

ECFVG® FAQ

1. *I am a foreign veterinary graduate. I wish to work as a veterinarian in the United States. How can I acquire a veterinary license to practice the profession?*

Practice of veterinary medicine in the United States requires licensure. The educational prerequisite for veterinary licensure in most states and for certain federal positions includes graduation from a veterinary school accredited by the American Veterinary Medical Association Council on Education (AVMA COE®).

Graduates of foreign schools not accredited by the AVMA COE® are required to demonstrate that they have received an education equivalent to that of an AVMA COE®- accredited school before they can take a licensing exam. The certificate offered by the Educational Commission for Foreign Veterinary Graduates® (ECFVG®) is accepted by all state veterinary regulatory boards and the federal government as meeting the educational prerequisite for licensure or certain types of employment, respectively.

2. *What is an educational equivalency assessment certification program?*

Educational equivalency assessment certification programs determine whether foreign veterinary graduates have veterinary clinical skills and knowledge that are equivalent to those attained by an entry-level graduate of an AVMA COE®-accredited veterinary school.

3. *Is the educational equivalency assessment program not the same as licensing?*

The educational equivalency programs are not the same as licensing agencies. The educational equivalency programs are prerequisites that must be completed by graduates of foreign veterinary schools to become eligible to take a licensure examination.

4. *If they are not the same, why should I go through a certification program? What are the benefits to me?*

The educational equivalency certification programs such as the one offered by the ECFVG® are designed to help state veterinary licensing boards identify graduates of foreign veterinary colleges/schools who have an education comparable to that of graduates of AVMA COE®- accredited veterinary colleges/schools.

5. *What are my options if I do not wish to go through the ECFVG® certification program?*

Option one: is to repeat veterinary school in the United States. Please see here for more information on veterinary education in the United States (<https://www.avma.org/public/Careers/Pages/vet-school-admission-101.aspx>).

Option two: is to consider a career that does not require licensure. For example, many

positions in research or in industry are suitable and fruitful for veterinarians and do not require a license to practice veterinary medicine.

Option three: is to enroll in PAVE®. More on PAVE below.

6. *It seems there are two veterinary certification programs. What is ECFVG®? What is PAVE®? How are they different from one another? How do I know which is right for me?*

The certification program offered by the ECFVG®, an independent Commission within the AVMA, has 4 steps (For more information, see here:

<https://www.avma.org/professionaldevelopment/education/foreign/pages/ecfvg-pp-steps.aspx>).

The certification program offered by the American Association of Veterinary State Boards (AAVSB) is the Program for Assessment of Veterinary Education Equivalence (PAVE®). It too has 4 evaluative steps. (For more information, see here: <http://www.aavsb.org/PAVE/>).

While the 3rd step in the ECFVG program is the Basic and Clinical Sciences Examination ([BCSE](#)), PAVE uses the [Qualifying Science Examination \(QSE\)](#). The BCSE is offered throughout the year on a continuous testing basis. For Step 4 in the ECFVG program, candidates will take the [Clinical Proficiency Exam \(CPE\)](#). There is no option of an Evaluated Clinical Year (ECY). In PAVE, candidates have to complete an Evaluated Clinical Experience (ECE) in order to fulfill Step 4 of the program.

The ECFVG® certification is accepted by all state veterinary regulatory boards and the federal government as meeting the educational prerequisite for licensure or certain types of employment, respectively. The ECFVG certification is also accepted by Canada, Australia and New Zealand. As of April 1, 2020, the PAVE® certification is recognized by 40+ states in the United States and three countries, Australia, Canada, and New Zealand.

7. *Why and how is the ECFVG® charged with the mandate of assessing the educational equivalence or practice readiness of foreign veterinary graduates?*

The AVMA ECFVG® certification program was initiated more than 40 years ago at the request of state veterinary regulatory boards and others to provide assistance in assessing whether graduates of foreign veterinary schools not accredited by the AVMA COE® meet the educational prerequisite for licensure or other types of employment.

Since its inception, the ECFVG® has served the state boards, foreign-trained veterinarians, the profession, and the public well by awarding more than 6,691 certificates.

8. *How and in what ways are candidates' fees spent?*

Candidates' registration and reregistration fees go towards payment of costs related to

offering, maintaining and running the ECFVG® program. Quality Assurance program (QAP) funds are spent on developing and refining the exams and maintaining exam security. Other than the administrative fee, the entire CPE application fee goes to the CPE site at which the candidate is being examined.

9. *Which countries do ECFVG® certificate holders come from?*

ECFVG® certificate holders come from over 90 countries around the world, including veterinarians from the United States who studied at a foreign veterinary school not accredited by the AVMA COE®.

10. *Who is considered a foreign veterinary graduate? If my school is not currently included in your list, does it mean I am not eligible to register for the ECFVG®?*

All graduates (as well as final year students) from [AVMA ECFVG®-listed veterinary colleges](#) are eligible to register for the ECFVG®. If a veterinary college is not AVMA ECFVG®-listed, you can contact Vicky Wragg. The AVMA ECFVG does not represent this to be a comprehensive list of all veterinary schools in the world. The AVMA ECFVG®-listed Veterinary Schools of The World includes all schools that were listed by the World Health Organization in its 1991 World Veterinary Directory and in the 1983 Pan American Health Organization publication, Diagnosis of Animal Health in the Americas. The list also includes additional schools that have come to the attention of the ECFVG for reasons related to the ECFVG certification program. Such schools are listed here only after correspondence with the national government ensures that the school is officially recognized by that government as a professional school of veterinary medicine and its graduates are qualified to practice veterinary medicine within that country without any restrictions. The AVMA ECFVG®-listed veterinary colleges are not accredited by the AVMA COE®.

11. *Do I have to be a US citizen or Canadian citizen (or a new immigrant to US or Canada) in order to register for the ECFVG® certification program?*

You do not have to be a citizen or permanent resident of the United States or Canada to register in the ECFVG® program. Those on non-immigrant work visas, student visas, and exchange visas are eligible to register. The program is not restricted by geography, either. Anyone living and working outside the United States and Canada hoping to attain a certificate for personal or professional reasons is also welcome to register in the ECFVG. The Australasian Veterinary Boards Council Inc provides the ECFVG certificate holder the eligibility to apply for registration as a veterinary surgeon in Australia and New Zealand without further examination.

However, please note that **the ECFVG® does not apply or advocate for a United States visa on behalf of anyone.** All visa formalities must be fulfilled by the candidate.

12. *How do I apply and register for the ECFVG® certification program? What are the costs*

involved?

To register in the ECFVG® certification program, you must complete the [online application](#), submit all necessary proof of graduation documents and, as of January 2015, submit a payment totaling \$1,400.00 USD; (\$675.00 ECFVG Operating Costs; \$725.00 ECFVG Quality Assurance Program fee). For the most recent fee structure and a complete list of documents, please refer to the information online at <https://www.avma.org/ProfessionalDevelopment/Education/Foreign/Pages/ECFVG-pp-steps.aspx>

13. Why does registration cost so much? Why does the Step 4 exam (the CPE) cost so much?

All candidate fees go towards meeting the cost of running and maintaining the certification program and toward the cost of preparing and maintaining the high quality of both our examinations, the BCSE and the CPE.

Other than the administrative fee, the entire CPE application fee goes to the examination site to cover the expenses associated with the administration of the CPE. These expenses include exam personnel (examiners, technicians, coordinators, personnel for animal care), animal patients, materials, and space. Some sites temporarily halt their day-to-day clinical and service activities in order to run the CPE.

14. What kind of profit is made by the ECFVG® and the AVMA as a result of administering the certification program?

The idea that the certification program generates profit for the ECFVG® and the AVMA is a misconception. Neither the ECFVG nor the AVMA make money from the ECFVG® certification program. The ECFVG is a body of volunteer members who donate considerable amount of time and effort to fulfill the Commission's mission of a fair and unbiased administration of the program. The AVMA, a non-profit organization, provides staff support and has incurred most of the overhead costs involved in running a program of such scope and magnitude.

15. How long does it take to complete the ECFVG® certification program?

It is up to individual candidates to determine the time they require to complete the program – the more clinical or practice experience a candidate has, the more likely they are to complete the program quickly. The best prepared candidates can finish the 4 steps of the program in as short as 4 – 6 months, conditional on CPE availability. However, about half of our candidates complete the program in 2 to 2.5 years.

16. Do I have unlimited time to complete the ECFVG® program?

Candidates enrolled in the ECFVG® program on or after January 1, 2015, will be required to complete Step 3 and Step 4 requirements within seven (7) years of completing Step 2

requirements, in order to successfully complete certification requirements. That is, candidates who do not complete certification requirements within the stipulated seven-year period will be required to submit valid scores from English language proficiency exams and successfully complete the BCSE **again** prior to becoming eligible for the CPE again.

For more information, please visit the website at <https://www.avma.org/education/foreign/time-between-ecfvfg-certification-program-steps>.

17. Why do candidates need to retake Steps 2, 3 and 4 if they have not completed the certification program within the seven (7) years of completing Step 2, English language requirement?

The ECFVG certificate is awarded based upon the candidates' having demonstrated knowledge and skills meeting contemporary standards and expectations, not standards and expectations that are several years old. Veterinary medicine evolves constantly; we update the test(s) on a yearly basis to make sure that they reflect current standards.

18. How long does it take to complete Step 1? What does it entail? What can I do to speed up the process?

The ECFVG® will verify all applicants' educational credentials by directly contacting the veterinary school that the candidate graduated from. This may take anywhere from 2 weeks to 2 months. Much of the variation in time is dependent on the schools' ability to respond to our verification process in a timely manner. If you have contacts in the school or surrounding areas who can request the school authorities to respond in a timely manner, it can help speed up the process. Applicants do not need to wait for Step 1 to be completed and may proceed with Steps 2 and 3 of the certification program while verification is being obtained. However, Step 1 will not be considered completed until such verification is obtained, and applicants are not eligible to apply for Step 4 of the certification program (the CPE) until Steps 1, 2, and 3 are completed.

19. I am enrolled into the Canadian Veterinary Medical Association (CVMA) National Examining Board (NEB) program. Can I transfer my degree documents (diploma, transcripts, college verification) from the NEB to the ECFVG®?

The ECFVG® conducts a Step 1 verification process independent of the NEB. The ECFVG applicants cannot transfer their degree documents (diploma, transcripts, college verification) from the NEB to the ECFVG. For step 2, English requirement, the ECFVG requires that scores are directly sent from ETS, IELTS™ and CAEL for fulfilling Step 2 requirement. However, BCSE and CPE scores may be transferred between the two programs.

20. What do I have to submit to fulfill Step 2 of the ECFVG® certification program?

To complete Step 2, candidates must provide the ECFVG® with proof of English language

proficiency by meeting the pass points established by the ECFVG on one of the following assessment tools: the internet-based TOEFL (TOEFL iBT®), the IELTS™, or the CAEL Assessment. More specific information can be found here:

<https://www.avma.org/education/foreign/steps-ecfv-certification-program#step2>

21. *Why are TOEFL iBT®, IELTS™, and CAEL scores valid only for 2 years after the date of the tests for Step 2 (English language requirement) completion?*

TOEFL iBT®, IELTS™, and CAEL scores are valid only for 2 years after the date of the tests for Step 2 completion. This policy is based upon recommendations from the organizations administering the English language proficiency exams.

22. *Can I get a waiver for Step 2, English requirement if:*

- a. I am a naturalized American citizen?
- b. I did my graduate school in the United States?
- c. I completed high school in a country with English as official language?

None of the above. The only candidates who can get a waiver for Step 2 are candidates completing secondary school in the United States, United Kingdom (England, Wales, Scotland, and Northern Ireland), Australia, New Zealand, or Canada (except Quebec).

Such candidates who are eligible for waiver must provide documentation of at least three years full-time attendance at a secondary (high) school located in one of the above countries at which the complete language of instruction was English. Acceptable documentation includes a letter directly from school officials stating dates of attendance (month and year of both initial and final dates of attendance are required) and verifying that the complete language of instruction was English or, for graduates of US high schools only, a certified, notarized, or official copy of the final transcript. A degree from an English-speaking college or university is not considered adequate proof of English language ability. A certificate of English-language courses is not considered adequate proof of English language ability.

23. *Can I have the NEB transfer my English language scores to the ECFVG®?*

The ECFVG® requires original score reports directly from ETS or other English-language testing agencies. Candidates cannot have the NEB transfer their English language scores to the ECFVG®.

24. *What is the BCSE? How is it different from NAVLE? Will I have to do both exams?*

The BCSE fulfills Step 3 requirement for the educational equivalency certification program. The North American Veterinary Licensing Examination (NAVLE) is a requirement for licensure to practice veterinary medicine in all licensing jurisdictions in the United States and Canada. ECFVG candidates will become eligible to take the NAVLE only after passing the BCSE.

25. I completed the NBE and NBE/CCT several years ago. Do I still have to do the BCSE?

As of November 2013, a new ECFVG® policy came into effect and, according to this policy, all candidates who enroll in the ECFVG® program on or after January 1, 2014, will have to pass the BCSE in order to fulfill Step 3 requirements. Passing scores from NBE and NBE/CCT will no longer be accepted as fulfilling Step 3 requirements for those enrolled in the program on or after January 1, 2014.

26. How is the BCSE structured? What study materials are available to prepare for the BCSE? Are there any tutorials?

Click [here to access information](#) about the content and structure of the BCSE along with information on the references and practice test.

27. How difficult is it to pass the BCSE? Can you tell a little bit more about how to prepare for the exam? What are the passing scores and how are they determined? Is there a limit on the number of times I can take the BCSE?

The BCSE tests for entry-level knowledge of a recent graduate of an AVMA COE®- accredited veterinary college. The overall pass rate of all BCSE takers is about 45%, but this includes first-time exam takers (whose pass rate is typically higher) as well as all those who retake the exam two or more times. The level of preparation of individual candidates also plays a role. The pass point of the BCSE examination is criterion-referenced. That means that the test is developed to assess whether candidate's knowledge meets the minimum expectation of a graduate from an AVMA COE-accredited veterinary school. Therefore, candidates are not graded on a curve or in relation to other candidates. The test is not designed to pass or fail a predetermined number of candidates. In fact, 100% of candidates could pass any given test administration if all of the candidates were well-prepared for this examination designed to test minimum knowledge related to veterinary medicine and as taught in AVMA COE-accredited veterinary schools. Being familiar with the curricular content at AVMA COE-accredited veterinary schools will benefit all candidates.

At present, there is no limit on the number of times a candidate can take the BCSE, although no candidate may take the BCSE more than three times in a calendar year. All candidates who fail the BCSE are required to wait about four months (or about 120 days) between BCSE attempts (i.e., from date of previous BCSE attempt) in order to apply for a BCSE retake.

28. I want to take the NAVLE during the next testing window, how do I register?

NAVLE registrations are handled directly by the International Council for Veterinary Assessment (ICVA). More information can be found here: <https://www.icva.net/navle/>.

29. How early must I complete the BCSE to ensure that my information can be transferred to the ICVA or state board for my NAVLE application?

The BCSE must be completed no later than 30 days (our recommendation is no later than 40 days) to date of NAVLE registration deadline.

30. How long does it take to transfer information to the ICVA or a state board after I have requested?

Normally, it takes up to 2 weeks to transfer information to the ICVA or a state board after a candidate makes a request.

31. When do we register to take the CPE in the educational equivalency assessment process?

According to the policy currently in place, any time after completion of the BCSE, a candidate can apply to take the CPE. However, candidates registering in the program on or after July 1, 2014, will also need to meet the surgical experience requirement and complete the 6 surgical experience forms prior to the candidate's CPE. For more details, please check here:

<https://www.avma.org/education/foreign/ecfvg-clinical-proficiency-examination-candidate-bulletin#cpe-eligibility>.

When the surgical experience is outside of the five-year period prior to the candidate's CPE with the ECFVG®, the candidate is responsible for submitting surgical experience documentation **again** to meet the current requirement of surgical experience within five-years period prior to the candidate's CPE.

To download the surgery experience form, please visit the website here:

https://www.avma.org/sites/default/files/2020-03/Surgical_Experience_Documentation.pdf

a. Does the tooth extraction or equivalent dental procedure meet one of the six surgical experience requirements?

Tooth extraction or equivalent dental procedures do not require the same level of aseptic surgical procedure; therefore, such procedures do not meet the requirement of the surgical experience.

b. Does ovariohysterectomy of a cat or rabbit as the primary surgeon meet the requirement of the surgical experience?

If the documented surgery involved all elements of an aseptic surgical procedure, including gowning & gloving, draping of the patient, and use of sterile instrumentation and was validated by one or more veterinarians licensed to practice veterinary medicine in any international jurisdiction, the documented surgery meets the requirement established by the ECFVG®.

c. Does a surgery procedure performed in the field meet the surgery experience

requirements?

If the documented surgery involved all elements of an aseptic surgical procedure, including gowning & gloving of sterile gowns and gloves, draping of the patient with sterile drapes, and use of sterile instrumentation, and was validated by one or more veterinarians licensed to practice veterinary medicine in any international jurisdiction, the documented surgery meets the requirement established by the ECFVG®.

d. Do rodent (rat and mouse) surgeries meet the requirement of surgery experience?

Rodent (rat and mouse) surgeries often do not require all elements of an aseptic surgical procedure for each animal such as a new sterile gown, a new pair of sterile gloves, draping of each patient with a new sterile drape, and use of sterilized instruments for each patient. Therefore, the rodent surgeries do not meet the requirement of surgery experience.

32. What is the CPE?

The Clinical Proficiency Examination (CPE) has been developed by the ECFVG® and the Canadian Veterinary Medical Association (CVMA) National Examining Board (NEB) as the fourth step of the ECFVG® or NEB to assess educational equivalency. It is a clinical, hands-on, performance-based examination intended to assess the practical clinical veterinary skills at the level of a recently-graduated veterinarian from an AVMA COE®-accredited veterinary college.

The Seven (7)-section, clinical skills examination is administered at colleges of veterinary medicine or other authorized testing institutions. The skill and knowledge level expected to receive a passing score on each section of the CPE is that of an entry-level US or Canadian veterinarian (i.e., new graduate of an AVMA COE®-accredited veterinary school).

33. How is the CPE structured?

For CPE structure and format, please refer to here:

<https://www.avma.org/professionaldevelopment/education/foreign/pages/ecfvg-cpe-bulletin.aspx#cpe-format>

34. How difficult is it to pass the CPE? What is the pass rate for candidates who take the CPE?

The examination is a comprehensive assessment of the clinical skills of an entry-level veterinarian, evaluating the diagnostic, surgical, and therapeutic proficiency a candidate possesses in a variety of species, including dogs, cats, horses, cows, and other food animals (sheep, pigs, goats). The pass rate for candidates taking the CPE for the first time is about 25%. The pass rate for candidates repeating failed sections is higher than 25%. Pass rates for CPE should be understood in the context of the huge variation in the experiences and skills of

the ECFVG® candidates, and candidates are well-advised to gain all of the skills and working familiarity necessary to be considered equivalent to a graduate of an AVMA COE®- accredited veterinary school prior to attempting the examination.

35. What study materials are available to prepare for the CPE? Are there any tutorials?

The CPE manual of administration (MOA) is a foundational document and every CPE candidate should be well-acquainted with it. The MOA details most skills tested during the exam. The case-based exams are usually based on diagnoses such as those listed here: <https://www.avma.org/professionaldevelopment/education/foreign/pages/ecfvg-cpe-bulletin.aspx#cpe-common-diagnoses>. However, please note that the list of cases provided is a representative sample to illustrate the type of cases that might be used in the examination and is not all-inclusive.

36. Does the ECFVG® offer any training programs or provide any practice materials?

The ECFVG® is a certification program, not an educational or training program. The ECFVG® does not offer any training programs or provide any practice materials.

37. How do I train myself for a CPE? Are there any programs in place that will consider me as a learner and prepare me for the CPE?

Some veterinary schools accept foreign veterinary graduates on an individual basis for clinical training programs (i.e., clerkship rotations, courses, or special training student status for varying lengths of time). This is independent of the ECFVG® program. The ECFVG® does not request or recommend any schools to provide clinical training for the ECFVG candidates. It is up to the individual foreign veterinary graduate to contact the different schools and make arrangements that best suit their needs. The ECFVG does not evaluate any of the programs.

The Canadian Veterinary Medical Association (CVMA) National Examining Board (NEB) provides a Self-Assessment Tool for the Clinical Proficiency Exam. This tool is designed to help candidates to evaluate the preparedness for the Clinical Proficiency Exam (CPE). It should not be interpreted as an exclusive or comprehensive summary of required learning for successful completion of the Clinical Proficiency Exam. For more information, please visit the website at: <https://wiki.cvma-acmv.org:8443/display/NEBP/Self+Assessment+Tool+for+the+Clinical+Proficiency+Exam>.

38. How do other ECFVG® registrants prepare for the CPE?

ECFVG® registrants are a heterogeneous group. Their preparation for the CPE likely depends on individual variations in educational background, clinical and work experience and level of practice readiness and preparation.

39. Where is the CPE offered? Do I have a choice as to which site I will go to for my CPE?

To obtain the most current information of the approved CPE sites, please visit the website at: <https://www.avma.org/education/foreign/ecfvg-clinical-proficiency-examination-candidate-bulletin#cpe-sites-schedule>

Candidates choose the site during sign-up for the exam, but on a first-come first-served basis. For more information please see here:

<https://www.avma.org/professionaldevelopment/education/foreign/pages/ecfvg-cpe-bulletin.aspx#cpe-sites-schedule>

40. I hear that some testing sites are more difficult than others? Is it true? How can the ECFVG allow the difficulty level of the exam to vary like that?

The pass rates across sites do not vary; therefore, there is no evidence that some sites are more difficult than others. The CPE is a standardized exam. A lot of care and attention has been given to ensuring that testing standards do not vary across the sites. The scoring rubrics are well-defined by examiners across all of the sites and examiners attend periodic training sessions.

41. What is the average wait time to secure a CPE testing date?

Current wait times for a full CPE are in the range of 4 to 6 months. Wait times for retakes of individual sections have greater variation (from 3 to 7 or 8 months), depending on the sections.

42. Is there a limit to the number of times I can take the CPE?

Currently there are no limits, although we would like to encourage candidates to take time for adequate level of preparation between exam sittings.

Candidates enrolled in the ECFVG® program on or after January 1, 2015, will be required to complete Step 3 (BCSE) and Step 4 (CPE) requirements within seven (7) years of completing Step 2 (English language) requirements, in order to successfully complete certification requirements. For more information, please visit the website at <https://www.avma.org/education/foreign/time-between-ecfvg-certification-program-steps>.

43. Can I take an ECY in place of a CPE?

There is no option to replace an evaluated clinical year (ECY) for the CPE in the ECFVG certification program.

44. I am registered with the Canadian Veterinary Medical Association (CVMA) National Examining Board (NEB), can I take the CPE at a site in the United States?

Only registrants of the ECFVG® can take the CPE at a site in the United States. NEB candidates who are also registered in the ECFVG have an opportunity to take the CPE in the United States. They then request a transfer of CPE scores from the ECFVG to the NEB.

45. *I would like to assess if the ECFVG® is a good investment of time and money for me, before I register. I would like to know some program statistics that can help me calculate my chances of successfully completing the certification. Can you give some information about the number of registered candidates, the number that successfully completed the program, how long it took for them to complete, what schools did they come from, how old are they, on average, what kind of work experience they had, etc.?*

ECFVG® candidates have received their veterinary degree in over 90 countries, belong to different age categories, have different levels of professional and clinical experience, pursue different career paths such as private practice, research, government service, and are based in the U.S. and Canada and also elsewhere. The certification is recognized in Australia and New Zealand, also.

About 50% of the candidates complete the ECFVG® certification program in about 2 years with some earning their certificate in less than four (4) months of time. The first-time (full CPE) pass rate is now about 25% but completion rate of first CPE cycle is higher after taking into consideration the pass rate for retake of failed CPE sections.

Typically, those who have clinical practice experience do better; however, even experienced clinicians will do well to familiarize themselves with the CPE Manual of Administration. As it is a structured examination where examiners are obligated to follow the scoring rubric, even practitioners will benefit from following the structure of the exam. Finally, demonstrating the ability to communicate is a major aspect of the CPE that is both directly and indirectly assessed during various cases and at different stations.

46. *I obtained the Certificate of Qualification (CQ) from the CVMA National Examining Board (NEB) in Canada via the alternative pathways which became effective April 1, 2020. Can I obtain the ECFVG® certificate using the CQ?*

The ECFVG® certification program requires the ECFVG candidates to complete all four steps in order to receive the ECFVG® certificate. QSE scores from the AAVSB PAVE® program cannot be accepted to fulfill the requirement of step 3, BCSE. Evaluated clinical experience (ECE) from the AAVSB PAVE® program cannot be accepted to fulfill the requirement of step 4, CPE. Successful completion of the final year (clinical year) in an AVMA COE® accredited program cannot be accepted to fulfill the requirement of step 4, CPE, either.