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**VETERINARY TECHNICIAN
SUNRISE REVIEW**

January 2006

Information Summary and Recommendations

Veterinary Technician Sunrise Review

January 2006



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THE SUNRISE REVIEW PROCESS

A Sunrise Review is an evaluation of a proposal to change the laws regulating health professions in Washington. The Legislature's intent, as stated in the Sunrise Act, chapter 18.120 RCW, is to permit all qualified individuals to provide health services unless there is an overwhelming need for the state to protect the interests of the public by restricting entry into the profession.

The Sunrise Act, RCW 18.120.010, states that a health care profession should be regulated only when:

- Unregulated practice can clearly harm or endanger the health, safety or welfare of the public, and the potential for the harm is easily recognizable and not remote or dependent upon tenuous argument;
- The public needs and can reasonably be expected to benefit from an assurance of initial and continuing professional ability; and
- The public cannot be effectively protected by other means in a more cost-beneficial manner.

If the Legislature identifies a need and finds it is necessary to regulate a health profession not previously regulated by law, it should select the least restrictive alternative method of regulation, consistent with the public interest. Five types of regulation may be considered as set forth in RCW 18.120.101(3):

1. *Stricter civil actions and criminal prosecutions.* To be used when existing common law, statutory civil actions and criminal prohibitions are not sufficient to eradicate existing harm.
2. *Inspection requirements.* A process enabling an appropriate state agency to enforce violations by injunctive relief in court, including, but not limited to, regulation of the business activity providing the service rather than the employees of the business, when a service being performed for individuals involves a hazard to the public health, safety or welfare.
3. *Registration.* A process by which the state maintains an official roster of names and addresses of the practitioners in a given profession. The roster contains the location, nature and operation of the health care activity practices and, if required, a description of the service provided. A registrant is subject to the Uniform Disciplinary Act, Chapter 18.130 RCW.
4. *Certification.* A voluntary process by which the state grants recognition to an individual who has met certain qualifications. Non-certified persons may perform the same tasks, but may not use "certified" in the title. A certified person is subject to the Uniform Disciplinary Act, Chapter 18.130 RCW.
5. *Licensure.* A method of regulation by which the state grants permission to engage in a health care profession only to persons who meet predetermined qualifications. Licensure protects the scope of practice and the title. A licensee is subject to the Uniform Disciplinary Act, Chapter 18.130 RCW.

OVERVIEW OF PROCEEDINGS

The Department of Health's role is to inform the legislature whether an applicant's proposal meets the Sunrise criteria. The department accomplishes this by reviewing the applicant report, conducting its own independent research, and gathering input from stakeholders.

The Legislature requested the department conduct a sunrise review on House Bill 1511, An Act Relating to Veterinary Technicians. The proposal would remove practical experience as one option to qualify for the national examination after December 31, 2009. Department staff notified the applicant group and requested they submit their applicant report to initiate the Sunrise process. Staff then created an interested parties list, consisting of professional associations, interested parties lists maintained by the department, the bill sponsors, legislative staff, and department staff.

The applicants, Markiva Contris, Registered Veterinary Technician (RVT), and Shirley Sandoval, RVT submitted the sunrise application, which included some additions to House Bill 1511. The additions to the proposal included a request for continuing education, clarification of their credential type to "Licensed Veterinary Technician," the addition of two veterinary technicians to the Veterinary Board of Governors, and a fee breakdown. The department requested and received additional information and clarification about the applicant report from the applicants.

The department scheduled a public hearing and sent notice of the hearing and related materials to interested parties. The department chose a review panel which included department staff and a public member. Staff also conducted literature and internet reviews. There was a public comment period that lasted until the public hearing date. Staff reviewed all information and comments received.

The review panel conducted a public hearing on August 16, 2005. Interested persons presented testimony. There was an additional ten-day written comment period following the public hearing.

The draft report was routed to participants and interested parties for review, followed by a ten-day rebuttal period to comment on the draft report.

A recommendation was made based upon all information received. The proposed final draft was reviewed and approved by the Assistant Secretary of Health Systems Quality Assurance and the Secretary of the Department of Health. The final report was transmitted to the Legislature via the Office of Financial Management.

Acronyms

RVT = Registered Veterinary Technician

VTNE = Veterinary Technician National Examination

AAVSB = American Association of Veterinary State Boards

WSVMA = Washington State Veterinary Medical Association

AVMA = American Veterinary Medical Association

EXECUTIVE SUMMARY

Proposal for Sunrise Review

House Bill 1511 was introduced during the 2005 legislative session. It would remove the option of five years of practical experience with a licensed veterinarian to qualify for registration as a veterinary technician after December 31, 2009. In addition to the proposal in the bill, the applicants also requested that two licensed veterinary technicians be added to the Veterinary Board of Governors, that the veterinary technician credential be changed from registration to licensure, the addition of a continuing education requirement, and a review of registration costs with a fee breakdown.

Background

House Bill 1511 was referred to the Department of Health for a Sunrise Review. While this is not a traditional Sunrise Review, the Legislature stated it raises many of the same issues, particularly the appropriate levels of training necessary to protect the public.

Current Regulation

Veterinary technicians are registered in Washington State. Requirements for registration are successful completion of an examination administered by the board, which is currently the Veterinary Technician National Examination (VTNE), and:

- Completion of a post postsecondary educational program for animal or veterinary technology approved by the Committee on Veterinary Technician Education and Activities (CVTEA), or
- Graduation from a two-year curriculum in animal health or veterinary technology which is not accredited by the CVTEA plus a minimum of 36 months of full-time experience under the supervision of a licensed veterinarian(s) who must attest to the completion of that experience, or
- Award of a Doctor of Veterinary Medicine (D.V.M.) or Veterinary Medical Doctor (V.M.D.) degree or equivalent from an American Veterinary Medical Association accredited or listed college of veterinary medicine, or
- Registration, certification, or licensure as an animal health or veterinary technician in one or more states and 36 months of full-time experience under the supervision of a licensed veterinarian(s), or
- Completion of a course in veterinary technician education as a member of the United States military and completion of a tour of active duty as a veterinary technician or specialist, or
- Five years' full-time experience as an unregistered assistant under the supervision of a licensed veterinarian(s) who must attest to the completion of that experience.

Veterinary assistants are not credentialed in Washington State. They are trained on-the-job and work under the supervision of a veterinarian or a registered veterinary technician. Veterinary assistants are authorized to do many of the same tasks as veterinary technicians, but under higher levels of supervision. Veterinary assistants are prohibited from performing some procedures that veterinary technicians are authorized to perform, such as inducing anesthesia.

Recommendations to the Legislature

1. The proposal to remove the five year experience route as an option for registration of veterinary technicians does not meet the Sunrise criteria and should not be enacted.
2. The Washington State Veterinary Board of Governors should develop standard tasks and procedures in rule that must be included in the five years of practical experience necessary before qualifying to sit the national examination. The supervising veterinarian must attest to completion of five years of experience that includes the required procedures.
3. The proposal to change the veterinary technician credential from registration to licensure should be enacted.
4. One licensed veterinary technician should be added to the Washington State Veterinary Board of Governors to provide representation on the board that regulates veterinary technicians.
5. The department asserts that continuing education might be beneficial to the profession, but could not make a formal recommendation because the sunrise criterion for continuing education was not met.

FINDINGS AND SUMMARY OF INFORMATION

Proposal to Remove the Five Year Experience Route to Registration

The applicants cite three concerns with the experience route to registration:

1. Veterinary assistants are prohibited by WAC 246-935-050 from performing some of the vital skills required as veterinary technicians.
2. Veterinary assistants are not regulated by the Department of Health; therefore, there are no set standards or assurance of training.
3. Veterinary assistants may not identify themselves as individuals training to become veterinary technicians. This allows the public to assume they have qualifications. The public may be unaware that an uncredentialed assistant is practicing skills or gaining experience practicing on their pets.

The applicants stated that the current experience route to registration allows potential for direct harm to the public by uncredentialed veterinary personnel, who often receive the majority of their training from one veterinarian or one practice. The applicants feel this leaves the potential for veterinary assistants to be asked to perform tasks they are not legally allowed to do or be taught techniques that may not represent current best practices. The applicants cite one instance of disciplinary action against a veterinarian for allowing an unregistered assistant to perform procedures he or she was not credentialed to do. There was no harm to an animal.

RCW 18.92.125 states, "A veterinarian retains professional and personal responsibility for any act which constitutes the practice of veterinary medicine as defined in this chapter when performed by a veterinary technician or veterinary medication clerk in his or her employ." Veterinary technicians are only authorized to work under the delegation and supervision of a licensed veterinarian.

The applicants addressed the second sunrise criterion which asks if the public needs and can reasonably be expected to benefit from an assurance of initial and continuing professional ability. They stated that since veterinary assistants are not regulated by the department, there are no set standards and no assurance of training for experience trained applicants.

The applicants further stated that the Veterinary Technician National Exam (VTNE) will no longer be available to experience-trained candidates after 2010. Research by Department of Health staff revealed that the current owners of the examination, the American Association of State Veterinary Boards (AASVB) has not adopted the recommendation to remove the experience route by 2010. Experience-trained applicants in Washington will still be allowed to sit for the national examination. A copy of the AASVB statement is attached in appendix D.

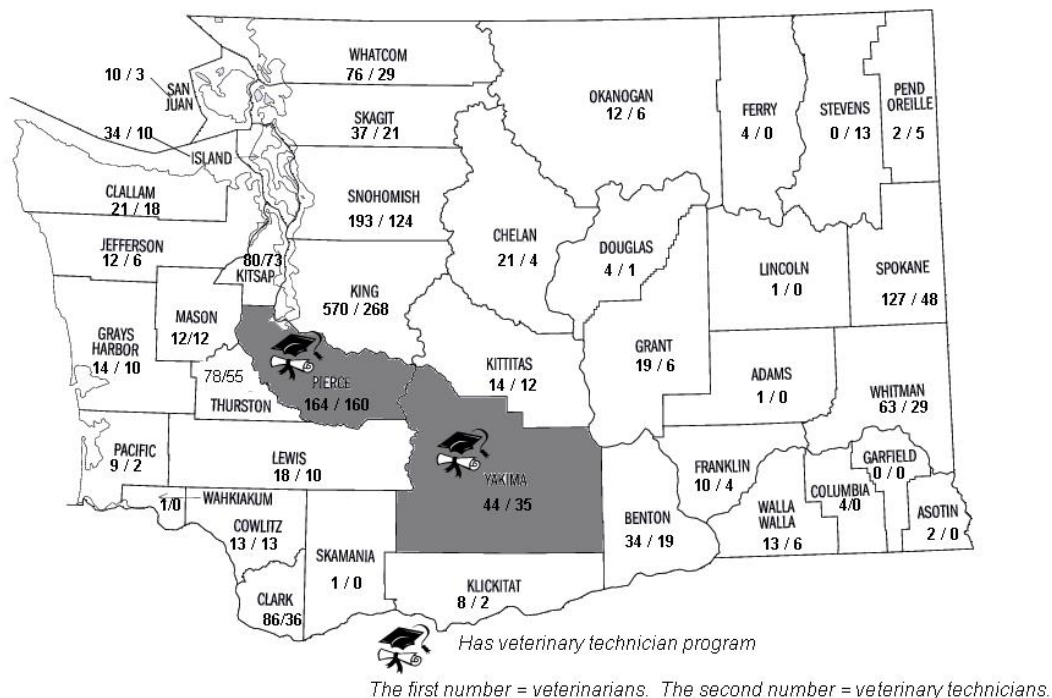
The Washington State Veterinary Medical Association (WSVMA) opposes removing the experience route to registration. They feel experience trained veterinary technicians are qualified and that those who are not qualified will be screened out because they will fail the national examination.

Testimony indicated that the pass rate for experience-trained applicants is much lower than the pass rate for formally educated applicants. According to testimony, the fail rate for experience trained applicants nationwide is 57 percent. Applicants from Pierce College and Yakima Valley Community College have a 100 percent pass rate. The statistics for Washington state show that of the 40 candidates for the January 2005 examination, all eight who failed were experience-trained.

Each group interprets the examination statistics differently. The applicant group states that this demonstrates the inadequacy of experience training and that the examination should only be allowed to complement education. The WSVMA finds it acceptable, since the test determines whether a candidate applying under the experience route has received adequate training. They have stated that the examination adequately screens out veterinary assistants who are not qualified to become credentialed.

Public testimony stated that removing the experience route would create a barrier to registration, especially in rural areas. Access to veterinary technician services is a growing problem in Washington and nationwide. Formal training is expensive and opportunities are limited in Washington State. There are only two programs in Washington: Pierce College in Lakewood, and Yakima Valley Community College. Both programs cost \$6,000 to \$6,500 for a veterinary technician degree. There are three distance learning programs approved, which cost up to \$18,000. Many assistants cannot travel to Lakewood or Yakima, or afford the tuition of a distance learning program.

Number of Veterinarians and Veterinary Technicians by County



In a few instances, public comment referred to “grandfathered” veterinary technicians and a “grandfather clause” for the experience alternative to education. “Grandfather clause” is defined in RCW 18.120.020(3) as “a provision in a regulatory statute applicable to practitioners actively engaged in the regulated health profession prior to the effective date of the regulatory statute which exempts the practitioners from meeting the prerequisite qualifications set forth in the regulatory statute to perform prescribed occupational tasks.” There is no grandfather clause in the veterinary statutes.

The department researched other states regarding the experience alternative. Of the 44 states that regulate or recognize veterinary technicians (either mandatory or voluntary), 12 allow an experience alternative for credentialing.¹

Washington’s current experience requirement only requires applicants have five years of experience, but does not outline what the experience must include. The attestation required in the veterinary technician application requests details about the experience. However, there are no standards that must be met on this attestation.

Three panel members headed the public hearing. Two members were department staff and the third was a public member. The panel members agreed that the applicants did not prove the first Sunrise criterion of harm or potential for harm in the proposal. All three panel members felt that the second Sunrise criterion, the public needs and can reasonably be expected to benefit from an assurance of initial and continuing professional ability, should be addressed by setting minimum standards to the requirements for the experience alternative for registration.

Proposal to Clarify the Proper Title for Veterinary Technicians to “Licensed Veterinary Technician”

The applicants requested that the department clarify the proper title for veterinary technicians. They stated that the department licenses veterinary technicians, but the title in Chapter 18.92 RCW refers to them as registered.

The veterinary technician credential was created prior to the Sunrise Act, Chapter 18.120 RCW. The Sunrise Act defines three levels of regulation to be considered in the scope of a Sunrise Review. Chapter 18.122 RCW, Uniform Administrative Provisions, defines registration, certification, and licensure as follows:

- Registration is the least restrictive, and requires formal notification of the Department of Health identifying the practitioner, and does not require qualifying examinations.
- Certification is a voluntary process recognizing an individual who qualifies by examination and meets established educational prerequisites, and which protects the title of practice.
- Licensure is the most restrictive and requires qualification by examination and educational prerequisites of a practitioner whose title is protected and whose scope of practice is restricted to only those licensed.
- RCW 18.122.030.

¹ www.avma.org/careforanimals/animatedjourneys/aboutvets/vtstregs.asp. AVMA State Regulations for Registration of Veterinary Technicians – 2004.

According to these definitions, the credential issued to veterinary technicians most closely matches licensure because an examination, education, and/or experience are required. The change from registration to licensure would be a technical change to Chapter 18.92 RCW, not a further restriction on practice of the profession.

Proposal for the Addition of Two Licensed Veterinary Technicians to the Veterinary Board of Governors

Veterinary technicians are regulated by the Veterinary Board of Governors and credentialed by the department but are not currently represented on the board. The applicants state that the addition of two veterinary technicians would allow technicians to contribute to the regulation and discipline of their profession. In addition to representing the veterinary technicians on the board, the Sunrise panel members felt that one veterinary technician member could help to develop and maintain criteria for the five year training provision.

The Washington State Veterinary Medical Association is neutral to creating positions designated for veterinary technicians. However, they raised a concern that a veterinary technician board member might be in a position to discipline a veterinarian. Since policy dictates that disciplinary cases are assigned to members with sufficient qualifications to review the case, a veterinary technician member would not be assigned veterinary disciplinary cases. The board could develop a written policy to document this practice if needed.

There would be minimal costs to add a new member to the board. These costs would include travel and board pay for approximately six meetings per year.

Addition of Mandatory Continuing Education

The applicants stated that the field of veterinary medicine is constantly changing to incorporate new technology and therapies. They assert that mandated continuing education would aid in ensuring the public that veterinary personnel are committed to higher standards by staying current in the field. Continuing education is required for licensure for veterinarians. Credentialed veterinary technicians should be held to the same standards.

The addition of a continuing education requirement for license renewal is supported by both veterinarians and veterinary technicians.

Department staff researched how many states currently require continuing education. Continuing education is required for renewal in 32 of the 44 states that regulate or recognize veterinary technicians.²

The addition of a continuing education requirement may alleviate some of the concerns of the applicant group regarding the lack of formal education of experience trained technicians. It would provide opportunities for both experience trained and formally trained veterinary technicians to keep up with changing technology. Continuing education would also give experience trained veterinary technicians some formal education outside of the veterinary offices where they trained.

² www.avma.org/careforanimals/animatedjourneys/aboutvets/vtstregs.asp. AVMA State Regulations for Registration of Veterinary Technicians – 2004.

RCW 18.120.050 states:

Requirements for licensees to engage in continuing education as a condition of continued licensure has not been proven to be an effective method of guaranteeing or improving the competence of licensees or the quality of care received by the consumer. The Legislature has serious reservations concerning the appropriateness of mandated continuing education. Any legislative proposal that contains a continuing education requirement should be accompanied by evidence that such a requirement has been proven effective for the profession addressed in the legislation.

The applicants did not provide any evidence that mandatory continuing education has been proven effective for veterinary technicians.

REBUTTAL COMMENTS

A number of stakeholders repeated information submitted during the initial public comment period and at the public hearing. New or rebuttal information and the department's responses are summarized below.

1. One stakeholder stated that the department's proposal to develop proposed standards and tasks in rule for the field experience option (recommendation 2) is not specific enough. The department did not include details about how this recommendation should be implemented because it does not require action by the Legislature. If this recommendation is implemented, it will be addressed in detail through rulemaking.
2. Stakeholders are concerned that field training may encourage unlicensed practice by veterinary assistants. If unlicensed practice is occurring in veterinary offices, it should be reported to the disciplinary authority.
3. Some stakeholders expressed concern about low standards of care in some veterinary clinics. This issue must be addressed through the reporting and disciplinary process, not through restricting entry into the veterinary technician profession.
4. One stakeholder commented that the department did not make a recommendation to require continuing education (recommendation 5) although she states that the rationale supports it. The sunrise criterion states that the applicants must provide evidence that continuing education has been proven effective within the veterinary technician profession. The department asserts that continuing education might be beneficial to the profession, but could not make a formal recommendation because the sunrise criterion for continuing education was not met.
5. One stakeholder identified an error in the "Current Regulations" section of the report that states veterinary assistants are prohibited from performing venipuncture for blood samples. There was confusion within the applicant report as well on this issue. Staff confirmed that this was an error and corrected it in the report.

6. Many stakeholders commented that they were opposed to the use of the shortage of veterinary technicians and education costs as rationale for our recommendation to continue allowing the field training option. There were many comments expressing concerns about the access to care issue on both sides. Some rebuttals stated that the costs of education are a long-term investment in the profession. Since this issue does not address the three sunrise criteria, the department removed it as a rationale.
7. Some stakeholders expressed concern that the department does not value educational programs. The department values education, but does not feel the proposal to remove the experience option meets the sunrise criteria. Increasing requirements for credentialing veterinary technicians would further restrict entry into the profession and would likely increase the shortage in Washington State.
8. One of the applicants provided the course requirements for AVMA accredited programs along with her rebuttal comments. This information should be shared with program staff during rulemaking if the department's recommendation for the Veterinary Board of Governors to develop standards for the field training option is implemented.
9. The WSVMA wrote to state they are taking no position to adding a veterinary technician to the Veterinary Board of Governors. However, if the Sunrise Review recommends adding a veterinary technician to the board, they strongly request guidelines be written into rule or policy so that veterinary technicians are not allowed to discipline veterinarians in standard of care issues.

They went on to state that they would like to go on record as strongly recommending continuing education requirements for licensed veterinary technicians. They contended that in the changing world of medical knowledge and techniques it is simply unacceptable that a license be maintained without the demonstration of an effort to stay abreast of changes.

10. During the rebuttal period, the AAVSB adopted the following policy regarding eligibility to sit for the VTNE examination, which means that the examination will still be offered to experience trained applicants in Washington.
 - For jurisdictions where there is no legal authority to regulate or recognize veterinary technicians, AAVSB will require graduation from an accredited veterinary technician program as one criterion for eligibility.
 - For jurisdictions where there is legal authority to regulate or recognize veterinary technicians, AAVSB, consistent with its mission statements, will defer to the legislatively mandated requirements set forth in the statutes. However, and in furtherance of the AAVSB Practice Act Model, the association will continue to promote graduation from an accredited veterinary technician program.

DETAILED RECOMMENDATIONS TO THE LEGISLATURE

The department found; 1) The American Association of State Veterinary Medical Boards (AAVSB) will not be removing the field training option for Washington State applicants, and 2) access to veterinary technician services is a growing problem in Washington and nationwide. Raising standards could increase this barrier to access.

1. The proposal to remove the five year experience route as an option for registration of veterinary technicians does not meet the Sunrise criteria and should not be enacted.

Rationale:

- This proposal does not meet the first criterion by proving harm or the potential for harm in the existing qualifications for veterinary technician registration.
- The applicants' argument that the public is unaware that unregistered assistants are practicing skills or gaining experience with their pets is not sufficient to eliminate the experience route to registration. Veterinary assistants perform tasks they are legally allowed to do, under the supervision of licensed veterinarians who are responsible for their performance. The experience they use to qualify for registration as a veterinary technician is authorized under the veterinary regulations.
- The applicants stated concern that veterinary assistants are prohibited from performing certain skills required as a veterinary technician, however, they can still be taught these procedures by observing them over the five year period. The public is protected because the veterinarians that supervise the veterinary assistants are regulated and are held responsible for the veterinary technicians and veterinary assistants.

2. The Washington State Veterinary Board of Governors should develop standard tasks and procedures in rule that must be included in the five years of practical experience before qualifying to sit the national examination. The supervising veterinarian must attest to completion of the five years of experience and that the training included the required procedures.

Rationale:

- The second criterion that the public needs and can reasonably be expected to benefit from an assurance of initial and continuing professional ability may not be met. The current attestation of experience can be inadequate to address whether the applicant has a minimum level of competence.
- Developing standards for the five year provision addresses the third sunrise criterion by providing the "other means" of protecting the public in a more cost-beneficial manner.

3. The proposal to change the veterinary technician credential from registration to licensure should be enacted.

Rationale:

- The qualifications required for a veterinary technician credential most closely match the definition of licensure because an examination, education, and/or experience are required.
- The change from registration to licensure would be strictly a technical change to the RCW, not a further restriction of the profession.

4. **One licensed veterinary technician should be added to the Washington State Veterinary Board of Governors so they have representation on the board that regulates their profession.**

Rationale:

- Veterinary technicians are regulated by the board but are not currently represented on it. Addition of a veterinary technician to the board would address the second sunrise criterion by adding veterinary technician expertise to provide input on what constitutes initial and continuing professional ability.
- If standards are added to the experience training option, a veterinary technician representative on the board could provide valuable input on the development and maintenance of these standards.

5. **The department does not commonly support mandatory continuing education requirements because RCW 18.120.050 requires proof of its effectiveness on improving the competence of licensees. The applicants did not provide proof of effectiveness of continuing education within the veterinary technician profession. However, continuing education may alleviate some of the applicant group's concerns regarding the lack of formal education of experience trained veterinary technicians.**

Rationale:

- Continuing education would provide opportunities for both field trained and formally trained veterinary technicians to keep up with changing technology.
- Continuing education would give field trained veterinary technicians some formal education outside of the veterinary offices where they trained.
- Continuing education is supported by both veterinarians and veterinary technicians.

6. **The applicants also requested a breakdown of veterinary technician registration fees. This information does not fall under the scope of a Sunrise Review. However, the department will provide budget information from the veterinary program directly to the applicants under public disclosure.**

Technical Change

If the Legislature proposes a change in credential to Licensed Veterinary Technician, the following RCW sections should be amended:

RCW 18.92.013: Dispensing of drugs by registered and licensed personnel. (1) A veterinarian legally prescribing drugs may delegate to a registered veterinary medication clerk or a ~~registered~~ licensed veterinary technician.

RCW 18.92.140, License – Procedures, requirements, fees. Each person now qualified to practice veterinary medicine... ~~registered~~ licensed as a veterinary technician...

RCW 18.92.145, License, permit, examination, and renewal fees.
(3) For a ~~certificate of registration~~ license as a veterinary technician;

APPENDIX: A

PROPOSED LEGISLATION

HOUSE BILL 1511

State of Washington

59th Legislature

2005 Regular Session

By Representatives Flannigan, Haigh, Campbell and Hudgins

Read first time 01/26/2005. Referred to Committee on Economic Development, Agriculture & Trade.

AN ACT Relating to veterinary technicians; and amending RCW 18.92.015.

BE IT ENACTED BY THE LEGISLATURE OF THE STATE OF WASHINGTON:

Sec. 1 RCW 18.92.015 and 2000 c 93 s 9 are each amended to read as follows:

~~((Unless the context clearly requires otherwise,))~~ The definitions in this section apply throughout this chapter unless the context clearly requires otherwise.

"Veterinary technician" means a person who has successfully completed an examination administered by the board and who has either successfully completed a post high school course approved by the board in the care and treatment of animals or ~~((had five years' practical experience, acceptable to the board, with a licensed veterinarian))~~ has completed five years of practical experience with a licensed veterinarian that the board has deemed acceptable prior to December 31, 2009.

"Board" means the Washington state veterinary board of governors.

"Department" means the department of health.

"Secretary" means the secretary of the department of health.

"Veterinary medication clerk" means a person who has satisfactorily completed a board-approved training program developed in consultation with the board of pharmacy and designed to prepare persons to perform certain nondiscretionary functions defined by the board and used in the dispensing of legend and nonlegend drugs (except controlled substances as defined in or under chapter 69.50 RCW) associated with the practice of veterinary medicine.


--- END ---

APPENDIX: B
APPLICANT REPORT

Applicant Report Cover Sheet and Outline
Washington State Department of Health Sunrise Review

Cover Sheet

DEPARTMENT OF HEALTH
JUN 29 2005
HEALTH SYSTEMS
QUALITY ASSURANCE

- Legislative proposal being reviewed under the sunrise process (include bill number if available)
HB 1511 – Removal of the “field training” route to qualification for licensure of Registered Veterinary Technicians. WAC 246-935-060 states that candidates will be eligible to sit for the Veterinary Technician National Exam (VTNE) if a candidate has “five years full-time experience as an unregistered (veterinary) assistant under the supervision of a licensed veterinarian(s) who must attest to the completion of that experience”. HB 1511 would eliminate this route, requiring all candidates for licensure be graduates of an approved veterinary technology program.
- Name and title of profession the applicant seeks to credential/institute change in scope of practice:
Profession: Veterinary Technology
Professional Title: Registered Veterinary Technician
- Applicant's Organization: Washington State Association of Veterinary Technicians (WSAVT)
- Contact person(s): Markiva Contris, RVT Shirley Sandoval, RVT

- Number of members in organization: 300
Approximate number of individuals practicing in Washington: 1000

Name and address of national organizations with which the state organization is affiliated:
National Association of Veterinary Technicians of America (NAVTA)
P.O. Box 124
Battleground, IN 47920

Interested parties:
Washington State Veterinary Medical Association (WSVMA)
P.O. Box 962
Bellevue, WA 98009

Markiva Contris, RVT, Shirley Sandoval, RVT, and the Washington State Association of Veterinary Technicians (WSAVT) formally request a Department of Health Sunrise Review of Washington State Veterinary Technicians with emphasis placed on alternate routes of licensure, proper title, continuing education requirements, Veterinary Technician representation on the Veterinary Board of Governors and cost of licensure.

Currently the alternative route to licensure for veterinary technicians includes five years full-time experience as a veterinary assistant. The WSAVT considers this to be a problem for several reasons:

1. **Training:** Veterinary assistants are prohibited by WAC 246-935-050 from performing vital skills required as veterinary technicians. A veterinary assistant undergoing field training is not allowed to: induce anesthesia of any kind, perform venipuncture to obtain blood samples, or evaluate lab samples. Field trained individuals would therefore be untrained and unskilled in these vital areas.
2. **Regulation:** Veterinary assistants are not regulated by the Department of Health. There is a lack of standards because there is no regulation and assurance of training.
3. **Public Education:** Veterinary assistants may not identify themselves as an individual training to become a veterinary technician, allowing the public to presume their qualifications. WAC-246-935-050 states: No individual, other than a registered veterinary technician may advertise or offer her/his services in a manner calculated to lead others to believe that she/he is a trained or registered veterinary technician. The public may be unaware that an unregistered assistant is practicing skills or gaining experience with their pet.

Proposed legislation (HB 1511) asked that the field training option be eliminated from the Washington State Administrative Codes. This legislation has not made it past committee. Instead, it was referred to the Department of Health for a sunrise review. In 1999, the Veterinary Technician Testing Committee (VTTC), a volunteer committee that validates the Veterinary Technician National Exam (VTNE), in an effort to standardize the level of education/experience of veterinary technician candidates sitting for the VTNE proposed a 2010 deadline, after which the VTNE will not be available to field trained candidates. The WSAVT is asking Washington State to comply with this proposal.

The alternatives to this proposed deadline has been:

1. Alternative testing if the VTNE is unavailable.
2. Asking the VTTC for an exception if the VTNE is unavailable.
3. Changing nothing.

The greatest public benefit of closing this alternate route to licensure will be quality control. The current field-training clause allows a potential for direct harm to the public by unlicensed veterinary personnel. These individuals often receive the majority of their training from one veterinarian or one practice. In such an unregulated environment, there is great potential for veterinary assistants to be requested to act beyond their approved scope of practice or to be taught techniques that may not represent current best practices. Most importantly such limited exposure does not guarantee that the unlicensed individual will gain critical thinking skills while on the job. By requiring accredited program training for all Registered Veterinary Technicians, Washington State will be able to assure the public of a minimum standard of qualification, training in anesthesia induction and laboratory skills, and critical thinking training; all of which allows for greater safety to pets, the public, and veterinary personnel. The WSAVT sees only public benefit with this higher standard of qualification for veterinary technicians. If the field-training route were disallowed, the expected costs of regulation would not change from current costs.

Washington State is home to two AVMA accredited veterinary technology programs. Both programs are housed in state community colleges: Pierce College, Lakewood, and Yakima Valley Community College, Yakima. The programs are two years in length and offer an Associate's degree in Veterinary Technology. Curriculum includes courses in anesthesiology, pharmacology, hematology, and public health. An AVMA accredited Veterinary Technology program is required to instruct students using an essential task list that incorporates technical skills and critical thinking skills, balancing an individual's education with a wide variety of species comparisons and the study of normal and abnormal body functions. These requirements are the same from state to state, ensuring that any graduate from an accredited program is proficient in the task list regardless of which state they received their education. Currently there are four fully accredited distance learning veterinary technology programs available for individuals who may not be able to attend Pierce College or Yakima Valley.

According to WAC 246-935-050, Registered Veterinary Technicians are allowed to do a variety of tasks depending on the amount of supervision by a veterinarian. The amount of time spent on these tasks will vary according to the scope and focus of the practice they are employed by. To help differentiate between Registered Veterinary Technicians and veterinary assistants, the following Veterinary Technician duties CANNOT be practiced by veterinary assistants:

- Induction of anesthesia of any kind. A veterinary assistant may not induce anesthesia. This would include injectable anesthetic agents, masking down with inhalent anesthetics, or any combination of these skills. This is a vitally important task that a Registered Veterinary Technician should be adequately trained in. In a typical clinic, the Registered Veterinary Technician will spend 15-20% of their time inducing anesthesia.
- Venipuncture for blood sample collection. A vet assistant may prepare blood samples for hematology, but they cannot collect the blood from the animal. In a typical clinic, the Registered Veterinary Technician will spend 25-30% of their time performing venipuncture for blood sample collection.

- Evaluation of lab work. A veterinary assistant may prepare samples for evaluation, but they cannot interpret the lab samples. Labwork includes fecal analysis for parasites or bacteria, urinalysis for chemistry or sediment, cytology of any kind, and blood chemistries and hematology. In a typical clinic, the Registered Veterinary Technician will spend 40-50% of their time evaluating and recording observations of lab samples. Lab sample analysis is a major skills area that veterinary assistants are untrained and unqualified to do.

Under WAC 246-935-040 Responsibilities of veterinarian: A veterinarian must not permit any unregistered assistant to perform any animal health care services not authorized by WAC 246-935-404 or WAC 246-935-050. Under the current eligibility requirements, a field-trained individual is untrained and therefore unskilled in the above practices, yet able to sit for the VTNE and possibly become licensed as a veterinary technician. If they are receiving training in the above tasks as an unregistered assistant, then they and their supervising veterinarian are in direct violation of the WAC.

Registered Veterinary Technicians are regulated by the Veterinary Board of Governors and licensed by the Department of Health. Currently, there is no Registered Veterinary Technician representation on the Board of Governors. The WSAVT would like to add two Registered Veterinary Technician members to the Board of Governors to allow for technician input in areas of regulation and discipline of our profession. Furthermore, WSAVT would ask the Department of Health to clarify the proper title for Registered Veterinary Technicians. Currently, the Department of Health licenses Veterinary Technicians, yet the title in the Washington Administrative Code is "Registered".

The WSAVT would like to request continuing education requirements for license renewal. The field of veterinary medicine is constantly changing and requiring continuing education for Registered Veterinary Technicians will ensure that they stay current with the profession. The WSAVT would also like a review of the licensure costs with a fee breakdown. Continuing education requirements could easily be incorporated under the current licensing fees.

APPENDIX: C

FOLLOW-UP QUESTIONS TO APPLICANT REPORT

Veterinary Technician Supplemental Questions to the Applicants

1. *Can you provide confirmation from the AAVSB that they adopted the VTTC's recommendation to drop field trained candidates from eligibility to sit the VTNE examination after 2010? We have received inconsistent information regarding this issue.*

The AAVSB has not clarified their official stance to the 2010 deadline. The VTTC stands by its 1999 recommendation to limit the administration of the VTNE to only graduates of an accredited veterinary technology program. The annual AAVSB meeting will take place in Kansas City, MO September 8-11, 2005. Hopefully AAVSB will be forthcoming with their position at that time.

2. **(Sunrise staff were confused when asking these questions and later clarified that veterinary technicians are currently registered, not licensed in the RCW.)**

Since veterinary technicians are licensed, why are you proposing to change the title to Registered Veterinary Technician, which is a lower level of credentialing? Registration is an official roster of practitioners, with no examination or specific qualifications required, while licensure requires specific qualifications including an examination in order to practice.

Veterinary technicians are "licensed" by the Department of Health, but the current RCW and WAC language refers to veterinary technicians as "registered". The language of the RCW and WAC needs to be changed to reflect that veterinary technicians are licensed. The WSAVT would recommend that the official title for credentialed veterinary technicians be "Licensed Veterinary Technician" or "LVT".

3. *You state in the application that there is a potential for direct patient harm to the public by unlicensed veterinary personnel. Do you have any examples of harm to the public from unlicensed personnel?*

The WSAVT does not have many specific incidences of harm to the public by unlicensed veterinary personnel because ultimately it is the veterinarian's responsibility when harm has occurred. This information would be found through the Department of Health or the Veterinary Board of Governors. Public harm and unlicensed personnel working beyond the scope of practice goes unreported all the time as this profession is very poor at policing itself. The public rarely knows what is happening "behind the scenes" of a veterinary practice and is rarely informed of the level of credential the individual performing a task has. Often, the public is unaware of what veterinary personnel are legally able to do. One example of disciplinary action is as follows:

In April 2005 the Veterinary Board charged Clark County veterinarian Erich Bargar (VT00006850) with unprofessional conduct. Allegations against him include allowing an unregistered technician and/or assistant to perform procedures the technician was not licensed to perform. He also allegedly failed to keep appropriate documentation and failed to keep controlled substances in a locked cabinet.

4. *How much does tuition cost for an Associate's Degree in Veterinary Technology from Pierce College and Yakima Valley Community College?*

The Veterinary Technology Program at Pierce College average costs are as follows: \$6500 over two years for Washington State residents. This would include cost of tuition, fees, books, and uniforms. The average costs for Yakima Valley Community College are as follows: \$6000 over two years for tuition and fees. Books and uniforms vary in price and would be an additional expense.

Incidentally, if one is to research the cost of programs in comparable human health professions, one would find the following: RN degree at Tacoma Community College = approximately \$6500 over two years. RN degree at Pacific Lutheran University = approximately \$22,040/year for four years. PA program at University of Washington = approximately \$42,324/program.

5. *What is the average tuition for the four distance learning programs you refer to in the application?*

The average cost/credit for the four distance learning programs is \$253/credit. The average number of credits required is 71 for a tuition cost of approximately \$18,000 over a 3-5 year period.

6. *How do distance learning students complete their lab work and gain clinical experience?*

All four distance programs require a preceptor relationship with a veterinary clinic. All programs require employment at a veterinary clinic as well. Clinical experience is obtained under the mentorship of their preceptor veterinarian. Exams are often conducted via video tape or travel to the school.

7. *What are the VTNE pass rates for Pierce College, Yakima Valley Community College, and the distance learning programs?*

The VTNE pass rate at Pierce College is close to 100 percent. In the past eight years, Pierce College has only had one student not pass the VTNE on the first try. The VTNE pass rate at Yakima Valley Community College is also close to 100 percent. Again, only one student has had to take the VTNE twice.

8. *In order for a continuing education requirement to be considered, RCW 18.120.050 requires you to provide evidence that such a requirement has been proven effective for veterinary technicians. Please address this issue.*

The field of veterinary medicine is constantly changing to incorporate new technology and therapies. Required Continuing Education (CE) will aid in ensuring the public that veterinary personnel are committed to higher standards by staying current in the field. CE is required for licensure for veterinarians and all other medical professions in this state. Credentialed veterinary technicians should hold their profession up to the same standards. CE is required for renewed licensure for veterinary technicians in 32 out of the 41 states that currently credential veterinary technicians.

APPENDIX: D

**STATEMENT FROM
AMERICAN ASSOCIATION OF VETERINARY STATE BOARDS**

October 14, 2005

Sherry Thomas
Health Systems Quality Assurance
Office of the Assistant Secretary
310 Israel Road
Tumwater, WA 98504-7850
Mail Stop 47850

RE: Veterinary Technician National Examination (VTNE)

Dear Sherry:

As Charlotte Ronan is currently out of the office on business, she asked that I follow up with you regarding eligibility issues for candidates wishing to sit for the AAVSB VTNE. For your information, AAVSB recently acquired ownership of the VTNE and the Board of Directors wanted to receive input from relevant parties before making any decisions on this important issue. After input at its Annual Meeting in September, the AAVSB Board of Directors addressed this matter on a conference call October 12, 2005.

The board adopted the following policy regarding eligibility to sit for the VTNE:

For jurisdictions where there is no legal authority to regulate or recognize veterinary technicians, AAVSB will require graduation from an accredited veterinary technician program as one criterion for eligibility..

For jurisdictions where there is legal authority to regulate or recognize veterinary technicians, AAVSB, consistent with its mission statement, will defer to the legislatively mandated requirements set forth in the statutes. However, and in furtherance of the AAVSB Practice Act Model, the association will continue to promote graduation from an accredited veterinary technician program.

Please understand that AAVSB will comply with the legal mandates of the contractual obligations with test administrators assigned under the acquisition agreements related to the VTNE. If we may be of any further assistance, you may contact either Charlotte or me at 1-877-698-8482, extension 225 or 221.

Sincerely,

Kathy Hunt
Associate Director

Cc: Charlotte Ronan

APPENDIX: E
SUMMARY OF HEARING

Veterinary Technicians Sunrise Review
Public Hearing
August 16, 2005

Hearing location: Department of Health, 310 Israel Road, Tumwater, Washington
Hearing Panel: Allen Spaulding (Department of Health); Jovi Swanson (Department of Health); Yvonne Braeme (Representing the Public)

Department Staff: Pamela Lovinger, Sherry Thomas

The hearing began at 9:00 A.M.

Applicant's Presentation

Markiva Contris, RVT presented the applicant report.

Questions from the Panel

Jovi Swanson: When a supervisor attests to a vet tech's completion of certain criteria, what is listed on it?

Markiva Contris: As far as I know, it is just a letter from the veterinarian stating the person has completed five years.

Jovi: So there's no criteria listed such as doing anesthesia.

Markiva: No.

Jovi: How long is the vet tech's field experience?

Markiva: The program is two years and speaking from Pierce College, the final 10 weeks is the externship. For the full 10 weeks they go to three different veterinary clinics and work full time.

Yvonne Braeme: Does the examination currently cover all those areas that are allowed under law for the licensed people?

Markiva: The VTNE is a 200 question multiple choice exam with various areas that they are asking questions on, but it is not in any way a practical exam. It tests book learning. It doesn't show whether or not someone is skilled.

Yvonne: What is the pass rate for those in the five year program?

Markiva: I just received some information that the fail rate for five year experience people, nationwide, is 57 percent. This is from June of this year.

Kathy Kube from Pierce College: I want to expand on what Markiva has said. Part of the pre-requisites for admission is a minimum of 20 hours in a veterinary hospital with rotation through the whole hospital. They have about a couple dozen areas they have to observe in and have the doctors sign off on. Also, during the last quarter we send some over to the veterinary college and they do their externships at WSU Veterinary School.

Pam Lovinger: I wanted to clarify some things for the record. Part of the background information in this proposal has always been access to the national veterinary technician exam. Our understanding is that there is currently no restriction on five year experience trained people sitting the exam and the current owner of the exam has not adopted the 2010 deadline. Is that accurate?

Markiva: As of today, the AAVSB has not specified what their stance is concerning the 2010 deadline. The Veterinary Technician Testing Committee is committed to uphold the 2010 deadline. We have not heard from AAVSB yet on whether or not they're going to stand behind us. We will be meeting with AAVSB in Kansas City September 8-11 and they are supposed to clarify their position at that time.

Pam: That information won't be available for the initial report, but we will hopefully be able to include it in the final report.

Markiva: I will be attending the meeting and will report back to you.

Pam: In the application there is a request for continuing education. We need you to describe what that will look like, what is available, how many credits, etc.

Markiva: We're limited to some extent on continuing education opportunities at this time. We feel that if it becomes a requirement then the opportunities will come.

Shirley Sandoval: As far as meetings are concerned, there are national, state and local meetings and conferences. You have to seek it out but it's out there.

Markiva: In some of the opportunities in emergency medicine, anesthesia, pain management, office procedures, communication skills, etc., continuing education is vital for technicians to remain current with the cutting edge technology that is out there.

Pam: So the primary purpose would be to keep licensed veterinary technicians current with evolving medicine?

Markiva: Yes.

Yvonne: How many continuing education credits are you thinking of requiring and over what period of time?

Answer: Veterinarians are currently required to do 30 hours every three years. We're thinking technicians could reasonably start out with 15 hours every three years.

Public Testimony

Linda Merrill, Washington State Association of Veterinary Technicians

The profession of veterinary technology has dramatically progressed since the establishment of the first formal college-level education program in the U.S. in 1961. Here in Washington State, the first formal, accredited program for veterinary technology was started at Pierce College in 1969. The addition of a second program in Yakima in 1999 has provided Washingtonians with a second option at formal education in the field of veterinary technology. For those individuals not able to attend either program, the alternative of working in the veterinary setting while attending accredited online programs has been available since 1995. With these choices now available, the legislature's intent, that all individuals should be permitted to provide health services, can be achieved without compromising on the entry level

Veterinary Technician Sunrise

knowledge of the individual. The original intent of the experience clause, to permit individuals currently working in the field a chance to utilize their employment history towards their credentialing, has been accomplished. It is now time to sunset the experience clause.

In today's world of intentional or accidental bio- and agro-terrorism, hope alone will not safeguard animal health, the nation's food supply, the public's health or the U.S. economy. An ample supply of well-trained veterinarians and veterinary technicians will be needed to help ensure the health of America's animals and people and the safety of its food supply. The British government, during the foot and mouth outbreak, determined that the optimal ratio of veterinarians to veterinary technicians was 1:2. An on the job trained "technician" with five years of experience in small animal medicine will not be able to bring the required knowledge into play in these situations. Formal schools of veterinary technology provide training in these situations. Formal schools of veterinary technology provide training in public health, food safety, food security, infectious diseases, global health, and environmental quality. Work experience does not. In this situation alone, the need to protect the interests of the public by restricting entry is overwhelming.

Nationwide, approximately 31 percent of households own cats and 36 percent of households own dogs, including Washington State. The owners of these companion animals are increasingly demanding higher standards of care for their pets. The level of formal education of veterinary technicians is just one aspect of the issue. The public needs, expects and benefits from assurance of the entry level ability of veterinary technicians. Without formal education requirements, these needs and expectations cannot be consistently assured.

The veterinary health care team is the foundation of modern veterinary care. Gone are the days of Dr. James Herriot and the solo veterinarian "doing it all." Veterinary medical care is provided by veterinarians, veterinary technicians, and veterinary assistants. Each individual provided certain skills, knowledge and expertise to the situation. Ultimately the veterinarian remains responsible for the veterinary care provided, but each individual on the team is responsible for his or her actions and inactions. Veterinary technicians, as the second level of care in the process, have greater potential for harm than the other, subsidiary positions on the veterinary health care team. A study of human surgical patients in Pennsylvania found that a hospital's death rates are higher when the nurses' education levels are lower. "Better educated nurses tend to be more proficient in critical thinking." Although this study is human based, the results are applicable to veterinary medicine and the education levels of the veterinary technician.

Harm is defined as "physical, emotional, mental, social, or financial impairment resulting from the functions rendered or failed to be rendered by the group seeking regulation." The potential for emotional harm to the companion animal public is very real. This would be due to substandard care or the failure to provide care by veterinary technicians inadequately experienced or educated in veterinary medicine. The AVMA reports a dramatic increase in the number of lawsuits involving the providers of and the standards of veterinary medical care. The potential for financial impairment includes both large animal and small animal veterinary medicine. In large animal medicine veterinary technicians are involved in herd health issues that can dramatically effect the public's investment. An on the job trained "technician" may or may not have the training necessary to meet the obligations of the situation. Without standardized education, this cannot be determined.

Medicine, both human and veterinary, is a rapidly evolving field. "There is no question that, if the public is to receive the best quality of care, health care professionals need to continue to learn. Mandating continuing education is a feasible alternative, being relatively easy to administer and acceptable to most professionals.

Notwithstanding arguments against it, mandatory continuing education is useful in maintaining professional competence. Continuing education can play a significant role in enhancing the quality of health care as well as provide professionals with an enriching experience."

While the benefits of continuing education can be debated, the need for some mechanism for practitioners to enhance their skills and knowledge is not. Continuing education requirements remain the best choice at the least expense. Veterinary technicians should not be the only medical field without this requirement.

In closing, I hope I've provided you with sufficient reasons to recommend closing of the experience clause and the addition of continuing education requirements for veterinary technicians in the state of Washington.

Deb Cofer, Washington State Association of Veterinary Technicians

I am a licensed veterinary technician who has worked in the field for six years. When I started out as a veterinary assistant, I was allowed to do many things that are prohibited in the WAC and when I would ask them why questions of my peers, many of whom were grandfathered, I would get the answer that that's just the way we do it. I needed more than that; just doing it wasn't ok for me. I went to Pierce College and graduated with a tremendous amount of knowledge that made me so thankful in looking back that I never lost an animal because of my ignorance at that time.

I have a couple of statements to share with you. What was good enough in the 80's and "adequate enough" as Nancy Leveque, the board member commented, should no longer be the measurement by which we provide healthcare to animals in Washington State today. We've got new technologies, new treatments, and new expectations of clients that mandate that we meet a higher level of experience. The WSAVT is all about raising that bar and providing better care. That's why the association themselves is asking for the c.e. requirement. This is why I support eliminating the five years experience.

I've been looking at things I've noticed happening over the last few months and difference between the school and field trained technicians. There are examples such as blood pressure monitoring and error signals where the technician doesn't know what to do with that such as lowering anesthesia or lowering fluids, or something as simple as looking at stool samples to determine if there are parasites and thinking there are when it's just undiagnosed fat material...

That is not training you get on the job. There is no curriculum or time allotment in a veterinary hospital. There were four opportunities to take c.e. in the last year and I work with four grandfathered technicians. Only one of my peers opted to take one of those and that was when I drove and bought dinner.

I also want to mention that it is against the law right now for assistants to administer anesthesia. I don't know if it's been just a miss or what but it does not make it against the law that once the animal has been intubated and put on a surgery table, an assistant can monitor it. That scares me tremendously. In monitoring anesthesia, there is no on-the-job training to tell you what to do when you're taking an animal too deep, how to monitor vital signs and when to take action on the vital signs, etc. The supposition is that there will be a veterinarian there doing the surgery that should be there to take immediate action but it's been my experience that the veterinarians are far too busy with surgery work to worry about the anesthesia part until the animal isn't breathing. The majority of animals undergoing surgery are doing so under crisis events such as being hit by a car, so they are at the greatest risk for anesthesia. The schooling provided at Pierce and Yakima provide you for critical care and when to get alarmed. I can tell you that everyone I have talked to were under the impression that everyone who administered anesthesia were licensed veterinary technicians. They did not know that on-the-job trained people were doing this.

Last, the AVMA opposes eliminating the five year experience clause and I've just read that the number one reason they oppose it is because of the shortage of veterinary technicians, not that they disagree with quality and formal training. They just don't think there are enough technicians out there. The number one issue is lack of program availability. In Washington State we could definitely benefit from another school,

especially in Snohomish County. Washington State has a premier veterinary college at WSU that has only two veterinary schools. Rather than maintain the quality of care at status quo, AVMA's time would be better spent creating additional opportunities for veterinary technicians to get training. WSU currently has satellite programs in the entire state, on other subjects and they should add opportunities for veterinary technicians.

Robert Privette, DVM, Washington State Veterinary Medical Association

I am a vet in Kennewick and am opposed to the bill. The association is opposed to the bill at this time.

There are three schools of thought within the association:

1. A small percentage who are adamantly opposed to the bill, mostly those in small specialty practices and don't feel their needs are served by the formal education process
2. A small percentage who are in favor of the bill
3. The vast majority who are opposed to the bill because it would create a shortage of veterinary technicians which could lead to additional procedures that veterinarians would have to do themselves, creating higher costs or the need for veterinary assistants to do more, which they aren't qualified to do.

There are approximately 50 percent of the applicants taking the exam that are experientially trained and the other half have completed the formal education process. There is currently a shortage and if we eliminated that 50 percent, the shortage will get worse. They are in favor of the formal education process but feel that it is not wise to proceed until processes are in place to provide additional educational opportunities in the state. We are in favor of continuing education and would encourage it.

We feel that what was stated that 50 percent of field trained applicants fail the exam is not necessarily a bad thing because the exam is the final arbitrator. In conclusion, we believe that House Bill 1511 is not in the best interest of the public at this time.

Yvonne: Has your group looked at any recommendations for pursuing additional educational programs?

Dr. Privette: We would like to see them expanded. We have talked to Renton Technical College and they have expressed some interest in starting an assistant program and we have encouraged them to expand that to a veterinary technician program. At this point they have not expressed any interest in that

APPENDIX: F
PARTICIPANT LIST

Participant List

NAME	ORGANIZATION
Shirley Sandoval	Washington State Association of Veterinary Technicians (WSAVT)
Markiva Contris, RVT, Applicant	WSAVT and Pierce College
Linda Merrill	Washington State Association of Veterinary Technicians (WSAVT)
Deb Cofer	Washington State Association of Veterinary Technicians (WSAVT)
Kathy Kube	WSAVT and Pierce College
William Wickwire	Veterinary Technician at Sumner Veterinary Hospital
Susan Wedam, DVM	Yakima Community College
Robert Privette, DVM	Washington State Veterinary Medical Association (WSVMA)
Candace Joy	WSVMA
Kristi Comyns	WSAVT

Review Panel

Allen Spaulding, Department of Health
Jovi Swanson, Department of Health
Yvonne Braeme, Public Member

Department of Health Staff

Pamela Lovinger
Sherry Thomas
Steve Saxe
Judy Haenke
Janelle Teachman
Nancy Houck
Leann Yount

APPENDIX: G
WRITTEN COMMENTS

Veterinary Technician Sunrise
Public Comments In Support of House Bill 1511

LoraLee Williams-Lutskas, RVT

I would like to address the health systems quality assurance group to let them know the benefits I see to the people of Washington state by implementing a sunset clause to the veterinary medical and surgical practice act.

The people of Washington State that take their pets/agriculture animals to the veterinary are expecting quality care. The requirement that all veterinary technicians have a standard education before applying for state licensure is long overdue. The National Association of Veterinary Technicians of America support and understands the need of all technicians in America to have the same basic education to protect the public. If all technicians have received education by an AVMA approved program of veterinary technology we can rest assured that the pets of Washington State are being cared for by knowledgeable personal.

There are two colleges in the state of Washington that can provide this degree to citizens of Washington. (Pierce College in Tacoma and Yakima Community College) Thus we have in place the ability to fulfill the requirement being asked by the sunrise clause.

I have been a veterinary technician in the state of Washington since 1983. I believe that my education from Fort Steilacoom (now Pierce College) has given me the advantage in my career to understand veterinary medical dosing, anesthesia, clinical pathology to meet the needs of the pet. The schooling that one receives in college allows them to take that knowledge and work within the veterinary community as a valuable team player. When one understands the blood levels of different pharmaceuticals, the normal values of the different species, one can recognize the sick patient much easier. As a team player with the veterinarian a veterinary technician can ensure the patient a comfortable and fast recovery from many illnesses.

The sunrise clause to the sunset clause of requiring all veterinary technicians in the state of Washington to have formal education will help safeguard the animals by having an educated paraprofessional meeting their needs. Education is the only method we have of making sure all technicians meet the same level of proficiency and understanding of veterinary medicine.

Liane Sperlich, DVM

Browns Point Veterinary Clinic

I am a licensed veterinarian in Washington State. I have been in practice for seventeen years and have owned my own practice for nine years. During that time I have benefited from the skills of Registered Veterinary Technicians that were graduates of an accredited program. As an employer I appreciate the skill level and training that comes with being an RVT, and also appreciate that I did not have to provide the training. Providing adequate salary and benefits for these skilled individuals has been an issue in our area, so much so that a task force has been developed. I see this as a sign that we should be trying to raise the standards for our RVTs in Washington State. There certainly are some highly capable people trained on the job, but to provide a consistency of education and technical ability, I think it is necessary to support the educational requirement for our RVTs. I support the Veterinary Technician legislation, House Bill 1511, as a means of upholding high standards for this important member of the veterinary team.

Deb Cofer, RVT

I am a graduate of Pierce College's Veterinary Technology Program and support the elimination of the 5-year experience clause in applicants being able to take the VTNE. I gave public comment at the Sunrise Review but apologize for not having a written copy for the committee. The following is that copy.

1) Prior to attending Pierce I was an unregistered assistant performing the majority of the tasks that technicians and assistants combined can perform. My training was on-the-job by other assistants who had also worked at the same clinic. After two years of on-the-job training and 'experience' and asking questions of why we did things a certain way to receive the answer "I don't know but it works", led me to want to be better, to know the why's to prevent any potential problems that would lead to harming an animal. I worked with outstanding veterinarians who had a very

busy practice and just were not available to provide the actual in-depth training that a person receives from attending a formal school. I went to Pierce to gain this knowledge rather than work an additional 3 years and take the VTNE. I was shocked upon attending courses at Pierce on the amount of knowledge I lacked, especially in the areas of anesthesia, pharmacology, parasitology, and wound management. To this day I am so thankful that I had never contributed to an animal's death during those initial assistant years due to this lack of knowledge.

No veterinarian today has the time nor the staff to provide the quality of education, both text and hands-on that is provided with formal training. Today I work with wonderful, friendly 'grandfathered' clause technicians who lack critical skills. Majority of laboratory analysis skills are non-existent, they lack knowledge of the affects of pre-anesthetic drugs, and their understanding of laboratory values and critical anesthesia monitoring are often only known by rote.

2) The question of whether or not the public is harmed by having assistants sit for the VTNE without formal training, to me, is an abounding 'yes'. What was good enough in practicing veterinary medicine in the 80's or 'adequate' enough as Nancy Leveque, Board of Governors member cites in her public comments should no longer be the measurement by which we provide health care to animals in Washington today.

New technology, new treatments, and new expectations of clients mandate that we meet a higher level of experienced care. WSAVT is all about raising the bar, striving to do better, elevating expectations and providing better care. This is why the WSAVT, themselves, have asked for CE requirements for licensing renewal. We expect our membership to continue to learn and do better, year after year.

3) Again, to the question as to whether or not the public is harmed by today's practice of having on-the-job assistants sit for the VTNE, I would add that the public is harmed today by having assistants monitor anesthesia. Today the RCW is clear in that assistants cannot, in any form, induce anesthesia nor intubate. However they can monitor a patient under anesthesia. I personally believe this must have been an oversight on the part of the Board of Governors. There is just too much that can go wrong under anesthesia. Often due to person's action or lack of action monitoring the anesthesia... taking an animal too deep, not monitoring vital signs, not taking action of those vital signs, not understanding the affects of the pre-anesthesia drugs used, not understanding the pre-existing problems of the animal and affect of anesthesia, not knowing what the values on the blood work mean to anesthesia monitoring, not knowing what atelectasis even is, etc. The supposition is the veterinarian is present so they can take immediate action. Most veterinarians are too busy doing their surgery to worry about the anesthesia part until they notice the animal isn't breathing or color is bad or blood isn't flowing.

If you question whether or not this is important for the public, I'd challenge you and the WSVMA to take this to the public. Ask clients and the public in general, are they aware that their pets, while undergoing anesthesia may be monitored by an assistant with as little as a few months on-the-job training? Given a choice, what would the clients prefer, an on-the-job trained assistant or a graduate of an AVMA accredited school? The clients I know would demand a graduate of an AVMA accredited school or take their pet and their business elsewhere. The greatest risk in surgery is not the actual surgery itself, but the risk of anesthesia, similar to human surgeries. The majority of animals undergoing surgery do so under crisis, such as hit-by-car, or are elderly pets undergoing anesthesia for dental cleanings and extractions, orthopedic, or abdominal surgeries. These are critical cases often at high risk for anesthesia. Who would you want to be monitoring your pet?

4) The WSAVT is not asking for the 'grandfather' clause to be removed immediately. We are asking it be removed December 31, 2009. That is more than enough time for the state, the AVMA, and the WSVMA to look for additional avenues for today's assistants and would-be technicians of the future to gain formal training. In reading the public comments from the WSVMA against removing this clause, it is clear they support and understand the quality of graduates of the formal training programs, but they feel there is a severe shortage of available technicians. With a perceived increase in shortage of licensed technicians, the veterinarians fear they must take on additional tasks themselves and worry this would add to the cost of providing health care.

This sounds so similar to the arguments and fears we had with requirement changes in human medicine and the nursing field in the 1970's. Today we continue to have a national shortage of nurses in the human field but there is no

way anyone is considering lowering the standards of care or licensing requirements of registered nurses because of financial impact due to this shortage.

I believe the shortage of veterinarians is caused from lack of perceived need. Along with being a licensed veterinary technician I am also the personnel manager at a small animal clinic. In the last three months I have lost three assistants to other local hospitals because they are allowed to do “tech work”. Clearly illegal items today per the RCW. I have explained that if they are performing these functions, it is illegal and the consistent reply I receive is that if it’s not a problem for the other doctors and hospitals, then I must be wrong. Often these are clinics that have no licensed technicians on staff and are willing to pay the assistants at technician level wages. For these individuals and veterinarians there is no incentive to have these assistants attend any formal training and expand their knowledge.

This is also why I believe the title of Registered Veterinary Technician should be changed to Licensed Veterinary Technician as there can be no confusion for the public on whether a person is licensed or not, regardless of the functions performed.

The WSVMA goes so far as to comment that with fewer RVTs available, veterinarians will increasingly rely on unregistered assistants. They give an example of an unregistered assistant monitoring an animal recovering from anesthesia who may not recognize adverse signs developing in the patient. I hate to tell them, but this is happening today throughout the state. WSVMA further comments that this could deter clients from seeking routine preventative care for their pets or delaying medical care. Based on this, I wonder what all those clinics that have no licensed technicians are doing today. Perhaps if the public was made more aware of whether a clinic or hospital had credentialed technicians on staff performing critical care for their animals, the market would drive having more assistants seeking licensure, whether gaining it before the 2010 deadline or attending formal training. I see in the future a veterinary practice being able to advertise that they have a high quality of licensed technicians on staff and this would increase their bottom line. This occurs today in the human field and we can learn from them that to raise the bar is far better in the long run than working so hard to stay status quo.

Dr. Susan Wedam

Background: Full partner in two practices, a primarily small animal practice since 1987 and an emergency practice since its start-up in 1996; Veterinary Technology Program Coordinator at Yakima Valley Community College since 1997

Current WAC defines Veterinary Technician as a credentialed individual that is registered or licensed. A Veterinary Assistant is neither a technician nor a veterinarian and is not required to meet any criteria or training. I will use these terms as such in my discussion.

1. Current option for Field Experience of 5 years does not have any training requirements or scope of practice.

The Field Experience option’s only requirement is “5 years full-time animal technician experience under the supervision of a licensed veterinarian(s) who shall attest to the completion of that experience”. There are no standards set for this nor any “training” required. Individuals may gain this experience as a receptionist or a kennel helper and this is included in the “5 years of experience”. Individuals that actually do receive some training or experience to be a technician do so outside the legal boundaries of the WAC while working on animals owned by the public without the owner’s knowledge.

It is truly not in the public’s best interest to have individuals licensed to perform procedures on animals when there has been no standard met to ensure that they are competent to do so. AVMA accredited Veterinary Technology Programs have extensive requirements for acquisition of practical clinical tasks and skills in addition to background knowledge regarding these skills prior to graduating. Individuals taking the “field experience” option should be held to this same standard to ensure that the level of competence expected from a Registered or Licensed Vet Tech is met. This is currently not done. The current examination, a multiple choice test, cannot adequately evaluate clinical skills or the application of knowledge to patients. This is done, however through the assessments required for completion of the college level programs.

Similarly we would never allow individuals that have worked in veterinary practices to sit for the veterinary exam to become OTJ trained veterinarians, as there is no standard met other than a single written exam.

AVMA standards can be obtained through the website at: http://www.avma.org/education/cvea/cvtea_process.asp , or by contacting Dr. Gary Leff at the AVMA . I can also provide a copy of the current standards if requested.

2. Veterinary Technology Programs require acquisition of clinical skills through multiple laboratories working with animals.

While all AVMA accredited Vet Tech Programs require an externship/clinical experience during the course of study, students work with live animals routinely during their laboratory courses. The students' "clinical experience" is not limited to simply that gained in practices during the externship. At Pierce and Yakima Valley Community College students work on Program animals, including dogs, cats, mice, rats, birds, horses and a variety of other large animals (cows, sheep, goats, pigs). They are provided abundant opportunity to gain skills prior to taking their "Clinical Experience" course near the end of their study. There are animal based lab classes each quarter of the program. These include demonstrating abilities in venipuncture, intravenous catheter placement, and anesthesia before performing this on a client-owned pet.

Often there are individuals that learn well from didactic methods but have a difficult time applying this knowledge to patients or clinical situation where higher level problem solving and integration of information is required. These individuals would be able to pass the VTNE and become RVT. However this same person would not be able to complete the educational requirements of a college-level program until they had demonstrated their ability to use this knowledge in safe and effective care of their patients.

3. Educational opportunities are available to individuals.

There are currently two main programs that provide total distance education, St. Petersburg College and Purdue University. These have standards that the clinic sites must meet to ensure that students are learning current knowledge and equipment. Unfortunately there is no requirement for clinical sites for the OTJ option of licensure in Washington. Purdue's requirements can be reviewed via their website at: <http://www.vet.purdue.edu/vtdl/vtdlhome/VTDLDocuments.html>

The majority of graduates from the Yakima Valley Community College's Program return to their hometowns. Many are older students with ties to these areas but make the effort to travel to gain their education. As most of the state is within 3 hours drive of Yakima, commuting for weekends is fairly easy.

Both Yakima Valley Community College and Pierce College are currently investigating the options for providing distance education. The difficulty lies in providing quality laboratory courses with adequate access to animals to use in developing skills. Lack of financial support adds to the challenges. Students will still have to be willing to do some travel to sites to gain practical skills although it should be closer than is currently available.

4. The lack of available Registered Vet Techs is compounded by the attrition of Technicians as they leave the field, not simply a lack of supply.

The main reason given to allow OTJ trained individuals to become licensed is a lack of qualified technicians. Lack of respect for knowledge level and thus lack of utilization is a key to the loss of credentialed technicians to other fields. Allowing less qualified individuals to become technicians adds to this dilemma.

It is extremely difficult in the midst of a busy practice to ensure that OTJ individuals receive the appropriate background into the skills they are taught as is evidenced by the very high percentage of OTJ that fail the VTNE, 57 percent in June 2005. This compounded with the total lack of any standard as to the quality of training that is given with OTJ experience can only decrease the respect given the profession as a whole.

Conclusions:

It is expected that veterinarians and technicians improve their abilities through that learned from clinical experience, a form of on-the-job training. It is not expected that this be their educational foundation or the only form of training. Increasing demands for high level patient care by veterinarians and their clients requires Technicians to continually

improve and use new medical knowledge and products to improve their care. This requires background knowledge and critical thinking skills to evaluate validity of data, differentiating marketing schemes from science, and appropriate application to the patient. I have worked with many individuals with the required 5 years of experience both in my practices as well as in the college's Vet Tech Program. They have many holes in their training, especially when it comes to evaluating and using new information and medical procedures.

Protection of the public encompasses not only individual animal care, but protection of the "national herd" and the ability to inform the public of zoonotic disease prevention. Technicians are to partner with veterinarians in this role and must receive training to do so. Most practices simply do not have the time provide this. Last Friday veterinarians received a "Health Advisory" regarding Tularemia, a zoonotic disease most often found in rabbits, which can infect dogs and cats as well as humans. This and other emerging diseases require technicians to be on the forefront to protect their clinical staff members as well as the public from these diseases.

On-the-job training could meet that provided through college based programs, it just currently does not. Nor is it economically practical to do so. In order for this to provide a viable tract to produce adequately qualified technicians, it must meet similar standards to those required by AVMA accredited programs and must be monitored to ensure adherence to these standards just as accredited programs are.

Denise Moore, Registered Veterinary Technician

I am writing to comment on the sunrise review for veterinary technicians in Washington.

I support the elimination of alternate pathways to becoming a veterinary technician. I do not feel that a person receiving on the job training gets sufficient education or experience. With OTJ training, a person is limited to learning what the doctor or technician is willing to teach, and then, probably only learning the basics and not a complete understanding as to why. Additionally, the laws prohibit any assistant from performing certain vital duties that technicians do, so how do they get hands on experience; they are either breaking the law, or not getting it. Another problem with OTJ training is that there are no certain criteria with which would have to be fulfilled to even sit for the boards. There are so many things learned in a teaching facility that are generally not taught in the workplace; the biggest being, once again, the why it is done a certain way, not just because "it has always been done this way and it works". One of the saddest situations I can think of is training under a senior doctor who refuses to try anything new. The "I've done it this way for 30 years and it has always worked" mentality; what that person is missing out on is disheartening. It is in environments such as that that a schooled technician is truly needed to encourage the evolution of better medicine; at least they can do anything in their power to better serve the patient/client.

I would also like to see a minimum of two RVTs placed on the Board of Governors so that we can be a part of our regulation. I feel that technicians have a better idea of what we need or don't need in our regulation and we should be able to express those feelings to the board.

Lastly, I feel that requiring continuing education for license renewal is a must. We have taken an oath that clearly states, "furthering my knowledge and competence through a commitment to lifelong learning", among many other things that can only be achieved through continuing education. Why should it be any more important for doctors to continue their education than technicians? We are supposed to be a health care team.

Laura Tautz-Hair, RVT, Veterinary Technician Specialist (Emergency and Critical Care)

I have been a registered veterinary technician for 7 years now. I began in the veterinary field 13 years ago as a receptionist, which quickly transitioned into a position as a veterinary assistant. After a few years as an assistant I had learned many skills and was very involved within the veterinary team. During my learning as an assistant I had mastered many of the hands on tasks of the practice such as drawing blood, placing intravenous catheters, administering subcutaneous and intramuscular injections, administering oral, ocular, and topical medications, etc. I found it frustrating to not always know the why behind the tasks I had learned. I was not educated in the side effects of the drugs I administered, nor was I educated in the anatomy of the patients I

was placing needles into. Monitoring anesthesia was also a part of my job which I was often nervous about because I was offered little training in this area. The practice was a busy practice, I tried to read as much as I could, but I did not have a mentor available to teach me what I felt I needed to know to complete the tasks in the safest manner for the patient.

I decided to attend the Veterinary Technology Program at Pierce College despite the discouragement of the veterinarian I was employed with at the time. Why go to school when you can just get your registration in a couple of years was what I was told by my employer. I chose to receive an education because I felt it was necessary to become a quality veterinary technician. I chose to be a person who not only could complete a list of hands on skills, but also had the knowledge behind those skills. Attending school was the best decision for my career. I received a broad education to assist me in my daily tasks, such as anatomy and physiology, pharmacology, parasitology, public health and zoonotic diseases, animal nursing, anesthesiology, radiology, etc.

I feel it is important for not only the animals that are being treated, but also for public health and safety that the profession of veterinary technology be educated. A majority of the states require education for veterinary technicians. It is important that Washington State join the effort to increase the quality of veterinary paraprofessionals in the nation. A candidate that has not gone through an American Veterinary Medical Association approved education will not have a guaranteed education in the basic duties of a veterinary technician. It is important for the veterinary technology profession to have a standard that all technicians receive the same education base which HB 1151 will allow for within Washington State.

In addition I would like to support the request of the Washington State Association of Veterinary Technicians that two registered veterinary technicians are allowed to be voting members of the veterinary board of governors. Simply on the principle of taxation without representation.

Trish Watson, RVT

I would like to take this opportunity to voice my support for the above referenced change.

To the first point of the “grandfather clause” allowing a person who has worked in a veterinary clinic for 5 years to take the exam for licensing:

As the veterinary field strives to utilize more specialized medical technology in daily practices, I believe it is fitting to ensure that safeguards are taken to require proper education along with the training of skills to become a Registered Veterinary Technician. Each clinic varies widely based on the knowledge and application of that knowledge of the veterinarians within that clinic, thereby training in the clinical setting will vary according to clinic. It is the goal of registered technicians to strive to ensure continuity in the requirements (educational as well as skills) of anyone wishing to pursue a career in the veterinary field as a technician. The internet has provided an alternative way to obtain this education for those who cannot commute or move to the city with an accredited program. It is now time to adjust the requirements as stated to reflect the level of commitment to the professional integrity of this field.

With regards to the changing of the title “registered” to “licensed”, I am also in support of the request.

Veterinary Technician Sunrise
Public Comments Against House Bill 1511

**Harmony Frazier, Senior Veterinary Technician
Woodland Park Zoo**

Please note that a friend of mine who is a Registered Veterinary Technician in WA State and also completed the Associate course at Pierce College DID NOT receive the notification of the Sun Rise review. She did recently receive her annual license bill though. It concerns me that not all technicians in WA received the notification. I would suggest that that alone would make this review invalid at this time.

I do have some comments though about the current proposal.

- I do not think removing the option for field trained Vet Techs to sit for state licensing and receive registration should be eliminated at this time.
- A formal 2 year Associate Degree is not necessarily the best option or fit for everyone. Not everyone has the luxury of attending school full time. These structured programs may work well for younger students entering into college soon after High School but are not the best fit for older students that have been in the working arena for years. Being a good technician is not necessarily contingent on attending a 2 year course. There are many skill levels of both Field Trained as well as school trained technicians. Discovering what makes a technician most proficient and then offering more than one avenue to get there should be the future direction for licensing.
- Working full time as a Veterinary Assistant while studying on your own, takes time and self discipline. Then to successfully pass the registration exam along side those that took the school path, should be commended.
- One of the objections raised by WSAVT is that veterinary assistants being trained on the job are performing tasks illegally in order to become proficient. I do not see this as an issue when being supervised and trained by a licensed veterinarian. Students in a veterinary technology program are also performing the same tasks on live animals which could also be considered technically illegal. In fact a classroom of students being supervised by one instructor may have less supervision than a field trained assistant working directly with a veterinarian.
- WSVTA also suggests that potential limited exposure to best practices and procedures is a problem for field trained technicians. This is a reflection of the quality of the licensed Veterinarian and should be addressed through the requirements for Veterinarians rather than assuming that practicing veterinarians are less knowledgeable than school instructors. The quality of either cannot be determined based solely on which they chose as a career path. In either case, as it also is for RVT with AVMA training, the veterinarian is ultimately responsible.
- I have reviewed the distance learning options suggested and only one, Purdue University appears to be available in WA state and have a superior track record. I would like to suggest if WA State is serious about raising the skill level of all RVT in the state that they commit to offering DL associated with a school in Washington.
- I do believe that continuing education is important and should be part of annual registration. The options for good continuing education in Washington are poor at best. I think this should be the next step in elevating requirements for technicians. Offer good continuing education first.
- Next; I would suggest that a Distance Learning course be offered in WA State. I do see value in formal education but believe it needs to accommodate more than those that can attend school full time in the daytime, at only the two locations.
- I would like to see the change to more formal education requirements happen in stages over time;
 - Continuing Education Courses
 - Distance Learning Option (Purdue University is a good example). Even with this, years being field trained should count toward the degree.
 - Then, phase in the option of a two year course and/or years of training with Distance Learning combo.
- I do not think Washington State is ready to move on this requirement change at this time.
- I would suggest that WSAVT work toward an array of good quality CE for all technicians in WA state.
- WSAVT members are less than 1/3 of all technicians working in the field in the state and as such, do not necessarily represent the wishes of the RVT in Washington.

Thank you very much for taking another look at this request. I look forward to hearing the outcome of your decision.

Nancy Leveque, Board Member
Washington State Veterinary Board of Governors

I am a new board member, but have heard about this possible law that all technicians have to attend the 2 year course to become licensed. I must admit that I do not agree with it. There are several reasons:

1. In my past experience of working with licensed techs that have attended a formal education or received on the job training, I have almost always thought that the on job training person was more than adequate, especially if they have passed the written test too. Those technicians have had 5 years of experience, where the 2 yr programs students may only have a month or two. I also find the licensed techs that have not attended a 2 year teaching program to be extremely committed to their work. Not to say the 2 yr program techs aren't but the techs that have completed 5 years and then taken the test and passed tend to show more diligence.

2. In this day and age with the cost of living etc and the tendency for the techs to be single women, I think it is often difficult for a potential vet tech to have the time and money to go to school for 2 years and complete the program and continue to provide a living for themselves or family. They may not have a good income for the 2 years and then afterward have to pay back loans, etc on the minimal pay that techs often receive. It is often not cost effective. Also I think it will decrease our availability of lic. techs.

3. Is this idea that to be a licensed tech, you have to attend a school for 2 years, possibly an idea for the institution to make more money? In human medicine, I believe that that paramedics can have on job training if they pass a test, then become licensed paramedic.

4. Also has anyone evaluated the teaching program lately, I have had the chance to visit with an instructor or two and have some concern about the quality of information and level of experience the instructor has to pass on to the students.

5. I by no means believe the teaching programs should be discontinued, I just think that the public/potential vet techs should be given an option of both chances to become a licensed veterinary technician. I believe it can only improve the quality of techs we receive.

Please accept these few informal comments. I am away on work and wish I had time to write more on the subject. Let me know if there is anything else that I can do.

Linda J. Crider, DVM, Chair
Washington State Veterinary Board of Governors

It is the opinion of this Board of Governors Member (Chair) that formal education for all Veterinary Technician License candidates **NOT** be mandated. As a member of the Inland Empire Veterinary Medical Association and with the blessing of Brian Hunter DVM (IEVMA President), I can say that this is the consensus of the organization, as well.

Reasoning:

Issue: **potential unavailability of a standardized test** – This has been resolved by the purchase of the currently used Veterinary Technician Test by the American Association of Veterinary State Boards (of which Washington State is a member.) It is my understanding that AASVB will continue to allow the test to be used for informally trained candidates.

Issue: **quality assurance and public protection** – For the veterinarian, the most useful assistant is licensed, educated, and experienced one. Ideally, all assistants are licensed and experienced. However, a shortage of licensed veterinary technicians exists in Eastern Washington, and practitioners often have a choice of educated assistants with a license or experienced assistants without. Licensed technicians can legally perform more tasks and should receive greater compensation; however, they must be able to competently and efficiently perform all tasks required of the position to provide quality care and warrant higher salaries. Unfortunately, veterinarians are often disappointed after hiring a recently licensed, formally-trained technician (with an increased salary expectation) when they find that they must spend the same amount of time training/supervising as with an experienced unlicensed assistant (who often has an initially lower salary expectation.) Many new graduates of formal technician programs lack specific practical skills as well as understanding of the flow, urgency and priorities of a real veterinary hospital. They often are familiar with tasks

but far from competent and efficient. In this case, the license creates a false sense of quality and safety. My personal observation has been that technicians licensed through the non-traditional, on-the-job training method have a greater dedication to the field, a greater level of maturity, and more success in their occupational position. I do not believe that the current technician programs prepare students adequately for the expectations/demands of real hospitals. Formal education does not seem successful in teaching multi-tasking, prioritizing and customer service. I don't believe that requiring a formal education ensures the quality of care of the individual patient; only the supervising veterinarian can do this, and the current Practice Act holds the veterinarian ultimately responsible for all tasks performed by licensed or unlicensed assistants. Any barriers to licensure of experienced assistants will only perpetuate the shortage of technicians, mock the veterinarian's responsibility of judging the competency of an assistant, and widen current holes in veterinary care availability for the public.

Issue: **inability of unlicensed assistants to practice tasks** of licensed veterinary technicians – Again, the Veterinary Practice Act of Washington State holds the supervising veterinarian responsible for every action performed by a licensed or unlicensed assistant. As stated before, I have observed that new graduates of technician programs have had minimal practical experience. As long as both preceding statements are true, I believe that the veterinarian should have the choice in whether they spend their time training a newly licensed, informally-trained person or a newly licensed formally-trained person. Ultimately, the veterinarian is the person held accountable.

Currently the Practice Act allows students enrolled in an accredited veterinary school to legally practice under the supervision of a licensed veterinarian. Perhaps legislation should be introduced to allow technician candidates who meet specified requirements to practice technician tasks under the immediate supervision of a licensed veterinarian. This could include candidates enrolled in approved distance learning courses who have successfully completed a certain percentage of the curriculum. It could also include informally-trained candidates with four years of full-time, documented experience who have submitted their documentation/test fees as intent to become licensed. Essentially this would create a "learner's permit" situation allowing those with intent on licensing legal practice time.

Skip Nelson, Board Member Washington State Veterinary Board of Governors

This appears to me to be a self serving, turf protecting effort on the part of the college graduate technicians. It reminds me of the "bad old days" when veterinarians had great difficulty becoming licensed in certain states unless they had graduated in that state.

In my field of exotic pets I have never been able to employ a graduate licensed technician. They are not interested in our patients and I have had to train all of my assistants, 3 of which passed with flying colors following mentoring by our staff veterinarians.

I do not believe the public and its animals would be well served by restricting the opportunity to take the qualifying examination by experienced assistants.

Washington State Veterinary Medical Association

The Washington State Veterinary Medical Association (WSVMA) opposes HB 1511, legislation that would eliminate veterinary technicians' ability to become registered through five years practical experience before taking the Veterinary Technician National Exam (VTNE). While the WSVMA is not opposed to moving more technicians through formal training before taking the VTNE, the WSVMA believes HB 1511 would be detrimental to the profession.

Background

In October 2004, WSMVA conducted a poll of its members to inquire whether they supported or opposed HB 1511. Seventy-two percent of members responding to the poll opposed the legislation. The WSVMA Executive Board also voted to oppose the legislation. There is currently an insufficient number of Registered Veterinary Technicians (RVTs) to perform necessary duties in veterinary practices throughout Washington State. The WSVMA is opposed to HB 1511 because it would further reduce the number of RVTs available for hire in Washington State.

Educational Programs & On-The-Job Training

Limited Access to Educational Programs

There is limited access to educational programs in Washington. There are only two veterinary technician educational programs: Pierce College in Lakewood and Yakima Community College (YCC) in Yakima. Pierce College enrolls forty students per year with a reported attrition rate of approximately nineteen percent. YCC has space for thirty-five students but, according to the college, often fails to fill the available slots. Furthermore, YCC reports an attrition rate of fifty percent or greater, often resulting in an average graduating class size of approximately sixteen to eighteen students. Therefore, fifty students or less may graduate statewide and enter the profession annually.

Additional Educational Programs Not Available

Currently, public funding for higher education is low due to economic conditions and at this time, there are no public institutions willing to add this program to their curriculum and undergo AVMA accreditation.

Distance Education & On-The-Job Training

Many potential technicians are place bound or live in remote areas with no access to regional schools. There are those who must work while attending school in order to support their families. Distance programs exist but they are cost prohibitive, often triple the amount of public education, and those attracted to the field do not have the resources to pay for these programs. Furthermore, distance programs take approximately three to five years to complete and graduates leave school with a high debt load in a field with low wages. This is a major deterrent to many potential technicians. In these cases, on-the-job training is the only alternative.

On-The-Job Training for Multiple Species & Specialty Practices

On-the-job training is an integral part of education for technicians of both general practitioners and board certified specialists. Veterinarians practice medicine on a wide variety of species and often require their technicians to be familiar and well-trained to handle specific medical issues inherent not only to companion animals, but also inherent to avian and exotic species. In addition, veterinarians who are board certified in specialties such as neurology, oncology, surgery, critical care and others expect a high level of expertise from their technicians. This training occurs at the practice level and is difficult to obtain in an educational setting.

Veterinary Technician National Exam

Currently, the Veterinary Technician National Exam (VTNE) is given to students who have: 1) successfully completed an AVMA accredited educational program; or 2) completed five years of training with a licensed veterinarian. The VTNE is the final arbiter for the credentialing of veterinary technicians, whether formally trained or job-trained.

The Effect of HB 1511 on Veterinary Practices in Washington

HB1511 would create a shortage of RVTs leading to more tasks needing to be performed by veterinarians. This would increase the cost of animal health care to the public.

The Effect of HB 1511 on Employment of Registered Veterinary Technicians

Demand for RVTs is increasing. By requiring formal education, HB1511 would decrease the number of available technicians.

The Effect of HB 1511 on Employment of Unregistered Veterinary Assistants

Because some tasks currently performed by RVTs do not require a license, HB1511 could lead to increased hiring of unregistered assistants. While RVTs can perform dental extractions, install IV catheters, induce anesthesia, and perform necropsies and many other duties, unregistered assistants are limited to cleaning teeth, taking radiographs, collecting lab specimens, and additional duties listed in WAC 246-935-050.

Wages for Registered Technicians and Unregistered Veterinary Assistants

In 2002, an American Animal Hospital Association (AAHA) study revealed wages for RVTs employed in the western states to be an average of \$26,503 with unregistered assistants at \$20,862. In 2004, post graduate surveys from both YCC and Pierce College showed most graduates are employed at an average approximate salary of \$24,000.

Improvement on Public Protection by HB 1511

No measurable improvement is evident.

The Effect of HB1511 on Animal Welfare

HB1511 could cause an increased risk to animals. With fewer RVTs available, veterinarians will increasingly rely on unregistered assistants. For example, an unregistered assistant monitoring an animal recovering from anesthesia may not recognize adverse signs developing in the patient. Additionally, with a shortage of RVTs, veterinarians will likely perform many RVT tasks with the resulting increased cost of animal health care. This could deter many from seeking routine preventative care for their pets or delaying medical care in an emergency.

Conclusion

The WSVMA opposes HB 1511 because we believe it will exacerbate the shortage of available RVTs. We do not oppose increasing the opportunities for RVTs to seek formal training and increasing the number of RVTs who enter the profession through formal education. This will require considerably increasing the educational opportunities beyond those currently available. Finally, because of financial, educational, and specialty training reasons, we believe the opportunity should remain for training and registration, through the experiential route. The exam will remain the final arbiter of one's training, both for those entering through formal education or experience.

Washington State Veterinary Medical Association Addendum to Statement on HB 1511

In addition to our previous written statement we would like to provide input on the following items:

1. Continuing Education Requirements for Technicians:
We believe the Dept of Health should adopt rules requiring Veterinary Technicians to attend continuing education in order to keep up with medical advances.
2. Name change from "registered" to "licensed" veterinary technician:
The WSVMA has no opposition to this change.
3. Creating positions on the Board of Governors to be designated for veterinary technicians to hold:
The WSVMA is opposed to this. There is nothing in the board of governor's mission statement that would support the addition of technicians to the board. From an historical perspective, the employing veterinarian has been responsible for the actions of his/her staff. Is there a change in this planned for the future? If so then maybe there should be a separate board of technicians to respond to complaints against technicians.

Response to Public Comment/Testimony

Markiva Contris, RVT

I wish to thank you and your panel for the opportunity to discuss issues that greatly affect veterinary technicians. The following is my “applicant response” to public comments.

Dr. Leveque:

Dr. Leveque states that field training is more than adequate in her mind. My response is that as a veterinary technician practicing in the State of Washington adequacy is simply not acceptable. Our goal here is to elevate the standard of skills and the quality of care *above* adequacy. When the WAC and the RCW were written, the field training clause was to be temporary, removed after the field of veterinary technology had an opportunity to establish itself. There is a nation wide movement to encourage education from an accredited veterinary technology program as the only route to licensure for veterinary technicians. The AVMA defines a veterinary technician as someone who has been educated through an accredited program, and NAVTA encourages all states currently offering alternate routes of licensure to comply with the VTTC recommendation.

Dr. Leveque states that the 2 year program candidates have limited experience. As a graduate of and an instructor in the Pierce College Veterinary Technology Program, I can state that this is not accurate. Students of any AVMA accredited veterinary technology program work directly with animals from the first day of class. I have enclosed a copy of the Pierce College Veterinary Technology curriculum, application packet, and rules and regulations. Each quarter is ten weeks in length, with each student getting at least four hours of lab time weekly for each clinical class. The students also gain valuable animal care skills by performing ward care duties where they care for school animals. I think that it is important to note that the students work only on school-owned animals, they do not practice at all on publicly owned animals. The students participate in an externship program the last quarter of their schooling. This allows the student to go to three different clinics and work full-time as a veterinary technician. The students must identify themselves as a technician student, and they enter into a cooperative work agreement with the supervising veterinarian. In our efforts to elevate veterinary technician standards, we conversed with several veterinarians who do not know what happens in a veterinary technology program. The WSAVT and WSVMA will co-host an Open House/Continuing Education opportunity at Pierce College on October 20, 2005. I invite Department of Health members, veterinarians, and veterinary technicians to attend this event to get an accurate idea of the level of skills the students are achieving in the program.

I believe it takes commitment and diligence to pursue veterinary technology as a chosen profession regardless of which route pursued. No matter what profession or what type of training a person receives, differences in personality, life experience, and motivation will influence job performance.

Dr. Leveque addresses the cost of an education. Yes, attending an educational program is a financial obligation that must not be undertaken lightly. But if one compares the cost of comparable human medical professions, one will find that schooling at a state run community college is considerably less than a four year institution. Workforce training, federal and state financial aid, grants, and scholarships are readily available to assist anyone wishing to pursue a degree. Veterinarians also have the option of financing a person’s veterinary technology education, with a contract agreement for future employment. Such an arrangement could be a valuable tax deduction for the veterinarian, and ensure veterinary technician employment.

Both veterinary technology programs are in state run community colleges. The faculty and staff do not receive any bonuses or increased salary incentives by increasing enrollment. The assumption that financial gain may be motivating the VTTC or the WSAVT is false.

Personal opinions of the veterinary technology programs aside, one can simply compare VTNE performance by each population to help illustrate level of skills. Of the thirty field trained candidates from Washington State sitting for the June 2005 VTNE, at least six candidates were repeat test takers. One candidate was sitting for the VTNE for the third time. (I only looked at the January 2005 and the June 2004 tests). In previous years, field trained candidates had a 64 percent pass rate on the VTNE. For the June 2005 test, field-trained candidates had a 44 percent pass rate. On the June 2005 VTNE, field-trained candidates scored below passing (425) in the following domains: Laboratory Procedures (333) and Radiology and Ultrasound (286). They received the minimum passing score in Surgery Prep & Assisting (425) and Animal Nursing (426). Field-trained candidates scored just above passing in Anesthesia (439), with the highest average score in Dentistry Procedures (479). The overall average for all domains was (403) well below the (425) passing score. Pierce College candidates scored well above the (425) passing score in all domains, and scored consistently higher than even the national averages in Pharmacy and Pharmacology (564), Dentistry Procedures (637), Laboratory Procedures (629), Animal Nursing (588), and Anesthesia (595). I do not have access to Yakima Valley Community College's scores, but Program Director Sue Wedam would be able to provide that information.

By comparing VTNE performance, one can see that program graduates perform much better than their field-trained colleagues. Of course this does not mean that the veterinary programs cannot improve. Certainly, the programs should strive to stay current with veterinary medicine, practice the highest ethical standards, and endeavor to teach the students safe and efficient animal care. Of course the programs can always improve, but constructive criticism and feedback would be beneficial, rather than personal opinion with no suggestions in areas of improvement.

Dr. Crider:

The AAVSB has not publicly stated that they will not support the VTTC recommendation or the 2010 deadline. Hopefully, AAVSB will be forthcoming with its decision at their annual meeting in Kansas City, MO, September 8-11, 2005.

Accredited veterinary technology programs teach hospital procedures, client care, and customer service, but any new graduate is simply that, a new graduate. The hiring clinic will understandably have to train a graduate in their personal hospital procedures and clinic organization. Any newcomer to any profession requires training and it is unrealistic to assume that additional training will not be necessary. A veterinary technology program teaches clinical and laboratory skills that the hiring veterinarian will not need to take valuable time to train them in. A newly graduated veterinarian would require similar training and patience before they are allowed to practice on their own without supervision, so how can any veterinarian believe that the need for further training of veterinary technicians is somehow a program's deficiency?

By encouraging education for veterinary technician candidates, the WSAVT is attempting to elevate the standard of care practiced by newly credentialed veterinary technicians. The WSAVT is in no way "mocking" the veterinarian, or making a judgment on veterinarians at all. Personally, I would think that a busy veterinarian would not have the time to adequately train a veterinary technician and would welcome the relief from those tasks. Put the responsibility and the time of training veterinary technicians on the veterinary technology programs, freeing the doctor to practice veterinary medicine.

I am puzzled by Dr. Crider and Harmony Frazier's comments concerning the legalities of veterinary assistants acting beyond their scope of practice. Why propose changing the laws to *lower* the standard of care when the proposal is to *elevate* the standard of care? Currently, veterinary assistants do not need to document skills learned before sitting for the VTNE. The Department of Health ends up relying on an honor system to determine whether a field-trained individual has received adequate training. Accountability is what the WSAVT is striving for.

Dr. Nelson:

Again, I would state that this is a nationwide endeavor to raise the level of standards in the veterinary technology profession. This is not an effort to “turf grab”. In my support of program education, I am in no way belittling or criticizing field trained veterinary technicians. I feel that for my profession to progress and remain on the cutting edge of veterinary medicine, the alternate route to licensure should be closed. As far as the other comments Dr. Nelson made, I would simply suggest that veterinarians who cannot keep qualified veterinary technicians employed might need to look at their own actions and management style and take some personal responsibility for their situation.

WSVMA:

The WSVMA opposition seems to stem from a veterinary technician shortage. As written, HB 1511 will not go into effect until 2010. The intention of the bill is to allow time to address veterinary technician shortages, veterinary technology program access, and allow field trained candidates to complete their field training. By setting a 2010 compliance date, we are allowing the profession to progress and move forward, with time to address a lot of the opposition issues.

A new program graduate will require additional training, especially if they work in a specialty practice. It is not the purpose of a veterinary technology program to train a veterinary technician in specialty practice, but to give strong clinical skills and critical thinking training so that a graduate has a strong foundation to build upon. It seems that the WSVMA and many veterinarians assume that a new graduate veterinary technician will be well skilled in every avenue of veterinary medicine. I would ask them to think back to when they were newly graduated from veterinary school. In defending the right to train their own technicians, veterinarians are placing unrealistic expectations on the programs and program graduates. Of course they will find graduates lacking.

The WSAVT strongly believes that measurable public protection will occur with the passage of HB 1511. Veterinary assistants who practice outside the laws and codes of conduct, veterinary assistants who perform technician duties while gaining their field training experience, and veterinary assistants that may not identify themselves properly all contribute to potential public harm. Closing the field-training route to licensure for veterinary technicians will help ensure public safety and confidence.

The WSVMA’s statement concerning the effect of HB 1511 on animal welfare actually addresses and supports WSAVT’s argument for closing the field-training route to licensure. Although the WSVMA is trying to make the point about a technician shortage, they state, “ For example, an unregistered assistant monitoring an animal recovering from anesthesia may not recognize adverse signs developing in the patient.” This is the point WSAVT is trying to make. Unregistered assistants and those candidates receiving field training may *not* recognize adverse signs developing in the patient. WSVMA acknowledges this is a problem. The solution is to close the field-training route to licensure for veterinary technicians and to require accredited program training for all new veterinary technicians.

Linda L. Merrill, LVT

Thank you for allowing me the opportunity to testify at the sunset hearing for veterinary technicians. I would like to provide the Department of Health with some additional comments after listening and reading the other testimony provided.

There is no argument that there is a shortage of veterinary technicians. This is true for Seattle, for Washington State, for the United States and for every country that utilizes veterinary technicians or their equivalent (Canada, Great Britain, etc.) The National Association of Veterinary Technicians of America (NAVTA) has

studied this problem in depth.³ The repeating cycle of poor utilization of skills, leads to low salaries, leads to exodus from field, leads to shortage of techs, leads to veterinarians training lay persons, leads to low recruitment due to low salaries, which leads us back to the starting point in the circle. The majority of states do not offer alternate routes to licensure. I'm not stating this as a reason to sunset, rather I'm pointing this out to highlight the fact that regardless of how many routes to licensure that are provided, the technician shortage will still exist. The shortage is not caused by low numbers entering the field; it is due to a variety of reasons that result in too many people leaving the field. To base the argument against sun setting due to the shortage is not a logical argument. One does not follow the other. Also using the sunrise/sunset criteria, this argument does not meet any of the standards.

As a former member and Chair of the Veterinary Technician Testing Committee (VTTC) of the American Association of Veterinary State Boards (AAVSB) I would like to add some background information. I was the Chair of the VTTC when the proposal to restrict the Veterinary Technician National Examination (VTNE) to graduates starting in 2010 was adopted. The compelling reason for this decision was the fact that the examination is designed to test the entry level knowledge of a graduate veterinary technician student who has completed two years of study and clinical experience. Those two years must fulfill the requirements of essential skills and knowledge as defined by the certifying body of the American Veterinary Medical Association (AVMA). To utilize the test to evaluate the knowledge and skills of an on the job trained individual is a bastardization of the examination. Yes, certainly, some individuals can pass the examination, but this can not be the only criteria upon which to judge that persons ability. It is meant as a complement to formal training, not as a stand alone examination. This is the reason the VTTC voted to restrict its use to graduates. This will restore the utilization of the examination back to its originally intended audience. Whether or not an individual state allows alternate pathways is a question beyond the scope of the VTTC and the AAVSB.

Comments were made about the practical experience of the 5 year, on the job trained person versus the 2 year, schooled person. First, I would like to point out that veterinary technician students have over two years of intensive experience. Prospective students are required to have practical experience as part of their entry requirements. Through out the two years of school, their education is a mixture of class room and laboratory experience. Laboratory experience is direct, animal, hands on experience. The advantage is that the student learns the proper way to perform the many tasks required on laboratory animals, not behind the scenes on an owners pet or agriculture animal. It must be remembered that a graduate veterinarian (4 year degree) is also not fully prepared to step out of school and into practice without some initial guidance and mentorship. Why is a graduate veterinary technician expected to do this? Yes, of course the 5 year person has 3 more years' practical experience, but they are lacking the 2 years of veterinary nursing critical thinking.

Response to Nancy Leveque

1. I believe that it shows diligence to make the financial commitment and the time commitment to attend a formal program. I think that many would argue that the 5 year experience route could be argued as the easy way out. What I do know is that individuals in both groups make sacrifices; I just don't understand how it is relevant to this discussion. Many on the job trained individuals have stated that they see no reason to attend school. I wonder how many of the experience individuals would attend distance learning programs if that was their only option. Would we truly see a decrease in applicants?
2. I don't think it is the place of WSVBG members or veterinarians to make these assumptions for any individual in Washington State. I find it offensive to characterize the people in this profession as poor, single women without the ambition to attend school.
3. The schools of veterinary technology are not the petitioners in this case.
4. The Veterinary Technician educational standards are set by the AVMA and monitored by the AVMA. If concerns exist, they should be addressed directly with the certifying body, not with the Department of Health.

³ NAVTA News, June 1995, Volume 9, No. 2 Profession in Crisis – Veterinary Technicians Caught in a Vicious Circle

Response to Linda J. Crider

- It has been my experience that if a technician is licensed it is “assumed” that they can do anything they are legally permitted to do. It is not my experience that every time a veterinarian hires a new technician that all the skills and tasks in the codes are evaluated prior to the technician performing those skills. I have found that most veterinarians are not even clear on which tasks are listed for technicians and assistants.
- The argument that new graduates do not have the practical experience needed has already been addressed.

Response to Harmony Frazier

- The average age of the veterinary technician student in Washington State and in the United States is on the rise. The field of veterinary technology has now become a popular second career choice and “the older student” is now in the majority in most programs.
- Students in formal veterinary technician programs are not performing tasks “illegally” since they are exempt. Assistants in practice are performing these tasks “illegally” per the current rules and regulations of Washington State.
- Quality continuing education is available in Washington State. There are numerous programs in the state, numerous programs available on the internet, and numerous programs available at the large national meetings held through out the US. I can easily find a great option every month.
- The joy of distance learning is that it is virtual. It does not need to be based in Washington State to have value.

Response to WSVMA

- Distance learning is not cost prohibitive. At our practice, 2 assistants have taken this option and managed.
- In depth training on exotic and avian species is not taught at veterinary colleges either. Veterinarians gain their training on these species on the job too. Why is the training of veterinary technicians expected to be any different? Basics are taught in school, the rest is learned at continuing education classes and on the job.
- The VTTC, which certifies the VTNE, does not feel it is appropriate for the VTNE to be the “final arbiter”, it is designed to be one piece in the puzzle, not the end all.
- If the shortage of veterinary technicians exists in states with alternate pathways and states without alternate routes, why is the schooling of veterinary technicians blamed for this problem? California, which allows even more alternate pathways than Washington, has a huge problem with the shortage. Shouldn't it hold true that states that have many pathways or states that don't regulate the differences in technicians and assistants would have less of a problem? This is not the case. The shortage is all across the US.
- I find the argument for increased risk to animal welfare confusing. On the one hand it states “an unregistered assistant monitoring an animal recovering from anesthesia may not recognize adverse signs developing in the patient”, but on the other hand states “training occurs at the practice level and is difficult to obtain in an educational setting”. Which is it? Veterinarians can either train assistants to perform technician tasks or they can't.

APPENDIX: H
REBUTTAL COMMENTS

Cindy Polley, RVT

I wish to submit my opinion in support of House Bill 1511.

I am a 1991 graduate of Pierce College and hold an Associate Degree in Veterinary Technology. I have had very positive experiences working with many dedicated and devoted veterinarians in my years in private practice. I have spent over 8 years working on the executive board of the Washington State Association of Veterinary Technicians (WSAVT), and more than one year as state representative for the National Association of Veterinary Technicians in America (NAVTA). I was a member of the AVMA Committee on Veterinary Technician Education and Activities (CVTEA) site team in 2002 for Yakima Valley Community College Veterinary Technician program as well. In my years as a technician, I have worked in large animal, small animal, emergency and critical care and mixed animal practice, in both Technician and Practice Manager capacity. I hold high esteem for my chosen profession. Being a Veterinary Technician is not my job – it is who

I am, and will always be. I am also one of the attrition factors in veterinary technology.

I am an individual who “calls a spade a spade”. I believe laws are made for a reason. I do not believe in some, but I have never broken any that I am aware of. I chose to leave the traditional work environment of a veterinary technician because DVM’s, whom I care for deeply, were saying they agree and respect my feelings regarding the rules and regulations of the Veterinary Practice Act relating to veterinary technology, then ordering an unregistered assistant to anesthetize an animal in the same breath. Their defense, in their own mind, was that there is a shortage of veterinary technicians. I left due to the blatant disrespect for my dedication, service, knowledge, and support of the duties and responsibilities of being a veterinary medical health care professional.

Because one can only “bang their head against the wall” so many times over an issue before they realize it hurts, I have made a decision that through public education I will have to do my part to promote the changes I feel necessary for my beloved profession.

In my opinion, there will be many Technicians like myself, who will continue to leave the field due to lack of respect of our profession. For all the same reasons listed by my colleagues, I support the elimination of alternate pathways to becoming a veterinary technician, a minimum of two RVT’s placed on the Veterinary Board of Governors, and a continuing education requirement for veterinary technician license renewal.

Kari Vanderpool

My name is Kari Vanderpool. I am currently a Veterinary Technician student. I am writing in response to the debate on whether to allow on the job training to satisfy the requirement for a person to sit for the national and state exams to be a licensed or registered veterinary technician. I understand that this is a very touchy debate and am sure it is one that you have received all sort of opinions about. Please, allow me to put in my two cents.

I have had the opportunity to observe in many different clinics to satisfy the pre-requisite for this program. The differences between the two were staggering. Once clinic employed nothing but licensed that registered technicians and the other only employed one where the rest of the employees had received on the job training. At each of the two locations I was required to ask multiple questions to make sure I knew what I was getting myself into. At the first clinic, all my questions were answered and then some. I felt very prepared. At the second clinic mentioned, I felt like I was getting passed around the office because nobody seemed to know or be able to give me a straight answer. The level of care provided for the animals was lower and the amount of time the doctor spent in the office was also low. This may explain his inability to afford to pay higher costs for employees who knew what they were doing. Also, the first clinic was professional and clean and somewhere I would like my animals to receive care. The second clinic was old, antiquated and the last day I was there for my internship was the last day I ever want to step foot in that office. It wasn't until I enrolled and attended classes at school that I found out that Veterinary practice is the only medical profession that offers on the job

training. I think that the expulsion of this current practice should be added into law and those who are seeking to sit for the national and state exams be required to attend accredited AVMA schooling. After all, we are dealing with our family members.

Thank you so much for your time. I would appreciate a response if at all possible at least to know that you received my letter and /or to give me the results to this debate.

Karen Norton

I am a student in the veterinary technology program at Pierce College and I want to share some of my thoughts with you concerning the licensing review for vet techs. I am 58 years old and on my third major career change. I am a strong believer in education.

My main points are:

- AVMA accredited education requirement to take the national and state tests
- More locations and methods to get the education
- At least one registered tech on the Board of Governors
- Minimum standards for performance with sanctions for failure to perform
- Continuing education requirement to maintain registration.

The field of veterinary medicine is changing very rapidly. It was not that many years ago that there was no such thing as a licensed vet. Now, it takes as much education to be a vet as it does to be a human doctor. Likewise, there was a time when there was no such thing as a veterinary technician. At least Washington State is advanced enough to recognize it as a profession. Washington now needs to take the next step and require graduation from an accredited program in order to be licensed as a vet tech. Many advances in human medicine come from research on animals and likewise, animal owners are expecting treatments that rival human medicine. As the field grows ever more technical, vets have to stay up to date with frequent and continuing education. A large amount of the actual hands-on work in a vet office is done by technicians. Surely, you don't expect that person to be competent in this technical field without education?

Washington State invests a lot of tax payer money in the veterinary program at EWU and the two vet tech programs at Yakima C.C. and Pierce College. The state would reap a larger benefit if they recognized and supported the education of vet techs by requiring graduation from an accredited program in order to get a vet tech license. Our education is expensive and requires a large commitment from students to graduate. You can help reward those that sacrifice by requiring graduation. As the field advances it is inevitable that education will become even more important and eventually licensing will require an education. I want to see that requirement sooner rather than later.

Right now there is little incentive to get an education and little incentive to be licensed because people can walk in off the street and be hired as a vet tech. Most vets look to pay the lowest salary possible to techs and they believe that requiring education and licensing would make people demand a higher salary. To some extent this is true. I believe that vets are taking a greater and greater liability risk using uneducated and unlicensed employees. Eventually the public will learn that education and licensing is important and look for vets that operate legally.

I know many very competent on-the-job trained vet techs. Many are manually very adept and can perform procedures well. I admire their skill level and ability to learn as they do. OJ trained techs only know what a given vet wants them to know. If your vet is not up-to-date, you will not be up-to-date and the next animal entrusted to your care may need that new information to survive. Also, many have no idea why they do what they do. Many have no idea why and how to change the standard procedure in face of a new situation. Many do not have the scientific background necessary to understand today's advances in veterinary medicine.

Right now there is not the capacity in state supported vet tech programs to supply enough graduates to satisfy the need. Not everyone can attend a one of the two two-year programs. I encourage the state to place more accredited programs at more community colleges and provide the education through distance learning or other methods. Commercial education companies see the need in Washington and are adding programs here.

I encourage the state to put registered veterinary technicians on the Board of Governors. It is only right and fair that we have representation on a body that affects our profession. I also encourage the state to look into setting minimum standards of performance for vet techs and provide for sanctions if those standards are not met. And I believe we need a continuing education requirement to maintain our registration.

Markiva Contris, Applicant

I would ask the DOH to reconsider their recommendation to allow continued field training as a route to licensure for veterinary technicians. I do not think that I can add to the eloquent statements of the people who testified at the DOH hearing or of the people who took the time to write their support of this proposed legislation. I can only restate my belief that there is potential for public harm with the continued allowance of field training as an alternate route to veterinary technician licensure. Under the guise of field-training, unlicensed and unregulated veterinary personnel are currently acting beyond the legal scope of practice. This can lead to harm of publicly owned animals through lack of training or lack of disclosure. The public is unaware of the level of training of veterinary personnel and therefore is unaware of the risks to their animals. The WSAVT and I find this unacceptable. The applicants, AVMA, NAVTA, and WSAVT feel that the only appropriate level of training necessary for veterinary technicians is “completion of a post secondary educational program for animal or veterinary technology approved by the Committee on Veterinary Technician Education and Activities (CVTEA).”

Unlicensed veterinary personnel are prohibited from inducing anesthesia, venipuncture for blood samples, and evaluating laboratory specimens of any kind (not just blood samples as stated in the draft report). The DOH asserts that unlicensed personnel can be taught these procedures by observing them over a five year period. Through personal experience, I can say it is nearly impossible to learn to do any of the above skills simply by observation alone. Mistakes are made by students in veterinary technology programs even when faculty, staff, the student, and classmates are focused on a single task or a single animal. I cannot imagine the mistakes that could occur in a busy veterinary practice when all personnel have multiple tasks to do and there is no time to devote to the constant vigilance required when a person is learning to perform a task.

The nationwide veterinary technician shortage will not resolve until technicians receive recognition for their skill level, are properly utilized, and are paid a wage equal to their skill level. The above cannot happen until there is a standard level of training required for licensure. Graduation from an accredited veterinary technology program standardizes the entry level skills, allowing the public and veterinarians to recognize the training required for the title. Standardizing skill levels will lead to better utilization of veterinary technicians and the wages will rise as a result.

The DOH asserts that VT education is “expensive”. I find it rather ironic that the DOH (a state entity) finds state-funded community colleges expensive. Education is a requirement for every other health profession licensed by the State of Washington, and expense is not an issue. Registered Veterinary Technicians are able to perform all the duties of a veterinarian except diagnose and prognose, prescribe medication, and perform surgery. Education is required for veterinarians; why isn't it required for veterinary technicians? I think this opinion regarding educational expense subjective not relevant for this discussion.

I am pleased with the DOH recommendations to change the title from registered to licensed veterinary technician, and I am pleased with the recommendations of having a veterinary technician serve as a voting member of the Veterinary Board of Governors and for required continuing education for relicensure.

It is in the public's best interest for the DOH to reconsider its stance on field training for veterinary technicians and require a standardized accredited education as the only route to licensure.

Sara E. Lotto, RVT

I'd like to make a few comments regarding the Veterinary Technician Sunrise Review of House Bill 1511.

My greatest concern is that the opposition to this bill is ignoring the obvious advancement being posed to veterinary technicians, removal of the five year experience route to licensure. Logic and history tells us that education is a major component to career success and longevity. 72 percent of states in America recognize the advantage of a veterinary technology education. Experience is valuable but only within the context of having a formal education. Education should not fall second to experience. Low standards are not allowed in human medicine and shouldn't be allow in veterinary medicine.

Currently, there is a shortage of veterinary technicians. Similarly in the human medical field, there is a shortage of nurses. Shortages in the nursing profession have created a higher demand and have increased the number people pursuing a nursing degree. Maybe if human medical doctors where allowed to regulate the nursing field, they would allow nurses to "grandfather" in. Just as this would be inappropriate in human medicine, veterinarians should not be allowed to regulate the veterinary technician field. The opposition to this bill has a short-term vision and is not considering the greater good. These changes will improve patient care and advance the veterinary medical profession.

In rebuttal, someone should propose experience be substituted for a veterinary degree. Since training on the job is adequate for veterinary assistants, aspiring veterinarians should be able to learn the same way. Then they could sit for the national veterinary exam.

Individuals also indicate the cost of attending a veterinary technology program as prohibitive. An individual who is serious about becoming a veterinary technician likely to pay \$6,000 to \$8,000 to reach their goal. To help keep things in perspective, veterinary students pay \$75,000 to \$100,000 for their veterinary education. As far as the available colleges in Washington, veterinary assistants are fortunate to have two choices (Pierce College & Yakima Valley Community College); veterinarians only have one choice (Washington State University). You'll find individuals pursuing a formal education are more likely to stay in a profession verses someone who has not financially invested in their career.

Veterinary Technicians are committed to seeing their profession advance. I encourage you to pass House Bill 1511.

WSVMA

(The WSVMA's position on adding veterinary technicians to the board was later updated to neutral.)

The Washington State Veterinary Medical Association has reviewed the draft document issued by the Dept of Health on the sunrise review of HB 1511 on veterinary technician licensing. We have questions and comments on the following two areas:

1. The WSVMA continues to oppose adding a veterinary technician to the Veterinary Board of Governors. However, if the Sunrise Review recommends adding a veterinary technician to the board, we strongly request guidelines be written into rule or policy so that veterinary technicians are not allowed to discipline veterinarians in standard of care issues.
2. The WSVMA would like to go on record as strongly recommending continuing education requirements for licensed veterinary technicians. In our ever changing world of medical knowledge and techniques it is simply unacceptable that a license be maintained without the demonstration of an effort to stay abreast of changes.

**Shirley Sandoval, RVT, Scientific Instructional Technician II,
Washington State University College of Veterinary Medicine, WSAVT Past President,
AIMVT President**

Proposal to remove the five year experience route to licensure:

“Veterinary assistants perform tasks they are legally trained to do, under the supervision of licensed veterinarians who are responsible for their performance. The experience they use to qualify for registration is authorized under the veterinary regulations”

Unless this experience includes inducing anesthesia, intubation, evaluation of laboratory samples etc... Unfortunately, there is unreported incidence currently occurring in the field of veterinary medicine. There are unregistered assistants, and some veterinary technicians, working outside of the designated skill and supervision levels. What this review has shown is that these incidences must be reported by people (employees) who will speak for the animals that cannot speak or protect themselves. As a pet owner I used to trust that veterinarians utilized the appropriate personnel for the appropriate tasks. However, working as an assistant was an eye opening experience. Few unregistered assistants know the state regulations, and currently, as there is no credentialing, there is not an impetus to learn these regulations.

AAVSB and their stand on the 2010 deadline. I have yet to see a current memo or letter from this organization that plainly states their stand on this issue. They have a grand ability to send a grey answer to fit everyone's needs without truly stating a position. I would like a written copy of the source of your information that plainly states the AAVSB's position.

Use of the VTNE to test non-graduates:

Graduate technicians are required to pass exams on knowledge, hands on skills and critical thinking. The following is from the CVTEA list of requirements of an AVMA accredited education:

The list of requirements were pulled out of rebuttals because of the length

Given this data, it would be near impossible to test a non-graduate candidate's competency in the knowledge, skill, and critical thinking encompassing these subjects and tasks with a 200 question multiple-choice exam. A graduate candidate is required to demonstrate their knowledge, skills and critical thinking abilities PRIOR to their eligibility to set for the VTNE. I find these discrepancies a major flaw in the current assumption that "the test must be doing its job" if it is weeding out candidates. These assumptions are non-scientific and very self serving.

The people of the State of Washington have also put their trust into the 5 year experience testament. However, I know of two persons who were granted permission to set the VTNE with less than 5 years experience. How they performed on the test is irrelevant to the fact that they were allowed to take the exam. Why did the DVM

attest to the experience without the candidate truly having it? How desperate are we to credential veterinary technicians? It seems we spend more time and money on experience training than on trying to keep credentialed veterinary technicians in the profession. The attrition rate is high, but pouring water in a bucket full of holes will not keep the bucket full. As long as we continue to de-value graduate technicians, the profession will be de-valued and the economics for all veterinary paraprofessionals will be low. When you can earn more working as in retail sales, fast food, or even bagging groceries, what is the point of having the graduate? For those of us who have made a career out of this profession, we have found those practices that do value their technical staff, and are willing to utilize us and maintain an affordable salary base. These are the one's that encourage distance learning to their place bound employees, as well as other meaningful benefits. Now it is time for our state to step up to the plate and show value in the veterinary technology profession. Veterinary technology is rated one of the top 20 growing professions in the nation.² We are not trying to limit the number of persons that can become credentialed veterinary technicians, just trying to make sure this profession has a solid base of knowledge, skills and critical thinking. Consider this current situation: a veterinary assistant, anyone from 14-?, can legally clean the teeth of an anesthetized animal AND monitor the anesthesia at the same time. That same person can administer vaccinations and place IV catheters. In human medicine this would be totally unheard of, yet we, the state of Washington, allow it to occur with our pets. All in the name of "there are not enough credentialed technicians. When there is a nursing shortage, do we drop their credentialing regulations so we can add more numbers to the profession? Nurse assistants are credentialed and have had some schooling, 5 years experience should allow them to set nursing boards...I think not. I find it difficult to believe the review board cannot see the potential harm this may cause the public.

2. Department of Labor, 2004

Formal training to become a veterinary technician poses no more significant barriers to licensure than any other medical profession. There are also numerous scholarships and grants available to these students. In comparison, new graduate veterinarians often acquire a debt load of \$100,000.00 + with an average starting salary of \$40-60,000.00, depending upon the location. As far as salary base for a technician, our salary survey shows \$9-14/hour with many working 40+ hours/week

Correction to Pg 4 (#1): The last line should read "evaluating laboratory samples" (not just blood)

Arnold L. Goldman DVM, MS **President, Connecticut Veterinary Medical Association**

Dear Veterinary Medicine Public Service Professionals of AK, AZ, CA, MS, NJ, NV, OR, WA and WI,

I write to you today because your state currently allows on-the-job trained veterinary technicians, with appropriate years of experience, to take the VTNE and achieve certification, registration or licensing in your respective jurisdictions.

In Connecticut we are concerned about the unilateral decision by AAVSB to immediately, and permanently eliminate the ability of on-the-job trained veterinary technicians to sit for the VTNE in any state, thus permanently relegating them to a second-class status and limiting their future employment options in other states in the future.

To us, this decision, taken abruptly at this time, appears discriminatory and unfair, in that AAVSB may allow such on-the-job trained individuals to take the examination if *state governments* insist on it, but will eliminate the

right to take the examination in those states in which taking the VTNE is used as a *voluntary* standard of excellence and achievement, but without state government oversight.

We all know that an adequate supply of highly competent veterinary technicians remains an elusive goal and that our veterinary technology college programs across the nation do not produce the numbers necessary to keep up with industry growth and attrition. A formal limitation on how one reaches the standard of competency seems to us to be counterproductive to our industry and has little point but to restrict the pool of eligible candidates.

There is a belief among proponents of such exclusive VTNE restrictions that the eventual achievement of pan-national governmental oversight will raise salaries of and the level of respect afforded to veterinary technicians. We believe, however, that it remains the willingness of private veterinary practice clients to choose and pay for services that limits salaries for veterinary technicians, as well as veterinarians. The marketplace determines the value of our industry to the public. As for respect, that is a function of the personal relationship between an employer veterinarian and an employee veterinary technician. For better or worse, that element of the equation cannot be mandated. We therefore don't believe that restricting access to the VTNE is an appropriate manner in which to raise salaries or esprit-de-corps in this important field.

We recognize that veterinary technicians employed in agriculture, medical research or university academics may have different skill-set requirements than those employed in private practice. While that may be true and merit advanced or specific training, it is not a justification to limit opportunities in private practice employment to an exclusive group of veterinary technology Associates degree program graduates. These formally educated individuals are simply not numerous enough to fulfill the need. Elimination of the option for their services will produce a crisis of care and be a real detriment to the public and private practice veterinary medicine both of which require the availability of high level veterinary medical care on demand.

