



MEMORANDUM

DATE	October 12, 2021
TO	Veterinary Medical Board (Board)
FROM	Jessica Siefertman, Executive Officer
SUBJECT	Agenda Item 7. Update, Discussion, and Possible Action Regarding Board Approval of RVT Colleges and Postsecondary Institutions

Background

During previous Board meetings throughout 2021, the Board has discussed RVT colleges and postsecondary institutions and was provided information regarding other entities that accredit/approve these programs. Specifically, the American Veterinary Medical Association (AVMA), [Committee on Veterinary Technician Education and Activities](#) (CVTEA) accredits the majority of veterinary technology programs within California. All CVTEA-accredited programs in veterinary technology must meet the Standards of Accreditation of the CVTEA to ensure the quality of the educational experience and the assessment of student knowledge and skills. The CVTEA also performs regular site visits and evaluates annual, biennial, interim, and terminal reports submitted by accredited programs.

In addition, all private postsecondary education programs operating in California must be approved by the [Bureau of Private Postsecondary Education](#)¹ (BPPE). BPPE’s mission is to protect students and consumers through the oversight of California’s private postsecondary educational institutions by conducting qualitative reviews of educational programs and operating standards, proactively combating unlicensed activity, impartially resolving student and consumer complaints, and conducting outreach.

In general, BPPE is responsible for the following:

- protecting consumers and students against fraud, misrepresentation, or other business practices at private postsecondary institutions that may lead to the loss of students’ tuition and related educational funds;
- establishing and enforcing minimum standards for ethical business practices and the health and safety and fiscal integrity of postsecondary education institutions; and,

¹ Education Code section 94874 provides specific exemptions from the approval process.

- establishing and enforcing minimum standards for instructional quality and institutional stability for all students in all types of private postsecondary educational and vocational institutions.

The [Accrediting Commission for Community and Junior Colleges](#) (ACCJC) also accredits RVT programs. Their mission “supports its member institutions to advance educational quality and student learning and achievement. This collaboration fosters institutional excellence and continuous improvement through innovation, self-analysis, peer review, and application of standards.” Much like AVMA and BPPE, ACCJC also conducts regular reviews of the programs, including onsite visits, to determine if the programs meet ACCJC’s eligibility requirements, commission policies and accreditation standards.

During prior discussions, the Board’s Executive Officer raised concerns that the requirement for the RVT programs to also be approved by the Board may serve as a redundant and overly burdensome requirement for the programs with little, if any, consumer protection benefit. In addition, the Board has yet to create and implement an RVT approval program pursuant to California Code of Regulations (CCR), title 16, sections [2064-2065.9](#). To do so, the Board would need to divert existing staff and other resources from current duties. Prior to doing that, the Board’s Executive Officer suggested the Board evaluate whether the requirement for Board approval is necessary for consumer protection considering the other government and private accrediting/approving entities already providing oversight. If deemed unnecessary, the Board could propose legislation and regulatory changes to remove the requirement for Board approval of RVT programs.

Update

Additional research must be conducted and provided to the Board for determination of whether the Board should continue to approve RVT programs. Such research would include an in-depth review of pertinent statutes (Bus. & Prof. Code, §§ 4841.1, 4841.5, subdivision (b), 4842.5, subdivision (g), and 4843) and regulations (CCR, tit. 16, §§ sections [2064-2068.5](#)) and whether removing the Board approval requirement would impact out-of-state RVT schools and the alternate pathway for RVT applicants. This research also should include: (1) a comparison of other states requiring veterinary technician program accreditation; (2) determining what other accrediting bodies exist; (3) comparing the accrediting body requirements and ongoing oversight; and (4) determining how many AVMA-accredited veterinary technician programs are in California.

In addition, there should also be a review of the pending RVT education rulemaking (proposed revisions to or additions of CCR, tit. 16, §§ 2036.1, 2064, 2065.1, 2065.2, 2065.6-2065.8, 2066, and 2068.5) as it does not appear this type of research was considered for the RVT program accreditation/Board approval issue.

Action Requested

Due to the extensive research necessary, the Board is requested to direct the Multidisciplinary Advisory Committee (MDC) to research and evaluate this issue further and submit recommendations to the Board for consideration.