



REVISED

MEMORANDUM

DATE	July 18, 2022
TO	Veterinary Medical Board (Board)
FROM	Access to Veterinary Care Task Force Jaymie Noland, DVM, Chair Dianne Prado
SUBJECT	Agenda Item 8. Access to Veterinary Care Task Force Report

The Access to Veterinary Care Task Force met on April 27, 2022. The webcast is available [here](#). During that meeting, representatives from Western University of Health Sciences and University of California, Davis discussed current access to care initiatives in California veterinary schools. In addition, the Board student liaisons reported their findings on surveys they distributed to students prior to the meeting to understand their perceptions on access to veterinary care. The task force also discussed and sought input on various opportunities for educational outreach regarding incremental care.

On June 15, 2022, the California Veterinary Medical Association (CVMA) sent the attached letter and a list of potential solutions to the Board’s Executive Officer for Board consideration at a future meeting.

The letter includes the CVMA’s recently approved Access to Veterinary Care position statement and, in part, the following statement:

“The CVMA appreciates efforts by the VMB to explore access-related issues and, to that end, attaches hereto a list of potential solutions identified by our task force that may assist in addressing those issues. The CVMA sees opportunity for collaboration with the VMB on several of the items on the list, and welcomes further dialogue and feedback aimed at finding solutions to address access to veterinary care.”

On July 13, 2022, the Board received the attached letter from the Animal Physical Therapy Coalition (APTC) and requested it be included in the materials for this discussion. The letter states, in part, the following:

*“[The APTC is] seeking common sense legislation consistent with those recommended by the VMB Stakeholder’s Task Force on Animal Physical Rehabilitation:
 That California licensed physical therapists with advanced certification in Animal Physical Rehabilitation may provide animal physical rehabilitation under the degree of supervision to be determined by the veterinarian who has established*

a veterinarian-client-patient relationship, on a veterinary premises or an Animal Physical Rehabilitation premises, or a range setting.”

During the Board meeting, the Task Force will highlight the opportunities where the Board is being asked to assist with the solutions and seek guidance from the Board on how it would like the Task Force to proceed.

Attachments:

1. CVMA Letter Dated June 15, 2022
2. CVMA's Access to Veterinary Care – Possible Solutions
3. APTC Letter Dated July 13, 2022



June 15, 2022

Jessica Sieferman
Executive Officer
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

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Sacramento, CA 95815-4505
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RE: Access to Veterinary Care

Dear Ms. Sieferman:

The California Veterinary Medical Association, representing over 7,800 veterinarians, registered veterinary technicians, and veterinary students, is pleased to share with the Veterinary Medical Board the CVMA's recently-adopted position statement on Access to Veterinary Care. This statement was formed by a specially-commissioned task force of veterinarians and registered veterinary technicians with a wealth of experience and expertise in the subject, and in consultation with Dr. Michael Blackwell of the University of Tennessee's Access to Veterinary Care Coalition.

The CVMA's position statement is:

Access to Veterinary Care is a multifaceted public health and welfare issue rooted primarily in many pet owners' inability to afford veterinary services, but influenced by other factors. Additional factors include:

- *regulatory policies including incremental care and utilization of veterinary support staff;*
- *transportation constraints;*
- *language barriers;*
- *veterinarian availability;*
- *public education and outreach;*
- *and others*

All people across the socioeconomic spectrum deserve to benefit from the human-animal bond.

Veterinarians alone cannot solve the problems that stand as barriers to veterinary care for so many pet owners. Because the health of the pet is linked to the health of their family, the problem of Access to Veterinary Care should be considered a public health and social service issue. Collaborative steps must be taken to help underserved families access veterinary care for their pets to ensure communal health and welfare. Collaboration of government agencies, private non-profit groups, pet owners, and the veterinary profession are key to addressing this issue.

The CVMA appreciates efforts by the VMB to explore access-related issues and, to that end, attaches hereto a list of potential solutions identified by our task force that may assist in addressing those issues. The CVMA sees opportunity for collaboration with the VMB on several of the items on the list, and welcomes further dialogue and feedback aimed at finding solutions to address access to veterinary care.

Sincerely,

A handwritten signature in black ink, appearing to read "Keith Rode". The signature is fluid and cursive, with a large initial "K" and "R".

Keith Rode, DVM
President, California Veterinary Medical Association

Attachment



Access to Veterinary Care- Possible Solutions

1) Incremental Care

- a. Educate veterinarians about incremental care and the importance of documenting declined services or against medical advice in the record
- b. Discuss incremental care with the VMB and their policy of making the “minimum standard” very close to a “gold standard”. Also, educate lawyers and personnel at Attorney General’s office about minimum standards.
- c. VMB Subject Matter Experts review of cases- discussing with them how they go about assessing minimum standards to address the incremental care aspect.

2) Expanded Role of RVTs

- a. (under)Utilization of RVTs- are there more things that RVTs can do to augment delivery of care? Clarifying regulations which state what RVTs can do under indirect supervision and also clarifying how long a VCPR is valid
- b. Discuss CCR 16 Section 2030.3 with the VMB and request that the MDC rewrite that law with the expanded role of the RVT and incremental care in mind. Also- how can this section be written with the VCPR (2032.1) requirement in mind?

3) Veterinary Profession Outreach and Education

- a. Continuing Education / Key Note Speakers
 - i. How to write medical records, specifically on how to justify incremental care
 - ii. Communication strategies with clients to ensure that they do not feel shamed in making incremental care decisions
- b. Inquiring about Access to Veterinary Care education in veterinary schools

4) Supporting local groups that are already doing AlignCare or subsidized veterinary care at a local level (e.g. HSVMA RAVS, rVETS, UCD Knights Landing One Health Initiative, Mercer Clinic, Downtown Dog Rescue, various animal shelters)

- a. Act as an information clearinghouse- possible webpage that has information about these resources?

5) Community Outreach and Education

- a. Brochures in multiple languages (English, Spanish, Cantonese, Vietnamese) that promote veterinary care available digitally for free and distributed to CVMA members for use in their office, distribution at local public animal events (fairs, rodeos, etc.) and to social service agencies or nonprofits such as Meals on Wheels, Red Cross.
 - i. Importance of veterinary care / taking your pet to the vet

- ii. Vaccines
 - iii. Parasite control
 - iv. Spay/ neuter
 - v. Responsibilities of owning a pet- is a pet the right thing for you?
- b. Develop TikTok, Youtube and Instagram videos on how people can find low cost veterinary services in their community
 - c. Educate the public and promote new public policies that will increase funding from non-traditional sources. For example, we think of cause marketing by businesses and corporations and options for the public to contribute as strategies with potential. Organizations that support families and community health are likely contributors.
 - d. Educate and gain the support of government, e.g., public health. These strategies are less compassion-based and more science-based, i.e., the prevention and control of zoonoses. Consider promoting tax incentives that will incentivize veterinary service providers to help.
- 6) Language Barriers
- a. Consider gathering information from membership about languages spoken in their practices to include on the Find a Veterinarian search
 - b. Ask VMB to gather languages spoken information from Licensee managers on premises permit initial applications or renewals (languages spoken in their practices)
 - c. Can the CVMA develop a list of interpreters that members could access?
- 7) California Veterinary Medical Foundation (CVMF) Angel Fund
- 8) Gathering information about Access issues in California- do nonprofit/ shelter groups collect such information already, can we use the AVCC poll questions to gather data in California?
- 9) Transportation issues: can California law be changed to allow pets to ride on public transportation?
- 10) Spay/Neuter services:
- a. Supply and demand issues currently being experienced in California (too many animals, not enough veterinarians)
 - b. Different general delivery models (mobile vs. fixed premises)
 - c. Are there opportunities to make spay/neuter free?
 - d. Spay/neuter can be a barrier to accessing other care, i.e.: your pet is not qualified to receive free food unless it is spayed or neutered.



July 13, 2022

California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

Re: July 20, 2022 CVMB Meeting relating to Agenda #8 Access to Veterinary Care

Dear Ms. Sieferman, Access to Veterinary Care Task Force members (Dr. Jaymie Noland and Dianne Prada, RVT) and California Veterinary Medical Board Members:

We received the notification of agenda for the upcoming July 20th Veterinary Medical Board meeting. Agenda Item 8 indicated there will be an Access to Veterinary Care Task Force Report (Task Force) by Jaymie Noland, DVM and Dianne Prado. The meeting materials for Item 8 further included a letter from the California Veterinary Medical Association (CVMA) providing possible solutions for some of the issues that California faces with providing access to care for animals.

The Animal Physical Therapy Coalition (APTC) has provided public comment and submitted letters for consideration at every meeting of both the CVMB and the Task Force where Access to Veterinary Care has been on the Agenda. This includes submissions and public comment for meetings held on: October 12, 2021, October 21, 2021, January 19, 2022, April 20, 2022 and April 27, 2022.

To date, we have yet to have any of the Board members make any mention or recognize this as an issue in any of the Board meetings.

At the most recent Task Force meeting, Dr. Noland did pause to take note of the issue after our public comments. She did recognize that legislation is necessary to make the appropriate changes to help California consumers gain access to rehab care for their animals by qualified Animal Physical Therapists, yet nothing has been done to address this issue after nearly 15 years that this Board began its discussion about animal rehabilitation.

We are deeply concerned, however, that this Board refuses to recognize this access to care issue and the issue surrounding qualified Physical Therapist's working on animals despite it being an identified Issue by the California State Legislature at the past two Sunset Reviews of the Board.

The Board was *specifically* tasked to explore ALL access to care issues in California. To date, this Board has ONLY allowed for CVMA input, while ignoring other input provided by other stakeholders, including the Animal Physical Therapy Coalition.

We respectfully request that this letter be included alongside the CVMA's letter in the agenda Meeting Materials so it too can be rightfully considered.

It is disappointing to repeatedly provide fact-based information on the pervasive animal rehab access to care issue, especially when we have thoughtfully considered an appropriate solution through legislation.

As a Coalition who represents DVMs, PTs, RVTs and consumers, the Animal Physical Therapy Coalition (APTC) has been sounding the alarm to the California Veterinary Medical Board (CVMB) on the access to animal rehabilitation care crisis in California for many years. We did so before the pandemic started, and COVID-19 has made access to animal rehabilitative care exponentially worse. Other organizations have been sounding the alarm as well.

Please note these recent examples:

- The APTC commented during the October 12, 2021, Access to Veterinary Care Task Force meeting and submitted documentation for the members to consider. We educated the Task Force on the realities of the access to rehab crisis as it relates to animal physical rehabilitation.
- APTC also submitted information for the Board's October 21, 2021, meeting. We submitted letters from veterinarians throughout California who have identified the issue of access to rehab care for their patients, as well as consumer letters echoing their difficulty to access care for their pets, along with a petition with thousands of signatures.
- Again, the APTC submitted a document for consideration for the Board's January 19, 2022 meeting. In addition to our submitted document, our Coalition also spoke during the public comment period about the identified issue of and subsequent solution for the animal rehab access to care crisis.
- And finally, at the most recent CVMB meeting on April 20, 2022, despite the letter we submitted for consideration, neither representative of the Access to Care Task Force or any of the Board members made any mention or recognition of this issue even after we provided additional public comment.

Unfortunately, we have yet to have our concerns addressed or even merely recognized during any recent meeting to acknowledge that an access to rehab care crisis even exists.

What was notable, however, was the attention that was given to the areas of access that the California Veterinary Medical Association (CVMA) identified as the areas of access where there are problems. But the CVMA is not the only voice for DVM's and RVT's. Rather, our Coalition also represents DVM's and RVT's (as well as consumers and PT's) who not only wish to be heard but also expect that action will be taken.

Unfortunately, the Board enacted regulatory language which further reduced access to rehab care by qualified physical therapists for animals in California by changing what had been the status quo.

The good news! The issue of increasing access to rehabilitative services can be more reasonably, adequately, and safely addressed in legislation. Once a statutory change is passed to improve access to properly qualified and licensed physical therapists (to work under the direct or indirect supervision of a veterinarian), then the regulatory language that was promulgated by the Board could be much more palatable. But until then, the recent regulatory language that became effective on January 1, 2022 is bad for California pets and the people who love them.

To set the record straight, we are NOT looking to allow any physical therapist without any formal training on animals to be able to treat without veterinary involvement. We are seeking common sense legislation consistent with those recommended by the VMB Stakeholder's Task Force on Animal Physical Rehabilitation:

That California licensed physical therapists with advanced certification in Animal Physical Rehabilitation may provide animal physical rehabilitation under the degree of supervision to be determined by the veterinarian who has established a veterinarian-client-patient relationship, on a veterinary premises or an Animal Physical Rehabilitation premises, or a range setting.

It is notable that under this construction, the veterinarian retains oversight over the animal's treatment plan. Further, the liability would rightfully be shifted to the treating qualified and licensed physical therapist.

The APTC asks the Task Force and the Board to consider these measures as a vital part of the solution to address the **access to animal rehabilitation care crisis** in California.

As has been noted in recent Task Force meetings, many areas of the access to care issues are going to be very difficult to solve because they are socioeconomic in nature. This Board has very little authority to be able to make meaningful change for those larger issues. But this issue is different. It has a straight forward solution through legislation.

Let's work together to solve it. The people have been asking and the animals need the care.

Thank you,



Karen Atlas, PT, MPT, CCRT

President: Animal Physical Therapy Coalition (APTC)

President: California Association of Animal Physical Therapists (CAAPT)

Past-member: California Veterinary Medical Board's Stakeholder's Task Force on Animal Physical Rehabilitation

Attachment: April 21, 2022, APTC letter to the Access to Veterinary Care Task Force

Cc: Jason Kaiser, Executive Officer, Physical Therapy Board of California
Senator Richard Roth, Chair, Senate Committee on Business, Professions and Economic Development
Assemblymember Marc Berman, Chair, Assembly Committee on Business and Professions



April 21, 2022

Access to Veterinary Care Task Force
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

Re: Access to Veterinary Care Task Force Meeting on April 27, 2022

Dear Access to Veterinary Care Task Force members (Dr. Jaymie Noland and Dianne Prada) and California Veterinary Medical Board Members:

As a Coalition who represents DVMs, PTs, RVTs and consumers, the Animal Physical Therapy Coalition (APTC) has been sounding the alarm to the California Veterinary Medical Board (CVMB) on the access to animal rehabilitation care crisis in California for many years. We did so before the pandemic started, and COVID-19 has made access to animal rehabilitative care exponentially worse. Other organizations have been sounding the alarm as well.

The APTC commented during the October 12, 2021, Access to Veterinary Care Task Force meeting and submitted documentation for the members to consider. We educated the Task Force on the realities of the access to rehab crisis as it relates to animal physical rehabilitation.

APTC also submitted information for the Board's October 21, 2021, meeting. We submitted letters from veterinarians throughout California who have identified the issue of access to rehab care for their patients, as well as consumer letters echoing their difficulty to access care for their pets, along with a petition with thousands of signatures.

Again, the APTC submitted a document for consideration for the Board's January 19, 2022 meeting. In addition to our submitted document, our Coalition also spoke during the public comment period about the identified issue of and subsequent solution for the animal rehab access to care crisis.

And finally, at the most recent CVMB meeting on April 20, 2022, despite the letter we submitted for consideration, neither representative of the Access to Care Task Force or any of the Board members made any mention or recognition of this issue even after we provided additional public comment.

Unfortunately, we have yet to have our concerns merely recognized during any recent meeting to identify that the access to rehab care crisis even exists.

What was notable, however, was the attention the California Veterinary Medical Association (CVMA) was given to the areas of access they identified as being a problem. But the CVMA is not the only voice for DVM's and RVT's anymore. And neither are just the 2 vet schools either. Rather, our Coalition also represents DVM and RVT voices (as well as consumers and PT's) who not only wish to be heard by this Task Force, but expect to be treated with the same respect and recognition that is granted to other organizations.

Unfortunately, the Board enacted regulatory language which further reduced access to rehab care for animals by making it more difficult for qualified physical therapists to provide essential animal physical rehab services in California.

The good news! The issue of increasing access to rehabilitative services can be more reasonably, adequately, and safely addressed in legislation. Once legislation is passed to improve access to properly qualified and licensed physical therapists (to work under the direct or indirect supervision of a veterinarian), then the regulatory language that was promulgated by the Board would be much more palatable. But until then, the recent regulatory language that became effective on January 1, 2022 is bad for California pets and the people who love them.

To set the record straight, we are NOT looking to allow any physical therapist without any formal training on animals to be able to treat without veterinary involvement. We are seeking common sense legislation consistent with those recommended by the VMB Stakeholder's Task Force on Animal Physical Rehabilitation.

That California licensed physical therapists with advanced certification in Animal Physical Rehabilitation may provide animal physical rehabilitation under the degree of supervision to be determined by the veterinarian who has established a veterinarian-client-patient relationship, on a veterinary premises or an Animal Physical Rehabilitation premises, or a range setting.

It is notable that under this construction, the veterinarian retains oversight over the animal's treatment plan. Further, the liability would rightfully be shifted to the treating qualified and licensed physical therapist.

The APTC asks this Task Force to consider these measures as a vital part of the solution to address the **access to animal rehabilitation care crisis** in California.

Notably, during the January 19, 2022 CVMB meeting, the Board specifically asked the Task Force to identify ALL access to care issues. Our Coalition has specifically identified this access to rehab care crisis for years without resolution. We have taken the time to research the specific issue *and* find a solution, but time and time again, the Board refuses to even recognize it for the problem it truly is. And it is a problem that will not go away by itself. The consumers have been asking for more access and it appears that the Board and Task Force are ignoring the very stakeholders you are tasked to serve.

Will this Task Force recognize and acknowledge the ongoing lack of access to animal physical rehab care in California?

As you have been noting in the recent meetings, many areas of the access to care issues are going to be very difficult to solve because they are socioeconomic in nature. This Board has very little authority to be able to make meaningful change for those larger issues. But this issue is different. It has a straight forward solution through legislation.

Let's work together to solve it. The people have been asking and the animals need the care.

Thank you,



Karen Atlas, PT, MPT, CCRT

President: Animal Physical Therapy Coalition (APTC)

President: California Association of Animal Physical Therapists (CAAPT)

Past-member: California Veterinary Medical Board's Stakeholder's Task Force on Animal Physical Rehabilitation

Cc: Jessica Sieferman, Executive Officer, California Veterinary Medical Board

Jason Kaiser, Executive Officer, Physical Therapy Board of California