE] at the time of its decision." Id. (citation modified). The AVMA's decision, however, conflicts with section 2.5.4 of the Policies. That section provides that an appeals hearing "shall be restricted to (1) the adverse accreditation or reasonable assurance decision, (2) a review of information before the Council at the time of the decision, (3) a review of the process and procedure used to arrive at the decision, and (4) testimony relevant to (1), (2) and/or (3), depending on the basis of the appeal." AVMA COE, Policies § 2.5.4 (emphasis added). The testimony Tuskegee wishes to offer on appeal is "relevant to" "a review of the process and procedure [the AVMA COE] used to arrive at the decision." *Id.* Yet, the AVMA ignored subsections (3) and (4) of section 2.5.4, and instead barred this testimony pursuant to subsection (2) of section 2.5.4. It is unquestionably relevant to the outcome of an accreditation proceeding that the accreditation agency exhibited biased and disparate treatment toward the college that it later placed on terminal accreditation status. Because the AVMA has prohibited Tuskegee from offering such evidence on appeal, the AVMA has violated its own Policies.

II. The AVMA COE disregarded its own criteria for accreditation and failed to consider all of Tuskegee's evidence, but the AVMA refuses to consider evidence of those errors in contravention of the Policies.

In placing Tuskegee on terminal accreditation status, the AVMA COE disregarded its own criteria for accreditation and failed to consider all of Tuskegee's evidence in support of accreditation. Tuskegee has evidence of those errors, and desires to present that evidence on appeal. But the AVMA also refuses to consider such evidence. That decision is contrary to the Policies.

Tuskegee has evidence that the AVMA COE disregarded its criteria for accreditation and failed to consider all of Tuskegee's evidence supporting accreditation. *See* AVMA COE, *Policies* § 2.5.4 (providing three grounds for appeal—the AVMA COE "1) ruled erroneously by disregarding established AVMA COE criteria for accreditation, 2) materially failed to follow its stated procedures, or 3) failed to consider all the evidence and documentation presented.").

For example, the AVMA COE concluded that Tuskegee was deficient with respect to Standard 2—Finances. But Dr. Lloyd testified that, based on his "comprehensive review of [Tuskegee's] financial soundness[,]" "the [AVMA] COE disregarded substantial evidence establishing that [Tuskegee] has sufficient funding and adequate resources to confidently operate as a [college of veterinary medicine]." Exhibit 3 ¶¶ 66–69. Further, Dr. Lloyd testified that "[t]here is no basis for the lingering major deficiency related to Standard 2, and the [AVMA] COE's finding to

the contrary erroneously disregarded established criteria for accreditation as well as the [AVMA] COE's own standards of accreditation." *Id.* ¶ 70.

Tuskegee desires to present Dr. Lloyd's testimony on appeal to support its contention that the AVMA COE disregarded its own accreditation criteria and failed to properly consider Tuskegee's evidence in support of accreditation. But the AVMA has barred Tuskegee from offering this testimony by Dr. Lloyd as well. Similar to Tuskegee's evidence of disparate treatment, the AVMA will not allow Tuskegee to present "expert testimony" because that testimony "was not evidence before the [AVMA COE] at the time of its decision." Exhibit 1-G at 6 (citation modified). Nor will the AVMA allow Tuskegee to present *any other* documentation that was not before the AVMA COE when it placed Tuskegee on terminal accreditation status. *Id*.

The AVMA's decision in this regard violates section 2.5.4 of the Policies twice over. *First*, the Policies grant colleges "[a]t any hearing, . . . the right to present witnesses and to submit documents and other written materials pertinent to the case." AVMA COE, *Policies* § 2.5.4. Here, the AVMA is prohibiting Tuskegee from "present[ing] [a] witness[] . . . pertinent to the case," which contravenes the Policies. *Id. Second*, the Policies allow Tuskegee to present evidence that is "relevant to" "the process and procedure [the AVMA COE] used to arrive at the [accreditation] decision." *Id.* Simply put, although the Policies *allow* Tuskegee to present evidence of "information before the [AVMA COE] at the time of the decision," they do not

solely limit Tuskegee to presenting that kind of evidence. *Id.*; see also supra at 7. Because the Policies allow Tuskegee to offer evidence "relevant to" "the process and procedure [the AVMA COE] used to arrive at the [accreditation] decision," and the AVMA will not allow Tuskegee to offer that evidence, the AVMA is violating its own Policies. AVMA COE, *Policies* § 2.5.4.

III. The AVMA COE admitted it possesses relevant documents related to the process and procedure it used to reach its accreditation decision, but the AVMA refuses to disclose that information to Tuskegee.

The AVMA COE admitted to Tuskegee that it possesses relevant documents about the process and procedure that it used to reach its accreditation decision. Tuskegee desires to review and present that evidence, but the AVMA COE and the AVMA have stonewalled Tuskegee's efforts to do so, in contravention of the Policies.

After Tuskegee submitted its appellate submission to the AVMA, Tuskegee requested information from the AVMA COE "related to" the "process and procedure" used by the AVMA COE to arrive at its terminal accreditation decision. *Id.* The AVMA COE responded by confirming that it had the relevant information, but it refused to disclose that information to Tuskegee. *See* Exhibit 1-C at 5. The AVMA COE's purported justification for its refusal was that the information Tuskegee sought was "confidential, *inter alia.*" *Id.* The AVMA later adopted the AVMA COE's position, explaining that Tuskegee would be prohibited from offering evidence "produced during pre-hearing discovery" because it would "not qualify as the

evidence before the [AVMA COE] at the time of its decision." Exhibit 1-G at 5 (citation modified).

Once again, the AVMA's limitation of Tuskegee's case on appeal violates section 2.5.4 of the Policies. *See* AVMA COE, *Policies* § 2.5.4. To be sure, the Policies *permit* Tuskegee to offer evidence of "information before the [AVMA COE] at the time of the decision." *Id.* But the Policies *also permit* Tuskegee to offer evidence "relevant to" "the process and procedure [the AVMA COE] used to arrive at the [accreditation] decision." *Id.* The AVMA's refusal to disclose information about the AVMA COE's process and procedure and its refusal to allow Tuskegee to present that evidence on appeal, especially in the light of its disparate treatment of Tuskegee, violates the Policies.

IV. The AVMA is limiting the testimony and witnesses that Tuskegee may offer on appeal, but the Policies contain no such limitations.

Moreover, the AVMA has effectively imposed an arbitrary limitation on the number of witnesses that Tuskegee may present on appeal. Such a limitation contradicts the Policies.

This accreditation matter has spanned over four years. Tuskegee informed the AVMA that it estimated that it would take about four or five days to present the evidence and testimony necessary to establish its case. *See* Exhibit 1-B at 1–2. In response, the AVMA informed Tuskegee that it will not allow "extensive" testimony

and will limit Tuskegee's entire presentation—including its rebuttal—to two-and-a-half hours. Exhibit 1-G at 6.

The AVMA's decision contradicts the plain language of section 2.5.4 of the Policies. That section grants colleges "[a]t any hearing, . . . the right to present witnesses and to submit documents and other written materials pertinent to the case." AVMA COE, *Policies* § 2.5.4. The only limitation that the Policies impose on colleges is that all of the testimony it presents must be "pertinent to the case." *Id.* Tuskegee's evidence is pertinent. The Policies impose *no* limitation on the length of a college's presentation, or the number of pertinent witnesses or documents a college may introduce. *See id.* The AVMA's arbitrary decision to limit Tuskegee's presentation and to prevent it from presenting the bulk of its evidence violates section 2.5.4 of the Policies.

STANDARD OF REVIEW

To obtain a preliminary injunction, Tuskegee must establish: (1) a substantial likelihood of success on the merits; (2) irreparable injury unless the injunction issues; (3) the threatened injury to Tuskegee outweighs any damage the proposed injunction may cause to the AVMA; and (4) if the Court issues the injunction, it would not be adverse to the public interest. *Wreal, LLC v. Amazon.com, Inc.*, 840 F.3d 1244, 1247 (11th Cir. 2016). "The district court has substantial discretion in weighing the four relevant factors to determine whether preliminary injunctive relief

is warranted." *Gonzalez v. Governor of Ga.*, 978 F.3d 1266, 1271 n.13 (11th Cir. 2020) (citation modified).

ARGUMENT

I. <u>Tuskegee is substantially likely to succeed on the merits of its due process claim.</u>

The facts above establish that Tuskegee is substantially likely to succeed on the merits of its federal common law due process claim. *See also* Compl. ¶¶ 123–34. "This factor is generally the most important of the four factors." *Gonzalez*, 978 F.3d at 1271 n.12 (citation modified). Further, "[a] substantial likelihood of success on the merits requires a showing of only *likely* or probable, rather than *certain*, success." *Id.* (citation modified).

Although there is some disagreement around the edges of what constitutes a federal common law due process claim in the accreditation context, all agree that "[i]t is axiomatic that an accrediting agency's failure to follow its own rules constitutes a violation of due process." *Bennett Coll.*, 474 F. Supp. 3d at 1307. Here, the facts prove that the AVMA has denied Tuskegee its right to due process by violating its own Policies over and over again.

First, the AVMA refuses to allow Tuskegee to introduce evidence of disparate treatment by the AVMA COE. Tuskegee would offer testimony from two witnesses explaining how the AVMA COE treated Tuskegee differently from any other veterinary college they have been associated with in their lengthy and illustrious

careers. Their testimony—that the AVMA COE violated section 1.6.1 of the Policies—supports a valid ground for appeal under section 2.5.4 of the Policies. *See* AVMA COE, *Policies* § 2.5.4 (providing that a college may appeal on the grounds that the AVMA COE "materially failed to follow its stated procedures").

The AVMA, however, will not allow Tuskegee to present this evidence. That rejection violates section 2.5.4 of the Policies, which allows colleges "[a]t any hearing, . . . the right to present witnesses and to submit documents and other written materials pertinent to the case." *Id*. That rejection also violates another part of section 2.5.4 of the Policies, which allows Tuskegee to present evidence that is "relevant to" "the process and procedure [the AVMA COE] used to arrive at the [accreditation] decision." *Id*. Because the AVMA is violating its own Policies, it necessarily is violating Tuskegee's right to due process. *See Bennett Coll.*, 474 F. Supp. 3d at 1307.

Second, the AVMA has rejected Tuskegee's attempt to present evidence that the AVMA disregarded its own criteria for accreditation and failed to consider Tuskegee's evidence supporting accreditation. Tuskegee would offer testimony that the AVMA COE committed those errors, which are valid grounds for appeal under Section 2.5.4 of the Policies. See AVMA COE, Policies § 2.5.4. The AVMA, however, refuses to let Tuskegee present that evidence for two reasons—each of which violates the Policies. The AVMA has made the arbitrary decision to prohibit expert testimony at the hearing even though the Policies allow colleges an

unqualified "right to present witnesses and to submit documents and other written materials pertinent to the case." *Id.* And, the AVMA stated that the evidence Tuskegee desires to present "was not evidence before the [AVMA COE] at the time of its decision." Exhibit 1-G at 6 (citation modified). But the Policies allow Tuskegee to present evidence that is "relevant to" "the process and procedure [the AVMA COE] used to arrive at the [accreditation] decision." AVMA COE, *Policies* § 2.5.4. Each of the AVMA's stated justifications violates the Policies, and, in turn, violates Tuskegee's due process rights. *See Bennett Coll.*, 474 F. Supp. 3d at 1307.

Third, the AVMA refuses to produce documents "relevant to" the "process and procedure" the AVMA COE used to arrive at its terminal accreditation decision. AVMA COE, Policies § 2.5.4. The AVMA COE brazenly told Tuskegee that information was "confidential, inter alia." Exhibit 1-C at 5. The AVMA agreed and told Tuskegee that it could not offer such evidence anyway, as that evidence would "not qualify as the evidence before the [AVMA COE] at the time of its decision." Exhibit 1-G at 5 (citation modified). Once again, the Policies allow Tuskegee to offer evidence "relevant to" "the process and procedure [the AVMA COE] used to arrive at the [accreditation] decision." AVMA COE, Policies § 2.5.4. The AVMA's refusal to disclose evidence relevant to the process and procedure the AVMA COE used to arrive at its accreditation decision violates the Policies, and in turn violates Tuskegee's right to due process. See Bennett Coll., 474 F. Supp. 3d at 1307; see also

Auburn Univ. v. S. Ass'n of Colls. & Schs., Inc., 489 F. Supp. 2d 1362, 1376 (N.D. Ga. 2002) (permitting college to conduct discovery in due process challenge).

Fourth, the AVMA's arbitrary and capricious limitation of Tuskegee's presentation on appeal violates its Policies. After Tuskegee requested to present all "pertinent" evidence on appeal, as allowed under the Policies, the AVMA balked and stated it would not allow "extensive" testimony and would limit Tuskegee's case to a total of two-and-a-half hours. Exhibit 1-G at 6. The AVMA's limitation of Tuskegee's case violates section 2.5.4 of its Policies, which grants Tuskegee "the right to present witnesses and to submit documents and other written materials pertinent to the case." AVMA COE, Policies § 2.5.4. The Policies impose no limitation on the time of a college's case or the number of "pertinent" witnesses a college may tender. The AVMA's decision to impose a limitation contrary to its Policies violates Tuskegee's due process rights.

II. <u>Unless this Court issues an injunction, Tuskegee will suffer irreparable harm.</u>

Tuskegee will suffer irreparable injury if this Court does not issue a preliminary injunction. The institutional, reputational harm that the AVMA is set to inflict on Tuskegee is not one that can "be undone through monetary remedies." *Ne. Fla. Chapter of Ass'n of Gen. Contractors of Am. v. City of Jacksonville*, 896 F.2d 1283, 1285 (11th Cir. 1990). If Tuskegee's terminal accreditation status becomes effective, the irreparable harm Tuskegee would suffer would include:

- Significant reputational injury to Tuskegee and its alumni;
- Significant harm to Tuskegee's ability to recruit prospective students because, in addition to Tuskegee's reputational injury, new students would not be eligible for federal aid;
- Significant harm to recruitment efforts for faculty and staff;
- Imposition of an obligation to formulate a "teach out" plan for existing students, and inability to accept new students under any accreditation status;
- Significant harm to faculty and staff retention;
- Significant harm to existing student retention;
- Significant harm to research grant funding;
- Significant harm to alumni giving and support;
- Significant harm to the provision of veterinary services in Alabama to protect animal and human health; and
- Potential for college closure following completion of the "teach out" plan for existing students.

Exhibit $4 \P 13$.

It is not an overstatement to say that the terminal accreditation of Tuskegee could result in the ruin of the program—a harm far too great for any monetary award to remedy. *See St. Andrews Presbyterian Coll. v. S. Ass'n of Colls. & Schs., Inc.*, No. 1:07-cv-00640, 2007 WL 4219402, at *3 (M.D.N.C. Nov. 29, 2007) (finding that similar factors constituted irreparable harm in the preliminary injunction context).

III. The threatened injury to Tuskegee outweighs the harm of an injunction to the AVMA.

Likewise, the catastrophic injury that terminal accreditation status presents to Tuskegee far outweighs the harm (if any) that a preliminary injunction would pose to the AVMA. Tuskegee seeks to preserve the status quo of its accreditation status while it presents its appeal from the AVMA COE's determination, a "textbook definition of a preliminary injunction." Klay v. United Healthgroup, Inc., 376 F.3d 1092, 1101 n.13 (11th Cir. 2004). The AVMA may argue that an injunction would harm its credibility among the AVMA COE's member institutions, i.e., other colleges of veterinary medicine, and harm its ability to enforce its own decisions. See St. Andrews Presbyterian Coll., 2007 WL 4219402, at *3. But the other colleges of veterinary medicine whose accreditation status is also governed by the AVMA COE—which may in the future be the subjects of adverse accreditation actions will benefit from the AVMA's compliance with due process protections. And the AVMA still retains the ability to enforce its own decisions so long as its procedures comply with due process. Indeed, it is likely that the only "harm" that will befall the AVMA if this Court enters the preliminary injunction is that it will be required to provide Tuskegee the more fulsome procedural rights required by the AVMA's own Policies. The equities are squarely in Tuskegee's favor.

IV. A preliminary injunction is in the public interest.

Finally, a preliminary injunction in favor of Tuskegee is not adverse to the public interest. The public has a "fundamental" interest in courts upholding the right to due process. *Boddie v. Connecticut*, 401 U.S. 371, 374 (1971). That is precisely the relief Tuskegee seeks from this Court. And, to be clear, Tuskegee is not challenging the AVMA's power as an accreditation agency to ensure that schools of veterinary medicine comply with the Standards. Tuskegee merely seeks to ensure that the AVMA applies those Standards fairly and according to its stated Policies. That request is not offensive to the public interest. *See St. Andrews Presbyterian Coll.*, 2007 WL 4219402, at *3.

Moreover, the public interest in this case has been made clear by the people of Alabama through leaders they have elected. *See White v. Alabama*, 74 F.3d 1058, 1070 (11th Cir. 1996) ("The will of the people is expressed through elections "). A bipartisan cohort of Alabama's congressional delegation recently wrote a letter to Secretary Linda McMahon, urging her to, among other things, "[e]ncourage the [AVMA] to provide a fair and thorough review process that allows Tuskegee to present its case fully." Exhibit 5 at 2. The Governor of Alabama made similar requests to the Secretary. Exhibit 6 at 2. Accordingly, granting a preliminary injunction is consistent with the public interest.

REQUESTED RELIEF

Tuskegee respectfully requests that this Court preliminarily enjoin the AVMA from holding the December 5, 2025 hearing as to Tuskegee's terminal accreditation status until the Court can finally adjudicate whether the AVMA's process and procedure for this appeal violates due process.

Respectfully submitted this 10th day of November, 2025.

Respectfully submitted,

/s/ James C. Lester

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CERTIFICATE OF SERVICE

I certify that on the 10th day of November, 2025, I filed a true and correct copy of the foregoing document via the CM/ECF system. On the same date, a true and correct copy of the foregoing document was also sent via first-class, U.S. mail to the following:

American Veterinary Medical Association c/o Dr. Janet D. Donlin 1931 North Meacham Road, Suite 100 Schaumburg, IL 60173-4360

On the same date, a true and correct copy of the foregoing document was also sent via email to the following:

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/s/ James C. Lester
OF COUNSEL

EXHIBIT 1 TO TUSKEGEE UNIVERSITY'S MOTION FOR PRELIMINARY INJUNCTION

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA

TUSKEGEE UNIVERSITY,	
Plaintiff,	
V.	Case No.:
AMERICAN VETERINARY MEDICAL ASSOCIATION,	
Defendant.	

TRANSMITTAL DECLARATION OF JAMES C. LESTER IN SUPPORT OF TUSKEGEE UNIVERSITY'S MOTION FOR PRELIMINARY INJUNCTION

- I, James C. Lester, depose and state the following under penalty of perjury:
- 1. I submit this Declaration in support of Tuskegee University College of Veterinary Medicine's ("Tuskegee") motion for preliminary injunction in the above captioned matter.
- 2. I am over 19 years of age, of sound mind, and am otherwise competent to make this Declaration.
- 3. I am counsel to Tuskegee University in the above captioned matter. I have personal knowledge of the information in this Declaration in my capacity as counsel for Tuskegee.

- 4. Attached as Exhibit A hereto is a true and correct copy of a September 15, 2025 Letter from Jed Mandel to Thomas Thagard and Matthew Berkowitz.
- 5. Attached as Exhibit B hereto is a true and correct copy of a September19, 2025 Letter from Thomas Thagard to Jed Mandel.
- 6. Attached as Exhibit C hereto is a true and correct copy of a September 22, 2025 Letter from Matthew Berkowitz to Jed Mandel.
- 7. Attached as Exhibit D hereto is a true and correct copy of a September 24, 2025 Letter from Jed Mandel to Thomas Thagard.
- 8. Attached as Exhibit E hereto is a true and correct copy of a September 29, 2025 Letter from Thomas Thagard to Jed Mandel and Julia Judish.
- 9. Attached as Exhibit F hereto is a true and correct copy of an October 10, 2025 Letter from Thomas Thagard to Julia Judish.
- 10. Attached as Exhibit G hereto is a true and correct copy of an October 20, 2025 Letter from Julia Judish to Thomas Thagard and Matthew Berkowitz.
- 11. Attached as Exhibit H hereto is a true and correct copy of an attachment to Exhibit G, the American Veterinary Medical Association Procedures for Appeal of Adverse Outcome.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

This 7th day of November, 2025.

James C. Lester

EXHIBIT 1-A TO TUSKEGEE UNIVERSITY'S MOTION FOR PRELIMINARY INJUNCTION

Jed R. Mandel (312) 929-1960 jmandel@clpchicago.com

September 15, 2025

Tuskegee University College of Veterinary Medicine c/o Mr. Thomas W. Thagard III 1901 Sixth Avenue North, Suite 1700 Birmingham, AL 35203

Council on Education c/o Mr. Matthew D. Berkowitz Carr Maloney P.C. 2000 Pennsylvania Avenue, NW., Suite 8001 Washington, DC 20006

Dear Mr. Thagard and Mr. Berkowitz:

I have been retained by the American Veterinary Medical Association to represent the panel that will hear the Tuskegee University's appeal of the AVMA Council on Education's assignment of terminal accreditation status. The AVMA's Board of Directors is in the process of finalizing the appointment of the seven members and one alternate member who will serve as the Hearing Panel pursuant to the provisions of Section 2.5.4 of the COE's Accreditation Policies and Procedures (the "COE Procedures"). I will provide you those names shortly.

The hearing will be held on Friday, December 5, 2025 beginning at 9:00 a.m. and concluding no later than 4:15 p.m. The hearing will be held at the Chicago Marriott Schaumburg, 50 N. Martingale Road, Schaumburg, Illinois. Attached are the "Procedures for Appeal of Adverse Outcome" (the "Procedures for Appeal") that will govern the conduct of the hearing.

Under the COE Procedures, 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." That notification will be sent sometime during the 10-40 day period prior to December 5, 2025. However, to allow the parties additional time to prepare and arrange their schedules, I am providing this additional notice.

Please note that the Procedures for Appeal provide the COE the opportunity, if it so elects, to submit a written response to the University's brief. Such response is due no later than October 24, 2025. If the COE submits a response, the University may elect to submit a reply. Such reply is due no later than November 14, 2025. All briefs must be submitted in accordance with the Procedures for Appeal.

Tuskegee University Council on Education September 15, 2025 Page 2

Finally, I want to disclose that one of the members of my firm is Susan F. Carlson. Ms. Carlson is married to Douglas Carlson, who is one of the attorneys representing the COE. While Chicago Law Partners, LLC ("CLP") does not have a conflict of interest with respect to our representation of the Hearing Panel in this matter, in an abundance of caution we have determined that it is in everyone's best interest to institute an "ethical wall" for the purposes of preventing Ms. Carlson from (i) sharing any information she may have learned from Mr. Carlson regarding this matter with any other CLP attorney or employee (and vice versa); and (ii) accessing any information, files or other materials (paper or electronic) regarding CLP's representation of the Hearing Panel.

If you have any questions about the timing or conduct of the hearing, in general, or about the Procedures for Appeal please let me know in writing promptly.

Very truly yours,

R. Handel

Jed R. Mandel

cc: Isham R. Jones III

American Veterinary Medical Association Procedures for Appeal of Adverse Outcome

Council on Education's Accreditation Determination Regarding the College of Veterinary Medicine, Tuskegee University

The appeal that the College of Veterinary Medicine, Tuskegee University (University) has taken of the adverse accreditation determination of AVMA's Council on Education (COE) will be conducted pursuant to Section 2.5.4 of the COE's Accreditation Policies and Procedures (July 2025), as follows:

Scope of Appeal: The pending appeal is a challenge of the adverse determination -- the assignment of terminal accreditation -- that the COE communicated on July 14, 2025, based on the evidence before the COE at that time. It is not a de novo hearing. The sole issues on appeal are whether the COE, in making its adverse accreditation determination regarding the University: (i) ruled erroneously by disregarding established AVMA COE criteria for accreditation; (ii) materially failed to follow stated procedures; or (iii) failed to consider all the evidence and documentation presented (collectively, the "Issues on Appeal").

<u>Pre-Hearing Procedure</u>: The University duly filed this appeal, and has submitted its initial brief and supporting documentation. The COE may submit its responsive brief and any supporting documentation on or before October 24, 2025, and the University may submit a reply brief on or before November 14, 2025. The submitting party must provide an electronic copy and nine (9) hard copies of any responsive or reply brief, with attachments or exhibits, to me, care of the AVMA, at: American Veterinary Medical Association, 1931 N. Meacham Road, Suite 100, Schaumburg, IL 60173, and must provide an electronic copy and one (1) hard copy to the other party.

Burden of Proof: The University has the burden of establishing through sufficient evidence that, with respect to one or more of the Issues on Appeal, the COE's adverse accreditation determination was plainly wrong or without evidence to support it.

Hearing Panel: The AVMA Board of Directors will appoint a hearing panel comprised of seven (7) persons, none of whom shall be current members of the COE or AVMA staff. The hearing panel members: (i) will include veterinary educators and practitioners, and one public member who completed his/her service on the COE within the last seven years; and (ii) will receive specific training to review all changes made in the COE policies and procedures since their service on the Council, so that panel members have the requisite knowledge and understanding to make decisions consistent with the policies and requirements of the Council on Education. The AVMA Board of Directors will designate the Chair of the hearing panel.

Hearing Date and Location: The hearing in this matter will take place on December 5, 2025, at the Chicago Marriott Schaumburg, 50 N. Martingale Road, Schaumburg, IL 60173. The specific room for the hearing will be designated prior to the hearing. The hearing will commence at 9:00 a.m., and will continue until 11:45 a.m., at which time there will be a lunch break. The hearing will resume at 1:00 p.m. and will conclude at 4:15 p.m. Attendance at the hearing will be limited to designated representatives of AVMA, the University and the COE. The parties will submit their

lists of designated representatives to the hearing panel and to each other no less than seven (7) days in advance of the hearing.

Hearing Procedure: Each of the University, the COE and the hearing panel may be represented by legal counsel. Both the University and the COE will have the right to present witnesses. The University and the COE will submit their lists of witnesses to the hearing panel and to each other no later than seven (7) days in advance of the hearing. The University and the COE also will have the right to submit documents and other written materials, provided such information is included in the supporting documentation submitted with the parties' briefs and is part of the accreditation record before the Council at the time of the decision. Further, the hearing shall be restricted to (1) the adverse accreditation decision, (2) a review of information before the Council at the time of the decision, (3) a review of the process and procedure used to arrive at the decision, and (4) testimony relevant to (1), (2) and/or (3), depending on the basis of the appeal. Documentation will include access to all materials related to the compliance determination, such as the college's selfstudy, 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 during the dates on which the site visit was made or on which the adverse decision was based. The hearing panel will not be bound by the rules of evidence applied in formal legal proceedings, and may, in its sole discretion, accept or reject evidence as it deems appropriate. Counsel for the University and for COE may make or lead the presentations on behalf of their respective clients. Witnesses will be excluded from the hearing room except during the time of their testimony.

The University, as the appellant, will present its case first, and will be allotted up to two hours to do so. Following the lunch break, the COE will present its case, and will be allotted up to two and one-half hours to do so. Thereafter, the University will have up to thirty minutes to make any response or rebuttal to the COE's presentation. The hearing panel members, or their counsel, are entitled to ask questions, including of any witnesses, during any of the presentations. Questioning from the hearing panel shall not enlarge the time allocated to the University or the COE. At the discretion of the hearing panel, or upon advance written request from either the University or the COE, a transcript of the hearing will be made and will be shared with all parties.

Hearing Panel Decision: The hearing panel may either affirm or amend the COE's adverse determination, or remand the determination to the COE for further consideration. If the hearing panel amends the COE's decision, the hearing panel will remand the matter to the COE with specific instructions to implement the hearing panel's decision. If the hearing panel remands the adverse determination for further consideration by the COE, the hearing panel shall identify the specific issues that the COE must address. In all cases where a decision is implemented by or remanded to the COE, the COE shall act in a manner consistent with the hearing panel's decisions and instructions. The decision of the hearing panel shall be produced in the form of a written report and will become a permanent record of the COE. 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 COE. All questions will be referred to the college which may respond as deemed appropriate.

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

EXHIBIT 1-B TO TUSKEGEE UNIVERSITY'S MOTION FOR PRELIMINARY INJUNCTION

Thomas W. Thagard III DIRECT 205.254.1091

EMAIL tthagard@maynardnexsen.com



September 19, 2025

VIA EMAIL

American Veterinary Medical Association c/o Mr. Jed R. Mandel Chicago Law Partners, LLC 333 W. Wacker Drive, Suite 810 Chicago, IL 60606 jmandel@clpchicago.com

Dear Mr. Mandel:

We are in receipt of your letter dated September 15, 2025 regarding Tuskegee University College of Veterinary Medicine's ("TU-CVM") appeal of the AVMA Council on Education's ("COE") assignment of terminal accreditation status. TU-CVM appreciates the AVMA's advanced scheduling of the December 5, 2025 in-person hearing.

As an initial matter, will you please confirm that the AVMA has been able to access TU-CVM's appellate documentation via the FTP link circulated to Dr. Janet Donlin and Mr. Isham Jones on September 12, 2025.

Additionally, on September 12, 2025, Mr. Jones requested that TU-CVM provide nine printed copies of its appellate documentation. TU-CVM's appellate documentation is approximately 4,800 pages and printing + shipping nine copies of all materials would likely exceed \$2,000 in costs. TU-CVM requests that the AVMA reimburse printing + shipping costs incurred given that, as noted by Mr. Jones, the COE's policies and procedures do not specify hard copies. Please let me know if the AVMA agrees to reimburse such costs at your earliest convenience. Once this is confirmed, we will copy and ship the nine volumes immediately.

Beyond those logistical matters, TU-CVM objects to certain aspects of the Procedures for Appeal of Adverse Outcome attached to your September 15 letter (the "AVMA Appeal Procedures") because they are inconsistent with TU-CVM's due process rights. (*See* Sections 3.2.6 and 3.2.7 of the COE's policies and procedures).

First, as the AVMA Appeal Procedures recognize, TU-CVM is entitled to present witness testimony and documentation at the hearing. However, the AVMA Appeal Procedures improperly and arbitrarily limit TU-CVM's case presentation to *two* hours. TU-CVM intends to present fact testimony from numerous witnesses as well as expert testimony from at least two expert witnesses. This matter has an extensive history, spanning four years of accreditation discussions and information exchanges between TU-CVM and the COE. TU-CVM cannot reasonably put on its case presentation in this matter—where the COE is threatening to end TU-CVM's historic veterinary program—in two hours. TU-CVM is entitled to put on its entire case presentation before the AVMA appeals panel without unreasonable and arbitrary time limitations. Nothing in Section 2.5.4 of the COE's policies

September 19, 2025 Page 2

and procedures places a temporal limitation on a college's presentation of its appeal to the panel. We currently estimate four to five full days of testimony and evidence will be required, although this estimate may change as our preparations proceed.

Toward that end, it is unclear from the AVMA Appeal Procedures whether documentation from TU-CVM's September 12 appellate submission (or which may be submitted with its forthcoming reply brief) must be "admitted" by the appeals panel during the hearing in order for it to be considered by the panel. If such admission of documentary evidence at the hearing is required, the AVMA's two-hour limitation is even more unreasonable and capricious. Relatedly, your letter and Mr. Jones' September 12 letter imply that the record cannot be expanded beyond TU-CVM's September 12 appellate submission, but the COE's policies and procedures plainly contemplate that additional testimony and documentation will be offered for the first time at the hearing. By way of example only, TU-CVM intends to offer expert testimony at the hearing as well as offer additional relevant financial information.

Moreover, allowing the AVMA appeals panel's (and their counsel's) questioning to count against the time limitation imposed is also unreasonable. One member of the AVMA appeals panel could monopolize TU-CVM's entire (albeit very short) two-hour case presentation, thereby completely eliminating any semblance of a fair hearing.

Second, the AVMA Appeal Procedures' burden of proof is inconsistent with Section 2.5.4 of the COE's policies and procedures, which states: "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. 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." As is plain, Section 2.5.4 of the COE's policies and procedures does not assign a burden of proof to either party and for the AVMA to establish such a burden by fiat clearly violates TU-CVM's due process rights.

For the same reason, the language in the AVMA Appeal Procedures regarding TU-CVM's burden to establish that the decision "was plainly wrong or without evidence to support it" has been deleted from the COE's policies and procedures and cannot be applied. Because it is not a part of the COE's policies and procedures, imposing such a standard will constitute another due process violation.

Third, the AVMA Appeal Procedures' assertion that the appeals panel's counsel may ask questions of witnesses is inconsistent with Section 2.5.4 of the COE's policies and procedures, which states: "The hearing panel may also have legal counsel present to advise it with respect to procedural matters." Cross examining witnesses does not constitute advising the panel on procedural matters.

Fourth, the lack of any limitation on the appeals panel's discretion to admit or reject documentary evidence is inconsistent with due process. TU-CVM is not seeking imposition of the formal rules of evidence, but given that the AVMA appeals panel is represented by counsel, there should be some reasonable standard of review for the admission of evidence.

Fifth, the AVMA Appeal Procedures' statement on costs is inconsistent with Section 2.5.4 of the COE's policies and procedures. The AVMA Appeal Procedures seek to impose costs on TU-



September 19, 2025 Page 3

CVM if the determination of the COE is upheld "in whole or in part." Section 2.5.4 of the COE's policies and procedures states that an appellant is responsible for all costs "[i]f the decision by the COE is upheld"—that is, a partial affirmance is not grounds to impose "all expenses associated with the appeal" on TU-CVM.

Sixth, a husband and wife respectively representing the COE and the AVMA appeals panel <u>does</u> constitute a conflict of interest. Even if your firm has attempted to impose an "ethical wall" regarding Mrs. Carlson, it is improper for the decision-maker (the AVMA appeals panel) to be advised by a firm whose member has a financial interest in a favorable decision for the COE. TU-CVM can only assume that your firm referred Mr. Carlson to the COE. The same family cannot serve both as advocate and judge. That is a classic due process violation. Given that TU-CVM's very existence is at issue, the current conflicted representation must be remedied.

In its September 12, 2025 appellate submission, TU-CVM requested that the COE produce certain documents and make available certain witnesses for pre-hearing depositions. To date, both the COE and AVMA have ignored these requests. TU-CVM requested that the document productions be made no less than 90 days before the hearing. Now that the hearing has been set for December 5, 2025, which is in less than 90 days, TU-CVM amends its request such that documents are produced by the COE no later than **October 5**, 2025. If the COE fails to produce the requested documents and/or refuses to allow pre-hearing depositions, TU-CVM intends to seek relief from the AVMA to order this necessary pre-hearing discovery.

Finally, by this letter, TU-CVM hereby requests that the appeals hearing on this matter is transcribed by a licensed court reporter. If the AVMA prefers, TU-CVM can arrange for a court reporter to be present at the hearing. Please contact my office no later than October 17, 2025 to discuss logistics for timely securing a court reporting service.

Thank you for your attention to these matters. TU-CVM requests a written response to each and every objection as quickly as possible such that there is a full record of how TU-CVM is to be treated in accordance with its due process rights.

Further, TU-CVM reserves all rights to raise additional challenges to the AVMA Appeal Procedures, the composition of the AVMA appeals panel, including any potential bias, as well as any other aspect of this appeals process as the need arises.

Sincerely,

/s/ Thomas W. Thagard, III
Thomas W. Thagard, III
Counsel for Tuskegee University
College of Veterinary Medicine

Cc: Matthew D. Berkowitz (via email to matthew.berkowitz@carrmaloney.com)



EXHIBIT 1-C TO TUSKEGEE UNIVERSITY'S MOTION FOR PRELIMINARY INJUNCTION



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September 22, 2025

VIA EMAIL ONLY

Jed R. Mandel Chicago Law Partners, LLC 333 W. Wacker Drive, Suite 810 Chicago, IL 60606 jmandel@clpchicago.com

Re: Tuskegee University College of Veterinary Medicine ("TU-CVM") vs.

AVMA Council on Education (the "COE" or "Council")

Dear Mr. Mandel:

I write on behalf of the AVMA Council on Education (the "COE" or "Council") to respond to certain issues and objections raised by Tuskegee University College of Veterinary Medicine ("TU-CVM") concerning the Appeals Procedures.

As a threshold matter, it appears that TU-CVM misunderstands the nature of this proceeding. This an administrative appeal of the COE's decision to assign TU-CVM Terminal Accreditation status. This is not a trial. As such, the procedures of the proceeding are to be guided by principles of an administrative appeal, and not trial procedure as TU-CVM seems to desire.

The Appeals Procedure is clear and is based upon and generally consistent with section 2.5.4 of the Accreditation Policies and Procedures of the AVMA Counsel on Education ("COE Policies and Procedures"). The COE Policies and Procedures have been repeatedly reviewed and approved by the Department of Education.

The grounds for this appeal are limited to whether the Counsel: "(1) ruled erroneously by disregarding established AVMA COE criteria for accreditation, (2) materially 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." COE Policies and Procedures, § 2.5.4; *see also* Procedures for Appeal.

CARR MALONEYPC

Jed R. Mandel *Re: TU-CVM vs. COE or Council* September 22, 2025 Page **2** of **5**

"[The] appeal is not a *de novo* review, but a challenge of the Council's decision based on the evidence before the Council at the time of its decision." COE Policies and Procedures, § 2.5.4; *see also* Procedures for Appeal. Therefore, new evidence or evidence outside of the record that was not before the Council at the time of its decision should not be considered. Moreover, the evidence presented "shall be relevant to the conditions existing at the college during the dates on which the site was made or on which the adverse decision was based." COE Policies and Procedures, § 2.5.4. Finally, because the review is limited to the evidence before the Council at the time its decision, "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." *Id.*

The rules set forth above are consistent with common law due process and largely mirror the standard of review of such agency decisions under federal law. See Pro. Massage Training Ctr., Inc. v. Accreditation All. of Career Sch. & Colleges, 781 F.3d 161, 170 (4th Cir. 2015); Thomas M. Cooley L. Sch. v. Am. Bar Ass'n, 459 F.3d 705, 712 (6th Cir. 2006). The procedures employed must be fair. Prof. Massage, 781 F.3d at 169 (citations omitted). The inquiry is "only whether the decision of an accrediting agency such as [the COE] is arbitrary and unreasonable or an abuse of discretion and whether the decision is based on substantial evidence. *Id.* at 171 (quoting Thomas M. Cooley, 469 F.3d at 712). "The Supreme Court has defined substantial evidence to be anything 'more than a mere scintilla' provided that a 'reasonable mind might accept [the evidence] as adequate to support a conclusion." Id. at 174 (quoting Almy v. Sebelius, 679 F.3d 297, 301 (4th Cir. 2012) (in turn quoting Consol. Edison Co. v. NLRB, 305 U.S. 197, 229 (1938)). The reviewing body is "not free to conduct a de novo review or to substitute their judgment for the professional judgment of the educators involved in the accreditation process." Id. at 171. "In considering whether the [decision] was supported by substantial evidence, [the reviewing body] is confine[d] to the record that was considered by the accrediting agency at the time of the final decision." Id. at 174-175.

Against this backdrop, the vast majority of the concerns and issues raised by TU-CVM have no merit.

1. The burden of proof and the standard of review.

TU-CVM takes issue with the procedural rule that the College "has the burden of establishing through sufficient evidence, with respect to one or more of the Issues on Appeal, the COE's adverse accreditation determination was plainly wrong or without evidence to support it." TU-CVM appears to contend that it does not have the burden of proof. Such a contention is clearly wrong. Section 1.2.2 of the Accreditation Policies and Procedures of the AVMA Council on Education ("COE Policies and Procedures") specifically states that "it is the burden of the college or school of veterinary medicine to demonstrate that it meets the Standards of Accreditation."

Furthermore, this is an appeal of the COE's accreditation determination, which is not reviewed *de novo* based on the evidence before the Council at the time of the decision. COE

CARR MALONEY_{PC}

Jed R. Mandel *Re: TU-CVM vs. COE or Council* September 22, 2025 Page **3** of **5**

Policies and Procedures, § 2.5.4. "The hearing panel may either affirm or amend an adverse decision, or remand the adverse decision to the Council for further consideration." *Id.* Because the College is challenging the decision, the decision is not reviewed anew, and because of the limited decisional options of the Panel as set forth in section 2.5.4, the supported implication is that TU-CVM has the burden. It is also consistent with appellate practice in that the party who appeals the decision has the burden to show that there was an error with respect to the decision below. Moreover, this interpretation is consistent with federal courts that have reviewed an accrediting agency's decision. *See, e.g., Pro. Massage*, 781 F. 3d at 171.

The COE has no objection to not using the "plainly wrong or without evidence to support it" standard. The COE strongly recommends the standard set forth in *Professional Massage* and federal courts, which is used by many other accrediting agencies. That standard is "whether the decision of an accrediting agency . . . is arbitrary and unreasonable or an abuse of discretion and whether the decision is based on substantial evidence." *Pro. Massage*, 781 F. 3d at 171. Therefore, the College "has the burden of proof to show that the COE's decision to assign TU-CVM was arbitrary and unreasonable or an abuse of discretion and whether the decision was based on substantial evidence." This should resolve TU-CVM's concern.

2. Two Hours for TU-CVM to present at the appeal hearing is adequate given that the arguments, evidence, and testimony that may be presented is limited to the evidence and record that was before the Council at the time of the decision. New evidence and expert testimony based on that new evidence is not permitted.

Most of the other issues raised by TU-CVM are premised on its mistaken belief that it is permitted to make arguments and present evidence and testimony that is outside of the record. This includes its request to: (a) not limit the admission of testimony and evidence at the hearing, (b) present expert testimony, (c) preclude the Panel from asking questions of TU-CVM witnesses; and (d) conduct the hearing over 4-5 full days. In short, TU-CVM appears to be looking for a full-blown trial and a *de novo* review, which this is not. The Policies and Procedures neither require nor permit.

Section 2.5.4 of the COE Policies and Procedures specifically states that "the appeal is not a *de novo* review, but a challenge of the Council's decision based on the evidence before the Council at the time of its decision." *See also* Procedures for Appeal. The evidence to be considered and reviewed is limited to what was before the Council at the time of the decision. This is consistent with the COE Policies and Procures, the Procedures for Appeal, and federal case law.

TU-CVM asserts that it intends to present numerous fact witnesses and two expert witnesses, and introduce new evidence, including additional or new financial statements. Thus, TU-CVM believes its allotted time of 2 hours to present its case is insufficient. It believes that it needs 4-5 full days.

CARR MALONEY

Jed R. Mandel *Re: TU-CVM vs. COE or Council* September 22, 2025 Page **4** of **5**

Because the evidence and testimony is constrained to what was before the COE at the time of the decision, numerous fact witnesses are not necessary. The only testimony that may be permitted is testimony about what is in the record, which certainly can be done by less than a handful of witnesses from the College to clarify any points in the record. Multiple days is not needed.

Relatedly, and contrary to TU-CVM's position, it is appropriate for Panel members to ask witnesses any clarifying questions. TU-CVM asserts that this is inconsistent with section 2.5.4 of the COE Policies and Procedures (which states that the Panel "may have legal counsel present to advise it with respect to procedural matters") because "[c]ross examining witnesses does not constitute advising the panel on procedural matters." TU-CVM appears to misunderstand the role of the Panel's counsel. Indeed, allowing Panel members to get clarification from the subject matter experts from TU-CVM may be of benefit to the College and conforms with due process requirements. There is also no basis for TU-CVM's concern about the formal admission of evidence. The only evidence that is permitted is what was before the COE at the time of its decision. The record is in and everything else is out.

A process whereby an institution's counsel presents arguments and a couple of witnesses from the institution to testify about certain points in the record, followed by clarification questions by the Panel, is generally consistent with accrediting agency appeal practices. In fact, the time duration of accreditation appeals is often shorter than what is being afforded to TU-CVM. Again, this is not a trial. Following the submission of the briefs, which contains the arguments, 2 hours (plus 30 minutes in rebuttal) is more than adequate.

Furthermore, the two expert witnesses proposed by TU-CVM should be precluded from testifying. Based on TU-CVM's Submission in Support of its Appeal, it appears that much of their presentation is based on the declaration and testimony of Dr. James Lloyd and the testimony of Willie M. Reed. However, Dr. Lloyd's declaration appended to the Submission and the opinions of Drs. Lloyd and Reed are outside of the record in that that their contentions, and by extension, TU-CVM's arguments, constitute "new evidence" that was not before the Council at the time it made its decision. This includes "new evidence" concerning financial statements that were not presented to the COE before the decision to assign TU-CVM Terminal Accreditation status. In fact, there are no documents or communications from Drs. Lloyd and Reed that are part of the record. To allow their testimony and evidence based on their opinions would impermissibly invite the Panel to substitute its judgment for that of the Council, which is contrary to the standard of review set forth in section 2.5.4 of COE Policies and Procedures and Procedures for Appeal. Therefore, the testimony and new evidence advanced by Drs. Lloyd and Reed may not be considered. The COE formally objects to the testimony of Drs. Lloyd and Reed.

3. The COE Objects to TU-CVM's Discovery Requests.

In its Submission, TU-CVM propounded a number of document requests and seeks to depose all members who voted to assign TU-CVM Terminal Accreditation status, all staff members

CARR MALONEY_{PC}

Jed R. Mandel *Re: TU-CVM vs. COE or Council* September 22, 2025 Page **5** of **5**

of the COE who were involved in the accreditation review, *inter alia*, and all witnesses that the COE intends to call as a witness at the Appeals Hearing.

Such requests are improper and are not permitted under section 2.5.4 the COE Policies and the Procedures for Appeal. Again, the review for appeal is not *de novo*. The review is limited to the Council's decision based on the evidence before the Council at the time of its decision." COE Policies and Procedures, § 2.5.4; *see also* Procedures for Appeal. Again, evidence outside of the record that was not before the Council at the time of its decision may not be considered.

Consistent with the aforementioned policies and procedures, TU-CVM has been provided with the entire record, which encompasses many of the documents requested. But many of the other requests are not part of the record and seek information that is confidential, *inter alia*. Moreover, any deposition testimony is not evidence that was before the Council at the time of its decision. While § 2.5.4 allows for testimony at the appeal hearing, nothing in § 2.5.4 allows for depositions in advance of the hearing or any discovery for that matter. TU-CVM's request cannot be explained as anything other than an intent to harass the Council and its members and staff or a complete ignorance or disregard of the rules and scope of this appeal. This is an appeal based on a closed record. It is not a trial. The Council has fully satisfied its obligation in providing the entire record. It will not be providing any additional documents and will not allow the depositions requested.

4. There is no conflict of interest.

TU-CVM asserts that there is a conflict of interest because an attorney for the COE, Douglas Carlson, is married to someone who works in the same law firm as the Appeal Panel's counsel. TU-CVM is wrong. First, Douglas Carlson is not representing the COE in this matter. Second, it is the COE understanding that counsel for the Panel does not offer any substantive input to the Panel and has no decision-making authority with respect to the appeal decision. There is no conflict.

Should you or other counsel have any questions or wish to discuss, please feel free to contact me.

Sincerely,

Matthew D. Berkowitz

EXHIBIT 1-D TO TUSKEGEE UNIVERSITY'S MOTION FOR PRELIMINARY INJUNCTION

Jed R. Mandel (312) 929-1960 jmandel@clpchicago.com

September 24, 2025

Mr. Thomas W. Thagard III Maynard Nexsen 1901 Sixth Avenue North, Suite 1700 Birmingham, AL 35203

Dear Mr. Thagard:

I am confirming receipt of your September 19, 2025 letter. Please note that AVMA staff are still in the process of determining whether they can fully access the FTP link you sent on September 12, 2025. Assuming they can, AVMA will not need TU-CVM to provide nine printed copies of its appellate documentation.

As an initial matter, let me clarify that, as you noted, I misquoted TU-CVM's burden under AVMA's most current Appeal Procedures. TU-CVM's burden of proof is not explicitly to establish that the COE's decision "was plainly wrong or without evidence to support it." Nevertheless, TU-CVM's burden will be substantially the same. Under common law due process principles, TU-CVM must demonstrate that the COE's decision was arbitrary and capricious, an abuse of discretion, or not based on substantial evidence. That essentially is what Section 2.5.4 of COE's Appeal Procedures for Adverse Outcomes describes as the only grounds for appeal.

I also am confirming receipt of Matt Berkowitz's September 22, 2025 letter responding to the additional due process/procedural points raised in your September 19th letter to me (on which he was copied). I fully agree with the points raised by Mr. Berkowitz and therefore will not tread the same ground here.

The AVMA Hearing Panel will follow the due process procedures established in its Appeal Procedures – a level of due process approved by the U.S. Department of Education. Although TU-CVM's time to present its case will not be expanded beyond two hours, I note that TU-CVM has the right "to submit documents and other written materials pertinent to the case," and the Panel will consider those written submissions to the extent they have a direct bearing on the case and are "relevant to conditions existing at the college during the dates on which the site visit was made or on which the adverse decision was based."

In addition, while members of the Hearing Panel or the Panel's legal counsel will not cross-examine witnesses (this is not a trial), they may, however, ask witnesses clarifying questions. TU-CVM will not need to have their appellate submission formally admitted into evidence. As you note, the formal rules of evidence do not apply to this hearing. Nevertheless, the Hearing Panel does have the right and obligation to disregard documentation or testimony that does not fall within the "Scope of Appeal" as outlined in my September 15, 2025 letter.

Mr. Thomas W. Thagard III September 24, 2025 Page 2

As for your request that the hearing be transcribed. AVMA will make those arrangements, with the costs allocated in accordance with Section 2.5.4 of the Appeal Procedures.

Please also note that I will share this response with the members of the Hearing Panel. It ultimately will be their decision as to the procedures for conducting the hearing – within the constraints of the existing AVMA Appeal Procedures. I will let you know promptly if the Panel has any different view.

Finally, no conflict exists that prevents me or my firm from representing the Hearing Panel in this appeal. Contrary to your contention, my colleague Ms. Carlson has no financial interest in a favorable decision for the COE. The interests of counsel for the Appeal Panel are not in whether the Council's adverse accreditation decision is affirmed, amended, or remanded, but rather in ensuring that that the Panel receives the legal advice to conduct its role in accordance with the AVMA COE Appeal Procedures and applicable legal standards. Moreover, please note that Julia Judish at Pillsbury also will be providing legal representation to the Hearing Panel. Please include her on any further communications about TU-CVM's appeal (at julia.judish@pillsburylaw.com).

Jed R. Mandel

Matthew D. Berkowitz cc: Isham R. Jones III

Julia Judish

EXHIBIT 1-E TO TUSKEGEE UNIVERSITY'S MOTION FOR PRELIMINARY INJUNCTION

Thomas W. Thagard III DIRECT 205.254.1091

EMAIL tthagard@maynardnexsen.com



September 29, 2025

VIA EMAIL

American Veterinary Medical Association c/o Mr. Jed R. Mandel Chicago Law Partners, LLC 333 W. Wacker Drive, Suite 810 Chicago, IL 60606 jmandel@clpchicago.com

c/o Ms. Julia E. Judish Pillsbury Winthrop Shaw Pittman LLP 1200 Seventeenth Street, NW Washington, DC 20036 julia.judish@pillsburylaw.com

Dear Mr. Mandel and Ms. Judish:

Tuskegee University College of Veterinary Medicine ("TU-CVM") is in receipt of Mr. Mandel's letter dated September 24, 2025 as well as the AVMA Council on Education's ("COE") September 22, 2025 letter. To the extent the AVMA "fully agree[s] with the points raised by" the COE's September 22 letter, TU-CVM reasserts its objections, but will not rehash each of those objections here. TU-CVM's objections have been preserved and are not waived given the parties' correspondence to date. However, certain aspects of both Mr. Mandel's September 24 letter and the COE's September 22 letter require additional attention.

I. Governing Standard

Mr. Mandel's September 24 letter adopts the COE's position that common law due process principles apply for this appeals hearing, and under common law due process principles, TU-CVM must demonstrate that the COE's decision was arbitrary and capricious, an abuse of discretion, or not based on substantial evidence. This appeals hearing is <u>not</u> a due process challenge in federal court, and TU-CVM objects to the AVMA applying a more stringent standard of review than contained in Section 2.5.4 of the COE's policies and procedures.

Section 2.5.4 of the COE's policies and procedures states that TU-CVM may appeal an adverse accreditation decision on the grounds that the COE "(1) ruled erroneously by disregarding established AVMA COE criteria for accreditation, (2) materially failed to follow its stated procedures, or (3) failed to consider all the evidence and documentation presented." Those are the three standards of review that must be applied. The plain language of Section 2.5.4 simply does

not include the arbitrary and capricious, abuse of discretion, or substantial evidence standards that the AVMA now seeks to impose upon TU-CVM at the request of its internal division, the COE.

For example, one of TU-CVM's primary grounds for appeal is that the COE failed to consider all the evidence and documentation presented. If it is shown that the COE did, in fact, fail to consider all of the evidence and documentation presented by TU-CVM, then the appeals panel should reverse or remand pursuant to the plain terms of the COE's policies and procedures. TU-CVM has no additional burden to show that the COE's failure in this respect was also arbitrary and capricious, an abuse of discretion, or was somehow unsupported by substantial evidence.

The COE's policies and procedures do state that the appeals panel's review is not "de novo," and TU-CVM is not asking for de novo review. TU-CVM insists that the appeals panel apply Section 2.5.4 as it is written, and reverse or remand the COE's decision if the appeals panel finds that such decision "(1) ruled erroneously by disregarding established AVMA COE criteria for accreditation, (2) materially failed to follow its stated procedures, or (3) failed to consider all the evidence and documentation presented." With such limited appellate grounds, the appeals panel is not applying a "de novo" standard of review. TU-CVM notes that it will constitute a federal due process violation if the appeals panel fails to apply the plain language of the COE's policies and procedures and instead applies a stricter standard of review. See Pro. Massage Training Ctr., Inc. v. Accreditation All. of Career Sch. & Colleges, 781 F.3d 161, 172 (4th Cir. 2015) (due process requires an accrediting agency to follow "its rules in reaching its decision"); Bennett Coll. v. S. Ass'n of Colleges & Sch. Comm'n on Colleges, Inc., 474 F. Supp. 3d 1297, 1307 (N.D. Ga. 2020) ("It is axiomatic that an accrediting agency's failure to follow its own rules constitutes a violation of due process.").

II. Evidence before the Appeals Panel

TU-CVM appreciates the AVMA's willingness to consider "documents and other written materials" that TU-CVM submits before or during the appeals hearing, but Section 2.5.4 of the COE's policies and procedures states that TU-CVM has a right to present testimony, not just written materials. Limiting TU-CVM's case presentation to two hours—inclusive of documents, testimony, argument, and panel questioning—is simply insufficient given the lengthy accreditation history between TU-CVM and the COE, and especially considering that the COE has voted to end this 80-year old college of veterinary medicine. The proper procedure is for TU-CVM to have the opportunity to present the evidence it deems allowable under Section 2.5.4 of the COE's policies and procedures without limitation. The COE's policies and procedures provide for nothing less nor do they impose any type of restriction on witnesses being present throughout the hearing. TU-CVM estimates that its case presentation could take four to five days. Any specific objections by the COE can be heard by the appeals panel as the evidence is presented.

The COE's September 22 letter also requested a blanket exclusion of testimony from Drs. Lloyd and Reed. While Mr. Mandel's September 24 letter "fully agree[d] with the points raised by" the COE, his letter did not expressly exclude witness testimony from Drs. Lloyd and Reed. If the AVMA is taking the position that Drs. Lloyd and Reed are categorically prohibited from



offering testimony in this matter (as requested by the COE), the AVMA must explicitly state so in writing.

Neither Mr. Mandel's September 24 letter nor the COE's September 22 letter addressed the language from Section 2.5.4 of the COE's policies and procedures, which states: "The hearing panel may also have legal counsel present to advise it with respect to procedural matters." TU-CVM welcomes questions from the appeals panel, but TU-CVM fails to see how the COE's policies and procedures allow for the appeals panel's *counsel* to ask substantive questions directly to witnesses. Such questioning goes beyond advising the appeals panel "with respect to procedural matters" and would allow the appeals panel's counsel to influence the substantive decision making of the panel.

Additionally, neither Mr. Mandel's September 24 letter nor the COE's September 22 letter addressed TU-CVM's objection to the newly imposed cost structure, which is inconsistent with Section 2.5.4 of the COE's policies and procedures. TU-CVM objects to the imposition of any costs not so awardable under the plain language of the COE's policies and procedures.

III. <u>Pre-hearing Discovery</u>

The COE has now objected *in toto* to TU-CVM's pre-hearing discovery requests. In support of its objections, the COE contends that the "record" before the appeals panel is limited to the "information before the Council at the time of the decision." Once again, the COE disregards the plain language of its own policies and procedures. Section 2.5.4 of the COE's policies and procedures states that the appeals panel may hear evidence concerning "(1) *the adverse accreditation or reasonable assurance decision*, (2) a review of information before the Council at the time of the decision, (3) *a review of the process and procedure used to arrive at the decision*, and (4) testimony relevant to (1), (2) and/or (3), depending on the basis of the appeal." The COE's objection to discovery improperly narrows evidence before the appeals panel to category (2), wholly ignoring categories (1), (3), and (4).

To use another example, TU-CVM's appeal includes the contention that the COE violated its own policies and procedures by applying its standards of accreditation in an inconsistent and biased manner as compared with other colleges of veterinary medicine. As set forth in TU-CVM's initial appellate submission, Drs. Lloyd and Reed will provide testimony that, in their substantial experience, other colleges' financial data has never been challenged, ignored, or distrusted in the same manner as TU-CVM's data has been by the COE. Given these facts, TU-CVM is entitled to pre-hearing discovery as to why the COE approached TU-CVM's financial data with such antagonism and distrust—discovery that goes to the very heart of the "process and procedure" used by the COE to arrive at the adverse accreditation decision. This includes, but is not limited to, emails and other forms of electronic communications in which COE members, staff, and/or site visitors analyzed the legitimacy of TU-CVM's financial data, as well as meeting minutes and Teams / collaboration notes wherein COE members, staff, and/or site visitors assessed the standards of accreditation as applied to TU-CVM.



To be sure, in its September 22 letter, the COE openly admits that it is withholding responsive materials: "TU-CVM has been provided with the entire record, which encompasses many of the documents requested. But many of the other requests are not part of the record and seek information that is confidential, inter alia." (emphasis added). The COE's policies and procedures state that the appeals panel should receive documentation and testimony regarding the COE's "process and procedure" to arrive at its adverse accreditation decision, not just a review of information before the COE at the time of the decision. TU-CVM has requested discovery into the COE's "process and procedure" to arrive at its adverse accreditation decision, and the COE has acknowledged that relevant materials exist, but the COE is now refusing to produce such relevant materials because they are "confidential, inter alia." The COE's policies and procedures contain no mechanism for the COE to refuse to produce relevant information after it has rendered an adverse accreditation decision, nor is the COE entitled to the deliberative process privilege which is reserved for government actors.

TU-CVM takes serious issue with the COE's dismissive accusation that TU-CVM's discovery requests are intended to harass the COE and its members and staff. The COE has voted to end TU-CVM's historic veterinary program. The COE's decision will have a substantial negative impact on TU-CVM's students, faculty, staff, and alumni. Based on the plain language of the COE's policies and procedures, TU-CVM is entitled to place at issue the "process and procedure" utilized by the COE to reach its momentous decision. Rather than openly defend its decision, the COE now hides its decision-making process behind three words: "confidential, *inter alia*." Nothing in the COE's policies and procedures supports the COE's effort in this regard. *Cf. Auburn Univ. v. S. Ass'n of Colleges & Sch., Inc.*, 489 F. Supp. 2d 1362, 1374 (N.D. Ga. 2002) ("[A]n open, fair and deliberative process seems essential to protect all interests and to assure some measure of confidence in the outcome of the inquiry."); *see also id.* at 1376 (allowing university to conduct discovery into accreditation staff's potential conflict of interest).

Furthermore, TU-CVM is concerned that the AVMA and the COE may be misrepresenting the "approved" nature of their appeals process. TU-CVM understands that the Department of Education actually found in its November 7, 2024 decision letter that the AVMA COE's appeals procedures *do not* comply with federal regulations. Specifically, the Department of Education adopted the Staff Report finding that the AVMA COE "does not meet the requirements of this section [602.25(f)] of the criteria. The agency must afford the appeal panel access to the accreditation documentation, utilized by the COE for the compliance determination for the program appeal, in its entirety for review and decision. To reiterate, all documentation used by the COE in its decision to take the adverse action must be made available to the appeals panel." By withholding certain documents as "confidential, *inter alia*" the COE is not providing TU-CVM or the appeals panel "all documentation used by the COE in its decision to take the adverse action" in their "entirety." To TU-CVM's knowledge, the AVMA and the COE's appeals procedures – including those that they seek to impose here – remain in noncompliance with the Department of Education's regulations. As recognized by the Department of Education, TU-CVM must be provided all materials and communications considered by the COE in its decision making process.



Given that the COE is an internal division of the AVMA, TU-CVM requests that the AVMA direct the COE (1) to respond to TU-CVM's pre-hearing document discovery requests no later than October 6, 2025 and (2) to voluntarily submit to pre-hearing depositions for the individuals identified.

IV. Conflict of Interest

In the AVMA's letter of September 15, 2025, Mr. Mandel stated that "Ms. Carlson is married to Douglas Carlson, who is one of the attorneys representing the COE." In the COE's September 22 letter, the COE stated that "Douglas Carlson is not representing the COE in this matter." Now, in the AVMA's September 24 letter, Mr. Carlson is not mentioned at all. TU-CVM cannot respond to this point when it is being told different things by the AVMA and the COE. TU-CVM's objection stands until the AVMA and the COE identify all counsel.

Finally, if the appeals panel is the ultimate decision maker for these procedural issues as stated by Mr. Mandel's September 24 letter, then TU-CVM requests that the appeals panel receive all correspondence from TU-CVM in which it has set forth its objections. Mr. Mandel's one-sided and conclusory summary of TU-CVM's positions in his September 24 letter does not provide the appeals panel with sufficient detail to make an informed ruling on TU-CVM's objections.

Sincerely,

/s/ Thomas W. Thagard, III
Thomas W. Thagard, III
Counsel for Tuskegee University
College of Veterinary Medicine

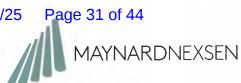
Cc: Matthew D. Berkowitz (via email to matthew.berkowitz@carrmaloney.com)



EXHIBIT 1-F TO TUSKEGEE UNIVERSITY'S MOTION FOR PRELIMINARY INJUNCTION

Case 2:25-cv-00890 Document 2-1 Filed 11/10/25 Page 31 of 4

Thomas W. Thagard III
DIRECT 205.254.1091
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October 10, 2025

VIA E-MAIL

Julia Judish
Pillsbury Winthrop Shaw Pittman LLP
1200 Seventeenth Street, NW
Washington, DC 20036
julia.judish@pillsburylaw.com

Re: Tuskegee University College of Veterinary Medicine ("TU-CVM") vs. AVMA Council on Education (the "COE")

Dear Julia:

Thank you for your letter of October 6, 2025.

Please let us know of the Panel's decisions related to our procedural objections no later than October 21, 2025, so that we can take whatever steps necessary to protect our client's interests.

Please let us know the identity of the Panel members as soon as you know them. Since AVMA and the COE will already know their identities, it is only fair that TU-CVM has that information as well.

We look forward to hearing from you.

Sincerely,

Tom Thagard

Cc: Matthew Berkowitz (via email to <u>matthew.berkowitz@carrmaloney.com</u>)

Jed Mandel (via email to jmandel@clpchicago.com)

Jay Lester (via email to ilester@maynardnexsen.com)

EXHIBIT 1-G TO TUSKEGEE UNIVERSITY'S MOTION FOR PRELIMINARY INJUNCTION



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October 20, 2025

Via E-Mail

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Counsel for the AVMA Council on Education

Re: Tuskegee University College of Veterinary Medicine ("TU-CVM") vs. AVMA Council on Education (the "COE")

Dear Mr. Thagard and Mr. Berkowitz,

I write with an update about the Hearing Panel in TU-CVM's appeal of the COE's assignment of terminal accreditation to TU-CVM, as well with a fuller response to the various procedural issues that have been raised in earlier correspondence from each of you.

We now have a full complement of seven Hearing Panel members. Our seventh member is David Scammell, DVM, a veterinary practitioner in Winnipeg, Manitoba.

Thank you, Mr. Thagard, for sharing Dr. Epperson's disclosure with TU-CVM and confirming that TU-CVM does not object to Dr. Epperson serving on the Hearing Panel.

With respect to TU-CVM's objections to Drs. Hoffman and Martindale serving on the Hearing Panel because they "appear to currently serve or in the past have served on AVMA's House of Delegates," I can confirm that neither they nor any other member of the Hearing Panel currently serves in the AVMA House of Delegates, nor is any Hearing Panel member otherwise serving in a role in which they are participating in the governance of the AVMA. All Hearing Panel members have completed conflict of interest disclosures and have affirmed that they can impartially review TU-CVM's appeal. The robustness of this process is demonstrated by Dr. Epperson's disclosure of his prior interactions with TU-CVM, even though that did not rise to the level of a conflict of interest.¹

Section 2.5.4 of the COE Accreditation Policies and Procedures provides that no persons appointed to an appeal hearing panel by the AVMA Board of Directors "shall be current members of the Council on Education or AVMA staff." In his letter of October 13, 2025, Mr. Thagard suggested that members of the AVMA House of Delegates should be disqualified from service on the Hearing Panel as participants in the AVMA's governance to the same extent as AVMA staff. The hypothetical scenario of current service in the House of Delegates does not need to be addressed here. Since Dr. Martindale previously served on the AVMA House of Delegates,² the only pertinent issue is whether a record of past service to the AVMA – whether as a former employee of the AVMA, as a former member of the AVMA House of Delegates, or as a former member of the AVMA's COE – inherently creates a disqualifying conflict of interest that should bar participation in deciding the appeal of an adverse accreditation action by the COE. It does not. Indeed, Section 2.5.4 expressly requires that all persons appointed to an appeal hearing panel must "have completed service on the Council within the last seven years." I note that in the U.S. Department of Education's review of the COE Accreditation Policies and *Procedures*, no concerns were raised about this provision.

As noted above, a review of the *COE Accreditation Policies and Procedures* and a general application of conflict of interest principles lead to the conclusion that TU-CVM's objection to Dr. Martindale's service on the panel is without merit. However, so as to provide a fully definitive answer, the agenda for the AVMA Board of Directors' meeting on October 23-24 will include a resolution as to the general issue that Mr. Thagard raised: whether prior service in the AVMA House of Delegates

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¹ The Conflict of Interest Statement completed by each individual selected for the Hearing Panel includes a catch-all category requiring the selected individual to attest that they "have no reason to believe other conflicts of interest exist that have not been listed herein that would influence my decision in this appeal matter or cast doubt on my ability to make an unbiased determination about the issues on appeal" and to disclose any relevant facts if they had "any questions about the existence of a conflict of interest."

² Dr. Hoffman is neither a current nor former member of the AVMA House of Delegates.

presents a conflict with serving on the hearing panel for an appeal of an adverse COE accreditation panel.³ I will inform both of you of the AVMA Board's decision.

Moving on from these preliminary conflict of interest issues,⁴ I can now respond more fully to the procedural requests raised by TU-CVM and to which the COE has voiced objection.

The Procedures for Appeal of Adverse Outcome Document.

Mr. Thagard previously identified that the *Procedures for Appeal of Adverse Outcome* document that was originally sent to TU-CVM had erroneously included a description of TU-CVM's burden of proof that did not match the language in Section 2.5.4 of the current *COE Accreditation Policies and Procedures*. Mr. Mandel acknowledged that error in prior correspondence, and that has now been corrected in the attached *Procedures for Appeal of Adverse Outcome*, which was provided to the Hearing Panel on October 6th (and later provided to Dr. Scammell, once he was appointed). The updated *Procedures* document also eliminates any reference to counsel for the Hearing Panel questioning witnesses at the hearing.

TU-CVM had also objected to the phrasing in the *Procedures* document about TU-CVM's responsibility for all expenses associated with the appeal "if the determination of the COE is upheld, **in whole or in part**." While the "in whole or in part" language

https://todaysveterinarybusiness.com/lincoln-memorial-lawsuit-061825/ and https://www.dvm360.com/view/lincoln-memorial-university-sues-american-veterinary-medical-association. No Hearing Panel member raised this as an issue on their Conflict of Interest disclosure form. Moreover, even if Hearing Panel members learn that TU-CVM's outside counsel represents a plaintiff in a different case against the AVMA, there is no reasonable basis to expect that information to affect their view of TU-CVM's appeal. In any appeal hearing, members of the hearing panel understand than an adverse ruling on appeal may result in the institution filing a lawsuit. The institution's choice of counsel is irrelevant.

³ Mr. Thagard's letter explained that TU-CVM's objection to a former member of the AVMA House of Delegates serving on the panel arose from both general concerns about the individual's participation in the governance of the AVMA and specific concerns about whether a past AVMA House of Delegates member would have potential bias against TU-CVM due to Mr. Thagard's firm's representation of a different institution in antitrust litigation against the AVMA. There is no evidence that any member of the Hearing Panel is aware of that lawsuit, much less of the "inside baseball" information about which law firm represents the plaintiff in that suit. Mr. Thagard's law firm is not named in articles in veterinary news publications about that litigation matter. See

⁴ In Mr. Thagard's October 13th letter, he also requested "the complete CVs of each panel member." We will not be providing this information, nor does the AVMA Board of Directors request that panel members submit their complete CVs to be appointed to a panel. Nothing in the *COE Accreditation Policies and Procedures* requires either that the AVMA Board obtain CVs or that such detailed background information be provided to the parties. I note that even in litigation, the parties are not provided with the CVs of trial or appellate judges.

is not the same phrasing as in Section 2.5.4, it accurately reflects the allocation of expenses based on the outcome of the appeal. Section 2.5.4 provides that:

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 [a more limited set of expenses].

The allocation of costs thus depends on whether the COE's assignment of terminal accreditation status to TU-CVM is upheld, or whether that accreditation status decision is reversed. Unless the Hearing Panel finds that the COE (i) ruled erroneously by disregarding established Council criteria for accreditation, (ii) materially failed to follow its stated procedures, or (ii) failed to consider all the evidence and documentation presented, the terminal accreditation status decision will be upheld if the Hearing Panel finds that substantial evidence supports the COE's determination of major deficiencies in even one Standard of Accreditation of the three Standards on which the adverse action was based. Thus, for example, even if (hypothetically) the Hearing Panel were to decide that the COE committed error in not granting a good cause extension for TU-CVM to demonstrate compliance with Standard 11, Outcomes Assessment, and/or disregarded substantial evidence supporting TU-CVM's compliance with Standard 2, Finance, the assignment of terminal accreditation status would be upheld unless TU-CVM also prevailed on its appeal of the COE's finding of major deficiencies as to Standard 4, Clinical Resources. Because the adverse accreditation decision outcome would be the same – assignment of terminal accreditation status – TU-CVM would be responsible for all expenses associated with the appeal, under Section 2.5.4. Only if the decision by the COE "is reversed in its entirety" would the appeal costs be shared between the AVMA and TU-CVM.

Pre-hearing Discovery Requests

TU-CVM has put forward a growing list of requests for pre-hearing discovery. The TU-CVM's September 12th written submission in support of its appeal sought to propound eleven broad document requests on the COE, including "all documents" concerning restrictions on accreditation status relating to other colleges of veterinary medicine.⁵ TU-CVM also sought to depose all members of the COE who voted on

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⁵ After the COE stated that some of the documentation sought by TU-CVM "is confidential" and was "not part of the record," TU-CVM characterized that as an admission that the COE was "refusing to produce such relevant materials." But the COE is correct that information about decisions relating to accreditation reviews of other veterinary medical colleges is both confidential and not part of the accreditation record on which the COE based its decision about TU-CVM's own accreditation status – and thus is not relevant to this appeal. Section 1.2.4 of the *COE Accreditation Policies and Procedures* provides that "Those who participate in COE activities must maintain the confidentiality of all non-public information relating to accreditation and veterinary education." In addition, Section 2.5.1

the July 14, 2025 terminal accreditation decision, all staff members who assisted in the COE's accreditation review of TU-CVM, and all witnesses that the COE intends to call to testify at the appeal hearing. In Mr. Thagard's September 29th letter, he specified that the pre-hearing discovery requests cover documents that he asserts may shed light on "why the COE approached TU-CVM's financial data with such antagonism and distrust," including "emails and other forms of electronic communications in which COE members, staff, and/or site visitors analyzed the legitimacy of TU-CVM's financial data," as well as "meeting minutes and Teams / collaboration notes wherein COE members, staff, and/or site visitors assessed the standards of accreditation as applied to TU-CVM." In Mr. Thagard's October 13th letter, he added requests to receive from the AVMA the "specific training [provided to Hearing Panel members] related to changes in the Policies and Procedures since the panelists served on the COE" and "the identities of any trainers."

These requests reflect a fundamental misunderstanding of the nature of the appeal process for adverse COE accreditation decisions. Section 2.5.4 clearly states that

- "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."
- "All documentation and testimony shall be relevant to conditions existing at the college during the dates on which the site visit was made or on which the adverse decision was based."

There is no provision in Section 2.5.4 or in the *Procedures* document for pre-hearing discovery. Any documentation or evidence produced during pre-hearing discovery would, by definition, not qualify as "the evidence before the Council at the time of its decision." Indeed, provisions that narrow the scope of an appeal are typical of accreditation bodies, and the U.S. Department of Education's review of the *COE Accreditation Policies and Procedures* raised no concerns about these provisions.

The full Hearing Panel convened on October 17, 2025, to consider TU-CVM's requests for pre-hearing discovery, and Hearing Panel members reviewed all submissions and correspondence relating to those requests in advance of convening. The Hearing Panel voted unanimously in favor of a resolution that "Because the appeal is not a de novo determination, no discovery requests, whether for document requests or depositions, will be available to either party to the appeal."

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provides that, once an action of the COE is final and a final report of evaluation is sent to a college of veterinary medicine, "the self-study, all correspondence, directives, recommendations, and related information and documentation of the site visit and the evaluation are confidential to the Council and will not be publicly disclosed," except to the extent disclosed by the college itself or its institution, or except as required for the COE to correct any incorrect or misleading information regarding pre-accreditation or accreditation released by the institution.

Hearing Duration and Witnesses

TU-CVM also has requested that the Hearing Panel not limit the admission of testimony and evidence at the hearing to two hours so that TU-CVM may "present fact testimony from numerous witnesses as well as expert testimony from at least two expert witnesses." In Mr. Thagard's September 19th letter, he estimated that TU-CVM would expect to present four to five full days of testimony and evidence.

As stated above, Section 2.5.4 limits the scope of the appeal hearing to "a challenge of the Council's decision based on the evidence before the Council at the time of its decision." For this reason, no extensive fact witness testimony is either necessary or permitted, and expert testimony – which by its nature was not "evidence before the Council at the time of its decision" unless it is already part of the accreditation record – will also not be allowed. ⁶ At its October 17, 2025 meeting, the Hearing Panel voted unanimously in favor of a resolution

[t]o affirm that the Hearing Panel will apply the <u>Procedures for Appeal of Adverse Outcome</u> as sent to the Hearing Panel on October 6, 2025, including that the University will be allotted up to two hours to present its case at the appeal hearing. Although witnesses may be presented, the witnesses will be restricted to presenting testimony relevant to the conditions existing at the college at the time of the site visit or on which the COE based its adverse decision as communicated on July 14, 2025. Any witness testimony may only be for the purpose of clarifying evidence already in the accreditation record that was before the COE at the time of that decision. Because the appeal is not a de novo determination, no expert witness testimony will be permitted.

Additional Observations

Both the Hearing Panel and its counsel (Mr. Mandel and I) understand and respect the momentous nature of an assignment of terminal accreditation status and its impact on TU-CVM. As stated in Section 1.2.2 of the *COE Accreditation Policies and Procedures*, the mission of the AVMA COE is designed to protect the rights of students, to assist colleges in improving veterinary medical education, and to assure the public that accredited programs provide a quality education that enables students to develop entry-level competency. Per Section 2.1.1, the COE must accredit "only those programs that demonstrate that they meet the Standards of an Accredited College of Veterinary Medicine, their own stated educational goals and objectives, and that materially comply with Council procedures and directives."

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⁶ TU-CVM has access to the same accreditation record as the Hearing Panel through the COE's accreditation software, Armiture.

The appeal procedure provides an opportunity for a college subject to an adverse accreditation decision to identify material errors by the COE, whether those errors are in application of the Standards, procedural errors, or a disregard of substantial evidence. The appeal procedure is by nature retrospective, with the appeal hearing panel's review of whether a college has substantively met the COE Standards limited to evidence of the conditions on which the adverse decision was based and that was before the COE at the time of the decision. For TU-CVM, that covers the evidence it submitted in its reports and other submissions to the COE through June 21, 2025.

If TU-CVM believes that it has other evidence relevant to the identified findings of non-compliance that, in hindsight, it wished it had put before the COE, or if it has made progress in resolving the identified major deficiencies since April, it may hope that it can stave off a final assignment of terminal accreditation status. However, new evidence of that nature cannot be considered by the Hearing Panel.

Rather, the *COE Accreditation Policies and Procedures* provide a different avenue for TU-CVM to seek to marshal new evidence to protect its accreditation status. Per Section 2.5.3, prior to final assignment of terminal accreditation status,

A college may request a reevaluation at any time for reasons of reclassification. The request should justify the reasons for requesting a different classification. A current self-evaluation, or an updated report of a self-evaluation less than two years old, must be submitted approximately twelve (12) weeks before the date of a site visit. The report should indicate the changes that have occurred since the previous evaluation with particular reference to the recommendations previously made. When there appears to be reasonable probability that the classification can be changed, the Council will make every effort to implement a new evaluation, but in no case less than one year after a previous evaluation (the meeting at which the Council made the relevant decision).

Furthermore, even if TU-CVM is unsuccessful in its appeal and the COE issues a final decision of assignment of terminal accreditation status, TU-CVM would still be able to request reevaluation after that final decision, during the teach-out period in which it would continue to serve currently enrolled student (as described in Section 3.2.7) and prior to assignment of Accreditation Withheld status. Per Section 3.2.8,

A college with Terminal Accreditation status may request reevaluation. The request will be considered by the COE if the college can provide evidence that the deficiency(ies) resulting in the Terminal Accreditation status has(have) been resolved. The COE will determine what additional reports will be required and whether a site visit is necessary as part of the reevaluation. The request and process for reevaluation will not alter the original terms of terminal accreditation.

In short, although TU-CVM has an incontrovertible right to appeal and even to litigate over any final adverse decision of the COE, whether it can hold an accreditation status that allows it to admit new students to its DVM program will always depend on its ability to demonstrate compliance with the COE's Standards. If it can demonstrate full compliance with those Standards through the COE's procedures, even outside of the appeal process, it will be able to continue its proud history of educating students for the veterinary profession.

Regards,

Julia Judish

cc: Jed Mandel, Chicago Law Partners

Julia Judion

EXHIBIT 1-H TO TUSKEGEE UNIVERSITY'S MOTION FOR PRELIMINARY INJUNCTION

American Veterinary Medical Association Procedures for Appeal of Adverse Outcome

Council on Education's Accreditation Determination Regarding the College of Veterinary Medicine, Tuskegee University

The appeal that the College of Veterinary Medicine, Tuskegee University (University) has taken of the adverse accreditation determination of AVMA's Council on Education (COE) will be conducted pursuant to Section 2.5.4 of the COE's Accreditation Policies and Procedures (July 2025), as follows:

<u>Scope of Appeal</u>: The pending appeal is a challenge of the adverse determination -- the assignment of terminal accreditation -- that the COE communicated on July 14, 2025, based on the evidence before the COE at that time. It is not a <u>de novo</u> hearing. The sole issues on appeal are whether the COE, in making its adverse accreditation determination regarding the University: (i) ruled erroneously by disregarding established AVMA COE criteria for accreditation; (ii) materially failed to follow stated procedures; or (iii) failed to consider all the evidence and documentation presented (collectively, the "Issues on Appeal").

<u>Pre-Hearing Procedure</u>: The University duly filed this appeal, and has submitted its initial brief and supporting documentation. The COE may submit its responsive brief and any supporting documentation on or before October 24, 2025, and the University may submit a reply brief on or before November 14, 2025. The submitting party must provide an electronic copy and nine (9) hard copies of any responsive or reply brief, with attachments or exhibits, to me, care of the AVMA, at: American Veterinary Medical Association, 1931 N. Meacham Road, Suite 100, Schaumburg, IL 60173, and must provide an electronic copy and one (1) hard copy to the other party.

Burden of Proof: The University has the burden of establishing through sufficient evidence that, the assignment of terminal accreditation should be reversed or remanded to the Council for further proceedings because the COE's adverse accreditation determination was deficient in one of more of the following ways: (i) the COE ruled erroneously by disregarding established AVMA COE criteria for accreditation; (ii) the COE materially failed to follow stated procedures; or (iii) the COE failed to consider all the evidence and documentation.

Hearing Panel: The AVMA Board of Directors will appoint a hearing panel comprised of seven (7) persons, none of whom shall be current members of the COE or AVMA staff. The hearing panel members: (i) will include veterinary educators and practitioners, and one public member who completed his/her service on the COE within the last seven years; and (ii) will receive specific training to review all changes made in the COE policies and procedures since their service on the Council, so that panel members have the requisite knowledge and understanding to make decisions consistent with the policies and requirements of the Council on Education. The AVMA Board of Directors will designate the Chair of the hearing panel.

Hearing Date and Location: The hearing in this matter will take place on December 5, 2025, at the Chicago Marriott Schaumburg, 50 N. Martingale Road, Schaumburg, IL 60173. The specific room for the hearing will be designated prior to the hearing. The hearing will commence at 9:00

a.m., and will continue until 11:45 a.m., at which time there will be a lunch break. The hearing will resume at 1:00 p.m. and will conclude at 4:15 p.m. Attendance at the hearing will be limited to designated representatives of AVMA, the University and the COE. The parties will submit their lists of designated representatives to the hearing panel and to each other no less than seven (7) days in advance of the hearing.

Hearing Procedure: Each of the University, the COE and the hearing panel may be represented by legal counsel. Both the University and the COE will have the right to present witnesses. The University and the COE will submit their lists of witnesses to the hearing panel and to each other no later than seven (7) days in advance of the hearing. The University and the COE also will have the right to submit documents and other written materials, provided such information is included in the supporting documentation submitted with the parties' briefs and is part of the accreditation record before the Council at the time of the decision. Further, the hearing shall be restricted to (1) the adverse accreditation decision, (2) a review of information before the Council at the time of the decision, (3) a review of the process and procedure used to arrive at the decision, and (4) testimony relevant to (1), (2) and/or (3), depending on the basis of the appeal. Documentation will include access to all materials related to the compliance determination, such as the college's selfstudy, 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 during the dates on which the site visit was made or on which the adverse decision was based. The hearing panel will not be bound by the rules of evidence applied in formal legal proceedings, and may, in its sole discretion, accept or reject evidence as it deems appropriate. Counsel for the University and for COE may make or lead the presentations on behalf of their respective clients. Witnesses will be excluded from the hearing room except during the time of their testimony.

The University, as the appellant, will present its case first, and will be allotted up to two hours to do so. Following the lunch break, the COE will present its case and will be allotted up to two and one-half hours to do so. Thereafter, the University will have up to thirty minutes to make any response or rebuttal to the COE's presentation. The hearing panel members are entitled to ask questions, including of any witnesses, during any of the presentations. Questioning from the hearing panel shall not enlarge the time allocated to the University or the COE. At the discretion of the hearing panel, or upon advance written request from either the University or the COE, a transcript of the hearing will be made and will be shared with all parties.

Hearing Panel Decision: The hearing panel may either affirm or amend the COE's adverse determination, or remand the determination to the COE for further consideration. If the hearing panel amends the COE's decision, the hearing panel will remand the matter to the COE with specific instructions to implement the hearing panel's decision. If the hearing panel remands the adverse determination for further consideration by the COE, the hearing panel shall identify the specific issues that the COE must address. In all cases where a decision is implemented by or remanded to the COE, the COE shall act in a manner consistent with the hearing panel's decisions and instructions. The decision of the hearing panel shall be produced in the form of a written report and will become a permanent record of the COE. 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 COE. All questions will be referred to the college which may respond as deemed appropriate.

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

EXHIBIT 2 TO TUSKEGEE UNIVERSITY'S MOTION FOR PRELIMINARY INJUNCTION

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA

TUSKEGEE	UNIV	'ERSIT	Y,

Plaintiff,

v.

Case No.:

AMERICAN VETERINARY MEDICAL ASSOCIATION,

Defendant.

DECLARATION OF DR. WILLIE REED IN SUPPORT OF TUSKEGEE UNIVERSITY'S MOTION FOR PRELIMINARY INJUNCTION

- I, Dr. Willie Reed, depose and state the following under penalty of perjury:
- 1. I submit this Declaration in support of Tuskegee University College of Veterinary Medicine's ("Tuskegee") motion for preliminary injunction in the above captioned matter.
- 2. I am over 19 years of age, of sound mind, and am otherwise competent to make this Declaration.
 - 3. I have personal knowledge of the matters herein.
- 4. I received my Doctor of Veterinary Medicine degree from Tuskegee University College of Veterinary Medicine and a Doctor of Philosophy from Purdue University. From 2007 to 2024, I served as Dean of Purdue University College of Veterinary Medicine. Before this 16-year deanship, from 1997 to 2006, I was the

Acting Chair (1997-2001) and Chair (2001-2006) of Michigan State University's Department of Pathobiology and Diagnostic Investigation. Between 1990 and 2006, I was the Director of the Animal Health Diagnostic Laboratory at Michigan State University (now known as the Diagnostic Center for Population and Animal Health). This lab is one of the largest and most comprehensive diagnostic laboratories in the country. As part of my leadership, I oversaw a \$58 million construction project for the laboratory. I also served as President of the AAVMC from 2010 to 2011, Chair of the AVMA Council on Research, President of the American Association of Veterinary Laboratory Diagnosticians, and President of the American Association of Avian Pathologists.

- 5. My curriculum vitae is attached as Exhibit A.
- 6. I understand that the American Veterinary Medical Association ("AVMA") Council on Education ("AVMA COE") has decided to place Tuskegee University College of Veterinary Medicine on terminal accreditation status.
- 7. Tuskegee has chosen to appeal that decision to an internal appeals panel of the AVMA, as the AVMA COE's policies and procedures allow.
- 8. I understand that the AVMA appeals panel's hearing regarding the AVMA COE's decision to place Tuskegee on terminal accreditation status is currently set for December 5, 2025. At this hearing, and without limitation, I intend to testify to the following:

- a. During my tenure as Dean of Purdue University College of Veterinary

 Medicine, the college was placed on probationary accreditation due to
 the need to replace its old and outdated hospital.
- b. The AVMA COE never asked Purdue University for financial statements to support its ability to fund the \$108 million dollar project. Purdue University simply moved forward with construction—using the same design firm as Tuskegee has engaged for its new construction project—and obtained an extension to its probationary status to complete the project.
- c. Even though Tuskegee has received express commitments of unlimited support from Tuskegee University, the University President, the University Board of Trustees, and a major financial institution, the AVMA COE treated those commitments (and other data showing Tuskegee's sound financial position) with distrust it did not show to Purdue or other institutions.
- d. Tuskegee presented the AVMA COE ample evidentiary support that it has the financial resources necessary to operate a successful college of veterinary medicine.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

This Zday of November, 2025.

Dr. Willie Reed

Wiesie Read

CURRICULUM VITAE

WILLIE M. REED, DVM, PhD, DACVP, DACPV

Dean, College of Veterinary Medicine Purdue University Lynn Hall Room 1176 West Lafayette, IN 47907-2026

> Phone 765-494-7608 Fax 765-496-1261 wreed@purdue.edu

SPECIALTY: Veterinary Pathology, Avian Diseases, Infectious Diseases

PERSONAL DATA: Married: Dorothy Ann Reed, PhD

Children: Kimberly Melissa

Brandon Christopher

Home address: 5786 Augusta Blvd, West Lafayette, IN 47906

Home phone: 765-463-6097

EDUCATION AND TRAINING:

1972	Valedictorian, McIntosh High School, McIntosh, Alabama
1976	BS (High Honors), Animal and Poultry Science, Tuskegee Institute, Tuskegee, Alabama
1976	Training in Comparative and Laboratory Animal Pathology, Department of Comparative Pathology, University of Alabama, Birmingham, Alabama
1978	DVM (High Honors), Tuskegee University, Tuskegee, Alabama
1979	C. L. Davis, DVM Foundation, Review of Ophthalmic and Neuropathology of Animals, Purdue University, West Lafayette, Indiana
1980	Scientific Writing Course, Purdue University, West Lafayette, Indiana
1981	The Inflammatory Process – Short Course, International Academy of Pathology, United States-Canadian Division, Chicago, Illinois
1982	PhD, Veterinary Pathology, Purdue University, West Lafayette, Indiana
1983	Gross Morbid Pathology of Domestic Animals, Armed Forces Institute of Pathology, Washington, DC
1983	Olafson Pathology Short Course, Cornell University, Ithaca, New York
1984	Managing for Commitment, Center for Creative Leadership, Greensboro, North Carolina
1990	Managing Organizational and Personal Change, Center for Creative Leadership, Greensboro, North Carolina
1992	USDA-APHIS Teachers of Infectious Diseases and Laboratory Diagnosticians Course on Foreign Animal and Poultry Diseases, Plum Island, New York

1997	Chemical/Biological Countermeasur	oc Courco IIC Arm	w Chamical Cahaal	Fort McClollan Alabama
1997	Chemical/biological Countermeasur	es course u s arm	iv unemicai school	FOR MICCIPILAN ALADAMA

Penn Executive Veterinary Leadership Program: Making an Impact as a Global Health Leader, Wharton School, University of Pennsylvania, Philadelphia, Pennsylvania

PROFESSIONAL EXPERIENCE:

2011

2007 to 2024	Dean, College of Veterinary Medicine, Purdue University, West Lafayette, Indiana
2001-2006	Chairperson, Department of Pathobiology and Diagnostic Investigation, Michigan State University, East Lansing, Michigan
1997-2001	Acting Chairperson, Department of Pathobiology and Diagnostic Investigation, Michigan State University, East Lansing, Michigan
1990-2006	Director, Animal Health Diagnostic Laboratory, Michigan State University, East Lansing, Michigan (name and address changed in July 2002 to Diagnostic Center for Population and Animal Health, Michigan State University, East Lansing, Michigan)
1990	Professor of Veterinary Pathology, Department of Pathology, Michigan State University, East Lansing, Michigan
1987-1990	Associate Professor of Avian Pathology, Purdue University, West Lafayette, Indiana
1985-1990	Assistant Director, Animal Disease Diagnostic Laboratory, Purdue University, West Lafayette, Indiana
1985-1990	Chief of Avian Diseases Diagnostic Service, Animal Disease Diagnostic Laboratory, Purdue University, West Lafayette, Indiana
1982-1987	Assistant Professor of Veterinary Pathology, Purdue University, West Lafayette, Indiana
1978-1982	Graduate Instructor in Veterinary Pathology, Purdue University, West Lafayette, Indiana
Summer 1977	Research Assistant, Department of Pathology, The Upjohn Company, Kalamazoo, Michigan
Summer 1976	Research Assistant, Department of Comparative Medicine, University of Alabama, Birmingham, Alabama

ADMINISTRATIVE EXPERIENCE:

Dean, College of Veterinary Medicine, Purdue University: I was appointed dean of the College of Veterinary Medicine January 1, 2007. As dean, I am responsible for all learning, discovery, and engagement activities of the College. The College has a budget of \$84M, employs 360 support staff, and has a faculty of 120 representing most of the specialties in veterinary medicine. The College's learning mission is accomplished through three types of educational programs with the main emphasis on the Doctor of Veterinary Medicine professional degree. In addition, the College educates veterinary nurses through the two- and four-year undergraduate veterinary nursing degree program. Through the graduate program, masters and PhD degrees are awarded. The College has an enrollment of 336 students in the Doctor of Veterinary Medicine Program, 102 students in the Veterinary Technology Program and 122 students in graduate and residency programs.

Director, Diagnostic Center for Population and Animal Health, Michigan State University: From 1990 through 2006, I served as Director of the Diagnostic Center for Population and Animal Health (DCPAH) at Michigan State University. The DCPAH serves as the official veterinary diagnostic laboratory for the State of Michigan. It is a large, complex laboratory with an extensive client base, with an annual operating budget of approximately \$10 million. As Director, I served as the Chief Operating Officer, responsible for all administrative, personnel, and financial matters. The

DCPAH had a total staff of 120, of which 28 are professionals, and performed over 1.5 million tests annually. In 2003, the DCPAH occupied a new, state-of-the-art, \$58 million, 152,000 gross sq. ft. facility with high-containment BSL-3 Ag necropsy and laboratory space. As Director, I identified the need for the facility and helped secure funding from the State of Michigan. The facility was designed to assist the state in eradicating bovine tuberculosis from domestic cattle and wildlife, and to provide diagnostic capabilities in detecting emerging and foreign animal diseases. I was responsible for overseeing the design and construction of the facility. In addition, with the assistance of a consulting company, I engaged the DCPAH in a strategic planning process that led to redefinition of its vision and mission, in order to position it as the leading U.S. veterinary diagnostic laboratory. The goal of the project was to become entrepreneurial, with renewed emphasis on customer service. An extensive marketing plan was developed, with the goal of growing the business to generate income to drive the DCPAH's academic and clinical research programs. The DCPAH generated over \$10M annually.

Acting Chairperson, Department of Pathology; Chairperson, Department of Veterinary Pathology; Chairperson, Department of Pathobiology and Diagnostic Investigation, Michigan State University: In 1997 I was appointed Acting Chairperson of the Department of Pathology. At that time, the department was shared by the Colleges of Veterinary Medicine, Human Medicine, and Osteopathic Medicine and comprised 30 faculty consisting of veterinarians, physicians, and PhDs. I was asked by the deans of the three medical colleges to lead the department through a strategic planning process. This led to the creation of a new department, Veterinary Pathology, in the College of Veterinary Medicine; I was appointed Chairperson. I then led the new department through a strategic planning process that recommended expansion and a new name--the Department of Pathobiology and Diagnostic Investigation. The new department was comprised of pathologists, anatomists, microbiologists, immunologists, neuroscientists, aquatic medicine specialists, toxicologists, and endocrinologists and has the responsibility for administering courses in gross anatomy, histology, neuroscience, general systemic and clinical pathology, and pathology clinical rotations for professional students. The department also had an array of graduate courses, mainly in the area of pathology. Since creation of the new department, research funding increased dramatically and averaged over \$5-6 million annually. Under my leadership, we developed one of the largest pathology residency training programs in North America (16 positions) through collaborations with private industry and the federal government. The department had an active minority recruitment program, and over 40% of the residency positions were filled by minority veterinarians. The graduate program was revamped and was partially supported by an NIH Training Grant.

PRE-PROFESSIONAL AWARDS AND ACTIVITIES:

Dean's List, 1972-1978

Recipient of Women's Auxiliary Award for Highest Cumulative Grade Index – Sophomore Year of Veterinary School Vice-President, Student Chapter, American Veterinary Medical Association, 1977
President, Student Chapter, American Veterinary Medical Association, 1978

SPECIALTY CERTIFICATION:

Diplomate, American College of Veterinary Pathologists, 1983 Charter Diplomate, American College of Poultry Veterinarians, 1991

VETERINARY LICENSURE:

Michigan, Ohio, and Alabama

MEMBERSHIP IN PROFESSIONAL ORGANIZATIONS:

American College of Veterinary Pathologists
American Veterinary Medical Association
Midwest Association of Veterinary Pathologists
American Association of Avian Pathologists
American Association of Veterinary Laboratory Diagnosticians
American Association for the Advancement of Science
World Poultry Science Association

C. L. Davis, DVM Foundation
Midwest Association of Avian Veterinarians
Indiana Veterinary Medical Association
American College of Poultry Veterinarians
U.S. Animal Health Association
World Poultry Veterinary Association
Conference of Research Workers in Animal Disease

COMMUNITY SERVICE:

Member of West Lafayette (Indiana) Sagamore Lions Club, 1983-1990 (Secretary 1984-1986, President 1989-1990) Member of Board of Directors, Hanna Community Center, Lafayette, Indiana, 1988-90 (Vice President 1989-1990); 2007-2015 (Board President)

Member of Greater Lafayette (Indiana) United Way Planning Committee, 1989-1990

Member of Knights of Columbus, Okemos St. Martha Council, Okemos, Michigan, 1991-present (Grand Knight, 2005-06)

PROFESSIONAL HONORS AND AWARDS:

Member: Phi Zeta, Honor Society of Veterinary Medicine

Alpha Kappa Mu

Gamma Sigma Delta, Honor Society of Agriculture (Secretary 1986-88,

President 1988-89)

Sigma Xi

Phi Kappa Phi Honor Society

C. L. Davis, DVM Foundation Scholarship Award in Veterinary Pathology, 1981

Distinguished Alumnus Award, McIntosh High School, May 1985

Honorary Member of the Mobile County Commission, Mobile, Alabama, May 1985

Achievement Award for Academic and Professional Accomplishments, presented by the Washington County Commissioner, Mobile, Alabama, May 1985

Certificate of Recognition, Michigan State University All University Excellence in Diversity Recognition and Awards, 2002

Distinguished Veterinary Alumnus Award, Tuskegee Veterinary Medical Association, 2003

USDA/APHIS Administrator's Award for Animal Health, United States Animal Health Association, 2006

Achievement in Education, Indiana Black Expo Summer Celebration & Black Business Conference, 2008

Inducted into the Washington County Hall of Fame, Chatom, AL, 2010

Iverson Bell Diversity & Inclusion Award, Association of American Veterinary Medical Colleges, 2011

Distinguished Service Award, Black Graduate Student Association, 2016

Purdue University Title IX Distinguished Service Award, 2017

Presidential Distinguished Alumnus Award, Tuskegee University College of Veterinary Medicine, 2017

Honorary Alumnus Award, College of Veterinary Medicine, Michigan State University

American Veterinary Epidemiology Society Honorary Diploma, 2018

Doctor of Science honoris causa, Royal Veterinary College, University of London. 2018

American Veterinary Medical Associate Frederick Douglass Patterson Lifetime Achievement Award, 2023

Indiana Veterinary Medical Association Lifetime Achievement Award, 2024

Purdue College of Agriculture Distinguished Service Award, 2024

President's Award, Tuskegee Veterinary Medical Alumni Association, 2025

Distinguished Service Award for Pioneering Leadership in Veterinary Medical Education and Support of the Tuskegee University College of Veterinary Medicine, 50th Veterinary Medical Symposium, March 2025

Distinguished Service Award, Black Graduate Student Association (BGSA), April 2025.

CONSULTATIONS:

Member of Special Review Site Visit Committee for NIH, Universidad Central Del Caribe, Puerto Rico, May 18-20, 1988

Member of Special Review Site Visit Committee for NIH, Inter-American University, San Juan, Puerto Rico, May 16-17, 1988

Member of NIH Animal Resources Initiative Grant Review Panel, Bethesda, Maryland, June 17, 1988

Member of Special Review Site Visit Committee for NIH, University of Hawaii, Honolulu, Hawaii, September 21-24, 1988

Member of Special Review Site Visit Committee for NIH, Winston-Salem, State University, Winston-Salem, North Carolina, October 2-4, 1988

Member of Special Panel Review Committee, NIH, Bethesda, Maryland, February 17, 1989

Member of Special Review Site Visit Committee for NIH, Texas A&I University, Kingsville, Texas, April 29-May 1, 1989

Chairman, NIH Animal Resources Initiative Grant Review Panel, Bethesda, Maryland, May 10, 1989

Member of Special Review Site Visit Committee, NIH, Bethesda, Maryland, May 11-12, 1989

Member of Special Review Site Visit Committee for NIH, Talladega College, Talladega, Alabama, January 22-24, 1990

Member of Special Review Site Visit Committee for NIH, Incarnate Word College, San Antonio, Texas, April 23-25, 1990

Member of Special Review Site Visit Committee for NIH, New Mexico State University, Las Cruces, New Mexico, September 23-25, 1990

Member of Special Review Site Visit Committee for NIH, Navajo Community College, Shiprock, New Mexico, May 2-3, 1991

Member of Special Review Site Visit Committee for NIH, University of Puerto Rico, September 24-27, 1991

Member of Special Review Site Visit Committee for NIH, Prairie View A&M University, Prairie View, Texas, January 14-16, 1992

Member of Special Review Site Visit Committee for NIH, California State University, Hayward, California, April 28-30, 1992

Member of Special Review Site Visit Committee for NIH, Catholic University, Ponce, Puerto Rico, October 18-19, 1992

Member of Special Review Site Visit Committee for NIH, Ponce School of Medicine, Ponce, Puerto Rico, October 20-22, 1992

Member of Special Review Site Visit Committee for NIH, Fayetteville State University, Fayetteville, North Carolina, February 16-17, 1993

Member of Special Review Site Visit Committee for NIH, Barry University, Miami, Florida, April 21-23, 1993

Member of Ad-Hoc Review Committee, NIH Comparative Medicine Program, Animal Facility Improvement for Small Research Programs, National Center for Research Resources, Rockville, Maryland, October 18-19, 1993

Member of Ad-Hoc Review Committee, NIH Comparative Medicine Program, Facility Improvement for Large Research Programs, Bethesda, Maryland, June 14-17, 1994

Member of Virology Panel for the Animal Health and Well Being Program of the National Research Initiative, Arlington, Virginia, May 3-5, 1994

Member of SBIR Animal Production and Protection Panel, USDA, Washington, DC, January 30-31, 1997

Member of the Virology Panel, National Research Initiative, Sustaining Animal Health and Well-Being, USDA, Washington, DC, May 12-16, 1997

Member of SBIR Animal Production and Protection Panel, USDA, Washington, DC, February 18-20, 1998

Panel Manager, SBIR Animal Production and Protection Panel, USDA, Washington, DC, January 26-27, 1999

Member of the National Animal Disease Center Ruminant Research Review Team, Ames, Iowa, April 26-28, 2000

Member of National Cancer Institute Special Emphasis Technical Evaluation Panel, Washington, DC, December 8, 2000

Member of Review Committee, Department of Veterinary Diagnostic and Production Medicine, Iowa State University, Ames, Iowa, February 2004

Member, USDA-ARS Animal Health National Research Program Assessment Team, 2004-2005

Member of Peer Review Panel, Veterinary Loan Repayment Program, National Institute of Food and Agriculture (NIFA), USDA, August 26-29, 2012

TEACHING ACTIVITIES, PURDUE UNIVERSITY:

Advanced Dermatopathology (Graduate Level Course): Lectures on viral and bacterial diseases of the skin

Advanced General Pathology (Graduate Level Course): Lectures on pathogenesis of amyloidosis

Clinical Pathology, Microbiology and Necropsy (Professional Students Course): Responsible for teaching necropsy techniques and gross necropsy diagnostics

Diagnostic Pathology Clerkship (Professional Students Course): Responsible for teaching approaches to the identification of the causes and pathogenesis of diseases in mammals

Avian Pathology (Graduate Level Course): Responsible for teaching entire course (8-12 students in course), offered every 3 years

Neoplastic Diseases (Graduate Level Course): Lectures on neoplasms of the lower gastrointestinal tract

Avian Medicine Clerkship (Professional Students Course, 6-8 students each year from 1984-1989): Provided specialized instruction in veterinary medical aspects of the avian species, including management of commercial flocks; pathological, microbiological and serological investigation of diseases of birds; and prevention and treatment of diseases of commercial flocks and pet birds.

TEACHING ACTIVITIES, MICHIGAN STATE UNIVERSITY:

Veterinary Integrative Problem Solving (professional students): Presented cases related to poultry diseases

Respiratory Diseases (professional students): Responsible for providing 3 hours of lecture on respiratory diseases of birds

Avian Pathology: Responsible for teaching a portion of a graduate-level course, with primary responsibility for diseases of the gastrointestinal tract

Digestive Tract Diseases (professional students): Responsible for providing 3 hours of lecture on digestive diseases of birds

MEMBERSHIP ON STATE AND NATIONAL COMMITTEES/BOARDS:

2014-present	Zoetis Animal Health, Board of Directors, Chair Quality & Innovation Committee
2013	Member NIH Physician-Scientist Workforce Working Group
2012-2014	Member NIH Advisory Committee to the Office of Intramural Research
2010-2012	Member, American Veterinary Medical Association (AVMA)/American Association of Veterinary Medical College (AAVMC) Joint Leadership Committee
2011-2014	Member, American Veterinary Medical Association (AVMA) Member Services Committee
2011-2013	Member, US Secretary of Agriculture Advisory Committee on Animal Health
2010-2011	President, Association of American Veterinary Medical Colleges (AAVMC)
2009-2011	Member, North American Veterinary Medical Education Consortium (NAVMEC) Board of Directors
2009-2010	President-elect, Association of American Veterinary Medical Colleges (AAVMC)
2009-2012	Member, Association of American Veterinary Medical Colleges (AAVMC) Executive Committee
2008-present	Member, Dean's Advisory Committee, College of Veterinary Medicine
2007-present	Member, Indiana Animal Health Foundation
2007-2009	Secretary, Association of American Veterinary Medical Colleges (AAVMC)
2007-2009	Member, Leadership Committee, Association of American Veterinary Medical College (AAVMC)
2004-2007	Member, Board of Directors, ACVP/STP Coalition
2004-2007	Vice Chair, Transmissible Diseases of Poultry Committee, U.S. Animal Health Association
2003-2006	Member, Steering Committee, USDA National Animal Health Laboratory Network (NAHLN)
2004-2007	Member, Legislative Advisory Committee, American Association of Veterinary Laboratory Diagnosticians
2003-2004	President, American Association of Veterinary Laboratory Diagnosticians (AAVLD)
2003-2007	Member, Comparative Medicine Review Committee, NIH-NCRR Initial Review Group
2002-2007	Member, Board of Directors, C. L. Davis DVM Foundation
2002-2006 (also 1990-1991)	Member, Awards Committee, American Association of Avian Pathologists
2001	Vice President, American Association of Veterinary Laboratory Diagnosticians
2000-2006	Member, Training Coordinators Committee, American College of Veterinary Pathologists

2002-2004	Member, Invasive Species Advisory Committee, U.S. Secretary of the Interior
2003-present	Treasurer, Tuskegee Veterinary Medical Alumni Association
1999-2003	President, Tuskegee Veterinary Medical Alumni Association
1999-2000	Member, Panel on Euthanasia, American Veterinary Medical Association
1999-2000	President, American Association of Avian Pathologists
1998-2011	Member, Accreditation Committee, American Association of Veterinary Laboratory Diagnosticians
1998-2004	Elected to the American Veterinary Medical Association Council on Research by the American Veterinary Medical Association House of Delegates (elected Council Chairperson 2003-04)
1998-2003	Member, Advisory Board, C. L. Davis, DVM Foundation
1998-1999	President-Elect, American Association of Avian Pathologists (AAAP)
1997-2006	Member, Avian Working Group, National Animal Health Reporting System Steering Committee
1997-2006	Member, Michigan Department of Agriculture Food Safety Alliance
1997	Member, Examination Validation Committee, American College of Veterinary Pathologists
1996-2006	Member, Michigan Bovine Tuberculosis Core Committee
1996-2006	Member, Michigan Tuberculosis Steering Committee
1996-present	Member, Kenneth Eskelund Preceptorship Committee, American Association of Avian Pathologists
1996-2001	Member, Program Advisory Committee, American Association of Avian Pathologists
1996-2005	Member, Editorial Committee, A Laboratory Manual for the Isolation and Identification of Avian Pathogens, American Association of Avian Pathologists
1995-2006	Member, Users Liaison Group, Avian Disease and Oncology Laboratory, U.S. Department of Agriculture
1995-2000	Member, Equine Advisory Committee, Michigan Department of Agriculture
1996-2006	Member, Board of Veterinary Medicine, State of Michigan (appointed by Governors John Engler and Jennifer Granholm)
1995-1999	Board of Directors, American Association of Avian Pathologists (representing North Central Region)
1994-2006	Member, Pseudorabies Advisory Committee, Michigan Department of Agriculture (name has been changed to Swine Health Advisory Committee)
1993-2006	State Veterinarian's Advisory Committee, Michigan

1993	Proctor, Examination Committee, American College of Veterinary Pathologists
1992-2004	Member, Editorial Board, Avian Diseases
1992-present	Member, Long Range Planning Committee, American Association of Veterinary Laboratory Diagnosticians (Chairperson 1995-2001)
1991-1994	Member, Examination Committee, American College of Poultry Veterinarians
1991-1996	Member, Secretary of Agriculture's Advisory Committee on Foreign Animal and Poultry Diseases
1990-2006	Member, Diagnostic Laboratories Directors Committee, American Association of Veterinary Laboratory Diagnosticians
1990-2006	Delegate to the House of Delegates for the State of Michigan, American Association of Veterinary Laboratory Diagnosticians
1990-2006	Member, Avian Advisory Committee, Michigan Department of Agriculture
1989-present	Member, Education Committee, American Association of Avian Pathologists (Chairperson 1991-1995)
1989-1991	Member, Conference Committee, North Central Avian Disease Conference (Program Chairperson 1990)
1989-1993	Member, General Research Support Review Committee and Minority Biomedical Research Support Subcommittee, National Institutes of Health
1988-1996	Member, Committee on Enteric Diseases of Poultry, NCT-157
1985-1989	Member, Poultry Health Committee, American Association of Avian Pathologists
1985-2000	Member, Committee on Pathogenesis, Bioecology and Control of Respiratory Diseases of Poultry, NC-116
1985-1990	Ex-Officio Member of the Board of Directors, Indiana State Poultry Association
1986-1988	Alternate Delegate to the House of Delegates for the State of Indiana, American Association of Veterinary Laboratory Diagnosticians

<u>UNIVERSITY, COLLEGE, AND DEPARTMENTAL COMMITTEE</u> <u>ASSIGNMENTS, PURDUE UNIVERSITY</u>:

COVID-19 Vaccine Distribution Committee, Chair, 2021

COVID-19 Medical Advisory Team, 2020

COVID-19 Mitigation Implementation Committee, 2020

COVID-19 Safe Campus Taskforce, Co-Chair, 2020

College of Agriculture Dean Search and Screening Committee, Chair, 2018

Provost Search and Screening Committee, 2017

College of Pharmacy Dean Search and Screening Committee, Chair, 2016

College of Health and Human Sciences Dean Search and Screening Committee, Chair, 2012

College of Agriculture Dean Search and Screening Committee, Chair, 2009

Animal Disease Diagnostic Laboratory Director Search Committee, Chair, 2008

Admissions Committee, College of Veterinary Medicine, 1988-1990

Strategic Planning Committee, College of Veterinary Medicine, 1989

Continuing Education Advisory Committee, College of Veterinary Medicine, 1987-1990

University Grade Appeals Committee, 1985-1988
Faculty Advisor, undergraduate DVM students, Classes of 1985 and 1986
Campus Appeals Board, 1984-1986, 1986-1988
Grievance Committee, College of Veterinary Medicine, 1983-1985, 1986-1988
Faculty Committee, College of Veterinary Medicine, 1984-1985, 1985-1986 (Co-Secretary)
Ad Hoc Committee on Minority Recruitment, 1983-1985
Tumor Board, College of Veterinary Medicine, 1983

<u>UNIVERSITY, COLLEGE, AND DEPARTMENTAL COMMITTEE</u> ASSIGNMENTS, MICHIGAN STATE UNIVERSITY:

Administrative-Professional Association Bargaining Committee – Management, 1991-2006 Clerical-Technical Bargaining Committee – Management, 1991-present Search Committee, Chairperson of Large Animal Clinical Sciences, College of Veterinary Medicine, 1992

Search Committee, Dean, College of Veterinary Medicine, 1993
Vice Chair, MSU Community Charitable Campaign, 1994-2002
Search Committee, Extension Poultry Specialist, Department of Animal Science, 1996
Strategic Planning Committee: Service to End Users Theme Group, College of Veterin

Strategic Planning Committee: Service to End Users Theme Group, College of Veterinary Medicine, 1997

Futuring Executive Committee, College of Veterinary Medicine, 2004-2006 Chairperson, Dean's Search and Rating Committee, College of Veterinary Medicine, 2006

RESEARCH INTERESTS:

Pathogenesis of infectious diseases Gastrointestinal pathology Salmonellosis Avian pox, Marek's disease, and leukosis J virus

RESEARCH PROJECTS (MICHIGAN STATE UNIVERSITY):

Immunologic relationship of avian pox viruses
Diagnosis, control, and pathogenesis of Subgroup J avian leukosis virus (ALV-J)
Pathogenesis of Marek's disease virus

MANUSCRIPT REVIEWER:

Avian Diseases (Member of Editorial Board 1990-2005) Veterinary Pathology Journal of Veterinary Diagnostic Investigation Wildlife Diseases Avian Pathology Journal of the American Veterinary Medical Association

INVOLVEMENT IN GRADUATE STUDENT RESEARCH:

Major Professor (Purdue University) for:

- 1. Jack, Sherman W., Department of Veterinary Pathobiology, "Pathogenesis of Quail Adenoviral Hepatitis", PhD 1989.
- 2. Fulton, Richard, Department of Veterinary Pathobiology, "Pathogenesis of Infectious Bronchitis", PhD 1991.

3. Fitzgerald, Scott, Department of Veterinary Pathobiology, "Pathogenesis of Marble Spleen Disease in Pheasants", PhD 1991.

Major Professor (Michigan State University) for:

- 1. Cardona, Carol, Department of Pathology, "Hemorrhagic Enteritis of Turkeys", PhD 1998.
- 2. Ping, Wu, Department of Pathology, "Marek's Disease", PhD 1998.
- 3. Williams, Susan, Department of Pathobiology and Diagnostic Investigation, "Subgroup J Leukosis in Leghorn Chickens", PhD 2001.
- 4. Yondem, Bedriye Bilge, Department of Pathology, "The Influence of Marek's Disease Virus on Avian Leukosis Virus in Meat-Type Chickens", MS 2001.
- 5. Pandiri, Arun, Department of Pathobiology and Diagnostic Investigation, "Subgroup J Leukosis in Broilers", PhD 2005.
- 6. Cui, Xiaoping, Department of Pathobiology and Diagnostic Investigation, "Characterization of Marek's Disease Virus Encoded Chemokine-Like Gene", PhD 2003.
- 7. Banat, Ghida, Department of Pathobiology and Diagnostic Investigation, "Avian Leukosis J-Virus in Chickens", PhD 2007.

Member of Graduate Advisory Committee (Purdue University) for:

- 1. Shackelford, Cynthia C., Department of Veterinary Pathobiology, "Proliferative Enteritis in Swine", PhD 1990.
- 2. del Fierro, Gloria, Department of Veterinary Pathobiology, "A Study on Experimentally Induced Turkey Hemorrhagic Enteritis in the Chicken", MS 1985.
- 3. Webb, D. M., Department of Veterinary Pathobiology, "Furazolidone Cardiotoxicity in Ducklings", PhD 1989.
- 4. Sell, David, Animal Science Department, "The Effects of Tannins on Laying Hens", PhD 1983.
- 5. Shea, Maribeth A., Department of Veterinary Pathobiology, "Role of Plasmids in the Virulence of Salmonella choleraesuis", MS 1987.
- 6. Marbella, Cynthia, Department of Veterinary Pathobiology, "Identification of Specific Antibody Against Ascaris suum", MS 1987.
- 7. Elliott, G., Department of Veterinary Pathobiology, "Porcine Neutrophil Function Tests: Evaluation, Optimization, and Validation of Chemotaxis, Phagocytosis and Bacterial Killing", PhD 1989.

Advisor (Purdue University) for:

- 1. Hasselbach, Valerie, "Pathology of Adenovirus Infection in Quail", National Institutes of Health, Minority High School Student Summer Research Apprentice Program, June-August 1986.
- 2. Minor, Chalanta, "Furazolidone Toxicosis in Ducklings", National Institutes of Health, Minority High School Student Summer Research Apprentice Program, June-August 1987.
- 3. Hunt, Craig, "Normal Pulmonary Lavage Cytology of the Lungs of 6-Week-Old Specific-Pathogen-Free Chickens", National Institutes of Health, Minority High School Student Summer Research Apprentice Program, June-August 1988.

4. White, Maya, "Hematological Evaluation of 4-Week-Old Specific-Pathogen-Free Chickens", National Institutes of Health, Minority High School Summer Research Apprentice Program, June-August 1989.

Member of Graduate Advisory Committee (Michigan State University) for:

- 1. Fikes, Jim, Department of Pathology, "The Use of the Avian Embryo for Ototoxicity Testing", PhD 1992.
 - Kufuor-Mensah, Eric, Department of Pathology, "Increased Susceptibility to Marek's Disease Due to
- 2. Mycotoxicosis", PhD 1996.
- 3. Butler, Kelly, Department of Veterinary Pathology, "Transmission, Pathology, and Epidemiology of Mycobacterium bovis in Michigan Wildlife", PhD 2001.
- 4. Zwick, Laura, Department of Pathobiology and Diagnostic Investigation, "Mycobacterium bovis in Michigan Wildlife: Pathology and Epidemiology" (withdrew from PhD program 2001).
- 5. Carter, Laura, Department of Pathobiology and Diagnostic Investigation, "Effects of Concentrated Fine Ambient Particles on the Lungs of Rats Coexposed to an Inhaled Allergen (withdrew from PhD program 2003).
- 6. Clarke, Kathy-Anne, Department of Pathobiology and Diagnostic Investigation, "Mycobacterium bovis in Wildlife", PhD 2005.
- 7. Jones, Yava, Department of Pathobiology and Diagnostic Investigation, PhD 2010
- 8. Hayes, Schantel, Department of Pathobiology and Diagnostic Investigation, PhD 2009

RESEARCH GRANTS, AWARDS, AND CONTRACTS RECEIVED:

- The Pathogenesis of Salmonella choleraesuis, S. typhimurium and S. heidelberg in Pigs, \$7000, USDA Animal Health and Disease Research Fund 1433, **Reed WM**, 1983-1984.
 Prevalence of Urinary Calculi in Dalmatian Dogs, \$1500, SVM Canine Disease Research Board, **Reed, WM**,
- 2. 1983-1984.
- 3. Pathogenesis of Viral Hepatitis in Quail, \$30,000, Indiana Department of Natural Resources, **Reed, WM**, 1984-1989.
- 4. Porcine Salmonellosis: Determination of Virulence Factors in the Clinicopathologic Expression of Disease, \$7000, USDA Animal Health and Disease Fund 1433, **Reed, WM**, Boyce JR, 1985.
- 5. Poultry Disease Research: Ascites Syndrome and Infectious Bronchitis, \$27,000, Indiana State Poultry Association, **Reed, WM**, 1985-1989.
- 6. Effects of Litter Source, Litter Management and Humidity on Aspergillosis in Turkey Toms, \$9600, Turkey Market Development Council, Sutton AL, **Reed WM**, Hester PY, Tuite JF, Bryan TA, 1986.
- 7. Modification of Drug-Induced Cardiotoxicity and Myotoxicity: Effect of Se-E Deficiency on Leukocytic Function and Salmonellosis Susceptibility, \$11,940, USDA Animal Health and Disease Fund 1433, Van Vleet JR, Rebar AH, **Reed WM**, DeNicola DB, Bottoms G, Schultz R, 1986.
- 8. Pathogenesis, Bioecology and Control of Avian Respiratory Diseases, \$8000, Hatch Funds, **Reed WM**, 1985-1986.
- 9. In vitro Studies of Cardiotoxicity: Application to the Ascites Syndrome of Broiler Chickens, \$18,000, USDA Animal Health and Disease Research Fund, Van Vleet JF, Badylak S, Lamar C, **Reed WM**, 1987.
- 10. Nephropathogenicity of Infectious Bronchitis Virus, \$1000, INTERVET America, Reed WM, 1987.

- 11. Characterization of Avian Pox Viruses, \$5000, CEVA Laboratories, Reed WM, 1988.
- Control of Aspergillosis in Turkeys, \$12,000, Indiana Turkey Market Development Council, Sutton AL, 12. Reed WM, Hester PY, 1988.
- 13. Evaluation of a Fowl Pox Vaccine Applicator, \$1500, Agri-Bio Products, Reed WM, 1990.
- The Application of Genomic and Antigenic Characterization of Avian Poxviruses in the Development of 14. Improved Avian Pox Vaccines, \$53,152, Southeastern Poultry and Egg Association, Fatunmbi OO, Reed **WM**, 1993.
- 15. Development of an Immunohistochemical Stain to Identify Budgerigar Fledgling Disease Virus, \$2000, Morris Animal Foundation, Fitzgerald SD, Reed WM, Fulton R, 1994.
- 16. Prevention and Control of E. coli Septicemia in Turkeys, \$14,200, Michigan State University Extension/Michigan Allied Poultry Industries, Fulton RM, Reed WM, 1995.
- 17. The Application of Genomic and Antigenic Characterization of Avian Poxyiruses in the Development of Improved Avian Pox Vaccines, \$29,040, Southeastern Poultry and Egg Association, Fatunmbi OO, Reed **WM**, 1996-1997.
- 18. Diagnosis and Control of Subgroup J Avian Leukosis Virus, \$210,000, ARS, USDA, Reed WM, 10/1/98-9/30/03.
- 19. Biological Properties of Marek's Disease Viruses that Correlate with Protective Ability, \$58,000, Reed WM, ARS, USDA, 10/1/00-9/30/02.
- 20. Avian Leukosis Research, \$61,525, ARS, USDA, **Reed WM**, 10/1/00-9/30/01.
- Bovine Tuberculosis Surveillance in Free-Ranging Deer in Michigan, \$1,184,639, Michigan Department of Natural Resources, **Reed WM**, Fitzgerald SD, 10/1/95-9/30/02.
- 21.
- 22. Subgroup J Avian Leukosis Virus Infection in Chickens, \$105,000, Reed WM, ARS, USDA, 10/1/02-9/30/04.
- 23. TSE Surveillance, \$875,000 (contract), **Reed WM**, Kiupel M, USDA-APHIS, 10/1/03-9/30/06.
- 24. Surveillance for Chronic Wasting Disease in Wild Deer in Michigan, \$96,000 (contract), Kiupel M, Reed **WM**, Patterson J, 10/1/02-9/30/03.
- 25. Surveillance of Chronic Wasting Disease in Farmed Deer in Michigan, \$136,000 (contract), Kiupel M, Reed **WM**, Patterson J, Michigan Department of Agriculture, 10/1/02-9/30/06.
- 26. Validation of IHC for Chronic Wasting Disease in White-Tailed Deer on the Dako Autostainer, \$40,000 (contract), Kiupel M, **Reed WM**, Dako Corporation, 7/1/03-6/30/04.
- 27. Validation of IHC for Scrapie and West Nile Virus on the Ventana Benchmark System, \$80,000 (contract). Kiupel M, **Reed WM**, Ventana Medical System, 7/1/03-6/30/04.
- 28. Research Training on Comparative Medicine and Pathology for Veterinarians, \$1,019,780, Reed WM, MohanKumar PS, Fitzgerald SD, Bolin C, NCRR, NIH, 7/1/03-6/30/08.
- 29. Multicultural Scholars Program at the Purdue University College of Veterinary Medicine, \$136,000, Davis, K., San Miguel, S., Green, H., **Reed WM**, USDA, 10/1/10-9/30/14

<u>LECTURES – PRESENTATIONS:</u>

- 1. Pathogenesis of Salmonellosis in Swine. Upjohn Company, Kalamazoo, Michigan, November 1978.
- 2. Verminous Encephalitis in Quail. Midwest Association of Veterinary Pathologists, West Lafayette, Indiana, November 1981.
- 3. Avian Pox in Quail. Midwest Association of Veterinary Pathologists, West Lafayette, Indiana, November 1981.
- 4. Cerebrospinal Nematodiasis in Bobwhite Quail. North Central Avian Disease Conference, Ames, Iowa, June 3-4, 1981.
- 5. Avian Pox Outbreak in Two Flocks of Bobwhite Quail. North Central Avian Disease Conference, Ames, Iowa, June 3-4, 1981.
- 6. Faculty Discussant, Avian Diseases. Eleventh Annual Review of the Gross Morbid Anatomy of the Diseases of Animals, AFIP, Washington, DC, March 10-12, 1982.
- 7. Enteric Diseases of the Growing Pig. 70th Annual Conference for Veterinarians, Purdue University, West Lafayette, Indiana, September 9-10, 1982.
- 8. The Pathology and Pathogenesis of Porcine Salmonellosis. 19th Annual Veterinary Symposium, School of Veterinary Medicine, Tuskegee University, Tuskegee, Alabama, April 15, 1984.
- 9. Faculty Discussant, Diseases of Poultry. C. L. Davis, DVM Foundation Review Program in Veterinary Pathology, Rutgers University, Piscataway, New Jersey, June 9, 1984.
- 10. Histiocytic Enteritis in Rabbits. North Central Conference of Veterinary Laboratory Diagnosticians and North Central Avian Disease Conference, Sioux Falls, South Dakota, June 12-14, 1984.
- 11. Monensin Toxicosis in Cattle. North Central Conference of Veterinary Laboratory Diagnosticians and North Central Avian Disease Conference, Sioux Falls, South Dakota, June 12-14, 1984.
- 12. Viral Diseases of Poultry. University of Florida, Gainesville, Florida, February 21, 1985.
- 13. Infectious Bursal Disease: Pathology and Current Immunization Practices. Poultry Health and Management Conference, Purdue University, West Lafayette, Indiana, April 10, 1985.
- 14. Commencement Address, "You Are The World, You Are the Future", McIntosh High School, McIntosh, Alabama, May 31, 1985.
- 15. Porcine Salmonellosis: A Study of the Naturally Occurring Disease. North Central Conference of Veterinary Laboratory Diagnosticians, Purdue University, West Lafayette, Indiana, June 3-4, 1985.
- 16. Electrocution Deaths in a Modern Swine Operation. North Central Conference of Veterinary Laboratory Diagnosticians, Purdue University, West Lafayette, Indiana, June 3-4, 1985.
- 17. Ascites in White Leghorn Pullets. North Central Avian Disease Conference, Purdue University, West Lafayette, Indiana, June 4-5, 1985.
- 18. Ascites in White Leghorn Pullets: Isolation of a Virus and Reproduction of the Disease. Poultry Science Meeting, Ames, Iowa, July 31-August 4, 1985.
- 19. Control and Prevention of Poultry Diseases. 1985 Poultry Seminar, University of Benin, Benin City, Nigeria, August 13-14, 1985.
- 20. Control and Prevention of Poultry Diseases. 1985 Poultry Seminar, Port-Harcourt, Nigeria, August 16-17, 1985.

- 21. Control and Prevention of Poultry Diseases. 1985 Poultry Seminar, National Institute for Veterinary Research, Vom, Nigeria, August 19-20, 1985.
- 22. Avian Diseases. C. L. Davis, DVM Foundation Lecture, University of Chicago, Chicago, Illinois, February 8, 1986.
- Enteric Diseases of Swine. 21st Annual Veterinary Symposium, Tuskegee University, Tuskegee Institute,
- 23. Alabama, March 23-25, 1986.
- 24. Swine Diseases. School of Veterinary Medicine, Tuskegee University, Tuskegee Institute, Alabama, March 26, 1986.
- 25. A Study of the Ascites Syndrome in Indiana Broilers. 37th North Central Avian Disease Conference, East Lansing, Michigan, June 11-12, 1986.
- 26. Poultry Diseases. District VII Meeting, Indiana State Veterinary Medical Association, Terre Haute, Indiana, July 9, 1986.
- 27. Cardiomyopathy in Ducklings. Annual Meeting, AVMA and American Association of Avian Pathologists, Atlanta, Georgia, July 20-23, 1986.
- 28. Furazolidone-Induced Cardiomyopathy in Two Flocks of Ducklings in Indiana. 67th Conference of Research Workers in Animal Diseases, Chicago, Illinois, November 17, 1986.
- 29. Influence of Age on the Development of Furazolidone-Induced Cardiomyopathy in Ducklings. 67th Conference of Research Workers in Animal Diseases, Chicago, Illinois, November 17, 1986.
- 30. Influence of Water Restriction on the Development of Furazolidone-Induced Cardiomyopathy in Ducklings. 67th Conference of Research Workers in Animal Diseases, Chicago, Illinois, November 17, 1986.
- 31. Career Opportunities in Academia for the Veterinarian. National Institutes of Health Symposium on Career Opportunities in Biomedical Sciences, Meharry Medical College, Nashville, Tennessee, April 27-28, 1987.
- 32. Pathogenicity and Immunogenicity of Mynah Pox Virus. North Central Avian Disease Conference, University of Illinois, Urbana, Illinois, June 10-11, 1987.
- 33. Paramyxovirus-3 Infection in Cockatiels. Annual Meeting, AVMA and American Association of Avian Pathologists, Chicago, Illinois, July 20-23, 1987.
- 34. Induction of the Ascites Syndrome by Furazolidone Toxicosis in Broilers. Annual Meeting, AVMA and American Association of Avian Pathologists, Chicago, Illinois, July 20-23, 1987.
- 35. Influence of Sex and Strain of Bird on the Frequency of Induction of the Ascites Syndrome by Furazolidone Toxicosis in Broilers. Poultry Science Meeting, Corvallis, Oregon, August 10-13, 1987.
- 36. Studies on the Pathogenesis of the Avian Ascites Syndrome. National Animal Disease Center, Ames, Iowa, August 20, 1987.
- 37. Pathology of Avian Diseases. National Veterinary Services Laboratories, Ames, Iowa, August 21, 1987.
- 38. Fowl Pox. Tri-State Poultry Meeting, Fort Wayne, Indiana, October 5-7, 1987.
- 39. The Effect of Sex, Strain of Bird and Salt Concentration on the Frequency of Induction of the Ascites Syndrome by Furazolidone Toxicosis. 68th Conference of Research Workers in Animal Diseases, Chicago, Illinois, November 16, 1987.
- 40. Furazolidone-Induced Cardiomyopathy and Ascites in Broilers. 37th Western Poultry Disease Conference, Davis, California, February 28-March 3, 1988.

- Pathogenicity and Immunogenicity of Quail and Mynah Pox Viruses and Their Relationship to Fowl and Pigeon Pox Viruses. 37th Western Poultry Disease Conference, Davis, California, February 28-March 3, 1988.
- Diseases of Birds. C. L. Davis, DVM Foundation Symposium, Purdue University, West Lafayette, Indiana, June 20-24, 1988.
- 43. Pathogenicity and Immunogenicity of Pox Viruses Isolated from Chickens and Their Relationship to Fowl, Pigeon, Turkey and Quail Pox Viruses. American Association of Avian Pathologists Meeting, Portland, Oregon, July 17-21, 1988.
- 44. Pet Birds and Risk to the Poultry Industry. Tri-State Poultry Meeting, Fort Wayne, Indiana, October 10-12, 1988.
- 45. Disease Risks in Common Between the Pet Bird and the Poultry Industries. Multi-State Pet Bird Conference, Erlanger, Kentucky, April 20-21, 1989.
- 46. Faculty Discussant, Avian Diseases. Review of the Gross Morbid Anatomy of the Diseases of Animals, AFIP, Washington, DC, March 28-30, 1990.
- 47. Diseases of Birds. C. L. Davis, DVM Foundation Symposium, University of Arkansas for Medical Sciences Campus, Little Rock, Arkansas, June 18-22, 1990.
- 48. Characterization of Pox Viruses Isolated from Recent Outbreaks of Avian Pox. XVI Convencion Annual Areca and 40th Western Poultry Disease Conference, Acapulco, Mexico, 1991.
- 49. Influence of Age on the Incidence of Furazolidone-Induced Cardiomyopathy in Broilers. American Veterinary Medical Association Meeting, Seattle, Washington, July 27-August 1, 1991.
- 50. Pathology of Selected Diseases of Pet Birds. Michigan Veterinary Conference, Lansing, Michigan, January 24-26, 1992.
- 51. Equine Encephalitis in Pheasants. Tuskegee University Veterinary Medical Symposium, Tuskegee, Alabama, April 4-6, 1993.
- 52. Certification as a Means to Enhance Professional Stature—The Veterinary Model. Michigan State University Poultry Science Meeting, East Lansing, Michigan, July 25-29, 1993.
- 53. The Role of the Veterinary Diagnostic Laboratory in Emergency Disease Preparedness. U.S. Animal Health Association Meeting, Las Vegas, Nevada, October 26-29, 1993.
- 54. Characterization and Immunogenicity of "Variant Strains" of Avian Pox Viruses. American Veterinary Medical Association Meeting, San Francisco, California, July 9-13, 1994.
- 55. Avian Pox. 30th Annual Veterinary Symposium, Tuskegee University, Tuskegee, Alabama, March 18-21, 1995.
 - Evaluation of a Commercial Quail Pox Vaccine in the Control of "Variant" Fowl Vaccine Poxvirus Infections. American Veterinary Medical Association Meeting, Pittsburgh, Pennsylvania, July 8-12, 1995.
- 57. Quail Bronchitis: Pathology and Pathogenesis. International Symposium on Adenovirus and Reovirus Infections in Poultry, Rauschholzhausen, Germany, June 24-27, 1996.

56.

58. Development of an Avian Model to Study Polyomavirus. American Association of Avian Veterinarians Meeting, Tampa, Florida, August 28-30, 1996.

- 59. Pathology of Selected Avian Diseases. C. L. Davis, DVM Foundation Conference, Michigan State University, East Lansing, Michigan, June 15-19, 1997.
- Pathology of Poultry Diseases. First Southern and Eastern Africa Veterinary Pathology Symposium, C. L. Davis, DVM Foundation, Harare, Zimbabwe, September 8-10, 1997.
- 61. Pathology of Avian Diseases, in The Gross Morbid Anatomy of Diseases of Animals, C. L. Davis, DVM Foundation Courses, Bethesda, Maryland, March 22-26, 1998.
- 62. West Nile Virus. Tuskegee Veterinary Medical Association Fall Conference, Cabo San Lucas, Mexico, November 8-15, 2001.
- Real time quantitation of viral and proviral levels of subgroup J avian leukosis virus. American Veterinary Medical Association/American Association Avian Pathologists. Abstract p. 21. Nashville, July 2002.
- Molecular and biological characterization of naturally occurring recombinant avian leukosis (ALV) isolated form egg-type chickens suffering from myeloid leukosis. American Veterinary Medical Association/American Association Avian Pathologists. Abstract p. 20. Nashville, July 2002.
- Factors Affecting Subgroup J Avian Leukosis Virus Tolerance in Commercial Meat-Type Chickens.

 American Veterinary Medical Association/American Association Avian Pathologists. Denver, July 2003.
 - Large Animal Biosafety Containment A Detailed Case Study. Tradeline 15th Annual Animal Research Lab Planning Conference, San Diego, California, August 4-5, 2003.
- 67. Construction of the New Diagnostic Center for Population and Animal Health. 46th Annual Meeting, American Association of Veterinary Laboratory Diagnosticians, San Diego, California, October 9-13, 2003.
- Study of Adrenocorticotropic Hormone-induced Stress on Subgroup J Avian Leukosis Virus (ALV-J) Viremia and Antibody in Adult Meat-type Chickens Previously Exposed to Virus at Hatch and 32 Weeks of Age. American Veterinary Medical Association/American Association Avian Pathologists. Philadelphia, July 2004.
- 69. The New Diagnostic Center for Population and Animal Health at MSU. 26th Annual Fall Scientific Conference, Tuskegee Veterinary Medical Alumni Association, Rio de Janeiro, Brazil, November 10-20, 2004.
- 70. A Product of the Dream. St. Peter's Catholic Church, M. L. King Day Program, Chastang, Alabama, January 16, 2005.
- 71. National Veterinary Diagnostic Laboratories. Association of Public Health Laboratories Conference on Emerging Infectious Diseases Emerging Responses, Orlando, Florida, March 2-4, 2005.
- 72. Emerging and Foreign Animal Disease Issues: The Veterinary Diagnostic Lab Perspective. 142nd Annual Convention, American Veterinary Medical Association, Minneapolis, Minnesota, July 16-20, 2005.
- Effect of viremia and antibody status on tumor incidence, tumor spectrum, and viral distribution in different tissues of ALV-J infected meat-type chickens. American Veterinary Medical Association/American Association Avian Pathologists. Minneapolis, Minnesota, July 18-20, 2005.
- Pathogenesis and characterization of subgroup J Avian leukosis virus-induced histiocytic sarcomas in meat-type chickens. 57thAmerican College of Veterinary Pathologists, 2006 Annual meeting, Tucson, Arizona, December 2-6.

66.

Emergence of subgroup J avian leukosis virus neutralizing antibody escape variants in meat-type chickens infected with virus at hatch. American Veterinary Medical Association/American Association Avian Pathologists. Honolulu, Hawaii July 15-19, 2006.

- 76.
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- 83. Introduction to the Poultry Industry. Vetward Bound Program, College of Veterinary Medicine, Michigan State University, July 2010
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Last Revised: WMR -10/25/2022

EXHIBIT 3 TO TUSKEGEE UNIVERSITY'S MOTION FOR PRELIMINARY INJUNCTION

BEFORE A PANEL OF THE AMERICAN VETERINARY MEDICAL ASSOCIATION

TUSKEGEE UNIVERSITY COLLEGE OF VETERINARY MEDICINE,

Appellant,

v.

APPEAL OF ADVERSE ACCREDITATION DECISION

COUNCIL ON EDUCATION,

Respondent.

DECLARATION OF DR. JAMES W. LLOYD IN SUPPORT OF TUSKEGEE UNIVERSITY COLLEGE OF VETERINARY MEDICINE'S APPEAL OF ADVERSE DECISION

- I, Dr. James W. Lloyd, depose and state the following under penalty of perjury:
- 1. I submit this Declaration in support of Tuskegee University College of Veterinary Medicine's ("TU-CVM") appeal of the Council on Education's ("COE") July 14, 2025 decision to place TU-CVM on Terminal Accreditation for allegedly failing to comply with certain aspects of Standards 2, 4, and 11 of the COE's Accreditation Policies and Procedures.
- 2. I am over 19 years of age, of sound mind, and am otherwise competent to make this Declaration.
 - 3. I have personal knowledge of the matters herein.

Professional Background

4. I have spent my entire 37-year career in veterinary medicine, economics, and animal health management.

- 5. From 2013 to 2019, I served as Dean of the University of Florida College of Veterinary Medicine ("UF-CVM") and as a Professor in UF-CVM's Department of Large Animal Clinical Sciences.¹
- 6. From 2014 to 2019, I served as Affiliate Professor in the University of Florida's Department of Food and Resource Economics.
- 7. From 2007 to 2013, I served as Associate Dean for Budget, Planning, and Institutional Research at Michigan State University College of Veterinary Medicine ("MSU-CVM").
- 8. From 2005 to 2007, I was the Director of MSU-CVM's Office of Strategy and Innovation.
- 9. Before serving in those roles, I held a variety of other academic posts, including: Professor of Large Animal Clinical Sciences at MSU-CVM; Professor of Agricultural, Food, and Resource Economics at Michigan State University; Assistant to the Dean for Practice Management at MSU-CVM; and Adjunct Professor in the Department of Management at Michigan State University's Eli Broad College of Business.
- I was also the leader of the National Commission on Veterinary Economic Issues
 Working Group for nine years.
- 11. Early in my career, I was a practitioner of veterinary medicine, emphasizing food animal and equine care.
- 12. Since 2019, I have been the CEO and Senior Consultant for Animal Health Economics, LLC.

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¹ A current *curriculum vitae* is attached hereto.

- 13. I received a Doctor of Veterinary Medicine ("DVM") degree from MSU-CVM and a Doctor of Philosophy ("Ph.D.") in Agricultural Economics (with emphasis on Operations Research) from Michigan State University.
- 14. I have authored or co-authored over 200 scholarly publications and have delivered nearly 400 scholarly presentations and workshops. A significant portion of my research has been devoted to issues at the intersection of economics and veterinary medical education/practice.
- 15. During my professional career, I have performed executive leadership, consulting, and/or advisory services—*e.g.*, business and financial planning, strategic operations, leadership development—for several veterinary programs, including Iowa State University College of Veterinary Medicine, University of Illinois College of Veterinary Medicine, UF-CVM, Arkansas State University College of Veterinary Medicine, University of Prince Edward Island Atlantic Veterinary College, Texas A&M University College of Veterinary Medicine, Ross University School of Veterinary Medicine, and MSU-CVM.
- 16. Given my background, I have direct and extensive experience related to compliance with the COE's Accreditation Policies and Procedures, including Standard 2 (Finances), Standard 4 (Clinical Resources), and Standard 11 (Outcomes Assessment).
- 17. I have extensive experience reviewing and evaluating NAVLE test results and related curriculum.
- 18. Moreover, for the last two years, I have advised TU-CVM on accreditation-related issues and am familiar with the factual and procedural history of the COE's interactions with TU-CVM during that period of time.

19. I am well qualified to offer an expert assessment of the COE's incorrect decision to place TU-CVM on Terminal Accreditation, and I can also attest to various factual matters relevant to this appeal.

Materials Reviewed

- 20. In reaching my opinions herein, in addition to years of communications with TU-CVM personnel and consultants and the COE, I have reviewed the following materials:
 - a. Accreditation correspondence and exhibits between TU-CVM and the COE between 2021-2025,
 - b. All financial materials submitted by TU-CVM to the COE in support of accreditation,
 - c. Financial statements of TU-CVM,
 - d. 2024 Audited Financial Statements of Tuskegee University,
 - e. Tuskegee University President Dr. Brown's commitment to complete the teaching hospital and fund whatever is needed to satisfy accreditation standards for TU-CVM,
 - f. Tuskegee Board of Trustees' commitment to complete the teaching hospital and fund whatever is needed to satisfy accreditation standards for TU-CVM,
 - g. Commitment Letter from Truist Bank,
 - h. The architectural plans, timeline and cost estimates for the planned construction of TU-CVM's Small Animal Hospital and the Preclinical Instruction Building, and
 - i. TU-CVM's history of NAVLE testing results.

Standard 2 – Finances

COE's Financial Assessment of TU-CVM

- 21. In May of 2023, I first began working with TU-CVM related to its accreditation challenges and began working with TU-CVM Dean Ruby Perry to develop a plan of action to address the perceived deficiencies in Standard 2.
- 22. The first step of the plan was to review TU-CVM's current financial resources to determine the amount of additional revenue needed to ensure sufficiency of resources to attract and retain clinical faculty with a wide array of expertise by July 31, 2023.
 - 23. I visited the TU-CVM campus on July 18-20, 2023 to assist with this process.
- 24. During that visit, it was determined that the financial tables provided in the most recent self-study were inaccurate in the data presented as a result of the ambiguous data definitions provided by the COE.
- 25. Expense data needed correction in a number of categories, but the most significant was "[f]acilities operations and maintenance, utilities, and other expenditures for infrastructure." The numbers reported in the self-study were overstated because University expenditures in this category funds that were never included in either TU-CVM's budget or its accounts were mistakenly included along with TU-CVM's expenditures. By itself, this reporting error overstated TU-CVM's expenses by \$7 million in FY2019 and \$8 million in FY2020.
- 26. Similar confusion had been created by the revenue reporting. Self-study numbers included estimates of tuition, although those funds are never collected by TU-CVM or deposited into TU-CVM's accounts. Instead, the University collects the tuition and provides an annual appropriation to TU-CVM values that were not included in the self-study. Further, the self-study reported annual amounts in the category of "[f]unds carried forward from previous year," even

though carry forward is not allowed at the University. Consequently, these amounts needed to be removed from the progress report.

- 27. As a result of the major differences in both expenditures and revenues, TU-CVM's financial reporting methods were subsequently revised and its financial reports updated appropriately.
- 28. The revisions and updated values in Table A (Expenditures) and Table B (Revenue) were fully explained in communications to the COE.
 - 29. In its May 22, 2025 letter to TU-CVM, the COE stated:

During the 2021 comprehensive site visit, the site team evaluated the College's financial position and found that available resources appeared inadequate to support critical functions, including faculty hiring and retention, as well as funding for targeted infrastructure renovations.... At that time, the College had operated at a deficit for three consecutive years, with expenses exceeding revenues. These shortfalls were offset using carry-forward funds from fiscal years 2016 and 2017... Upon review of the site team's findings, the Council upheld these concerns and issued a Major Deficiency in Standard 2...

- 30. However, these conclusions were inaccurately based on the prior faulty data reporting, which had been subsequently corrected and addressed in the September 2023 progress report.
- 31. After reading that September 2023 report, the COE should have updated their site visit conclusions.
- 32. Instead, TU-CVM was asked to produce 5-year projections. In my substantial accreditation experience, I have never before seen the COE ask for this type of data from a CVM.
- 33. In response, TU-CVM produced these projections in the December 2023 progress report and secured a written endorsement of both the historical data and the projections from the Tuskegee University CFO.

- 34. These projections were sufficient and adequate financial evidence that TU-CVM had emerged from the COVID downturn and established a remarkable positive financial trend that projected positively for the future.
- 35. After reading those subsequent projections, it again would have been prudent for the COE to update their site visit conclusions.
- 36. At this juncture, the case had been fully and repeatedly made that the corrected financial reports/tables along with the projections for the future (both endorsed by the University CFO) warranted removal of the major deficiency associated with Standard 2.
 - 37. Instead, TU-CVM received a barrage of additional requests from the COE.
- 38. In early 2024, TU-CVM received requests from an individual member of the COE (Dr. Barbara Engel) for additional explanations of the financial data.
- 39. Dr. Engel had apparently been reviewing the 2023 interim report and strangely asked a host of questions that had been clearly answered in the December 2023 progress report.
- 40. Dr. Engel asked about "discrepancies" in expenditure and revenue tables that appeared to have been "edited."
- 41. These apparent differences were a direct result of the revised methods of financial reporting (discussed above) that had been clearly explained in the "Comments" section of the December 2023 interim report.
- 42. Dr. Engel also asked about the level of ongoing commitment of "main campus" to the level of financial support needed by TU-CVM to hire new faculty.
- 43. This question had also been expressly answered in the December 2023 progress report.
 - 44. Dr. Engel also asked about the existence of 5-year budget projections.

- 45. These had been expressly included in the December 2023 progress report.
- 46. Even though all of Dr. Engel's January 2024 questions had been answered in the December 2023 progress report and the December 2023 interim report, TU-CVM responded and answered her questions again.
- 47. Then, in an April 5, 2024 letter, the COE stated that: "The College must provide written evidence that the University is committed to providing renewable funding for the faculty positions being recruited or document committed alternative funding."
- 48. However, that written evidence had also already been provided in the December 2023 progress report in the form of a written endorsement by the University CFO (signed on November 21, 2023) as mentioned above.
- 49. Further, the same letter from the COE said that: "The University also must confirm that the full estimated cost of construction for the new hospital and diagnostic laboratory will be provided by the University or confirm sources for outstanding funding deficits left for any portion of the costs not covered by the University."
- 50. However, that very assurance had already been provided in writing by the Tuskegee University Board Chair on March 6, 2024.
- 51. Of note, this assurance was again subsequently affirmed in writing by the Tuskegee University President on August 21, 2024 and again in writing by the Tuskegee University CFO on April 27, 2025.
- 52. Despite all of these repeated assurances, the COE stated in its May 22, 2025 letter (with regard to proposed new construction of clinical facilities) that, ". . . the availability of sufficient funds for timely completion remains unclear."

53. Finally, the COE closed its May 22, 2025 comments on Standard 2 by returning to the change in accounting methods. After admitting that the post-revision numbers were indeed internally consistent, the COE stated:

Despite these reconciliations, the Council remained concerned that key financial indicators of progress toward Standards compliance - expenditures on instruction, academic support, and student services; capital investments; and teaching hospital revenues - had declined between FY2023 and FY2024. The April 2025 progress report provided some clarifications, describing that open faculty positions, the completion of several renovation projects, and clinical faculty vacancies contributed to the expenditure and revenue reductions observed.

Instruction expenditures have increased a total of 11% over the last 5 fiscal years, while hospital revenue has increased a total of 5% over the same period. The College has spent a total of \$2,240,825 on capital projects (renovations and new construction) since 2020. Therefore, the College has not demonstrated that financial resources are being allocated in a manner consistent with sustained compliance across all accreditation standards.

- 54. In summary, the COE concluded that a *one-year* decline in certain revenue and expenditure categories between FY2023 and FY2024 was an adequate basis to assign Terminal Accreditation—*even though TU-CVM's revenues and expenditures increased in almost every category over the last five fiscal years*.
- 55. Even more importantly, TU-CVM's revenues and expenditures increased over 20% between FY2020 and FY2024, but the COE chose to ignore these crucial metrics entirely.
- 56. In any event, as the COE itself recognized, TU-CVM's April 2025 progress report explained why the one-year decline in certain financial metrics between FY 2023 and FY2024 was not indicative of any failure to comply with Standard 2. For instance, capital expenditures were moderately lower in 2024 than 2023 because TU-CVM completed several substantial renovation projects in 2023. In addition, while teaching hospital revenues were marginally lower in 2024 than 2023 (~2.3%), teaching hospital revenues increased overall over the last five fiscal years.

- 57. It is illogical for the COE to conclude from (1) a completely reasonable level of capital investment, (2) solid growth in instructional expenditure, and (3) an increase in hospital revenue, that: "... the College has not demonstrated that financial resources are being allocated in a manner consistent with sustained compliance across all accreditation standards."
- Thus, as described above, as a basis for Terminal Accreditation, the COE accepted TU-CVM's financial reconciliations but then abruptly concluded without any foundation or support that it "remain[ed] concerned" about TU-CVM's ability to provide sufficient funding to meet all standards of accreditation, even though TU-CVM's revenues and expenditures increased by 20% over a five-year period.

TU-CVM's Current Financial Status as It Relates to Standard 2

- 59. I have also reviewed Tuskegee University's 2024 Audited Financial Statements. Based on that review, I note that the University maintains financial reserves in the form of liquid assets (*i.e.*, cash or investments that can be quickly converted into cash) in an amount that is *over two times* the estimated remaining cost to construct the new Small Animal Hospital and Preclinical Instruction Building
- 60. As such, even without any other sources of funding, the University could easily satisfy all of the expenses associated with the completion of the new facilities.
- 61. Even if the University did not have sufficient assets to cover all remaining construction costs, the COE also apparently failed to consider the University's strong credit position, which would allow it to borrow funds well in excess of what is needed to complete the Small Animal Hospital and Preclinical Instruction Building.
- 62. As stated in TU-CVM's June 21, 2025 submission to the COE, Truist Bank has indicated its readiness to lend up to \$88 million for construction costs at the University's request.

- 63. Thus, TU-CVM has demonstrated beyond dispute that it has several available sources of funding and that each is sufficient for the timely completion of the new facilities.
- 64. The COE's conclusion that TU-CVM's financial ability to build these new facilities remains "unclear" is simply not tenable in light of the strong evidence to the contrary.
- 65. I have never witnessed the COE treat another CVM in this manner, where it has refused to credit similarly situated, valid, and substantiated financial statements and other financial evidence and commitments in its accreditation assessment.
- 66. In sum, I have conducted a comprehensive review of TU-CVM's financial soundness and have examined its revenues, expenditures, assets, debts, and creditworthiness.
- 67. Based on this review and my extensive experience in overseeing the financial operations of successful CVMs, it is my opinion that the COE disregarded substantial evidence establishing that TU-CVM has sufficient funding and adequate resources to complete the construction of the new Small Animal Hospital and Preclinical Instruction Building in a timely manner.
- 68. Based on this review and my extensive experience in overseeing the financial operations of successful CVMs, it is my opinion that the COE disregarded substantial evidence establishing that TU-CVM has sufficient funding and adequate resources to confidently operate as a CVM.
- 69. Based on this review and my extensive experience in overseeing the financial operations of successful CVMs, it is my opinion that the COE disregarded substantial evidence establishing that TU-CVM has sufficient funding and adequate resources to satisfy all of the COE's standards of accreditation.

- 70. There is no basis for the lingering major deficiency related to Standard 2, and the COE's finding to the contrary erroneously disregarded established criteria for accreditation as well as the COE's own standards of accreditation.
- 71. In my opinion, TU-CVM has been and is being treated differently by the COE in this regard than all of the other CVMs with which I have been associated.

Standard 11 – Outcomes Assessment

- 72. In my experience, North American Veterinary Licensing Exam (NAVLE) pass rates have been an unexpected and unexplained challenge for many colleges/schools of veterinary medicine over the past several years, primarily since the COVID pandemic.
- 73. In the 2024-2025 NAVLE testing cycle, a total of 46 TU-CVM students passed of the 64 who took the exam, yielding a pass rate of 72%.
- 74. Although these scores fall short of the COE requirement of 80% pass rate, the upper boundary of the 95% confidence interval (CI) is 82.9% just short of the 85% goal.
- 75. If only two more candidates had passed the exam, the upper boundary of the 95% CI would have been 85.6% just over the threshold.
- 76. It is likely that a comprehensive look at the individual candidate performances would reveal at least two who "came very close," but did not pass.
- 77. Although these results do not fully meet the COE requirement, they demonstrate a marked improvement from the previous year, when the upper boundary of the 95% CI was 63.4%.
- 78. Even though in the end the 2024-2025 results still fell just short of the threshold, the marked improvement and the "near miss" are both noteworthy.
- 79. This substantial improvement is strong evidence that the measures implemented by TU-CVM to improve its NAVLE scores have been highly effective.

- 80. It is not uncommon for a veterinary school to require that students take a mandatory NAVLE preparation course to remain in good academic standing. It is my understanding that such courses are required at North Carolina State University, University of Arizona, Lincoln Memorial University, Texas Tech University, Utah State University, to name a few.
- 81. That data demonstrates TU-CVM's remarkable progress in improving its NAVLE scores and in my opinion, warrants a one-year good cause extension under Standard 11.

Conclusion

- 82. During the three-year window between 2022 to 2025, the COE has repeatedly demonstrated a lack of willingness to work with TU-CVM in good faith.
 - 83. The COE's actions have revealed its:
 - Lack of ability to communicate effectively, both internally and with TU-CVM;
 - General distrust of both College and University leadership at TU-CVM; and
 - Disparate treatment of TU-CVM in light of its treatment of other CVMs in the past.
 - 84. The COE's decision to place TU-CVM on Terminal Accreditation was incorrect.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

This 12th day of September 2025.

EXHIBIT A

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CURRICULUM VITA

JAMES W. LLOYD

james.lloyd@animalhealtheconomics.com (517) 290-4314

CURRENT POSITION

CEO/Founder and Senior Consultant, Animal Health Economics, LLC, since 2019
Professor Emeritus, College of Veterinary Medicine, University of Florida, since 2019
Professor Emeritus, College of Veterinary Medicine and College of Agriculture and Natural
Resources, Michigan State University, since 2013

Trustee, Board of Trustees, Ross University School of Medicine and Ross University School of Veterinary Medicine, 2023 to present

PROFESSIONAL FOCUS

Improving access to veterinary care by strengthening the veterinary workforce Fostering growth in pet ownership by improving access to pet products and services

EDUCATION

Doctor of Philosophy – Agricultural economics (Michigan State University) Doctor of Veterinary Medicine (Michigan State University) Bachelor of Science – Fisheries and wildlife (Michigan State University)

CONSULTING REPORTS/PUBLICATIONS (since 2019)

- 1. **Lloyd, J.W.** Evaluating the depth of quality in the 2018 AAVMC applicant pool. Association of American Veterinary Medical Colleges, Washington, DC, July 2019, 9 pp.
- 2. **Lloyd, J.W.** Characterizing the current US employment market for veterinarians June 2019. Animal Policy Group, Scottsdale, Arizona, July 2019, 9 pp.
- 3. **Lloyd, J.W.** High value veterinary technician initiative: 2-yr vs. 4-yr education project report. Veterinary Innovation Council, Orlando, February 2020, 13 pp.
- 4. **Lloyd, J.W.**, C.A. Cantner, V. Mariani, L.M. Greenhill, N.K. Haden, F. Tucker-Lively, and H.M. Chaddock. AAVMC faculty development needs assessment 2019. Association of American Veterinary Medical Colleges, Washington, DC, July 2020, 25 pp.
- 5. **Lloyd, J.W.**, C.A. Cantner, V. Mariani, L.M. Greenhill, N.K. Haden, F. Tucker-Lively, and H.M. Chaddock. AAVMC academic administrator leadership development needs assessment 2019. Association of American Veterinary Medical Colleges, Washington, DC, September 2020, 21 pp.
- 6. **Lloyd, J.W.**, and L.M. Greenhill. AAVMC admissions: report of 2019 student survey analysis. Association of American Veterinary Medical Colleges, Washington, DC, Nov. 2020, 14 pp.
- 7. **Lloyd, J.W.** Use of Graduate Record Examinations (GRE) in veterinary medical admissions. Association of American Veterinary Medical Colleges, Washington, DC, February 2021, 6 pp.
- 8. **Lloyd, J.W.**, and M.L. Cushing. Masters in veterinary clinical care: exploratory project report. Veterinary Innovation Council, Orlando, February 2021, 25 pp.
- 9. **Lloyd, J.W.** Power of 10: impact assessment report. Veterinary Medical Association Executives, Camas, Washington, August 2021, 143 pp.
- 10. **Lloyd, J.W.** Pet healthcare in the US: Are there enough veterinarians? Mars Veterinary Health, Vancouver, WA, April 2021, 7 pp. (available at: https://marsveterinary.com/tackling-the-veterinary-professional-shortage/, accessed 08/04/25).
- 11. **Lloyd, J.W.** Pet healthcare in the US: Are there enough veterinary nurses/technicians? Is there adequate training capacity? Mars Veterinary Health, Vancouver, WA, August 2021, 7 pp. (available at: https://marsveterinary.com/tackling-the-veterinary-professional-shortage/, accessed 08/04/25).

Updated: September 11, 2025

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- 12. **Lloyd, J.W.** Pet healthcare in the US: Pandemic-related questions & answers. Mars Veterinary Health, Vancouver, WA, January 2022, 7 pp.
- 13. **Lloyd, J.W.** Pet healthcare in the US: Are there enough veterinary specialists? Is there adequate training capacity? Mars Veterinary Health, Vancouver, WA, February 2022, 7 pp. (available at: https://marsveterinary.com/tackling-the-veterinary-professional-shortage/, accessed 08/04/25).
- 14. **Lloyd, J.W.** How might a recession impact veterinary medicine? The Fountain Report, Antelligence, Dec. 2, 2022, 2 pp.
- 15. **Lloyd, J.W.** Inflation and prices in veterinary medicine. The Fountain Report, Antelligence, Dec. 9, 2022, 2 pp.
- 16. **Lloyd, J.W.** Reflecting on recent trends in the number of veterinary visits and total revenue. The Fountain Report, Antelligence, Dec. 16, 2022, 2 pp.
- 17. **Lloyd, J.W.** 'Excess capacity' versus 'oversupply' in veterinary medicine. The Fountain Report, Antelligence, Jan. 6, 2023, 2 pp.
- 18. **Lloyd, J.W.** Economic efficiency in veterinary medicine. The Fountain Report, Antelligence, Jan. 13, 2023, 3 pp.
- 19. **Lloyd, J.W.** Turnover and attrition in veterinary medicine. The Fountain Report, Antelligence, Jan. 20, 2023, 3 pp.
- 20. **Lloyd, J.W.**, and D.M. Smith. Projecting the California veterinary workforce shortage. College of Veterinary Medicine, University of California-Davis. June 14, 2023, 7pp.
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- 26. **Lloyd, J.W.**, D.L. Harris, and D.M. Smith. The veterinary professional associate financial model: general practice. Department of Agricultural, Food, and Resource Economics, Michigan State University, Staff Paper Series #2024-008, July 2024, 27pp. (available at: https://ageconsearch.umn.edu/record/347402?ln=en, accessed 12/03/24).
- 27. **Lloyd, J.W.**, D.L. Harris, and D.M. Smith. The veterinary professional associate financial model: shelter practice. Department of Agricultural, Food, and Resource Economics, Michigan State University, Staff Paper Series #2024-009, July 2024, 31pp. (available at: https://ageconsearch.umn.edu/record/347403?ln=en, accessed 12/03/24).
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- 29. Tams, T.R. and **J.W. Lloyd**. House officer mentorship summit (HOMS): executive summary. Mars Veterinary Health, Vancouver, WA, 2024, 10 pp.
- 30. **Lloyd, J.W.**, and L.M. Greenhill. AAVMC shared faculty appointment survey: final report. Association of American Veterinary Medical Colleges, Internal Document, Wash., DC, 2024.
- 31. **Lloyd, J.W.** The veterinary market's invisible hand. Today's Veterinary Business, NAVC, Dec 1, 2024. (available at: https://todaysveterinarybusiness.com/invisible-hand-viewpoint-1224/, accessed 12/04/24).

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- 32. **Lloyd, J.W.** MVH specialist survey: interest in shared faculty appointments. Internal Report, Mars Veterinary Health, Vancouver, WA, January 2025, 11 pp.
- 33. **Lloyd, J.W.** Access to pet healthcare framing the issue. Animal Health Economics working paper, March 2025, 6 pp.
- 34. **Lloyd, J.W.**, W.A. Jensen, S.L. Anderson, A.M. Hoffman, and T.R. Tams. The Veterinary Professional Associate (VPA) Concept: Suggested Roles, Responsibilities, Skills, Knowledge, and Competencies, Department of Agricultural, Food, and Resource Economics, Michigan State University, Staff Paper Series#2025-003, May 2025, 27pp. (available at: https://ageconsearch.umn.edu/record/358747?v=pdf, accessed 08/03/25).
- 35. **Lloyd, J.W.** Uncertain economy? A thoughtful look ahead at the market for veterinary services. Animal Health News and Views, June 1, 2025. (available at: https://animalhealthnewsandviews.com/uncertain-economy-a-thoughtful-look-ahead-at-the-market-for-veterinary-services/, accessed 06/18/25).
- 36. **Lloyd, J.W.** Premiumization in Pet Products and Services: Winning Strategy or Lost Opportunity? Animal Health News and Views, July 1, 2025. (available at: https://animalhealthnewsandviews.com/premiumization-in-pet-products-and-services-winning-strategy-or-lost-opportunity/, accessed 08/03/25).
- 37. **Lloyd, J.W.** Veterinary Medicine and the "Lost Pet Owners". Animal Health News and Views, August 1, 2025. (available at: https://animalhealthnewsandviews.com/veterinary-medicine-and-the-lost-pet-owners/, accessed 08/14/25).
- 38. **Lloyd, J.W.** Request for Substantive Change Class Size Expansion, Atlantic Veterinary College, University of Prince Edward Island, September 2025.
- 39. **Lloyd, J.W.** and L.M. Greenhill. The AAVMC applicant pool: analysis of critical undergraduate enrollment trends. AAVMC working paper (in process), September 2025, 14pp.

WORKSHOPS/CONFERENCES CONDUCTED OR COORDINATED (since 2019)

- 1. Stetter, M., A. Maccabe, **J.W. Lloyd,** and W. Jensen. Leading change in veterinary healthcare delivery: new perspectives for AAVMC on the veterinary medical team. American Association of Veterinary Medical Colleges and Colorado State University College of Veterinary Medicine and Biomedical Sciences, virtual conference, July 21-22, 2021.
- 2. Stetter, M., A. Maccabe, **J.W. Lloyd**, and T. Tams. Improving house officer wellbeing. Mars Veterinary Health, UC Davis College of Veterinary Medicine, and the American Association of Veterinary Medical Colleges, Chicago, December 1, 2022.
- 3. Moore, R.M., A. Maccabe, **J.W. Lloyd,** and T. Tams. Enhancing house officer mentorship. Mars Veterinary Health, The Ohio State University College of Veterinary Medicine, and the American Association of Veterinary Medical Colleges, Columbus, October 19, 2023.
- 4. VandeWoude, S., T. Tams, **J.W. Lloyd**, and A. Maccabe. 2024 Mars Veterinary Health house officers summit, Colorado State University College of Veterinary Medicine and Biomedical Sciences, October 29, 2024.

CONSULTING PRESENTATIONS (since 2019)

- 1. **Lloyd, J.W.** The current US employment market for veterinarians, Pet Healthcare Industry Summit 2019, Banfield Pet Hospital, Portland, Oregon, September 12, 2019.
- 2. **Lloyd, J.W.** Evaluating the depth of quality in the 2018 AAVMC applicant pool, Pet Healthcare Industry Summit 2019, Banfield Pet Hospital, Portland, Oregon, Sept. 12, 2019.
- 3. **Lloyd, J.W.** Veterinary technician/nurse initiative Veterinary Innovation Council, Pet Healthcare Industry Summit 2020, Banfield Pet Hospital (virtual conference), Sept. 14, 2020.
- 4. **Lloyd, J.W.** Building a pipeline of leaders for academic veterinary medicine, AAVMC Annual Meeting (virtual), March 3, 2021.

CONSULTING PRESENTATIONS (since 2019 – cont'd)

- 5. **Lloyd, J.W.** Power of ten impact assessment, Veterinary Medical Association Executives (VMAE) Annual Conference (virtual), July 20, 2021.
- 6. **Lloyd, J.W.** and S. Anderson. MS in advanced clinical care a new "extender" for veterinarians? American Association of Veterinary Medical Colleges and Colorado State Univ. College of Veterinary Medicine and Biomedical Sciences, virtual conference, July 21-22, 2021.
- 7. Anderson, S. and **J.W. Lloyd**. MS in advanced clinical care a new "extender" for veterinarians? Veterinary Innovation Summit, Kansas City, August 28, 2021.
- 8. **Lloyd, J.W.** The veterinary workforce: where are we today? AAVMC Assembly Update, Sept. 28, 2021 (virtual).
- 9. **Lloyd, J.W.** Veterinary workforce issues: AAVMC strategy session. AAVMC Board of Directors Meeting, Washington, DC, Oct. 15, 2021.
- 10. **Lloyd, J.W.** Veterinary workforce issues: veterinarians, nurses/technicians, and specialists. AAVMC Board of Directors Meeting, Washington, DC, March 1, 2002.
- 11. **Lloyd, J.W.** Veterinary workforce analysis: veterinarians, nurses/technicians, and specialists. Cummings School of Veterinary Medicine at Tufts University Board of Advisors Meeting, April 15, 2022 (virtual).
- 12. **Lloyd, J.W.** What Comes Next? It's all about the journey. SCAVMA/VBMA Annual End of Year Celebration, MSU-CVM, Lansing, MI, April 16, 2022.
- 13. **Lloyd, J.W.** Veterinary medicine at Arkansas State University: considerations for a new program. A-State Board of Trustees Retreat, Memphis, June 4, 2022.
- 14. **Lloyd, J.W.** Veterinary workforce analysis: veterinarians, nurses/technicians, and specialists. AAVSB Board of Directors, Beaufort, NC, June 10, 2022.
- 15. **Lloyd. J.W.** Enhancing the veterinary workforce: focus on the healthcare team. AAHA Board of Directors, June 14, 2022 (virtual).
- 16. **Lloyd, J.W.** and A. Steele. Where have all the veterinarians gone? Association for Animal Welfare Advancement, Spring Conference, Chicago, June 17, 2022.
- 17. **Lloyd, J.W.** and L. Greenhill. AAVMC admissions: analysis of the 2021 cycle. AAVMC Board of Directors Meeting, Philadelphia, July 29, 2022.
- 18. **Lloyd, J.W.** Veterinary workforce analysis: veterinarians, nurses/technicians, and specialists, Chief Medical Officer/Chief Veterinary Officer Meeting, Philadelphia, July 31, 2022.
- 19. **Lloyd, J.W.** Veterinary workforce analysis: veterinarians, nurses/technicians, and specialists. Colorado House of Representatives Rep. Karen McCormick, Veterinary Mid-Level Professional Working Group Meeting, Aug. 9, 2022 (virtual).
- 20. **Lloyd, J.W.** Veterinary workforce analysis: current status and potential pathways forward. AAVSB Annual Meeting & Conference, Charlotte, September 17, 2022.
- 21. **Lloyd, J.W.** Veterinary workforce analysis: trends and current status. Veterinary Innovation Summit, Portland, OR, September 27, 2022.
- 22. Steele, A and **J.W. Lloyd.** Innovation to address our veterinary workforce crisis: why we need mid-level practitioners now. Veterinary Innovation Summit, Portland, OR, September 27,2022.
- 23. **Lloyd, J.W.** Veterinary workforce analysis: a look at the past with an eye toward the future. The Ohio State Univ., College of Veterinary Medicine All Faculty Meeting, Nov. 16, 2022.
- 24. Bober, M., M. Cushing, and **J.W. Lloyd**. Pet industry economic impact study, Pet Industry Leadership Summit 2023, Coral Gables, FL, January 31, 2023.
- 25. Greenhill, L.M. and **J.W. Lloyd**. AAVMC enrollment trends. AAVMC Board of Directors Meeting, Washington, DC, March 7, 2023.
- 26. **Lloyd, J.W.** and L.M. Greenhill. AAVMC academic workforce trends: a ten-year look. AAVMC Board of Directors Meeting, Washington, DC, March 7, 2023.
- 27. **Lloyd, J.W.** Veterinary workforce analysis: a look at the past with an eye toward the future, VetPartners Mid-Year Meeting, Denver, July 13, 2023.
- 28. **Lloyd, J.W.** Veterinary workforce analysis: post-covid update, AAVMC Community of Professional Competency Educators, September 7, 2023 (virtual).

CONSULTING PRESENTATIONS (since 2019 – cont'd)

- 29. **Lloyd, J.W.** Veterinary workforce analysis: a look at the past with an eye toward the future, Colorado Legislator Conference, Dumb Friends League, September 28, 2023 (virtual).
- 30. **Lloyd, J.W.** and D.L. Harris. Enhancing access to in-person pet healthcare: exploring market segmentation and innovative business models project update. Veterinary Innovation Summit, Kansas City, October 11, 2023.
- 31. Knudson, W., S. Miller, and **J.W. Lloyd**. The economics of the U.S. pet food and pet supply industry, Global Pet Expo, Orlando, March 19, 2024.
- 32. **Lloyd, J.W.**, L.M. Greenhill, and R.B. Fingland. AAVC/AAVMC faculty benefits study. AAVMC Board of Directors Meeting and Summer Deans Conference, Austin, June 21-22, 2024.
- 33. **Lloyd, J.W.** and L.M. Greenhill. Shared faculty appointment survey. AAVMC Board of Directors Meeting and Summer Deans Conference, Austin, June 21-22, 2024.
- 34. **Lloyd, J.W.** and L.M. Greenhill. Impact of the enrollment cliff. AAVMC Board of Directors Meeting, Austin, June 21, 2024.
- 35. **Lloyd, J.W.** Shared faculty appointment survey and AAVC/AAVMC faculty benefits study. NCSU-CVM Dean's Leadership Team, Raleigh, NC, September 17, 2024.
- 36. **Lloyd, J.W.**, D. Aspros, E. Nantz, N. Brunno, C. Tran, S. Schopler, V. Marcano, and A. Green. Hot topics in veterinary innovation: DEIB, workplace culture, and access to care. VMX 2025, Orlando, January 25, 2025.
- 37. **Lloyd, J.W.** Pet ownership is more affordable than you think breaking data reveals new opportunities for retailers. Global Pet Expo, Orlando, March 26, 2025.

PREVIOUS PROFESSIONAL EXPERIENCE (up until 2019)

Dean, College of Veterinary Medicine, University of Florida, 2013 to 2019
Professor, Department of Large Animal Clinical Sciences, University of Florida, 2013 to 2019
Affiliate Professor, Dept. of Food and Resource Economics, University of Florida, 2014 to 2019
Associate Dean for Budget, Planning, and Institutional Research, College of Veterinary Medicine,
Michigan State University (MSU), 2007 to 2013

Director, Office of Strategy and Innovation, College of Veterinary Medicine, MSU, 2005 to 2007 Assistant to the Dean for Practice Management, College of Veterinary Medicine, MSU, 1998 to 2007 Adjunct Professor, Dept. of Management, Eli Broad College of Business, MSU, 2003 to 2013 Professor, Depts. of Large Animal Clinical Sciences and Agricultural, Food, and Resource Economics, MSU, 1999 to 2013

Associate Professor (with tenure), Depts. of Large Animal Clinical Sciences and Agricultural Economics, MSU, 1994 to 1999

Assistant Professor, Depts. of Lg. Anim. Clin. Sciences and Agric. Economics, MSU, 1988 to 1994
Research Assistant and Project Coordinator, Swine Health Information Management System, Depts.
of Agricultural Economics and Large Animal Clinical Sciences, MSU, 1985 to 1988
Large Animal Resident/Instructor, Dept. of Large Animal Clinical Sciences, MSU, 1983 to 1985
Mixed Animal Veterinary Practitioner (65% food animal; 25% equine; 10% small animal), Clare
Animal Hospital, Clare, Michigan (1982 to 1983)

Mixed Animal Veterinary Practitioner (85% food animal; 15% equine), Southkent Animal Hospital, Caledonia, Michigan (1981 to 1982)

CONSULTING AND LEADERSHIP EXPERIENCE (up until 2019)

- 1. Chair, external review of Department of Veterinary Clinical Sciences and Lloyd Veterinary Medical Center, College of Veterinary Medicine, Iowa State University, March 2013.
- 2. Facilitator, Strategic Planning Retreat, LGVMA, Las Vegas, Feb. 2013.
- 3. Facilitator, Partnership Meeting, SWVS, Dallas, Sept. 2012.
- 4. Facilitator, Strategic Planning Retreat, SWVS, Dallas, June 2012.
- 5. Facilitator, Strategic Planning Retreat, WVC Board of Directors, Las Vegas, Nov. 2011.
- 6. Developed draft business plan for Lloyd Veterinary Medical Center, College of Veterinary Medicine, Iowa State University, 2009.
- 7. External reviewer: self-funded DVM degree program proposal, College of Veterinary Medicine, University of Florida, 2009.
- 8. Facilitator, Strategic Planning Retreat, Michigan Veterinary Medical Association, DeWitt, Michigan, March 2007.
- 9. Facilitator, MSU Executive Leadership Academy, 2006-2007.
- 10. Facilitator, Strategic Planning Retreat, Department of Large Animal Clinical Sciences, Texas A&M University, College Station, January 2006.
- 11. Facilitator, Strategic Planning Retreats, SWVS. Dallas, November 2004; Little Rock, Feb. 2005; Albuquerque, June 2005; Dallas, June 2007.
- 12. Panelist, external review of the Department of Veterinary Clinical Medicine and the Veterinary Teaching Hospital, College of Veterinary Medicine, University of Illinois, November 2004.
- 13. Coordinator, CIC Veterinary Consortium, 2004 to 2006.
- 14. Panelist, project to define "Employment Opportunities for College Graduates in the Food and Agricultural Sciences," USDA-CSREES, 2004.
- 15. Developed and coordinated "Veterinary Practice Management Symposium," a workshop for veterinary practice management educators and consultants to define a core curriculum for veterinary practice management. Held at Michigan State University, East Lansing, Oct. 2001.
- 16. Project Leader, Strategies to Increase the Skills, Knowledge, Aptitude and Attitude of Veterinarians, National Commission on Veterinary Economic Issues, 2000 to 2009.

CONSULTING AND LEADERSHIP EXPERIENCE (up until 2019 – cont'd)

- 17. Co-coordinator (with W. Reed), development of a proposal to fund a new building for the Animal Health Diagnostic Laboratory at Michigan State University, 1999 and 2000. Ultimately, over \$50M was granted by the State of Michigan.
- 18. Advisor for AAVMC on a national study of the market for veterinarians and veterinary services (the "mega study"). This work was jointly funded by AVMA, AAHA, and AAVMC, and conducted by KPMG-Peat Marwick, Inc. in Washington, D.C., 1998 to 1999.
- 19. Collaborator, "Peer Review of Professional Service," a national project funded by the W.K. Kellogg Foundation to develop methods for documenting the scholarship in faculty outreach programs, 1997 to 1999.
- 20. Developed, implemented, and coordinated the Practice-Based Ambulatory Program, Department of Large Animal Clinical Sciences, Michigan State University, 1994-99.
- 21. Co-author (with J.B. Kaneene) proposal to form NCR-168 Committee on Epidemiology and Economics of Animal Health Management. This proposal was approved for 1990-1992 (and extended to 2000) by the North Central Region Experiment Station directors.
- 22. Co-author (with J.B. Kaneene) proposal to create the *Population Medicine Center* at Michigan State University. The center was approved for 1989-1994 (and extended to present, now *Center for Comparative Epidemiology*), with a first-year budget of \$120,000.

HONORS AND AWARDS

Champion of Veterinary Medicine, Florida Veterinary Medical Association, 2019

President's Medallion, University of Florida, 2019

Professor Emeritus, College of Veterinary Medicine, University of Florida, 2019

Lifetime Achievement Award, VetPartners, 2018

Professor Emeritus, College of Veterinary Medicine, Michigan State University, 2013

Senior Fellow, Outreach and Engagement, MSU, 2005 to 2013

Leadership Award, LGVMA, 2013

President's Honor Roll, Michigan Veterinary Medical Association, 2006, 2007, 2008, 2009, 2011

Certificate of Appreciation, Assoc. of Vet. Practice Management Consultants and Advisors, 2004

Norden Teacher of the Year Award Finalist, CVM-MSU, 2003

Creativity in Teaching Award, Merck Agvet, 1995

State Team Award, Milk Quality Assurance Program, MSU Extension, 1993

Commendation (for Extension activity), Michigan Cattlemen's Association, 1992

The Honor Society of Phi Kappa Phi, MSU, 1985 to present

Phi Zeta, Honorary Veterinary Society, MSU, 1981 to present

Butler Award, voted by peers as "most likely to succeed" in large animal veterinary medicine, 1981

Honors College, MSU, 1975 to 1977

PROFESSIONAL SERVICE

Co-chair, DEI Committee, Michigan Veterinary Medical Association, 2021 to present

Board of Directors, Veterinary Innovation Council, 2016 to 2023

Board of Directors, Florida Veterinary Medical Association, 2013 to 2019

Veterinary Advisory Board, Blue Buffalo Company, Ltd., 2016 to 2018

Board of Directors, MSU Federal Credit Union, 2011-2013

Chair, Veterinary Teaching Hospital Director Search Committee, CVM-MSU, 2012 to 2013

Board of Directors, National Commission on Veterinary Economic Issues, 2010-2011

Supervisory Committee, MSU Federal Credit Union, 2009-2011

Strategic Planning Steering Committee, Assoc. of Am. Vet. Med. Colleges, 2008

Leadership Development Committee, MVMA, 2007-2013

Legislative Advisory Group, Assoc. of Am. Vet. Med. Colleges, 2007-2013

PROFESSIONAL SERVICE (cont'd)

Clinical Programs Committee, Assoc. of Am. Vet. Med. Colleges, 2007-2011 Leadership Development Committee, Assoc. of Am. Vet. Med. Colleges, 2007-2016 Executive Committee, Michigan Veterinary Medical Association, 2007 to 2011 – Second vice president, 2007; First vice president, 2008; President elect, 2009; President, 2010;

Second vice president, 2007; First vice president, 2008; President elect, 2009; **President**, 2010; Immediate past president, 2011

Coordinator, Outcomes Assessment Task Force, CVM-MSU, 2005 to 2013

Board of Directors, Michigan Veterinary Medical Association, 2004 to 2006

Futuring Design Team, CVM-MSU, 2003 to 2004

Board of Directors, Assoc. of Vet. Prac. Mgt. Consultants and Advisors, 2004 to 2010

Coordinator, Balanced Scorecard Development Team, Coll. of Veterinary Medicine, 2002 to 2006

Co-chair, Veterinary Teaching Hospital Director Search Committee, CVM-MSU, 2002 to 2003

Secretary, Veterinary Teaching Hospital Board, CVM-MSU, 2001 to 2010

Editorial Board, Journal of Veterinary Medical Education, 2000 to 2008

Chair, Equine Performance and Lameness Search Committee, Department of Large Animal Clinical Sciences, 2000 to 2001

Advisor, Veterinary Business Management Assoc., Michigan State University, 2000 to 2013

Survey Committee, Assoc. of American Veterinary Medical Colleges, 1999 to 2004

Analytical Epidemiologist Search Committee, Dept. of Lg. An. Clin. Sci., 1998 to 2000

Evaluating Quality Outreach Committee, Michigan State University, 1997 to 2000

Search Committee, Veterinary Specialist 13--Ruminant and Swine/Avian Species, Michigan Department of Agriculture, 1998

Acting Director, Population Medicine Center, College of Veterinary Medicine, January to July 1998

Chair, Faculty Advisory Committee, Dept. of Large Animal Clinical Sciences, 1997 to 1998

Computer Services Committee, Department of Agricultural Economics, 1996 to 1999

Faculty Advisory Committee, Dept. of Lg. An. Clin. Sci., 1996 to 1997, 2003 to 2005

Program Committee, Michigan Veterinary Conference, 1995 to 1997, 2000 to 2004

Preharvest Food Safety Committee, Michigan Department of Agriculture, 1995

Beef Production Medicine Search Committee, Dept. of Lg. An. Clin. Sci., 1995 to 1996

Coordinator, Practice-Based Ambulatory and Veterinary Preceptorship Program, Department of Large Animal Clinical Sciences, 1994 to 1999

Chair, Curriculum Committee, College of Veterinary Medicine, 1994 to 1997

Curriculum Committee, Department of Large Animal Clinical Sciences, 1993 to 1997

Vice-chair, Curriculum Committee, College of Veterinary Medicine, 1993 to 1994

Internal Management Committee, Michigan Center for Rural Health, 1992 to 1994

Post-Graduate Training Committee, Dept. of Large Animal Clin. Sci., 1991 to 1996

Lifelong Education Committee, College of Veterinary Medicine, 1991-94, 1995-97

Paratuberculosis Committee, Michigan Department of Agriculture, 1991 to 1994

Brucellosis Committee, Michigan Department of Agriculture, 1991

Bovine Spongiform Encephalopathy Committee, Michigan Dept. of Ag., 1990 to 1991

Production Medicine Search Committee, Dept. of Large Animal Clin. Sciences, 1990

Food Safety Task Force, Michigan Cooperative Extension Service, 1990 to 1995

Research and Extension Committee, Michigan Cattlemen's Association, 1990 to 1996

Food Animal Practice Committee, Michigan Veterinary Med. Assoc., 1990 to 2013

Beef Type of Farming Team, Michigan Agricultural Experiment Station, 1988 to 1991

Dairy Type of Farming Team, Michigan Agricultural Experiment Station, 1988 to 1991

Swine Type of Farming Team, Michigan Agricultural Experiment Station, 1988 to 1991

Search Committee, Veterinarian VIII--Food Safety, Michigan Dept. of Ag., 1990

Guidelines on Farm Animal Care Task Force, Michigan State University and Michigan Department of Agriculture 1989 to 1995

PROFESSIONAL MEMBERSHIPS

American Veterinary Medical Association Michigan Veterinary Medical Association (president in 2010) American Association of Bovine Practitioners American Association of Equine Practitioners

RESEARCH AND OTHER FUNDING – Principal and Co-Principal Investigator

- 1. **Lloyd, J.W.** Agricultural Integrated Management Software: Dairy health economics models. Source: Michigan AES and CES. Period: 1989-1991. Total grant: \$5000.
- 2. **Lloyd, J.W.**, M. Brown, J.B. Kaneene, and J. Staatz. Implementation of an animal health monitoring system in Honduras. Source: USAID. Period: 1990. Total grant: \$2200.
- 3. **Lloyd, J.W.**, J.B. Kaneene, and S.B. Harsh. Integration of information management, systems modeling, and computer simulation for health management in growing hogs. Source: CSRS/USDA Integrated Pest Management. Period: 1990-1993. Total grant: \$40,000.
- 4. Harsh, S.B., **J.W. Lloyd** (co-principal investigators), W. Moline, S.B. Nott, A. Rotz, C. Sniffen, and J.B. Kaneene. Financial evaluation of alternative production strategies for Michigan dairy farms. Source: Michigan Ag. Experiment Station. Period: 1990-1995. Total grant: \$72,805.
- 5. Lehenbauer, T., and **J.W. Lloyd** (co-principal investigators). Economic evaluation of alternatives to use of antibiotics in dairy cattle. Source: The Food Animal Production Medicine Consortium, Pew National Veterinary Education Program of the Pew Charitable Trust. Period: 1990-1991. Total grant: \$3500.
- 6. **Lloyd, J.W.**, H. Hickey, J.B. Kaneene, S.J. Levine, and D.C. Sawyer. Improving skills of Michigan veterinarians and livestock producers. Source: Assistant Provost for Lifelong Education, Michigan State University. Period: 1990-1992. Total grant: \$13,124.
- 7. **Lloyd, J.W.**, P.J. Hady, A.L. Skidmore, and J.B. Kaneene. Evaluation of dairy reproductive health indicators. Source: USDA Animal Health Formula Funds. Period: 1991-1992. Total grant: \$14,900.
- 8. Kaneene, J.B., **J.W. Lloyd**, and S.B. Smalley (co-principal investigators). Utilization of chemical residue information in Extension food safety education programs. Source: USDA/ES. Period: 1992-1996. Total grant: \$40,000.
- 9. **Lloyd, J.W.** Residue-free dairy products: Issues for Michigan veterinarians (a lifelong education opportunity for veterinarians held December 7, 1991 at Michigan State University-developed and coordinated). Sources and amounts: Michigan Milk Producers Association, \$300; Independent Milk Producer's Cooperative, \$250; CES Food Safety Task Force, \$130; MSD AgVet, \$120 (Total grant: \$800).
- 10. **Lloyd, J.W.** Stabilizing Michigan's rural economy by enhancing skills of veterinarians and dairy producers. Source: All-Univ. Outreach Grants. Period: 1994-1995. Total grant: \$15,000.
- 11. **Lloyd, J.W.**, S. Nott, and B. Bartlett. Can management-intensive grazing (MIG) enhance the sustainability of Michigan's dairy industry? Source: Michigan Animal Industry Initiative Research and Extension Funding. Period: 1995-1997. Total grant: \$44,000.
- 12. **Lloyd, J.W.** Lifelong education via internet for adjunct faculty in the Department of Large Animal Clinical Sciences. Source: All-University Outreach Grants. Period: 1996-1997. Total grant: \$7,500.
- 13. **Lloyd, J.W.** The importance of veterinary medicine to Michigan. Source: Michigan Veterinary Medical Association and College of Veterinary Medicine, Michigan State University. Period: 1998-1999. Total Grant: \$9,700.
- 14. **Lloyd, J.W.** Research prioritization and evaluation of strategic management in vet. practice management: Phase I. Source: Hill's Pet Nut., Inc. Period: 1999-2000. Total grant: \$23,000.
- 15. **Lloyd, J.W.** Research prioritization and evaluation of strategic management in vet. practice management: Phase II. Source: Hill's Pet Nut., Inc. Period: 2000-2001. Total Grant: \$19,000.

RESEARCH AND OTHER FUNDING – Principal and Co-Principal Investigator (cont'd)

- 16. **Lloyd, J.W.** Employment analysis of veterinary medical graduates, 2000. Source: American Veterinary Medical Association. Period: 2000-2001. Total Grant: \$2,500.
- 17. **Lloyd, J.W.,** and S.K. Abood. Co-faculty advisors for, "From School to Success: Shaping the Future of Your Veterinary Career," a SAVMA-sponsored forum for veterinary students from the Upper Mid-West held October 26-27, 2001 at Michigan State University. Source: 15+corporate and non-profit sponsors. Total Budget: \$40,000.
- 18. **Lloyd, J.W.,** and D.R. Ilgen (co-principal investigators). Enhancing the economic health of the veterinary profession by improving skills, knowledge, aptitudes, and attitudes (SKAs). Source: American Veterinary Medical Association. Period: 2002-2004. Total Grant: \$203,386.
- 19. **Lloyd, J.W.** Employment analysis of veterinary medical graduates, 2002. Source: American Veterinary Medical Association. Period: 2002-2003. Total Grant: \$2,500.
- 20. **Lloyd, J.W.** Faculty advisor for, "Investing in Your Future," a Veterinary Practice Builders Association sponsored forum for veterinary students on financial management held October 11, 2003 at Michigan State University. Source: Merial, Hill's Pet Nutrition, Inc., and several other minor corporate and non-profit sponsors. Total Budget: \$8,212.
- 21. **Lloyd, J.W.** Faculty advisor for, "Improving the Economics of Veterinary Practice in Michigan Expanding the Use of the NCVEI Website" a Veterinary Practice Builders Assn. project, Source: AVMA (\$6,000) and MVMA (\$3,000). Period: 2004. Total Budget: \$9,000.
- 22. **Lloyd, J.W.**, C.A. Wolf, and J.R. Black. US consumer expenditures on pets and veterinarian services. Source: Merial. Period: 2007. Total Budget: \$10,000.
- 23. **Lloyd, J.W.,** and D.L. Harris. The current status of veterinary practice management and career development teaching in AAVMC colleges. Period: 2009. Sources: CareCredit and Merial. Total Budget: \$25,000 (\$12,500 each).
- 24. **Lloyd, J.W.**, and H.M. Chaddock. The AAVMC Leadership Academy. Period: 2013-2016. Source: Elanco. Total Budget: \$150,000.

RESEARCH AND OTHER FUNDING – Co-investigator

- 1. Giesy, J., B. Poppenga, B. Thacker, J. Patterson, J. Sikarskie, and **J. Lloyd**. Bioavailability of contaminants. Source: EPA. Period: 1989-1991. Total grant: \$126,908.
- 2. Kaneene, J.B., J.H. Jackson, M.T. Yokoyama, R.D. Walker, R. Holland, **J.W. Lloyd**. Epidemiological study of food safety concerns of E. coli 0157:H7. Source: USDA Animal Health Formula Funds. Period: 1990. Total grant: \$15,000.
- 3. Kaneene, J.B., K. Gallagher, and **J.W. Lloyd**. Development of a Michigan Equine Monitoring System. Source: Michigan Dept. of Agriculture. Period: 1990-1996. Total grant: \$400,862.
- 4. Rust, S., and **J. Lloyd**. Beef Safety and Quality Assurance Program. Sources and amounts: National Cattlemen's Association, \$2000; Michigan Beef Industry Commission, \$2500; CES Food Safety Task Force, \$4800. Winter 1991. Total grant: \$9300.
- 5. Kaneene, J.B., **J.W. Lloyd**, M. Hogberg, et al. An interdisciplinary educational program in the safety of foods of animal origin. Source: Pew National Veterinary Education Program of the Pew Charitable Trust. Period: 1990 to 1993. Total grant: \$132,000.
- 6. Sprecher, D.J., and **J.W. Lloyd**. Establishment of a problem-oriented, multidisciplinary, elective course in dairy production medicine. Source: Food Animal Production Medicine Consortium, Pew National Veterinary Educ. Program. Period: 1990-1991. Total grant: \$2400.
- 7. Skidmore, A.L., and **J.W. Lloyd**. Development of a clinical case computer simulation to teach responsible antibiotic use in dairy cattle. Source: The Food Animal Production Medicine Consortium, Pew National Veterinary Educ. Program. Period: 1991-1992. Total grant: \$9750.
- 8. Tucker, H.A., A.L. Skidmore, M. VandeHaar, **J.W. Lloyd**, J. Ireland, R. Fogwell, and H. Ritchie. Cost-effective heifer rearing program. Source: Michigan Agricultural Experiment Station and The Upjohn Company. Period: 1993-1997. Total grant: \$199,000.

RESEARCH AND OTHER FUNDING – Co-investigator (cont'd)

- 9. Kaneene, J.B., **J.W. Lloyd**, and R. Erskine. Is the dairy quality assurance program effective in reducing drug residues in milk? Source: USDA Animal Health Formula Funds. Period: 1993-1995. Total grant: \$15,000.
- 10. Johnson-Ifearulundu, Y.J., J.B. Kaneene, and **J.W. Lloyd**. The effect of subclinical Johne's disease on milk production. Source: BRSG. Period: 1993-1994. Total grant: \$3,500.
- 11. Baker, J.C., R.K. Maes, H. Houe, P. Ruegg, and **J.W. Lloyd**. Persistent infection with bovine viral diarrhea virus (BVDV): Diagnosis, epidemiology, and control. Source: USDA Animal Health Formula Funds. Period: 1993-1994. Total grant: \$15,000.
- 12. Tucker, A., A. Skidmore, M. VandeHaar, **J.W. Lloyd**, R. Fogwell, D. Beede, H. Ritchie, and E.P. Stanisiewski. Lactation response of rapidly grown heifers. Source: Michigan Animal Industry Initiative Research Funding. Period: 1995-1997. Total grant: \$45,000.
- 13. Kaneene, J.B., **J.W. Lloyd**, R.J. Erskine, S.N. Gibbons, and D.A. Gage. Food safety studies. Source: Michigan Animal Industry Initiative Funding. Period: 1996-1997. Total grant: \$20,000.
- 14. Kaneene, J.B., **J.W. Lloyd**, R.J. Erskine, S.N. Gibbons, and D.A. Gage. Evaluation of the reliability of tests used for on-farm detection of antibiotics in individual cow milk. Source: American Veterinary Medical Foundation. Period: 1997. Total grant: \$15,000.

PUBLICATIONS – Refereed Journal Articles

- 1. **Lloyd, J.W.**, J.B. Kaneene, and S.B. Harsh. Toward responsible farm-level economic analysis, *J Am Vet Med Assoc*, 191:195-199, 1987.
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- 18. **Lloyd, J.W.**, and S.K. Abood. From school to success: shaping the future of your veterinary career, a SAVMA-sponsored forum for veterinary students from the Upper Mid-West, Michigan State University, East Lansing, October 26-27, 2001.
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- 32. **Lloyd, J.W.** Investing in your future, Veterinary Practice Builders Association (VPBA) special day-long seminar, sponsored by Merial and Hill's Pet Nutrition, Inc., Michigan State University, East Lansing, October 11, 2003.
- 33. **Lloyd, J.W.,** S.K. Abood, and H.M. Abreu. Interview/negotiation training and mentor workshop, Michigan State Univ., College of Veterinary Med., E. Lansing, October 16, 2003.
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- 35. **Lloyd, J.W.** Critical challenges facing the veterinary teaching hospital, Virginia-Maryland Regional College of Veterinary Medicine, Blacksburg, Virginia, September 14, 2004.
- 36. **Lloyd, J.W.** Benchmarking for the veterinary teaching hospital, NAVCA Annual Conference, College Station, Texas, September 29, 2004.
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- 38. **Lloyd, J.W.**, and R. Richardson. The role of teaching hospitals in veterinary medical education, AAVMC Annual Meeting, Washington DC, March 12, 2005.
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- 40. **Lloyd, J.W.** Teaching the non-technical skills, knowledge, aptitudes, and attitudes (SKAs): developing effective programs. Sponsored by the Association of American Veterinary Medical Colleges, American Veterinary Medical Assoc. Annual Meeting, Minneapolis, July 18, 2005.
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- 43. **Lloyd, J.W.** Teaching the non-technical skills, knowledge, aptitudes, and attitudes (SKAs): veterinary leadership development programs. Sponsored by the Association of American Veterinary Medical Colleges, American Veterinary Medical Association Annual Meeting, Honolulu, July 15, 2006.
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- 51. Lowrie, P.M., **J.W. Lloyd,** W. Reed, and K.S. Davis. 2010 Iverson Bell regional summit: infusing diversity into the veterinary curriculum, School of Veterinary Medicine, Purdue University, West Lafayette, May 23, 2010.
- 52. **Lloyd, J.W.** and P. Sanaghan. Creating the future of veterinary technology, College of Veterinary Medicine, Michigan State University, East Lansing, November 13-15, 2011.
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- 56. **Lloyd, J.W.** and H.M. Chaddock. The Association of American Veterinary Medical Colleges Leadership Academy 2013-14: Session 1. Lansing, Michigan, August 8-10, 2013.
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- 60. **Lloyd, J.W.** and H.M. Chaddock. The Association of American Veterinary Medical Colleges Leadership Academy 2014-15: Session 2. Indianapolis, Indiana, November 6-8, 2014.
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SCIENTIFIC PRESENTATIONS – National and International

- 1. **Lloyd, J.W.**, S.B. Harsh, J.B. Kaneene, B.J. Thacker, and G.D. Schwab. Decision support for growing and finishing pigs: Application of computer simulation techniques to a bioeconomic system. Conf. on Economics of Animal Diseases, MSU, East Lansing, June 22-25, 1986.
- 2. **Lloyd, J.W.**, S.B. Harsh, and J.B. Kaneene. Decision support for livestock production: A review of modeling techniques commonly employed. 124th Annual Meeting, American Veterinary Medical Association, Chicago, July 19-23, 1987.
- 3. **Lloyd, J.W.** Health management to enhance livestock profitability: Techniques of economic analysis. Section of Animal Health Economics, School of Veterinary Medicine, University of Pennsylvania, Kennett Square, March 10, 1988.
- 4. **Lloyd, J.W.** Economic issues of importance in livestock health management. International Programs, Veterinary Services, U.S. Department of Agriculture, Animal and Plant Health Inspection Service, Hyattsville, Maryland, June 17, 1988.
- 5. **Lloyd, J.W.** and S.B. Harsh. The Swine Health Information Management System. Livestock, Dairy, and Poultry Branch, U.S. Department of Agriculture, Economic Research Service, Washington, D.C., September 21, 1989.

- 6. Johnson R., J.B. Kaneene, and **J.W. Lloyd**. Standardization of a T lymphocyte colony assay for the culture of sheep lymphocytes, Conf. of Res. Workers in Animal Diseases, Chicago, November 1989.
- 7. Johnson, R., J.B. Kaneene, **J.W. Lloyd**, and Y. Bryant. Colony formation by lymphocytes from bovine leukemia virus infected sheep, CRWAD, Chicago, Nov. 1989.
- 8. Johnson, R., J.B. Kaneene, G. Louden, **J.W. Lloyd**, and S. Stark. Experimental studies of bovine leukemia virus infection in sheep, CRWAD, Chicago, Nov. 1989.
- 9. Lafi, S.Q., J.B. Kaneene, and **J.W. Lloyd**. Economic analysis of repeat breeder cow syndrome and related diseases, Conf. of Res. Workers in Animal Diseases, Chicago, November 1989.
- 10. **Lloyd, J.W.** and J.B. Kaneene. Research activities in epidemiology and animal health economics at Michigan State University, NCR-168 Committee on Epidemiology and Economics of Animal Health Management, Brookings, South Dakota, October 1990.
- 11. **Lloyd, J.W.**, J.B. Kaneene, and B.J. Thacker. The Swine Health Information Management System. I. System description and data analysis, Conf. of Res. Workers in Animal Diseases, Chicago, November 1990.
- 12. **Lloyd, J.W.**, S.B. Harsh, and J.B. Kaneene. The Swine Health Information Management System. II. An integrated decision support system for livestock health management, Conf. of Res. Workers in Animal Diseases, Chicago, November 1990.
- 13. Rook, J.S., and **J.W. Lloyd**. Multielement analysis of perinatal lamb livers. I. Relationships between element concentration and lamb age, Conf. of Res. Workers in Animal Diseases, Chicago, November 1990.
- 14. Rook, J.S., and **J.W. Lloyd**. Multielement analysis of perinatal lamb livers. II. Relationships between element concentration and cause of death, Conf. of Res. Workers in Animal Diseases, Chicago, November 1990.
- 15. Brown, M.I., **J.W. Lloyd**, J.B. Kaneene, and J. Staatz. The feasibility of transferring an animal health monitoring system from the United States to Honduras, 6th International Symposium of Veterinary Epidemiology and Economics, Ottawa, Canada, August 12-16, 1991.
- 16. **Lloyd, J.W.** Research activities in epidemiology and animal health economics at Michigan State University, NCR-168 Committee on Epidemiology and Economics of Animal Health Management, Robert Allerton Conference Center, Monticello, Illinois, October 1991.
- 17. **Lloyd, J.W.**, P.J. Hady and S.B. Harsh. Development of an expert system to evaluate drug use in dairy production, Conf. of Res. Workers in Animal Diseases, Chicago, November 1991.
- 18. **Lloyd, J.W.**, J.B. Kaneene, and L.D. Lloyd. Michigan lifelong education interests in veterinary epidemiology and animal health economics, Conf. of Res. Workers in Animal Diseases, Chicago, November 1991.
- 19. Hady, P.J., **J.W. Lloyd**, and J.B. Kaneene. Evaluation of dairy reproductive health indicators, Conf. of Res. Workers in Animal Diseases, Chicago, November 1991.
- 20. Poppenga, R., T. Herdt, E. Braselton, J. Vickers, W. Bravo, A. Stachowski, and **J. Lloyd**. Serum mineral concentrations of domestic and South American alpacas, 35th Annual Meeting of the American Association of Veterinary Laboratory Diagnosticians, Louisville, Kentucky, October 31 -November 3, 1992.
- 21. Hady, P.J., and **J.W. Lloyd**. Economic analysis of reproductive efficiency in adult dairy cattle, Conf. of Res. Workers in Animal Diseases, Chicago, November 1992.
- 22. O'Brien, D.J., **J.W. Lloyd**, and J.B. Kaneene. A principal components analysis of factors critical to participation in veterinary lifelong education programs, Conf. of Res. Workers in Animal Diseases, Chicago, November 1992.
- 23. Marteniuk, J.V., C.L. Carleton, M.E. Shea, and **J.W. Lloyd**. Analysis of computerized equine reproductive records, Conf. of Res. Workers in Animal Diseases, Chicago, November 1992.
- 24. Montgomery, B.A., **J.W. Lloyd**, and A. Jensen. Use of a Markov chain model to evaluate alternative administrative policies for a veterinary school faculty, Conf. of Res. Workers in Animal Diseases, Chicago, November 1992.

SCIENTIFIC PRESENTATIONS – National and International (cont'd)

25. **Lloyd, J.W.** Tissue residues and the Midwest dairy industry, FDA Tissue Residue Investigations and Strategies for Case Development Course, Lexington, Ky, August 16, 1993.

- 26. **Lloyd, J.W.**, and P.J. Hady. Partial budgeting as a dairy consultation tool. American Association of Bovine Practitioners, Albuquerque, New Mexico, September 19, 1993.
- 27. **Lloyd, J.W.**, and S.B. Harsh. Economic structure of the Michigan dairy industry, Conf. of Res. Workers in Animal Diseases, Chicago, November 1993.
- 28. **Lloyd, J.W.**, and J.B. Kaneene. Economic structure of the Michigan equine industry, Conf. of Res. Workers in Animal Diseases, Chicago, November 1993.
- 29. **Lloyd, J.W.**, S.B. Harsh, and J.B. Kaneene. Use of a computerized systems model to assess the economic benefits of feeding antibiotics to growing hogs, Conf. of Res. Workers in Animal Diseases, Chicago, November 1993.
- 30. Domecq, J.J., A.L. Skidmore, J.B. Kaneene, and **J.W. Lloyd**. Validation of body condition scores with ultrasound measurements of subcutaneous fat of dairy cattle, 1994 Annual Meeting, American Dairy Science Assoc., Minneapolis, July 1994.
- 31. **Lloyd, J.W.** Dairy cattle lameness: epidemiology and economics, 131st Annual Meeting, American Veterinary Medical Association, San Francisco, July 1994.
- 32. **Lloyd, J.W.** Financial aspects of dairy farm expansion and improvement: The veterinarian's role. 79th Annual Convention, Wisc. Veterinary Medical Association, Madison, October 1994.
- 33. **Lloyd, J.W.**, J.S. Rook, E. Braselton, J. Shelle, and M.E. Shea. Multielement analysis of mare's milk: Relationships between element concentration and days from foaling, mare, mare parity, and fetal gender, Conf. of Res. Workers in Animal Diseases, Chicago, November 1994.
- 34. **Lloyd, J.W.**, B. Dartt, S.B. Harsh, J.B. Kaneene, and G.D. Schwab. Use of optimal control techniques to estimate system performance in growing hogs, Conf. of Res. Workers in Animal Diseases, Chicago, November 1994.
- 35. Marteniuk, J.V., C.L. Carleton, **J.W. Lloyd**, and M.E. Shea. Influence of fetal gender, sire, and month of breeding on gestation length in mid-Michigan standardbreds, 40th Annual American Association of Equine Practitioners Convention, Vancouver, December 1994.
- 36. Harsh, S.B., **J.W. Lloyd**, and A.S. Go. Model for financial evaluation of alternative production strategies for Michigan dairy farms, FACTs 95, Farm Animal Computer Technologies Conference, Orlando, March 1995.
- 37. Domecq, J.J., A.L. Skidmore, **J.W. Lloyd**, and J.B. Kaneene. Relationships between changes in body condition scores and 120 day milk yield, 1995 Annual Meeting, American Dairy Science Assoc., Cornell University, Ithaca, New York, June 1995.
- 38. Brady, C.M., **J.W. Lloyd**, and J.E. Shelle. A comparison of expenses on boarding, riding, and training stables in Michigan, 1995 Annual Meeting, American Animal Science Association, Orlando, July 1995.
- 39. **Lloyd, J.W.** Tissue residues and the Midwest dairy industry, FDA Tissue Residue Investigations and Strategies for Case Development Course, East Lansing, Michigan, August 21, 1995.
- 40. Tetens, J., F.J. Derksen, J.A. Stick, N.E. Robinson, **J.W. Lloyd**, C.E. Berney, and M.E. Shea. The efficacy of prosthetic laryngoplasty with and without bilateral ventriculocordectomy as treatments for laryngeal hemiplegia in horses, American College of Veterinary Surgeons Annual Meeting, Chicago, October 1995.
- 41. Tetens, J., M.W. Ross, and **J.W. Lloyd**. Comparison of racing performance before and after conservative and surgical treatment of incomplete, midsagittal proximal phalanx fractures in standardbreds: 49 cases (1986-1992), American College of Veterinary Surgeons Annual Meeting, Chicago, October 1995.
- 42. Gibbons, S.N., J.B. Kaneene, **J.W. Lloyd**, and R.J. Erskine. An epidemiological study of risk factors associated with chemical residues in milk, Conf. of Res. Workers in Animal Diseases, Chicago, November 1995.

- 43. Dartt, B.A., **J.W. Lloyd**, and J.B. Kaneene. Evaluation of food animal practice-based ambulatory education, Conf. of Res. Workers in Animal Diseases, Chicago, November 1995.
- 44. **Lloyd, J.W.**, and J.B. Kaneene. Labor and expenses associated with health management in the Michigan equine industry, Conf. of Res. Workers in Animal Diseases, Chicago, Nov. 1995.
- 45. **Lloyd, J.W.**, and B.A. Dartt. The economics of intensive rotational grazing, Great Lakes Grazing Conference, Battle Creek, Michigan, February 20, 1996.
- 46. **Lloyd, J.W.** Economics of dairy production: the veterinarian's changing role, Pfizer Animal Health, Dairy Advisory Team, Kansas City, March 18, 1996.
- 47. **Lloyd, J.W.** The importance of dairy health management to economic efficiency and profitability, American Dairy Science Assoc. Annual Meeting, Corvallis, Oregon, July 1996.
- 48. **Lloyd, J.W.** Partial budgeting. In: Economic decision making for beginners, a workshop for non-economists, Amer. Soc. for Veterinary Epidemiology & Economics, Chicago, Nov. 1996.
- 49. Dartt, B.A., **J.W. Lloyd**, J.B. Kaneene, and B.B. Bartlett. Can management-intensive grazing (MIG) enhance the sustainability of Michigan's dairy industry? Conf. of Res. Workers in Animal Diseases, Chicago, November 1996.
- 50. **Lloyd, J.W.**, Dartt, B.A., B.R. Radke, and J.B. Kaneene. The relationship between cull rate and financial performance on Michigan dairy farms, Conf. of Res. Workers in Animal Diseases, Chicago, November 1996.
- 51. **Lloyd, J.W.** The importance of dairy health management to profitability. Animal Nutrition of Central Wisconsin Annual Producer Meetings, Marshfield and Fond du Lac, Wisconsin, January 16-17, 1997.
- 52. **Lloyd, J.W.** The importance of dairy health management to economic efficiency and profitability, Colorado Farm Show Dairy Days, Greeley, January 29, 1997.
- 53. Radke, B.R., **J.W. Lloyd**, J. Wooldridge, and J.B. Kaneene. The effect of modeling unobserved effects as random or fixed in linear models, Conf. of Res. Workers in Animal Diseases, Chicago, November 1997.
- 54. Radke, B.R., **J.W. Lloyd**, J. Wooldridge, and J.B. Kaneene. Prediction of dairy animal culling prior to, or during, first lactation using estimated breeding values, Conf. of Res. Workers in Animal Diseases, Chicago, November 1997.
- 55. O'Brien, D.J., J.B. Kaneene, **J.W. Lloyd**, M.L. Neterer, R.W. Dunstan, J.M. Kruger, and R.W. Leader. Frequencies and characteristics of some selected canine cancers, Michigan, 1964-1994, Conf. of Res. Workers in Animal Diseases, Chicago, November 1997.
- 56. O'Brien, D.J., J.B. Kaneene, **J.W. Lloyd**, M.R. Rip, and R.W. Leader. Spatial and temporal distribution of selected canine cancers, Michigan, 1964-1994, Conf. of Res. Workers in Animal Diseases, Chicago, November 1997.
- 57. Sandmann, L., R. Church, **J.W. Lloyd**, W. Rauhe, and C. Rosaen. University outreach: The journey from service to scholarship, Sixth American Association for Higher Education Conference on Faculty Roles and Rewards, Orlando, February 1998.
- 58. Radke, B.R., **J.W. Lloyd**, and J.B. Kaneene. Prepartum Holstein heifer selection to maximize Michigan producer profit, Conf. of Res. Workers in Animal Diseases, Chicago, Nov.1998.
- 59. Dartt, B.A., **J.W. Lloyd**, and J.B. Kaneene. The importance of veterinary medicine to Michigan, Conf. of Res. Workers in Animal Diseases, Chicago, November 1998.
- 60. Gibbons-Burgener, S.N., J.B. Kaneene, **J.W. Lloyd**, and R.J. Erskine. Evaluation of the influence of the Milk and Dairy Quality Assurance Program on drug management practices of Michigan dairy farms, Conf. of Res. Workers in Animal Diseases, Chicago, November 1998.
- 61. O'Brien, D.J., J.B. Kaneene, A. Getis, **J.W. Lloyd**, and G.M Swanson. Spatial and temporal comparison of selected cancers in dogs and humans, Michigan, 1964-94, Conf. of Res. Workers in Animal Diseases, Chicago, November 1998.
- 62. **Lloyd, J.W.** Why is everyone milking more cows, and where does the veterinarian fit in? 136th Annual Meeting, American Veterinary Medical Association, New Orleans, July 1999.

- 63. **Lloyd, J.W.** Economics of culling and replacement in dairy production. 136th Annual Meeting, American Veterinary Medical Association, New Orleans, July 1999.
- 64. Gibbons-Burgener, S.N., J.B. Kaneene, J.F. Leykam, **J.W. Lloyd**, and R.J. Erskine. Evaluation of the reliability of assays used for on-farm detection of antibiotics in individual cow milk, Conf. of Res. Workers in Animal Diseases, Chicago, November 1999.
- 65. Sandmann, L., P.G. Foster-Fishman, **J.W. Lloyd**, and C. Rosaen. Managing critical partnership tensions to strengthen the scholarship of engagement, Eighth American Association for Higher Education Conference on Faculty Roles and Rewards, New Orleans, February 2000.
- 66. **Lloyd, J.W.** Veterinary practice management education in the AAVMC, Association of American Veterinary Medical Colleges Annual Meeting, Washington, D.C., March 19, 2000.
- 67. **Lloyd, J.W.** Veterinary practice management: teaching needs as viewed by consultants and teachers, Association of American Veterinary Medical Colleges Summer Meeting, 137th AVMA Annual Convention, Salt Lake City, July 22, 2000.
- 68. **Lloyd, J.W.** Veterinary practice management education in the AAVMC *and* Veterinary practice management: teaching needs as viewed by consultants and teachers, Hill's Practice Management College Meeting, 137th AVMA Annual Convention, Salt Lake City, July 23, 2000.
- 69. **Lloyd, J.W.** Post-graduate economic success. Student Seminar (#18), American Association of Bovine Practitioners, Rapid City, South Dakota, September 19-20, 2000.
- 70. **Lloyd, J.W.** Veterinary practice management education in the AAVMC, Conf. of Res. Workers in Animal Diseases, Chicago, November 2000.
- 71. **Lloyd, J.W.** Veterinary practice management: teaching needs as viewed by consultants and teachers, Conf. of Res. Workers in Animal Diseases, Chicago, November 2000.
- 72. Dartt, B.A., **J.W. Lloyd**, and M.E. Shea. A computerized dairy herd inventory simulator, Conf. of Res. Workers in Animal Diseases, Chicago, November 2000.
- 73. **Lloyd, J.W.** Practice management in veterinary medical education, National Commission on Veterinary Economic Issues: Subgroup for Skills, Knowledge, and Aptitudes, Augusta, Michigan, December 5, 2000.
- 74. **Lloyd, J.W.** Veterinary practice management education, Association of Veterinary Practice Management Consultants and Advisors Meeting, Central Veterinary Conference, Kansas City, Missouri, August 25, 2001.
- 75. **Lloyd, J.W.**, D. Donovan, Y. Camara, D. Leeper, and R. Gross. Application of market research in veterinary practice management. I: client satisfaction. Conf. of Res. Workers in Animal Diseases, St. Louis, November 2001.
- 76. **Lloyd, J.W.**, D. Donovan, Y. Camara, D. Leeper, and R. Gross. Application of market research in veterinary practice management. II: satisfaction of referring veterinarians. Conf. of Res. Workers in Animal Diseases, St. Louis, November 2001.
- 77. **Lloyd, J.W.** Veterinary career development: template for a model curriculum, Association of Veterinary Practice Management Consultants and Advisors First Annual Meeting, Western Veterinary Conference, Las Vegas, February 10, 2002.
- 78. **Lloyd, J.W.**, and L.J. King. Skills, knowledge, aptitudes, and attitudes of successful veterinarians, and Veterinary career development: template for a model curriculum, Association of American Veterinary Medical Colleges Annual Meeting, Washington, D.C., March 10, 2002.
- 79. **Lloyd, J.W.** Skills, knowledge, aptitudes, and attitudes of successful veterinarians, NCVEI Forum, American Veterinary Medical Association Annual Meeting, Nashville, July 15, 2002.
- 80. **Lloyd, J.W.** Enhancing the economic health of the veterinary profession by improving skills, knowledge, aptitudes, and attitudes (SKAs) progress report, NCVEI Board Meeting, American Veterinary Medical Association Annual Meeting, Nashville, July 16, 2002.
- 81. **Lloyd, J.W.** Improving the skills, knowledge, aptitudes, and attitudes (SKAs) of the veterinary profession: project update, National Workshop on Core Competencies for Success in the Veterinary Profession, Indianapolis, August 23, 2002.

- 82. **Lloyd, J.W.** Improving the skills, knowledge, aptitudes, and attitudes (SKAs) of the veterinary profession: project update, Food Animal Educators Breakfast, American Association of Bovine Practitioners Annual Meeting, Madison, Wisconsin, September 28, 2002.
- 83. **Lloyd, J.W.** Recent economic trends and related developments in the veterinary profession, North American Veterinary College Administrators Annual Conference, East Lansing, Michigan, October 8, 2002.
- 84. **Lloyd, J.W.** Recent economic trends and related developments in the veterinary profession, Veterinary Practice Management Club, University of Missouri, Columbia, December 11, 2002.
- 85. **Lloyd, J.W.** Enhancing the economic health of the veterinary profession by improving skills, knowledge, aptitudes, and attitudes (SKAs) progress report, NCVEI Board Meeting, Western Veterinary Conference, Las Vegas, February 18, 2003.
- 86. **Lloyd, J.W.** Enhancing the economic health of the veterinary profession by improving skills, knowledge, aptitudes, and attitudes (SKAs), Association of American Veterinary Medical Colleges Annual Meeting, Washington, D.C., March 10, 2003.
- 87. **Lloyd, J.W.** and L.J. King. SKA Updates, NCVEI Forum, American Veterinary Medical Association Annual Meeting, Denver, July 21, 2003.
- 88. Johnson, M. D., C. Meyer, F.P. Morgeson, **J.W. Lloyd**, D.R. Ilgen, and M. Marrinan. Examining differences in identification of professionals across multiple targets. Interactive paper session of the 62nd Annual Meeting of the Academy of Management, Seattle, Aug. 2003.
- 89. Ilgen, D.R., **J.W. Lloyd**, F.P. Morgeson, M.D. Johnson, C.J. Meyer, and M. Marrinan. Veterinary medicine careers: views of veterinarians and college students, AAVMC Skills, Knowledge, Aptitudes, & Attitudes (SKAs) Colloquium, Des Moines, August 21-22, 2003.
- 90. **Lloyd, J.W.**, and D. Harris. The veterinary teaching hospital business model, AAVMC Skills, Knowledge, Aptitudes, & Attitudes (SKAs) Colloquium, Des Moines, August 21-22, 2003.
- 91. **Lloyd, J.W.** Skills, knowledge, aptitudes, and attitudes update: applicant pool, leadership, and the VTH business model, NAVCA Annual Conference, Ithaca, New York, September 24, 2003.
- 92. **Lloyd, J.W.** Skills, knowledge, aptitudes, and attitudes update, Banfield Corporate Headquarters, Portland, Oregon, October 20, 2003.
- 93. **Lloyd, J.W.** Skills, knowledge, aptitudes, and attitudes update, NCVEI Board, Schaumburg, Illinois, October 27, 2003.
- 94. Ilgen, D.R., **J.W. Lloyd**, F.P. Morgeson, M.D. Johnson, C.J. Meyer, and M. Marrinan. Evaluation of the veterinary school applicant pool: personal characteristics, knowledge of the veterinary profession, and influences on career choice, Conf. of Res. Workers in Animal Diseases, Chicago, November 10, 2003.
- 95. Harris, D.L., and **J.W. Lloyd**. Development of a veterinary teaching hospital business model, Conf. of Res. Workers in Animal Diseases, Chicago, November 10, 2003.
- 96. **Lloyd, J.W.** How the NCVEI is making the veterinary profession stronger, Mississippi Veterinary Medical Association Annual Meeting, Mississippi State, February 28, 2004.
- 97. **Lloyd, J.W.** The veterinary teaching hospital business model, American Association of Veterinary Clinicians Annual Meeting, Atlanta, March 25, 2004.
- 98. **Lloyd, J.W.**, D.L. Harris, and M. Marrinan. The veterinary teaching hospital business model, American Veterinary Medical Association Annual Meeting, Philadelphia, July 25, 2004.
- 99. **Lloyd, J.W.** Improving skills, knowledge, aptitudes, and attitudes (SKAs): project update, American Veterinary Medical Association Annual Meeting, Philadelphia, July 26, 2004.
- 100. **Lloyd, J.W.** The PDI study: non-technical competencies underlying career success as a veterinarian, Association of Veterinary Practice Management Consultants and Advisors Meeting, Central Veterinary Conference, Kansas City, August 26, 2004.
- 101. **Lloyd, J.W.** Veterinary professional development and career success: template for a model curriculum, Association of Veterinary Practice Management Consultants and Advisors Meeting, Central Veterinary Conference, Kansas City, August 27, 2004.

- 102. **Lloyd, J.W.** The veterinary teaching hospital business model, Virginia-Maryland Regional College of Veterinary Medicine, Blacksburg, Virginia, September 14, 2004.
- 103. **Lloyd, J.W.** NCVEI and the VMA: benefits and strategies, Twelve States Leadership Forum, Branson, Missouri, September 17, 2004.
- 104. **Lloyd, J.W.** Update on the veterinary teaching hospital business model, NAVCA Annual Conference, College Station, Texas, September 29, 2004.
- 105. **Lloyd, J.W.** Improving skills, knowledge, aptitudes, and attitudes (SKAs): project update, NCVEI Board, Schaumburg, Illinois, November 8, 2004.
- 106. **Lloyd, J.W.** SKA Programs at the North American Colleges/Schools of Veterinary Medicine, NCVEI Board, Schaumburg, Illinois, February 16, 2005.
- 107. **Lloyd, J.W.** The evolution of the veterinary teaching hospital, AAVMC Annual Meeting, Washington DC, March 12, 2005.
- 108. **Lloyd, J.W.** KPMG: AAVMC colleges respond, AAVMC Annual Meeting, Washington DC, March 14, 2005.
- 109. **Lloyd, J.W.** The evolution of the veterinary teaching hospital, AAVC Annual Meeting, Atlanta, March 31, 2005.
- 110. **Lloyd, J.W.** Future of veterinary teaching hospitals reflections from the NCVEI, AAVC Forum held in conjunction with the ACVIM Annual Conference, Baltimore, June 1, 2005.
- 111. **Lloyd, J.W.** The evolution of the veterinary teaching hospital, American Veterinary Medical Association Annual Meeting, Minneapolis, July 17, 2005.
- 112. **Lloyd, J.W.** The veterinary teaching hospital business model, College of Veterinary Medicine, University of Minnesota, July 20, 2005.
- 113. **Lloyd, J.W.** Veterinary leadership development, College of Veterinary Medicine, University of Minnesota, July 20, 2005.
- 114. **Lloyd, J.W.** Improving non-technical skills, knowledge, aptitudes, and attitudes (SKAs) in the veterinary profession, College of Veterinary Medicine, University of Minnesota, July 20, 2005.
- 115. **Lloyd, J.W.** The mega study: AAVMC colleges respond, Association of Veterinary Practice Management Consultants and Advisors Meeting, Central Veterinary Conference, Kansas City, August 25, 2005.
- 116. **Lloyd, J.W.** The evolution of the veterinary teaching hospital, Association of Veterinary Practice Management Consultants and Advisors Meeting, Central Veterinary Conference, Kansas City, August 25, 2005.
- 117. **Lloyd, J.W.** The evolution of the veterinary teaching hospital, College of Veterinary Medicine, University of Missouri-Columbia, August 31, 2005.
- 118. **Lloyd, J.W.** Improving non-technical skills, knowledge, aptitudes, and attitudes (SKAs) in the veterinary profession, College of Veterinary Medicine, University of Missouri-Columbia, August 31, 2005.
- 119. **Lloyd, J.W.** Enhancing the SKAs through recruitment and admissions, College of Veterinary Medicine, University of Missouri-Columbia, September 1, 2005.
- 120. **Lloyd, J.W.** Veterinary professional development and career success: template for a model curriculum, College of Veterinary Medicine, Univ. of Missouri-Columbia, September 1, 2005.
- 121. **Lloyd, J.W.** Improving self-esteem in new graduates: can SKA programs help? College of Veterinary Medicine, University of Missouri-Columbia, September 1, 2005.
- 122. **Lloyd, J.W.** The continuing evolution of the veterinary teaching hospital, NAVCA Annual Conference, Davis, California, September 22, 2005.
- 123. **Lloyd, J.W.** Benchmarking for the veterinary teaching hospital, NAVCA Annual Conference, Davis, California, September 22, 2005.
- 124. **Lloyd, J.W.** Veterinary leadership development, AABP Board of Directors, Salt Lake City, September 23, 2005.
- 125. **Lloyd, J.W.** Veterinary leadership development, College of Veterinary Medicine, University of Florida, September 26, 2005.

SCIENTIFIC PRESENTATIONS – National and International (cont'd)

126. **Lloyd, J.W.** Improving non-technical skills, knowledge, aptitudes, and attitudes (SKAs) in the veterinary profession, College of Veterinary Medicine, Univ. of Florida, September 27, 2005.

- 127. **Lloyd, J.W.** The evolution of the veterinary teaching hospital, College of Veterinary Medicine, University of Florida, September 27, 2005.
- 128. **Lloyd, J.W.** Enhancing the SKAs through recruitment and admissions, College of Veterinary Medicine, University of Florida, September 27, 2005.
- 129. **Lloyd, J.W.** Veterinary professional development and career success: template for a model curriculum, College of Veterinary Medicine, University of Florida, September 27, 2005.
- 130. **Lloyd, J.W.** Improving non-technical skills, knowledge, aptitudes, and attitudes (SKAs) in the veterinary profession, Coll. of Veterinary Medicine, Kansas State Univ., September 30, 2005.
- 131. **Lloyd, J.W.** Veterinary professional development and career success: template for a model curriculum, College of Veterinary Medicine, Kansas State University, September 30, 2005.
- 132. **Lloyd, J.W.** Veterinary leadership development, College of Veterinary Medicine, Kansas State University, September 30, 2005.
- 133. **Lloyd, J.W.** The evolution of the veterinary teaching hospital, College of Veterinary Medicine, The Ohio State University, October 10, 2005.
- 134. **Lloyd, J.W.** Improving non-technical skills, knowledge, aptitudes, and attitudes (SKAs) in the veterinary profession, Veterinary Business Management Association, College of Veterinary Medicine, The Ohio State University, October 10, 2005.
- 135. **Lloyd, J.W.** Enhancing the SKAs through recruitment and admissions, College of Veterinary Medicine, The Ohio State University, October 11, 2005.
- 136. **Lloyd, J.W.** Improving non-technical skills, knowledge, aptitudes, and attitudes (SKAs) in the veterinary profession, Faculty Seminar, College of Veterinary Medicine, The Ohio State University, October 11, 2005.
- 137. Lloyd, J.W. SKA campus visits update, NCVEI Board, Schaumburg, Illinois, Oct. 17, 2005.
- 138. **Lloyd, J.W.** Benchmarking for the veterinary teaching hospital project update, NCVEI Board, Schaumburg, Illinois, October 17, 2005.
- 139. **Lloyd, J.W.** Veterinary professional development and career success: template for a model curriculum, College of Veterinary Medicine, Texas A&M University, October 27, 2005.
- 140. **Lloyd, J.W.** The veterinary teaching hospital business model, College of Veterinary Medicine, Texas A&M University, October 27, 2005.
- 141. **Lloyd, J.W.** Improving non-technical skills, knowledge, aptitudes, and attitudes (SKAs) in the veterinary profession, College of Veterinary Medicine, Texas A&M University, Oct. 27, 2005.
- 142. **Lloyd, J.W.** Enhancing the SKAs through recruitment and admissions, College of Veterinary Medicine, Texas A&M University, October 27, 2005.
- 143. **Lloyd, J.W.** Improving non-technical skills, knowledge, aptitudes, and attitudes (SKAs) in the veterinary profession, School of Veterinary Medicine, University of Wisconsin-Madison, November 1, 2005.
- 144. **Lloyd, J.W.** Enhancing the SKAs through recruitment and admissions, School of Veterinary Medicine, University of Wisconsin-Madison, November 1, 2005.
- 145. **Lloyd, J.W.** Veterinary professional development and career success: template for a model curriculum, School of Veterinary Medicine, University of Wisconsin-Madison, Nov. 1, 2005.
- 146. **Lloyd, J.W.** Leadership issues in veterinary medicine, College of Veterinary Medicine, North Carolina State University, November 8, 2005.
- 147. **Lloyd, J.W.** Improving non-technical skills, knowledge, aptitudes, and attitudes (SKAs) in the veterinary profession, College of Veterinary Medicine, North Carolina State University, November 8, 2005.
- 148. **Lloyd, J.W.** Enhancing the SKAs through recruitment and admissions, College of Veterinary Medicine, North Carolina State University, November 8, 2005.
- 149. **Lloyd, J.W.** The veterinary teaching hospital business model, College of Veterinary Medicine, North Carolina State University, November 9, 2005.

- 150. **Lloyd, J.W.** Veterinary professional development and career success: template for a model curriculum, College of Veterinary Medicine, North Carolina State University, November 9, 2005.
- 151. **Lloyd, J.W.** Leadership issues in veterinary medicine, College of Veterinary Medicine, Oklahoma State University, November 18, 2005.
- Lloyd, J.W. Improving non-technical skills, knowledge, aptitudes, and attitudes (SKAs) in the veterinary profession, College of Veterinary Medicine, Oklahoma State University, November 19, 2005.
- 153. **Lloyd, J.W.** Enhancing the SKAs through recruitment and admissions, College of Veterinary Medicine, Oklahoma State University, November 19, 2005.
- 154. **Lloyd, J.W.** Curricular and co-curricular strategies for enhancing the SKAs, College of Veterinary Medicine, Oklahoma State University, November 19, 2005.
- 155. **Lloyd, J.W.** The veterinary teaching hospital business model, College of Veterinary Medicine, Iowa State University, December 6, 2005.
- Lloyd, J.W. Improving non-technical skills, knowledge, aptitudes, and attitudes (SKAs) in the veterinary profession, College of Veterinary Medicine, Iowa State University, December 7, 2005.
- 157. **Lloyd, J.W.** Leadership issues in veterinary medicine, College of Veterinary Medicine, Iowa State University, December 7, 2005.
- 158. **Lloyd, J.W.** Curricular and co-curricular strategies for enhancing the SKAs, College of Veterinary Medicine, Iowa State University, December 7, 2005.
- 159. **Lloyd, J.W.** Enhancing the SKAs through recruitment and admissions, College of Veterinary Medicine, Iowa State University, December 7, 2005.
- 160. **Lloyd, J.W.** Enhancing the SKAs through recruitment and admissions, College of Veterinary Medicine, University of Georgia, February 3, 2006.
- 161. **Lloyd, J.W.** Curricular and co-curricular strategies for enhancing the SKAs, College of Veterinary Medicine, University of Georgia, February 3, 2006.
- 162. **Lloyd, J.W.** Improving non-technical skills, knowledge, aptitudes, and attitudes (SKAs) in the veterinary profession, College of Veterinary Medicine, University of Georgia, February 3, 2006.
- 163. Lloyd, J.W. SKA update, NCVEI Board, Schaumburg, Illinois, February 15, 2006.
- 164. **Lloyd, J.W.** MSU-CVM affiliated satellite practice: program considerations, AAVMC Annual Meeting, Washington DC, March 11, 2006.
- 165. **Lloyd, J.W.** Veterinary teaching hospital benchmarking update, AAVC Annual Meeting, Atlanta, March 30, 2006.
- 166. **Lloyd, J.W.** Curricular and co-curricular strategies for enhancing the SKAs, College of Veterinary Medicine, Louisiana State University, May 16, 2006.
- 167. **Lloyd, J.W.** Improving non-technical skills, knowledge, aptitudes, and attitudes (SKAs) in the veterinary profession, College of Veterinary Medicine, Louisiana State University, May 16, 2006.
- 168. **Lloyd, J.W.** The veterinary teaching hospital business model, College of Veterinary Medicine, Louisiana State University, May 16, 2006.
- 169. **Lloyd, J.W.** Enhancing the SKAs through recruitment and admissions, College of Veterinary Medicine, Louisiana State University, May 17, 2006.
- 170. **Lloyd, J.W.** The veterinary teaching hospital business model, College of Veterinary Medicine, Colorado State University, May 18, 2006.
- 171. **Lloyd, J.W.** Enhancing the SKAs through recruitment and admissions, College of Veterinary Medicine, Colorado State University, May 18, 2006.
- 172. **Lloyd, J.W.** Curricular and co-curricular strategies for enhancing the SKAs, College of Veterinary Medicine, Colorado State University, May 18, 2006.
- 173. **Lloyd, J.W.** Leadership issues in veterinary medicine, College of Veterinary Medicine, Colorado State University, May 18, 2006.

- 174. **Lloyd, J.W.** The NCVEI veterinary leadership study, American Veterinary Medical Association Annual Meeting, Honolulu, July 15, 2006.
- 175. **Lloyd, J.W.** Veterinary leadership development programs, American Veterinary Medical Association Annual Meeting, Honolulu, July 15, 2006.
- 176. **Lloyd, J.W.** Non-technical competencies required for success in public practice, American Veterinary Medical Association Annual Meeting, Honolulu, July 16, 2006.
- 177. **Lloyd, J.W.** Rising to the challenge: evolution of the veterinary teaching hospital, Nine States Veterinary Conference, St. Paul, Minnesota, August 25, 2006.
- 178. **Lloyd, J.W.** Leadership issues in veterinary medicine, Nine States Veterinary Conference, St. Paul, Minnesota, August 26, 2006.
- 179. **Lloyd, J.W.** Enhancing non-technical SKAs in the veterinary profession: NCVEI initiative update, NCVEI Board, Schaumburg, Illinois, October 10, 2006.
- 180. **Lloyd, J.W.** VTH benchmarking project update, AAVC Annual Meeting, Washington, DC, March 2, 2007.
- 181. **Lloyd, J.W.** NCVEI benchmarking: pilot project update, NAVCA Annual Meeting, Guelph, Ontario, Canada, October 3, 2007.
- 182. **Lloyd, J.W.** Enhancing non-technical SKAs in the veterinary profession, NCVEI Board, Schaumburg, Illinois, October 9, 2007.
- 183. **Lloyd, J.W.** Improving non-technical skills, knowledge, aptitudes, and attitudes (SKAs) in the veterinary profession, Department of Veterinary and Biomedical Sciences, University of Nebraska–Lincoln, December 19, 2007.
- 184. **Lloyd, J.W.** NCVEI benchmarking: pilot project update, AAVMC Annual Meeting, Washington, DC, March 16, 2008.
- 185. **Lloyd, J.W.** Balanced scorecard I: Fundamentals of monitoring your veterinary practice, AAHA Annual Conference, Tampa, March 28, 2008.
- 186. **Lloyd, J.W.** Balanced scorecard II: Defining key metrics to monitor your veterinary, AAHA Annual Conference, Tampa, March 28, 2008.
- 187. **Lloyd, J.W.** Balanced scorecard III: Using the data to drive the implementation of strategy, AAHA Annual Conference, Tampa, March 28, 2008.
- 188. **Lloyd, J.W.** NCVEI benchmarking: project update, AAVC Annual Meeting, Atlanta, April 3, 2008.
- 189. **Lloyd, J.W.** VTH benchmarking: NCVEI project update, American Veterinary Medical Association Annual Meeting, New Orleans, July 19, 2008.
- 190. **Lloyd, J.W.** VTH benchmarking: NCVEI project update and discussion, NAVCA Annual Meeting, Knoxville, Tennessee, September 16, 2008.
- 191. **Lloyd, J.W.** Funding trends in veterinary medical education: drivers of veterinary teaching hospital evolution, College of Veterinary Medicine, Iowa State University, Ames, April 23, 2009.
- 192. **Lloyd, J.W.** Lloyd Veterinary Medical Center business planning, College of Veterinary Medicine, Iowa State University, Ames, June 29, 2009.
- 193. **Lloyd, J.W.** The MSU-CVM veterinary education model: a non-tracking approach, North American Veterinary Medical Education Consortium, Kansas City, April 29, 2010.
- 194. **Lloyd, J.W.** Non-technical SKAs: drivers of professional success, North American Veterinary Medical Education Consortium, Kansas City, April 30, 2010.
- 195. **Lloyd, J.W.** Why this matters: what do we know and how will we know we've made a difference? 2010 Iverson Bell Regional Summit: Infusing Diversity into the Veterinary Curriculum, School of Veterinary Medicine, Purdue University, West Lafayette, May 23, 2010.
- 196. **Lloyd, J.W.** and D.L. Harris. Veterinary practice management and career development education: impact of the mega-study and NCVEI. VetPartners Mid-Year Meeting, Kansas City, August 26, 2010.

- 197. Lowrie, P., S. Amass, K. Davis, H. Green, and **J. Lloyd**. Infusing diversity into the curriculum through inter-institutional collaboration: doing inclusive work on the system. AAVMC Annual Meeting, Alexandria, VA, March 12, 2011.
- 198. **Lloyd, J.W.** Infusing cultural and diversity knowledge into the curriculum: a goal for success in life and business, Regional Veterinary Medical Education Conference, College of Veterinary Medicine, Iowa State University, Ames, June 13, 2011.
- 199. **Lloyd, J.W.** Providing veterinary education: a financial perspective, AAVMC Annual Deans' Conference, Naples, FL, January 13, 2012.
- 200. **Lloyd, J.W.** Financing veterinary education: student loan repayment strategies, AAVMC Board of Directors and AAVMC-AVMA Joint Economic Summit #2, Alexandria, VA, March 8, 2012.
- 201. **Lloyd, J.W.** Providing veterinary education: a financial perspective, Admissions Workshop, AAVMC Annual Conference, Alexandria, VA, March 10, 2012.
- 202. **Lloyd, J.W.** Distributive plus model with private practitioners as adjunct faculty members, AAVMC Annual Conference, Alexandria, VA, March 11, 2012.
- 203. Greenhill, L., P. Carmichael, and **J.W. Lloyd.** National climate survey results, 2012 Iverson Bell Regional Summit: Infusing Diversity into Veterinary Medical Education, College of Veterinary Medicine, Michigan State University, East Lansing, May 19, 2012.
- 204. **Lloyd, J.W.** Providing veterinary education: a financial perspective, Faculty Seminar, College of Veterinary Medicine, The Ohio State University, Columbus, May 24, 2012.
- 205. **Lloyd, J.W.** You made the right choice, Student Townhall Meeting, College of Veterinary Medicine, The Ohio State University, Columbus, May 24, 2012.
- 206. **Lloyd, J.W.** Providing veterinary education: a financial perspective, VetPartners Mid-Year Meeting, Kansas City, August 24, 2012.
- 207. **Lloyd, J.W.** Providing veterinary education: an economist's perspective, College of Veterinary Medicine, Cornell University, November 9, 2012.
- 208. **Lloyd, J.W.** Financial planning for veterinary medical students, College of Veterinary Medicine, Cornell University, November 10, 2012.
- 209. Lowrie, P., K. Davis, H. Green, C. Patterson, and **J. Lloyd**. 2012 Iverson Bell Regional Summit: Infusing diversity into veterinary medical education. AAVMC Annual Meeting, Alexandria, VA, March 8, 2013.
- 210. **Lloyd, J.W.** How will we know we've made a difference? 2014 Iverson Bell Regional Summit: Infusing Diversity into Veterinary Medical Education, College of Veterinary Medicine, Purdue University, West Lafayette, June 1, 2014.
- 211. **Lloyd, J.W.** The market for veterinary medical education: a college of veterinary medicine economist's perspective, AVMA Economics Summit, Schaumburg, Illinois, Oct. 21, 2015.
- 212. **Lloyd, J.W.** Market segmentation: obligation, opportunity, or both? American Society of Veterinary Medical Association Executives (ASVMAE) ThinkWORKS, Denver, April 8, 2016.
- 213. **Lloyd, J.W.** Market segmentation: obligation, opportunity, or both? Veterinary Innovation Council, NAVC, Orlando, February 7, 2017.
- 214. **Lloyd, J.W.** Market segmentation: obligation, opportunity, or both? VetPartners, Indianapolis, July 20, 2017.
- 215. **Lloyd, J.W.** Market segmentation: obligation, opportunity, or both? Veterinary Advisory Board, Blue Buffalo, Savannah, Georgia, October 30, 2017.
- 216. **Lloyd, J.W.** Market segmentation: obligation, opportunity, or both? Association of American Veterinary Medical Colleges, Naples, Florida, February 2, 2018.
- 217. **Lloyd, J.W.** Leadership development: a lifetime journey. VMX, Orlando, February 6, 2018.
- 218. **Lloyd, J.W.** Training the next generation of graduates commentary, Veterinary Innovation Summit, Texas A&M University, College Station, April 8, 2018.

SCIENTIFIC PRESENTATIONS – National and International (cont'd)

219. **Lloyd, J.W.** Market analysis: critical trends driving demand for animal health, Animal Health Innovation, Latin America: Business Development and Partnering, Kisaco Research, Sao Paulo, May 30, 2018.

SCIENTIFIC PRESENTATIONS – State and Local

- 1. **Lloyd, J.W.** The Swine Health Information Management System (SHIMS): An overview. 64th Annual Postgraduate Conference for Veterinarians and Veterinary Technicians, Michigan State University, East Lansing, January 20-21, 1987.
- 2. **Lloyd, J.W.** The MSU Swine Record System: Description and suggested applications. 65th Annual Postgraduate Conference for Veterinarians and Veterinary Technicians, Michigan State University, East Lansing, January 26-27, 1988.
- 3. **Lloyd, J.W.** Food safety research at Michigan State University. Executive Dairy Seminar, Michigan State University, Agricultural Experiment Station, East Lansing, December 21, 1989.
- 4. **Lloyd, J.W.** Food safety activities at Michigan State University. 46th Annual Dairy Industry Conference, Michigan Department of Agric., Mich. State Univ., E. Lansing, April 10, 1990.
- 5. **Lloyd, J.W.** Economic analysis: When is a problem a problem? Dairy Production Medicine: Reproduction and Performance, Michigan State University Lifelong Education Program, Kellogg Biological Station, Hickory Corners, Michigan, December 12-14, 1990.
- 6. **Lloyd, J.W.** Drug residues and the Michigan dairy industry. Osceola County Annual DHIA Banquet, Marion, Michigan, January 15, 1991.
- 7. **Lloyd, J.W.** Economic analysis of dairy health management. Annual Producer Meeting, Animal Health Associates, Mt. Pleasant, Michigan, February 20, 1991.
- 8. **Lloyd, J.W.** Animal care issues in the feedlot. Beef Safety and Quality Assurance: Creating a Positive Image in the 1990's, Michigan Cooperative Extension Service, March 12-14, 1991.
- 9. **Lloyd, J.W.** Proper handling and injection techniques for veterinary biologicals and pharmaceuticals. Michigan Beef Expo, Mason, Michigan, April 5, 1991.
- 10. **Lloyd, J.W.** Economic considerations. Feed Safety and Quality Assurance Seminar, Michigan Department of Agriculture, July 30-August 1, 1991.
- 11. **Lloyd, J.W.** Milk and Dairy Beef Residue Prevention Protocol (10-Point Checklist), Dairy Quality Assurance Program, Michigan Cooperative Extension Service, March 30-April 3, 1992.
- 12. **Lloyd, J.W.** Review of 10-Point Quality Assurance Program. 49th Annual Dairy Industry Conference, Michigan Department of Agriculture, Lansing, April 21, 1992.
- 13. **Lloyd, J.W.** Milk and Dairy Beef Residue Prevention Protocol (10-Point Checklist). Operation Synergism, Michigan State University, Department of Agricultural and Extension Education and Cooperative Extension Service, East Lansing, September 24, 1992.
- 14. **Lloyd, J.W.** Quality Assurance Programs. Extension School, Michigan State University, Department of Agricultural and Extension Education and Cooperative Extension Service, East Lansing, October 22, 1992.
- 15. **Lloyd, J.W.** Quality Assurance Program Update. Mecosta County Annual DHIA Banquet, Mecosta, Michigan, January 20, 1994.
- 16. **Lloyd, J.W.** Update on the Milk and Dairy Beef Quality Assurance Program, Food Safety and Quality Assurance Module, Dairy Health Management Certificate Program, Michigan State University, Augusta, Michigan, January 21, 1994.
- 17. **Lloyd, J.W.**, and G.D. Schwab. Should I consider contracting services? 1994 Dairy Management Conference, Michigan State University Extension, Lansing, March 1-2, 1994.
- 18. **Lloyd, J.W.** Assessing the economic benefit of reproductive interventions on dairy farms, Reproduction Module, Dairy Health Management Certificate Program, Michigan State University, Hickory Corners, Michigan, March 6, 1994.

SCIENTIFIC PRESENTATIONS – State and Local (cont'd)

19. Radke, B.R., and **J.W. Lloyd.** The economic aspects of culling decisions, Heifer Management, Planned Parenthood, and Culling Module, Dairy Health Management Certificate Program, Michigan State University, Kettunen Center, Tustin, Michigan, September 11, 1994.

- 20. Dartt, B.A., **J.W. Lloyd**, and J.B. Kaneene. Evaluation of food animal practice-based ambulatory education, 5th Annual Phi Zeta Research Day, Michigan State University, College of Veterinary Medicine, October 5, 1994.
- 21. **Lloyd, J.W.** Epidemiology and economics of lameness in dairy cattle. 1995 Michigan Veterinary Conference, Lansing, January 26-29, 1995.
- 22. **Lloyd, J.W.**, and B.A. Dartt. Practice-based ambulatory at Michigan State University. 1995 Michigan Veterinary Conference, Lansing, January 26-29, 1995.
- 23. **Lloyd, J.W.** Enhancing financial management in the Michigan dairy industry. Thumb Veterinary Medical Association, Sandusky, Michigan, February 9, 1995.
- 24. **Lloyd, J.W.** What's new with the Milk and Dairy Beef Quality Assurance Program in Michigan? Michigan State University Extension, Cadillac, Michigan, July 25, 1995.
- 25. Tetens, J., F.J. Derksen, J.A. Stick, N.E. Robinson, **J.W. Lloyd**, C.E. Berney, and M.E. Shea. The efficacy of prosthetic laryngoplasty with and without bilateral ventriculocordectomy as treatments for laryngeal hemiplegia in horses, 6th Annual Phi Zeta Research Day, Michigan State University, College of Veterinary Medicine, October 3, 1995.
- Gibbons, S.N., J.B. Kaneene, and J.W. Lloyd. Chemical residues in U.S. beef: patterns of occurrence, 6th Annual Phi Zeta Research Day, Michigan State University, College of Veterinary Medicine, October 3, 1995.
- 27. **Lloyd, J.W.**, and B.A. Dartt. The economics of intensive rotational grazing, Central Michigan Family Ag Day, Michigan State University Extension, Lake Odessa, Michigan, Jan. 20, 1996.
- 28. **Lloyd, J.W.** Give me the bottom line. Do production and profitability intersect? 1996 Michigan Veterinary Conference, Lansing, January 25-28, 1996.
- 29. **Lloyd, J.W.** Health management to improve profits. Semi-annual Dairy Producer Meeting, The Veterinary Standard, Manchester, Michigan, April 8, 1996.
- 30. Dartt, B.A., and **J.W. Lloyd**. Grazing your dairy herd: How profitable is it? Michigan Agriculture Mega-Conference, Lansing, January 9, 1997.
- 31. **Lloyd, J.W.** Why is everyone milking more cows, and where does the veterinarian fit in? 1997 Michigan Veterinary Conference, Lansing, January 23-26, 1997.
- 32. **Lloyd, J.W.** The importance of dairy health management to profitability. Mecosta County Annual DHIA Banquet, Mecosta, Michigan, January 30, 1997.
- 33. **Lloyd, J.W.** The relationship of culling to efficiency and profitability. Michigan Professional Dairy Farmers' Association, Ithaca, Michigan, February 12, 1997.
- 34. **Lloyd, J.W.** Why is everyone milking more cows, and where does the veterinarian fit in? Thumb Veterinary Medical Association, Sandusky, Michigan, February 20, 1997.
- 35. Gibbons-Burgener, S.N., J.B. Kaneene, **J.W. Lloyd**, and R.J. Erskine. Evaluation of the influence of the milk and dairy beef quality assurance program on drug management practices on Michigan dairy farms. 8th Annual Phi Zeta Research Day, Michigan State University, College of Veterinary Medicine, October 14, 1998.
- 36. **Lloyd, J.W.** Dairy health management economics. Pharmacia & Upjohn Dairy Seminar, Augusta, Michigan, June 30, 1999.
- 37. **Lloyd, J.W.** The practice-based ambulatory program 1999 financial management study, Michigan State University, College of Veterinary Medicine, September 29, 2000.
- 38. **Lloyd, J.W.** The mega-study and large animal practices in Michigan, Michigan State University, College of Veterinary Medicine, September 29, 2000.
- 39. **Lloyd, J.W.** Post-graduate economic success, Veterinary Practice Builders Association, Michigan State University, College of Veterinary Medicine, October 26, 2000.
- 40. **Lloyd, J.W.** Pricing equine services: the 2000 MSU pricing study. 2001 Michigan Veterinary Conference, Lansing, January 25-28, 2001.

SCIENTIFIC PRESENTATIONS – State and Local (cont'd)

- 41. **Lloyd, J.W.** The economics of culling and replacement in the Michigan dairy industry. Heifer Management and Culling, Module #11, Dairy Health Management Certificate Program, Michigan State Univ., East Lansing, Michigan, Feb. 18, 2001.
- 42. **Lloyd, J.W.** Practice management in veterinary medical education, Michigan Veterinary Medical Association Summer Meeting, Traverse City, Michigan, August 1, 2001.
- 43. **Lloyd, J.W.** The practice-based ambulatory program 2000 financial management study, Michigan State University, College of Veterinary Medicine, October 12, 2001.
- 44. **Lloyd, J.W.** Evaluating customer satisfaction: the case of Michigan State University's veterinary teaching hospital, 2002 Michigan Veterinary Conference, Lansing, January 24, 2002.
- 45. **Lloyd, J.W.** Improving the skills, knowledge, aptitudes, and attitudes (SKAs) of the veterinary profession: project update, College of Veterinary Medicine Alumni Council Meeting, East Lansing, Michigan, October 19, 2002.
- 46. **Lloyd, J.W.** The practice-based ambulatory program 2001 financial management study, Michigan State University, College of Veterinary Medicine, November 7, 2002.
- 47. **Lloyd, J.W.** Enhancing the economic health of the veterinary profession by improving skills, knowledge, aptitudes, and attitudes (SKAs), Population Medicine Center Journal Club Seminar, MSU, College of Veterinary Medicine, E. Lansing, Michigan, March 5, 2003.
- 48. **Lloyd, J.W.** The National Commission on Veterinary Economic Issues: critical projects and issues identified for colleges of veterinary medicine, College-wide Forum, Michigan State University, College of Veterinary Medicine, April 9, 2003.
- 49. **Lloyd, J.W.** The National Commission on Veterinary Economic Issues: critical projects and issues identified for colleges of veterinary medicine, College of Veterinary Medicine Alumni Council Meeting, East Lansing, Michigan, April 15, 2003.
- 50. **Lloyd, J.W.** When it's time... retiring from practice ownership, Northeast Michigan Veterinary Medical Association, West Branch, Michigan, April 17, 2003.
- 51. **Lloyd, J.W.** Recruitment and selection to colleges of veterinary medicine, Mackinac Island Veterinary Conference, Mackinac Island, Michigan, August 3, 2003.
- 52. **Lloyd, J.W.** Skills, knowledge, aptitudes, and attitudes update: applicant pool, leadership, and the VTH business model, College of Veterinary Medicine Alumni Council Meeting, East Lansing, Michigan, October 3, 2003.
- 53. **Lloyd, J.W.** The veterinary teaching hospital business model, 2004 Michigan Veterinary Conference, Lansing, January 23, 2004.
- 54. **Lloyd, J.W.** The MSU-CVM balanced scorecard project, Macomb-Oakland Management Seminars, Sterling Heights, Michigan, March 5, 2004.
- 55. **Lloyd, J.W.** Enhancing the economic health of the veterinary profession by improving skills, knowledge, aptitudes, and attitudes (SKAs), Department of Agricultural Economics, Michigan State University, East Lansing, April 15, 2004.
- 56. **Lloyd, J.W.** Non-clinical competencies critical for success in veterinary medicine: What are they? Why are they important? What can we do to improve? Preveterinary Medical Association, Michigan State University, East Lansing, October 24, 2005.
- 57. **Lloyd, J.W.**, and S.K. Abood. Effective interviewing: finding the right match. 2006 Michigan Veterinary Conference, Lansing, January 27, 2006.
- 58. **Lloyd, J.W.** Leadership development at the College of Veterinary Medicine. VTH Practitioner Advisory Panel, College of Veterinary Medicine, MSU, East Lansing, March 7, 2006.
- 59. **Lloyd, J.W.**, and S.K. Abood. Effective interviewing: finding the right match. 2006 Michigan Veterinary Conference, Lansing, January 26, 2007.
- 60. **Lloyd, J.W.** Diversity and veterinary medicine, MVMA Board of Directors Retreat, DeWitt, Michigan, March 21, 2007.
- 61. **Lloyd, J.W.** Sustained success in Michigan's economy, 2007 Mackinac Island Veterinary Conference, Mackinac Island, Michigan, August 8, 2007.

SCIENTIFIC PRESENTATIONS – State and Local (cont'd)

- 62. **Lloyd, J.W.** The Michigan veterinary economy: is the glass half full or half empty? Grand Rapids Small Animal Practice Academy, Grand Rapids, Michigan, February 3, 2009.
- 63. **Lloyd, J.W.** Recent economic trends: what about the veterinary profession? MVMA Economic Summit, Coll. of Vet. Med., Michigan State University, E. Lansing, Mar. 18, 2009.
- 64. **Lloyd, J.W.** Funding trends in academic veterinary medicine: drivers of programmatic evolution, Department of Pathobiology and Diagnostic Investigation, College of Veterinary Medicine, Michigan State University, East Lansing, July 27, 2009.
- 65. **Lloyd, J.W.** Trends in academic veterinary medicine: MSU-CVM past, present, and future, Southeast Michigan Veterinary Medical Association, Rochester, Michigan, January 6, 2010.
- 66. **Lloyd, J.W.** Trends in academic veterinary medicine: the MSU-CVM perspective, Livingston County Veterinary Medical Association, Brighton, Michigan, February 25, 2010.
- 67. **Lloyd, J.W.** Trends in academic veterinary medicine: the MSU-CVM perspective, Northeast Michigan Veterinary Medical Association, West Branch, Michigan, June 17, 2010.
- 68. **Lloyd, J.W.** Trends in the Michigan veterinary economy 2010, Saginaw Valley Veterinary Medical Association, Frankenmuth, Michigan, September 22, 2010.
- 69. **Lloyd, J.W.** Diversity in veterinary medicine: why is it important and what are we doing? Michigan Department of Agriculture and Rural Development, Lansing, September 15, 2011.
- 70. **Lloyd, J.W.** Financing veterinary education: student loan repayment strategies, Veterinary Practice Builders Association, MSU-CVM, February 8, 2012.
- 71. **Lloyd, J.W.** Providing veterinary education: a financial perspective, Michigan Veterinary Medical Association Board of Directors, East Lansing, March 21, 2012.

TEACHING EXPERIENCE – Graduate Student Training

1.	Major Professor
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Student	<u>Degree</u>	<u>Discipline</u>	Completion Date
Margaret Brown	M.S.	Ag. Economics	1990
Patrick Hady	M.S.	Ag. Economics	1992
Brian Radke	Ph.D.	Ag. Economics	1998
Barb Dartt	M.S.	Ag. Economics	1998*
* Note: This student's thesis received an award as the year's best from the Department.			

^{2.} Committee Member

Student	<u>Degree</u>	<u>Discipline</u> Com	pletion Date
C.A. Martin	M.S.	Lg. An. Clin. Sci.	1992
Bruce Montgomery	Ph.D.	Ed. Administration	1992
Jorge Gonzalez	M.S.	Lg. An. Clin. Sci.	1993
Joseph Kelpinski	M.S.	Ag. Economics	1994
Colleen Bruning-Fann	M.S.	Lg. An. Clin. Sci.	1994
Colleen Brady	M.S.	Animal Science	1994
Joseph Domecq	Ph.D.	Animal Science	1995
John Rutherford	M.S.	Ag. Economics	1996
Daniel O'Brien	Ph.D.	Lg. An. Clin. Sci.	1998
Yvette Johnson-Ifearulundu	Ph.D.	Lg. An. Clin. Sci.	1998
Duane Banderob	M.S.	Ag. Economics	1999
Suzanne Gibbons	Ph.D.	Lg. An. Clin. Sci.	2000
Larry Judge	Ph.D.	Lg. An. Clin. Sci.	2001
David Weinstock	Ph.D.	Journalism	2002
Eric Wittenberg	M.S.	Ag. Economics	2002
Corey Risch	M.S.	Ag. Economics	2002
Christopher Byron	M.S.	Lg. An. Clin.Sci.	2002
Patricia Almeida	M.S.	Lg. An. Clin.Sci.	2003

TEACHING EXPERIENCE – Graduate Student Training

2. Committee Member (cont'd)

Student	<u>Degree</u>	<u>Discipline</u>	Completion Date
Ling Mei	M.S.	Animal Science	2003
Alda Tomo	M.S.	Ag. Economics	2009
Hilda Mejia-Abreu	Ph.D.	Ed. Administration	on 2013
Ruby Perry	Ph.D.	Ed. Administration	on 2019

3. External Examiner

Student Degree Discipline Completion Date Institution

Like Description Degree Discipline Completion Date Institution

Like Description Degree Discipline Completion Date Institution

John Deen Ph.D. Population Medicine 1993 University of Guelph

4. Post-Doctoral Research Assistants Supervised

<u>Name</u> <u>Dates</u>

Donna L. Harris 2002 to 2004

TEACHING EXPERIENCE – Courses

Dates	Course Number	Course Title, Number of Credits, Contribution
1985	AEC 837	Applied Operations Research, 4 quarter credits, 4 hours
1900	122000	lecture plus office hours
1988	AEC 995	Current Topics in Farm Management Research, 1 quarter credit, 1 hour lecture
1987 to 1995	VM 533	Veterinary Epidemiology, 3 sem. credits, 3-6 hrs. lecture
1990 to 1995	VM 544	Veterinary Public Health, 2 sem. credits, 2 hrs. lecture
1994 to 2004	VM 532	Veterinary Integrative Problem Solving III, 3 semester credits, 12 hours interactive problem solving
1994, 1996	VM 542	Veterinary Integrative Problem Solving IV, 3 semester credits, 4 hours interactive problem solving
1990 to 1994	LCS 412	Livestock Hygiene and Disease Control, 3 quarter credits, 1 hour lecture
1991 and 1992	LCS 811	Safety of Foods of Animal Origin, 4 qtr. credits, asst. course coordinator, 2 hrs. lecture, 32 hrs. lab
1991 to 1996	LCS 829	Design and Conduct of Epidemiological Studies and Clinical Trials, 3 sem. credits, 6 hours lecture
1986	LCS 642	Special Prob. Clerkship, 2 qtr. cred., course coordinator
1990	LCS 642	Special Problems Clerkship, 4 quarter credits, co- coordinated and taught one half of the course
1983 to 1985	LCS 660	Field Service/Food Animal Clerkship, 4 quarter credits, 2 days per week
1984 to 1995	LCS 660	Field Service Clerkship, 3 or 4 quarter credits, one hour lecture per offering
1990	LCS 664	Dairy Herd Health Clerkship, 3 quarter credits, co- moderated and taught one half of the course
1990 to 1995	LCS 664	Dairy Herd Health Clerkship, 3 quarter credits, 3 hours lecture per offering plus office hours
1985 to 1991	LCS 668	Swine Herd Health Clerkship, 3 quarter credits, 3 hours lecture per offering
1992 to 1995	LCS 674	Preceptorial Clerkship, 4 semester credits, course coordinator
1995 to 1999	LCS 621	Equine Practice Clerkship, 3 semester credits, course coordinator
1989 to 2007	LCS 625	Equine Herd Health Clerkship, 3 semester credits, 3 hours lecture per offering (twice per year)

TEACHING EXPERIENCE – Courses (cont'd)

<u>Dates</u>	Course Number	Course Title, Number of Credits, Contribution
1995 to 1999	LCS 631	Food Animal Practice Clerkship, 3 semester credits,
		course coordinator
1995 to 2001	LCS 633	Dairy Production Medicine Clerkship, 3 sem. credits, 9
1007 / 1000	I CC (24	hours interactive problem solving per offering
1997 to 1999	LCS 634	Swine Production Medicine Clerkship, 3 semester
1996 to 2001	LCS 637	credits, 3 hours lecture per offering Advanced Dairy Production Medicine Clerkship, 3 sem.
1990 to 2001	LCS 037	credits, 16 hours interactive problem solving
1995 to 2001	LCS 643	Food Animal Fundamentals Clerkship, 3 semester
1,7,0 10 2001	2000.0	credits, 3 hours lecture, 3 hours laboratory
1995 to 1999	LCS 677	Veterinary Preceptorship, 3 semester credits, course
		coordinator
2002 to 2007	LCS 681	Food Animal Production Medicine I, 3 semester credits,
		3 hours lecture, 3 hours laboratory
2002 to 2007	LCS 682	Food Animal Production Medicine II, 3 semester credits,
2002 + 2004	I CC (02	9 hours interactive problem solving
2002 to 2004	LCS 683	Food Animal Production Medicine III, 3 semester credits, 16 hours interactive problem solving
1999 to 2007	VM 541	Veterinary Career Development & Practice
1777 to 2007	VIVI 541	Management, 2 semester credits taught once per
		year, course coordinator
2005 to 2013	VM 690	Special Problems: Advanced Veterinary Practice
		Management Proseminar, 1 semester credit
		taught once per year, course coordinator
2005	VM 690b	Career Development and Business Skills, 3 sem. credits
• • • • • • • • • • • • • • • • • • • •	TT 5 600	once per year, 4 hours interactive workshop
2005 to 2013	VM 690	Special Problems: Independent Study in Career
		Development and Practice Management, 3 sem.
		Credits, 2 to 4 students per year

SERVICE LEARNING PROJECTS

Over the period 1999-2007, I coordinated approximately 60 public education sessions per year in the community related to veterinary medicine, conducted by veterinary students. Presentations included a wide variety of topics such as general health care (all species), dog bite safety, animal behavior, anatomy of the equine forelimb, and careers in veterinary medicine. Audiences ranged from kindergarten to high school seniors, in addition to several animal-related community organizations. The program resulted in a total of about 540 presentations.

EXHIBIT 4 TO TUSKEGEE UNIVERSITY'S MOTION FOR PRELIMINARY INJUNCTION

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA

TUSKEGEE UNIVERSITY,		
Plaintiff,		
v.	lim	Case No.:
AMERICAN VETERINARY MEDICAL ASSOCIATION,		
Defendant.		

DECLARATION OF DR. EBONY GILBREATH IN SUPPORT OF TUSKEGEE UNIVERSITY'S MOTION FOR PRELIMINARY INJUNCTION

- I, Dr. Ebony Gilbreath, depose and state the following under penalty of perjury:
- 1. I submit this Declaration in support of Tuskegee University College of Veterinary Medicine's ("Tuskegee") motion for preliminary injunction in the above captioned matter.
- 2. I am over 19 years of age, of sound mind, and am otherwise competent to make this Declaration.
 - 3. I have personal knowledge of the matters herein.
- 4. I obtained my Doctor of Veterinary Medicine degree in 2004 from Tuskegee, followed by a one-year Anatomic Pathology internship, also at Tuskegee.

I completed an Anatomic Pathology Residency in 2008 and a PhD in Pathology in 2011, both at Michigan State University. I am a Diplomate of the American College of Veterinary Pathologists.

- 5. Effective June 3, 2025, I was appointed Interim Dean of Tuskegee University's College of Veterinary Medicine, and effective October 31, 2025, I was named Dean of the college. Previously I was appointed as the Associate Dean for Academic and Student Affairs for the college after serving as Interim Associate Dean for Academic Affairs during the beginning of the spring 2023 semester. I am a board-certified veterinary anatomic pathologist who has served on the faculty at Tuskegee since 2011. I have previously served as the Assistant Dean for Pre-Clinical Programs, Department Head of Pathobiology for three years, and also served as Section Chief of Necropsy and as the Diversity and Inclusion Representative for the college.
- 6. On May 22, 2025 Tuskegee received a letter from the American Veterinary Medical Association's Council on Education ("AVMA COE") purporting to comprehensively explain its determination that Tuskegee did not achieve satisfactory compliance with the AVMA COE's Accreditation Standards ("Standards"). As a result, the AVMA COE informed Tuskegee that it intended to place Tuskegee on terminal accreditation status. The AVMA COE's decision in this

regard ignored overwhelming evidence demonstrating Tuskegee's compliance with the AVMA COE's Accreditation Standards.

- 7. When examined thoroughly and completely, the evidence Tuskegee presented to the AVMA COE shows that:
 - a. with respect to Standard 2, Tuskegee has adequate financial resources
 to timely complete new clinical facilities and to comply with all other
 accreditation requirements of the AVMA COE;
 - with respect to Standard 4, Tuskegee clinical caseloads and faculty are sufficient to meet the educational goals of the program and provide its students with the necessary instruction and clinical competencies; and
 - c. with respect to Standard 11, Tuskegee has demonstrated recent success in raising its NAVLE passage rates, such that a good cause extension is warranted under the AVMA COE's own Policies.
- 8. Tuskegee has chosen to appeal the AVMA COE's terminal accreditation decision to an internal appeals panel of the AVMA, as the AVMA COE's policies and procedures allow. While Tuskegee's substantive appeal of the AVMA COE's decision is based on a substantial number of errors, I note that in placing Tuskegee on terminal accreditation, the AVMA COE concluded that "the availability of sufficient funds for timely completion [of a new teaching hospital] remains unclear."

- 9. This conclusion ignored three separate occasions where Tuskegee provided written assurance of this unrestricted financial commitment: on March 6, 2024, from the Chair of the University's Board of Trustees; on August 21, 2024, from University President Mark A. Brown; and on April 27, 2025, from the University's Chief Financial Officer.
- 10. Further, in placing Tuskegee on terminal accreditation status, the AVMA COE reached conclusions about Tuskegee's integration of adjunct faculty into clinical education.
- 11. Tuskegee reported that I had been working strategically with clinical units to integrate both current and new adjunct faculty into the clinical teaching program. The AVMA COE simply rejected this statement despite not having conducted a site visit of Tuskegee since 2021.
- 12. On September 12, 2025, Tuskegee submitted its appellate submission to the AVMA appeals panel. Included in that submission, Tuskegee requested discovery from the AVMA COE related to the "process and procedure" used by the AVMA COE to arrive at its terminal accreditation decision.
- 13. If the AVMA appeals panel affirms the AVMA COE's decision to place Tuskegee on terminal accreditation status without affording Tuskegee due process, and the effective date of that terminal accreditation status occurs, it will cause irreparable harm to Tuskegee, including but not limited to:

- a. Significant reputational injury to Tuskegee and its alumni;
- b. Significant harm to Tuskegee's ability to recruit prospective students because, in addition to Tuskegee's reputational injury, new students would not be eligible for federal aid;
- c. Significant harm to recruitment efforts for faculty and staff;
- d. Imposition of an obligation to formulate a "teach out" plan for existing students, and inability to accept new students under any accreditation status;
- e. Significant harm to faculty and staff retention;
- f. Significant harm to existing student retention;
- g. Significant harm to research grant funding;
- h. Significant harm to alumni giving and support;
- i. Significant harm to the provision of veterinary services in Alabama to protect animal and human health; and
- j. Potential for college closure following completion of the "teach out" plan for existing students.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

This 7th day of November, 2025.

Dr. Ebony Gilbreath

EXHIBIT 5 TO TUSKEGEE UNIVERSITY'S MOTION FOR PRELIMINARY INJUNCTION

Congress of the United States

Washington, DC 20515

November 7, 2025

The Honorable Linda McMahon Secretary of Education U.S. Department of Education 400 Maryland Avenue, SW Washington, D.C. 20202

Subject: Tuskegee University College of Veterinary Medicine Accreditation Review

Dear Secretary McMahon:

Thank you for your ongoing commitment to Historically Black Colleges and Universities (HBCUs). We also appreciate the Department of Education's leadership in promoting innovation and ensuring that institutions like Tuskegee can deliver the highest quality education and transform the lives of students nationwide.

As members of Alabama's congressional delegation, we write to express concerns regarding the recent accreditation review of Tuskegee University College of Veterinary Medicine (TU-CVM) by the American Veterinary Medical Association (AVMA) Council on Education (COE). TU-CVM has been a cornerstone of veterinary education for more than 80 years, and its continued success is vital to Alabama, the nation, and the veterinary profession. Recently, the AVMA Council voted to impose terminal accreditation on the college, and Tuskegee is actively preparing for an appeal scheduled for December 5.

Tuskegee has worked to address the Council's concerns and has demonstrated measurable, significant improvements across key areas of accreditation, including:

- Positive audited financial statements for three consecutive years and careful stewardship of resources.¹
- Tuskegee University has formally committed \$18 million in institutional funds to the construction of a new 57,000-square-foot Small Animal Teaching Hospital, a debt-free capital project demonstrating prudent financial management and strategic investment in academic excellence.²
- A 21% increase in clinical caseload since 2021 and expanded faculty hiring to strengthen student training.³

¹ Supported by three consecutive years of positive audited financial statements (FY2022–FY2024) prepared by Warren Averett, LLC, confirming the University's fiscal stability and capacity to undertake major capital projects without incurring debt.

² Tuskegee University Press Release, "<u>Tuskegee University breaks ground on \$18 million investment for a small animal teaching hospital</u>," issued September 19, 2025, announcing the University's \$18 million commitment and the project's role in advancing veterinary education and clinical capacity.

³ The total clinical caseload for 2021 was 7,392 as reported to the AVMA COE in the 2021 self study, including the correction of case numbers reported on November 15, 2024. The total clinical case load for fiscal year 2023-2024 was 8,944, as submitted in our September 12, 2025 appeal, demonstrating a 21% increase in case numbers since the 2021 site visit.

 NAVLE pass rates improved from 51% to 72% in the most recent cycle, reflecting targeted academic support.⁴

Beyond these technical achievements, TU-CVM plays an irreplaceable role in advancing access and opportunity in veterinary medicine. Founded in 1945 by Dr. Frederick Douglass Patterson, TU-CVM opened doors for African Americans with a passion for veterinary medicine. Since then, the college has educated approximately 70% of the nation's African American veterinarians, many from economically challenged backgrounds. Today, TU-CVM boasts the most diverse student body among all U.S. colleges of veterinary medicine.

Located in Alabama's Black Belt region, TU-CVM serves rural and underserved communities while embracing the "One Health" approach through programs in veterinary medicine, public health, and biosciences. At a time when the USDA has identified 243 rural veterinary shortage areas in 46 states – the highest number ever recorded – Tuskegee's contributions to workforce development are more critical than ever. Nationally, this comes at a time when the nation is experiencing a critical shortage of veterinarians, especially in rural areas, and an incursion of infectious diseases threatening the financial vitality of poultry and livestock industries.

Tuskegee University has approached this accreditation review with transparency and a strong commitment to improvement, yet the process to date has raised serious concerns on our end. The accrediting body limited Tuskegee to only two hours to present its case and prohibited discovery of documents or witnesses – restrictions that conflict with its own established procedures. These constraints have prevented the university from fully demonstrating the substantial progress it has made in financial stability, clinical training, and student outcomes. Such limitations undermine the principles of due process and create an uneven playing field for an institution that has served the veterinary profession for more than 80 years.

Given this history and progress, we respectfully request that the Department of Education consider the following:

- 1. Encourage the accreditor to provide a fair and thorough review process that allows Tuskegee to present its case fully.
- 2. Support a good-cause extension to permit an additional NAVLE testing cycle, consistent with COE policy for institutions demonstrating improvement.

The Tuskegee University College of Veterinary Medicine has long been a leader in education, innovation, and service. Ensuring a fair process will help preserve an institution that strengthens our veterinary workforce in Alabama and nationwide.

We appreciate your time and attention this matter and look forward to hearing from you on this end.

⁴ NAVLE pass rates are reported by the International Council for Veterinary Assessment (ICVA), which delivers the North American Veterinarian Licensing Exam (NAVLE).

Sincerely,

Senator Katie Boyd Britt

Senator Tommy Tuberville

Representative Shomari C. Figures

Representative Terri Sewell

Representative Mike Rogers

CC:

- David Barker, Incoming Assistant Secretary for Postsecondary Education
- Christopher McCaghren, Acting Secretary for Postsecondary Education
- Elizabeth Daggett, Accreditation Group, Office of Postsecondary Education
- Mary Christina Riley, Senior Advisor, Office of the Secretary and Deputy Secretary

EXHIBIT 6 TO TUSKEGEE UNIVERSITY'S MOTION FOR PRELIMINARY INJUNCTION

OFFICE OF THE GOVERNOR

KAY IVEY GOVERNOR



STATE CAPITOL MONTGOMERY, ALABAMA 36130

(334) 242-7100 FAX: (334) 242-3282

STATE OF ALABAMA

October 31, 2025

The Honorable Linda McMahon Secretary of Education U.S. Department of Education 400 Maryland Avenue, SW Washington, D.C. 20202

Dear Secretary McMahon:

Please accept this letter as a statement of my support for the Tuskegee University College of Veterinary Medicine (TU-CVM) and its efforts to maintain its accreditation status with the American Veterinary Medical Association (AVMA) Council on Education (COE). The AVMA Council recently voted to impose terminal accreditation on the college, and Tuskegee is actively preparing for an appeal, which is scheduled for December 5.

For more than 80 years, TU-CVM has advanced animal health, agricultural innovation, and educational opportunity. In recent years, it is my understanding that TU-CVM has made significant and measurable improvements across critical areas of accreditation, including:

- Positive audited financial statements for three consecutive years and careful stewardship of resources;
- Groundbreaking of a new 57,000-square-foot Small Animal Teaching Hospital—an \$18 million debt-free project—that will expand clinical capabilities with advanced diagnostic suites, modern surgical operating rooms, and intensive care units;
- A 21 percent increase in clinical caseload since 2021 and expanded faculty hiring to strengthen student training; and
- Improved NAVLE pass rates from 51% to 72% during the most recent cycle, reflecting targeted academic support.

Beyond these achievements, TU-CVM represents an enduring legacy of opportunity and leadership in veterinary medicine. Since its founding in 1945 by Dr. Frederick Douglass Patterson, the college has trained approximately 70 percent of the nation's African American veterinarians. Its diverse and service-oriented student body continues to strengthen the veterinary workforce, particularly in rural and underserved areas across Alabama and the United States.

Secretary Linda McMahon October 31, 2025 Page 2

Located in Alabama's Black Belt region, TU-CVM serves rural and underserved communities while embracing the "One Health" approach through programs in veterinary medicine, public health, and biosciences. At a time when the USDA has identified 243 rural veterinary shortage areas in 46 states—the highest number ever recorded—Tuskegee's contributions to workforce development are more critical than ever.

Tuskegee reports that the accreditation review process may have imposed limitations that prevented it from fully presenting the breadth of its progress. To this end, I respectfully request the U.S. Department of Education consider:

- Encouraging the accreditor to provide a fair and thorough review process that allows Tuskegee to fully present its case; and
- Supporting a good-cause extension to allow an additional NAVLE testing cycle, consistent with COE policy for institutions demonstrating improvement.

Thank you for your full consideration of this request and for your continued commitment to improving American education.

Sincerely

Kay Ivey
Governor