**Responses to Public Comments**

**Accreditation Standards for Animal Science Programs**

**Spring 2020**

**Responder Demographics**

The Accreditation Standards for Animal Science Programs were sent to the ASAS membership for review and commentary. In total, 14 people sent responses. Two of the respondents stated that they represented departments, University of Florida and Texas A and M. Another of the remaining 12 responders was also from University of Florida and reiterated the submitted departmental responses. Two additional responders from Texas A and M disagreed with the departmental statement (1 submitted an email stating that they were in complete disagreement with the response that was distributed to the faculty and was sent to ASAS and the other submitted positive commentary within the system). The Texas A and M and University of Florida “Departmental Responses” were negative.

In terms of individual responses, we received 5 responses that were negative on all aspects of the standards and the program, 5 responses that were incredibly positive about the effort and 4 responders that did not seem to slant negative or positive, but rather just provided insight into changes needed within the document or structure.

The committee incorporated all appropriate grammatical changes and have discussed any and all programmatic discussions. Below are specific answers to questions. Please note any person that submitted could ask multiple questions, make multiple comments and make multiple corrections. In many cases, the committee fielded multiples of the same question or comment and therefore grouped responses. Additionally, individuals that view the program positively tended to have significantly fewer questions, concerns and comments.

**Why not use ARPAS to accredit animal science programs?**

ARPAS certifies animal science professionals and that is an entirely different program than accreditation. The main difference being – ARPAS certifies an individual. Accreditation – accredits a program and has no evaluation of individuals. Additionally, ARPAS has been asked if they would like to create and administer an Animal Science Accreditation program, they declined.

**What gives ASAS provision to accredit college and University programs?**

Of the five core principles, which define why ASAS exists and have long guided the society, two (numbers four and five) address the importance of contributing to a sound future of the animal science profession and discipline. Core Principle #4: “Career development for animal scientists, educators and producers is essential to the viability of the allied and animal industries.” Core Principle #5: Animal science and the production of animal-sourced foods must continually evolve to meet the needs and values of society.” Career development and evolution to meet future needs are exactly what accreditation is addressing and providing. ASAS is following a successful model used by numerous scientific societies in leading accreditation efforts for their disciplines. Examples of professional societies leading accreditation programs include but are not limited to disciplines of range management, forestry and landscape architecture.

 **Why Bachelor of Science vs Baccalaureate degrees?**

A strong science background is essential for an accredited animal science program and therefore, a Bachelor of Science degree is appropriate.

**What about combined programs like Animal and Veterinary Science, or Animal and Poultry Science? What about Departments of Agriculture where majors can be Animal Science, Horticulture, Soil Science, etc?**

What is being accredited is the degree. Accreditation does not accredit departments or institutions. The determining factor of accreditation, is whether or not the Accreditation Standards are met by the applying administrative unit. If Standards are met, the program can be accredited. For example, a Department of Animal and Food Science could be accredited as along as the Animal Science Standards are met regardless of the name of the department. A Department of Agriculture that offers a BS degree could have the Animal Science Program accredited (as long as Standards are met) and have no impact on other majors.

**I would like to see a statement added that programs that meet the standards are recognized as accredited programs.**

Standard 1 section on Program Disclosure addresses this. Additionally, a website will be maintained for the Animal Science Council on Accreditation that identifies accredited programs and actions by the Council. Public disclosure is a required and important component of accreditation.

**Add degrees in dairy, poultry, equine and others.**

It would not be appropriate for an Animal Science Accreditation program to define standards and requirements for other programs.

**Regarding Standard 2 addressing: Program governance, administration and institutional support – you are telling universities how they have to administer their resources. Discussion of funding is outside the scope of accreditation.**

The Standards identify that support and leadership are essential for an accredited program. It is the institution’s decision whether or not to support the program as described. Without funding, there cannot be successful animal science programs. Accreditation is a voluntary program.

**It is stated (line 61) that to be eligible for accreditation, the institution must be accredited by a regional commission on accreditation. Who will make up and why regional?**

Regional accreditation is in place in the US and most colleges and universities are already engaged in that process.

**It would be helpful if the document defined how often programs would be reviewed, process for reviews and membership of review teams. Who will make up the Council on Accreditation?**

The Standards of Accreditation are to identify the required elements of the program only and are expected to be given to the proposed Animal Science Council on Accreditation as the agreed upon criteria for accreditation. Once seated, the Council will approve application procedures, review processes, Council membership, Council operation, etc. Some of these issues have been discussed preliminarily by the accreditation committee (which is different from the proposed Council) and suggestions forwarded to the ASAS Board of Directors. Once the Council is seated, it is expected they will finalize the operations of the Council. It is proposed to have a 7 year accreditation period. It has also been proposed that the Council will consist of animal science professionals from academia, industry, government and an unaffiliated lay person.

**Need heading on Critical Thinking in Standard 3 – Student section.**

Critical thinking is addressed in Standard 4 – Program Learning Outcomes.

**How would you handle curriculum requirements/courses or PLO’s that are not taught within our department?**

The requirement is not that courses, or specific content is delivered from within the department. Even though all disciplines may not be covered in a specific animal science department a plan for training students to integrate knowledge of those disciplines is required. Again, how it is accomplished is up to the individual program. Syllabi are useful in demonstrating content in courses taught both inside and outside the department.

**Learning outcomes in addition to those already existing in federally accredited programs is burdensome. Imposition of additional educational requirements is burdensome. Animal science programs should be allowed to be differentiated.**

Accreditation is a voluntary program. There is considerable latitude provided for programs. Innovative and novel programs are encouraged. Accreditation standards are not written to be prescriptive in their requirements but rather encourage programs to employ novel, innovative and evolving methods and processes to accomplish the required standards. The proposed standards identify key required elements of an accredited program but do NOT identify how those elements might be accomplished. It is by intent that the WHAT of the requirements are defined but the HOW is determined by the institution/Department applying for accreditation**.** Accreditation is not designed to make all programs look alike, teach alike, serve the same student demographics or serve the same student professional aspirations. Uniqueness of individual programs is expected and encouraged.

**What is digital efficiency?**

Using digital technology in effective operations with little or no waste of time or materials.

**Interested that industry stakeholders are required to have input in curriculum.**

Programmatic accreditation relies on an active engagement and participation by partners in the accreditation process. This is necessary to ensure that the next generation of animal scientists are well prepared and trained. Input by industry professionals provides essential and timely insight into the ever changing arena in which animal scientists work. Incorporation and application of new technologies, discoveries and regulations must be considered as the field continues to evolve

**Disciplinary Diversity – Insisting departments support faculty in all disciplines is wasteful. My department does not have faculty in meat science – does that mean we could not be accredited? Documentation of how this (subject matter) is achieved by a program should be sufficient.**

There is no requirement that faculty representing all disciplines have to be based in home department. Most departments will have teaching faculty outside their department or program administration home. Your comment: Documentation of how this is achieved is exactly what is asked for. Accreditation standards are not written to be prescriptive in their requirements but rather encourage programs to employ novel, innovative and evolving methods and processes to accomplish the required standards. The proposed standards identify key required elements of an accredited program but do NOT identify how those elements might be accomplished. It is by intent that the WHAT of the requirements are defined but the HOW is determined by the institution/Department applying for accreditation. Accreditation is not designed to make all programs look alike, teach alike, serve the same student demographics or serve the same student professional aspirations.

**Scholarly activity of faculty is required. Not sure how this would be received by faculty at non-research institutions.**

No expectation of research scholarship. Scholarly activity can take many forms other than research and pedagogy is an important scholarly activity.

**Requirement for internet at livestock and laboratory facilities - that is not practical nor required for functionality. Quite a stretch, why is it even needed? What does this have to do with learning?**

Internet access for record and data collection, transmission of production records, communications, etc. is an expectation of progressive production and laboratory facilities. This is an essential requirement for training and preparing skilled professionals.

**Institutional alumni engagement. Programs will have various constraints to do what is suggested and encouraged to do what they can.**

Agreed and that is why stated as “should” and not “shall”.

General and/or Grouped Comments:

**Comments that terminology is too vague in many places; change “variation in” to “specific”; adequate; sufficient; appropriate; efficient. Not clear what is required and who is making the decisions. Standards don’t define acceptable thresholds. How do you assess “understanding”?**

Programs offering four year Bachelor of Science degrees in animal science vary significantly in size, scope, geographic location and focus. Individuality of programs is encouraged with the proposed accreditation program. Accreditation standards are not written to be prescriptive in their requirements but rather encourage programs to employ novel, innovative and evolving methods and processes to accomplish the required standards. **The proposed standards identify key required elements of an accredited program but do NOT identify how those elements might be accomplished. It is by intent that the WHAT of the requirements are defined but the HOW is determined by the institution/Department applying for accreditation.** Accreditation is not designed to make all programs look alike, teach alike, serve the same student demographics or serve the same student professional aspirations. Large enrollment programs will manage courses and course offerings differently than those with smaller enrollments. Programs training mainly preprofessional students (Graduate School, Veterinary School) will differ from those with most students intending to seek industry or production careers immediately upon graduation. Programs will vary in how they provide students with animal experiences and other experiential learning options.

Individuality and uniqueness of programs is expected and encouraged. While the standards identify key elements that all programs must possess and it is up to the program administration to show how those requirements are met. The success of a program meeting those standards is evaluated by the visiting review team and self-study documentation.

**Credentialing faculty. Our department already does it and this could conflict with existing practices. Requires too much paperwork to document disciplinary training. Another set of standards impacting scholarly activity. Why require certain percentages of faculty have certain degrees? How are DVM’s classified. I think you are getting paranoid and should not be credentialing faculty – judge them on experience, effectiveness and expertise.**

By definition credential means warranting of credit or confidence. The institution’s program administration is being asked and given the latitude to do and judge for themselves that they have confidence in the expertise of those teaching the courses, that faculty are in sufficient numbers and if you are delivering a program in animal science that the majority responsible for the curriculum are in the home program. Accreditation asks that the institution’s program administration document that the personnel teaching in their program have educational degrees and expertise to deliver. Faculty qualifications is already a part of most regional accreditations and can provide already collected data for much of the information requested for Animal Science accreditation.

**I do not support this proposal for accreditation of animal science programs. Well accredited programs are already well known and therefore this seems to be an unnecessary additional burden on departments.**

There are no accredited animal science programs. Many/most institutions are regionally accredited. This is a voluntary option for those who see value in it.

**Before finalizing the document, a proofreader and style editor should make sure spacing, comma style, and formatting of each section is consistent throughout the document.**

Agreed. That will be done and additional editing and formatting completed.

**I have no specific comment on the content of the proposed document. I am concerned, however, with the concept of ASAS taking on the responsibility of program evaluation and accreditation. This topic was discussed recently at a meeting of Department Heads/Chairs from across the country. There were a lot of questions regarding the value of this effort and many concerns about implementation and impact. Clearly, there has been some support which has fostered the effort to this point. Larger input through our membership is needed through a broad effort to inform members at each sectional meeting and the annual meeting. Although there may be a general feeling that this topic has been adequately communicated, simple discussion with members illustrates that this is not the case. Ultimately, accreditation needs to include support from our dairy and poultry partners. At the very least, a vote of the membership should be sought. I understand that there is little interest in a membership vote, but I hope the Board recognizes the value this can bring to the process.**

Accreditation efforts began in 2014. There have been multiple sessions (3 town halls) held at the annual meeting, several Taking Stock Articles, and other wide spread announcements to the membership. Additionally, the recent presentation at the Department Heads meeting was the 4th presentation at a Department Heads meeting. The membership nominates and votes for the ASAS Board of Directors. The membership also votes to approve the ASAS Strategic Plan which governs the programmatic movements of the membership appointed board. To move forward with any program is the purview of the Board following membership input. At this point, the ASAS Board has sought multiple points of input over several years.

**We appreciate the time and effort put into development of the proposed accreditation document, but feel that accreditation is not supported by our department.**

We understand. This is a program that will work for some departments and not for others and as such is completely voluntary. **Faculty in our department do not believe that accreditation is necessary and are especially concerned with the unnecessary administrative burden with little benefit to students.**

**I am not supportive of this effort by ASAS. I think that federal accreditation processes required of all degree granting institution in the US are more than adequate to protect students from predatory practices. Adding an additional accreditation process is of no benefit to students or departments. It increases the compliance burden of departments which is already too high.**

There is no question that there is effort and resources involved to assemble the documentation required. Much of the information and data requested is already collected for other purposes such as assessment and periodic program reviews. Additionally, there is no federal animal science accreditation effort. But understanding that this will work for some but not all programs, the program will be voluntary.

 **A primary concern of a large department with a robust tier 1 research program and functional animal science degree may now be viewed as equal to smaller programs that may not provide the depth of a program provided by our faculty.**

Accreditation does not rank programs but rather provides confidence that students have received training in a program that meets defined standards.

 **Our department is not simply represented by faculty that have ASAS as their primary scientific society. We have faculty that represent other societies (i.e., ADSA, SSR etc.) and feel strongly that these groups need to be engaged in the process before faculty will support accreditation of the curriculum.**

As it is inappropriate for Animal Science to define Standards of accreditation for other societies and disciplines (like dairy, poultry, physiology) it would be inappropriate for other societies or disciplines to define Standards for the Animal Science discipline. Multidiciplinary training is essential in most degree programs, but the Standards for accreditation should be defined by Animal Science professionals.

**Our department strongly believes that before accreditation is considered that a vote among all members should be considered.**

The membership nominates and votes for the ASAS Board of Directors. The membership also votes to approve the ASAS Strategic Plan which governs the programmatic movements of the membership appointed board. To move forward with any program is the purview of the Board following membership input. At this point, the ASAS Board has sought multiple points of input over several years.

  **This effort seems to be seeking to solve a problem that doesn't exist. Perhaps in 2014, at the height of the emergence of new online programs, there was worry over a threat to animal science degrees, but this did not come to be.**

Many disagree with this statement. Many believe it is past due. Others believe it is going to soon be required as federal accountability of higher education increases. If it is not done by animal science – it will be done for animal science by others less invested in the profession. There are increasing numbers of organizations accrediting programs including some associated with animal science. Examples of professional societies leading accreditation programs include but are not limited to disciplines of range management, forestry and landscape architecture. As the pressure for accreditation grows from a range of related organizations, ASAS is the logical entity to administer and provide leadership to develop and implement an accreditation process based on standards widely accepted and supported by its membership.

 **What evidence is there that students are falling prey to "fake" animal science programs in 2020? What evidence is there that animal science employers are unable to find qualified graduates in 2020? Is ASAS alleging that some animal science departments are not "worthy of the name"? What right does ASAS have to make such a designation?**

The Animal Science Accreditation program nor any other programmatic accreditation are about “fake” programs, or identifying “unworthy” programs. It is a tool as described below.

With increasing expectations of accountability in higher education, accreditation provides a valued opportunity to verify program quality and capacity for training students who are prepared to enter diverse professional positions upon graduation or continue their education in professional degree programs.

Programmatic accreditation in the US is a non-governmental process where programs voluntarily undergo a periodic comprehensive review that determines a program’s success in meeting defined professional standards. Accredited Animal Science programs can document third party peer review and evaluation of educational quality and accountability of a program in meeting essential standards identified and approved by animal science professionals from academia and industry.

 **My comments below are intended to point out the burdensome and needless nature of these proposed standards. Frankly, nothing can be done to improve them as this is a misguided effort.**

No committee response

**I think the document outlines a nice summary of what training students in animal science should look like and I think it is good that ASAS was and will be involved in helping shape the guidelines for accreditation. I do worry some about ASAS actually conducting / managing the accreditation process / procedures when that time comes. Having been on several of these when we had mandatory CEEES reviews it is a big undertaking; requires a considerable amount of resources; and even when handled professionally and honestly often creates friction between the accreditors and the accreditees. The best case scenario, in my opinion, would be for ASAS to continue to serve as the subject matter experts, so to speak, but try to have a third party actually manage the accreditation process, etc.**

As proposed and following the model used in other disciplines where accreditation is under the auspices of a professional society, the proposed Animal Science Council on Accreditation (ASCoA) will become an autonomous working group within ASAS.

The ASCoA would be established by the ASAS Board of Directors and be incorporated into the ASAS Bylaws as an autonomous working group with the responsibility to conduct accreditation actions of Bachelor of Science degree programs in animal science. This structure allows the Council to operate separate from the Board of Directors in all decisions of the Council.

**Well done and about time! Will be delighted to help with this.**

No committee response

`

**Comment: My understanding is that AVMA plans to accredit animal science programs and that this action is in part responsible for ASAS concern. If so, the ASAS Board should work with AVMA to avoid their attempts to overreach.**

Suggestions that this is the case but has not been confirmed to date.

**I appreciate the work of the Accreditation Committee and hope you find my comments useful. BTW, is the Accreditation Committee different from or synonymous with the Council on Accreditation referenced in the document?**

The committee that drafted the proposed standards is an ad hoc committee of ASAS established several years ago. It is different than the Animal Science Council on Accreditation, which must be formally established by the Animal Science Board of Directors and then is proposed to operate autonomously from the ASAS BOD for Accreditation decisions and operations.