

CCR 20345. Animal Health Care Tasks Definitions.

For purposes of the rules and regulations applicable to animal health care tasks for registered veterinary technicians, permit holders and veterinary assistants, contained in the division, the term:

- (a) "Veterinarian" means a California licensed veterinarian.
- (b) "R.V.T." means a registered veterinary technician.
- (c) "Veterinary assistant" means any individual who is not an R.V.T. or a licensed veterinarian.
- (d) "Supervisor" means a California licensed veterinarian or if a job task so provides an R.V.T.
- (e) "Direct Supervision" means: (1) the supervisor is physically present at the location where animal health care job tasks are to be performed and is quickly and easily available; and (2) the animal has been examined by a veterinarian at such time as good veterinary medical practice requires consistent with the particular delegated animal health care job task.
- (f) "Indirect Supervision" means: (1) that the supervisor is not physically present at the location where animal health care job tasks are to be performed, but has given either written or oral instructions ("direct orders") for treatment of the animal patient; and (2) the animal has been examined by a veterinarian at such times as good veterinary medical practice requires, consistent with the particular delegated animal health care task and the animal is not anesthetized as defined in Section 2032.4.
- (g) "Animal Hospital Setting" means all veterinary premises which are required by Section 4853 of the Code to be registered with the board.
- (h) "Administer" means the direct application of a drug or device to the body of an animal by injection, inhalation, ingestion, or other means.
- (i) "Induce" means the initial administration of a drug with the intended purpose of rendering an animal unconscious.
- (j) "Veterinary Assistant Controlled Substances Permit" or the abbreviation "VACSP" means a Veterinary Assistant Controlled Substances Permit issued by the board.
- (k) "~~Permit~~ VACSP holder" means a person who must be at least 18 years of age and is a holder of a VACSP issued pursuant to section 4836.2 of the code.
- (l) "Herd health" means insert definition here.

Commented [DA1]: Consider "Population Health" In an animal shelter location where an on-going assessment of the health and welfare of the entirety of all impounded species occurs. A holistic animal health management system based upon oversight by a veterinarian who reviews the status of identifiable parameters including but not limited to: disease prevalence, hygiene, parasite burden and mortality. This program also monitors nutrition assessments, housing needs, animal behavior and general welfare.

CCR 2035. Duties of Supervising Veterinarian.

(a) The supervising veterinarian shall be responsible for determining the competency of the R.V.T., ~~permit~~VACSP holder, or veterinary assistant to perform allowable animal health care tasks.

(b) A supervising veterinarian shall not delegate any function or allowable animal health care task to an R.V.T., VACSP holder, or veterinary assistant that requires clinical skill and judgment that is beyond the training and demonstrated competency of the R.V.T., VACSP holder, or veterinary assistant.

(c) The supervising veterinarian of an R.V.T., ~~permit~~VACSP holder, or veterinary assistant shall make all decisions relating to the diagnosis, treatment, management and future disposition of the animal patient.

(d) ~~Except for the provisions under subdivision (e), t~~The supervising veterinarian shall have examined the animal patient prior to the delegation of any animal health care task to an R.V.T., ~~permit~~VACSP holder, or veterinary assistant.

(e) The examination of the animal patient in a herd health setting shall be conducted at such time as good veterinary medical practice requires consistent with the particular delegated animal health care task.

~~(e) Rabies vaccines may be administered to an owned animal upon redemption from an animal shelter and pursuant to the direct order, written order, or telephonic order of a veterinarian licensed or authorized to practice in this state.~~

Note: Authority cited: Sections 4808 and 4836, Business and Professions Code. Reference: Sections 4836, 4836.1, 4840 and 4840.9, Business and Professions Code.

Commented [WT3]: Consider changing to "range setting" and define it. Old section 2034(i) defined "range setting" to mean "any setting other than an animal hospital setting." TX regulation defines "herd" as: "Herd – a group of animals of the same species, managed as a group and confined to a specific geographic location. A herd may not include dogs, cats, any animal in individual training, or any animal that competes as an individual."

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CCR Section 2035.5 Duties of Supervising Veterinarian and Animal Health Care Tasks for R.V.T., VACSP Holder, and Veterinary Assistant in ~~the~~ Shelter Setting

Commented [DA5]: Animal

(a) Notwithstanding subsection (c) of section 2035 and pursuant to subdivisions (a) and (b) of section 4840 of the code, limited medical care may be provided in a shelter setting by an R.V.T., VACSP holder, or veterinary assistant for the specific purpose of controlling infectious and zoonotic disease, controlling acute pain, and preventing environmental contamination if all the following are met:

(1) The supervising veterinarian has direct knowledge of the animal population and examines the animal(s) at such time as good veterinary medical practice requires consistent with the particular delegated animal health care tasks.

(2) The supervising veterinarian establishes written orders for:

(A) The indirect supervision of an R.V.T., VACSP holder, or veterinary assistant for vaccinations and prophylactic control of internal parasites and external parasites on intake.

(B) The indirect supervision of an R.V.T. for the treatment of medical conditions based on an animal's symptoms.

Commented [DA6]: Remove 'medical' as it implies a diagnosis.

(C) The direct supervision of a VACSP holder or veterinary assistant by an R.V.T. for the treatment of medical conditions based on an animal's symptoms.

Commented [DA7]: As above

(3) Treatment rendered under paragraph (2) may only be continued under the direction of a licensed veterinarian.

(b) Emergency animal care may be rendered by an R.V.T. pursuant to section 2069.

(c) An R.V.T., VACSP holder, or veterinary assistant shall not diagnose, perform surgery, or prescribe pursuant to section 4840.2 of the code.

(d) The supervising veterinarian shall maintain whatever physical presence is reasonable within the facility to ensure that the requirements in subsections (a) through(c) are met.

(e) Animals that have been adopted and returned to the shelter by the owner for treatment of a medical condition shall be examined by a veterinarian prior to treatment or dispensing medication pursuant to section 2032.1, unless the care is continued treatment of an existing medical condition prior to the animal being adopted and the R.V.T. is following the treatment protocol established by the veterinarian.

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(f) For animals surrendered to a shelter with valid prescription medication, an R.V.T., VACSP holder, or veterinarian assistant may continue administration of the prescription medication prior to veterinarian examination.]

(g) Rabies vaccines may be administered to an owned animal upon redemption from an animal shelter and pursuant to the direct order, written order, or telephonic order of a veterinarian licensed or authorized to practice in this state.

Note: Authority cited: Sections 4808 and 4836, Business and Professions Code. Reference: Sections 4836, 4836.1, and 4840, Business and Professions Code.

Commented [DA10]: I know this text exists, but who would be authorized but not licensed?

CCR 2030.6 Minimum Standards – Animal Shelter Medicine in a Fixed Facility

For purposes of these regulations, “animal shelter facility” shall mean a building, or part of a building, where veterinary medicine and its various branches are being practiced and where veterinary services are being provided to stray, unwanted, or seized animals that are deposited with or impounded by a privately or publicly operated agency or organization. An animal shelter facility shall meet the following standards:

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- (a) All instruments, apparatus, and apparel shall be kept clean and sanitary at all times. **{2030}**
- (b) Indoor lighting for halls, wards, reception areas, and examining and surgical rooms shall be adequate for their intended purpose. **{2030 (a)}**
- (c) Fire precautions shall meet the requirements of local and state fire prevention codes. **{2030 (f)(1)}**
- (d) The facility, temperature, and ventilation shall be maintained so as to assure the comfort of all patients. **{2030 (f)(2)}**
- (e) The floors, table tops, and counter tops in areas where animals are being treated shall be made of a material suitable for regular disinfecting and cleaning and shall be cleaned and disinfected regularly. **{2030 (g)(7)}**
- (f) The animal shelter facility where public spay and neuter services are provided shall have a reception area ~~or an office, or a combination of the two.~~ **{2030(b)}**
- (g) The animal shelter facility shall have an examination room separate from other areas of the facility and be of sufficient size to accommodate the doctor, assistant, patient, and client. **{2030(c)}**
- (h) Current veterinary reference materials shall be readily available at the facility. **{2030(f)(9)}**
- (i) All drugs and biologicals shall be stored and maintained according to the manufacturer’s recommendations and administered, prescribed, and dispensed in compliance with state and federal laws. **{2030(f)(6)}**
- (j) The animal shelter facility shall have the ability to provide diagnostic radiological services either on the premises or through outside services. Radiological procedures shall be conducted in accordance with Health and Safety Code standards. **{2030 (f)(4)}**
- (k) The animal shelter facility shall have the ability to provide clinical pathology and histopathology diagnostic laboratory services either on the premises or through outside services. **{2030 (f)(5)}**
- (l) The animal shelter facility shall have appropriate drugs, including oxygen, and equipment to provide immediate emergency care. **{2030 (f)(12)}**
- (m) The disposal of waste material shall comply with all applicable federal, state, and local laws and regulations. **{2030 (f)(3)}**
- (n) If animals are housed or retained in the animal shelter facility for treatment, the following shall be provided: **{2030 (d)}**
 - (1) Compartments or exercise runs or areas for animals shall be consistent with husbandry standards and shall be comfortable, sanitary, and provide for effective separation of animals and waste products. **{2030 (d)(1)}**

- (2) Effective separation of known or suspected contagious animals. {2030 (d)(2)}
- (3) Prior notice to the client if there are to be no personnel on-site during any time an animal is left at the facility. For purposes of this paragraph, prior notice may be accomplished by posting a sign in a place and manner conspicuous to the clients at the primary entrance of the premises, stating that there may be times when there are no personnel on the premises. {2030 (d)(3)}
- (4) When medically and/or species appropriate for a given species, -where animals are kept on the veterinary premises for 24 hours or more, the animals shall be provided with an opportunity for proper exercise. Compliance with this paragraph may be achieved by the use of exercise runs/areas or by providing the animal with the opportunity for outdoor walks. {2030.1 (a)}
- (o) When the facility is closed, a sign shall be posted and visible outside the primary entrance with a telephone number and location where emergency care is available. An answering machine or service shall be used to notify the public when the facility will be re-opened and where after-hours emergency care is available. If no after-hours emergency care is available, full disclosure shall be provided to the public prior to rendering services. {2030 (e)}
- (p) Anesthetic equipment in accordance with the procedures performed shall be maintained in proper working condition and available at all times. {2030 (f)(10)}
- (q) Sanitary methods for the disposal of deceased animals shall be provided. {2030 (f)(7)}
- (r) When the client has not given the veterinarian authorization to dispose of his or her deceased animal, the veterinarian shall retain the carcass in a freezer for at least 14 days prior to disposal. {2030(f)(7)}
- (s) If aseptic surgery is performed, the following shall be provided: {2030 (g)}
- (1) A room, separate and distinct from all other rooms, shall be reserved for aseptic surgical procedures that require aseptic preparations. A veterinarian may perform emergency aseptic surgical procedures in another room when the room designated for aseptic surgery is occupied or temporarily unavailable. {2030 (g)(1)} The board may exempt a facility that is currently registered with the board but does not have a separate aseptic surgery room, where the board determines that it would be a hardship for the facility to comply with the provisions of this paragraph. In determining whether a hardship exists, the board shall give due consideration to the following factors: {2030 (g)(1)(B)}
- (A) Zoning limitations. {2030 (g)(1)(B)(1)}
- (B) Whether the facility constitutes a historical building. {2030 (g)(1)(B)(2)}
- ~~(C) Whether compliance with this requirement would compel the veterinary premises practice to relocate to a new location. {2030 (g)(1)(B)(3)}~~
- (2) Storage in the surgery room shall be limited to items and equipment normally related to aseptic surgery and surgical procedures. Equipment not normally related to surgery and surgical procedure includes, but is not limited to, equipment used for dental prophylaxis, autoclaves, and non-surgical radiographic equipment. {2030 (g)(2)}
- (3) Open shelving is prohibited in the surgical room. {2030 (g)(3)}

Commented [DA13]: "Public" Animal shelters do not generally have clients in the VCPR sense.

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- (4) The surgical room shall not contain a functional sink with an open drain. {2030 (g)(4)}
- (5) Surgery room doors shall be able to be fully closed, fill the entire door space, be made of a material suitable for regular disinfecting and cleaning, and be cleaned and disinfected regularly, and not provide access from outside the facility when aseptic surgery services are provided. {2030 (g)(5)}
- (6) The surgery room shall be well-lighted, have equipment for viewing radiographs, and have effective emergency lighting with a viable power source. {2030 (g)(6)}
- (7) Surgical instruments and equipment shall be:
 - a. Adequate for the type of surgical procedures performed. {2030 (g)(8)(A)}
 - b. Sterilized as required by the surgical procedure performed and instruments used. {2030 (g)(8)(B)}
- (8) In any sterile procedure, a separate sterile pack shall be used for each animal. {2030 (g)(9)}
- (9) All instruments, packs, and equipment shall be sterilized and have an indicator that reacts to and verifies sterilization. {2030 (g)(10)}
- (10) The following attire shall be required for aseptic surgery: {2030 (g)(11)}
 - (A) Each member of the surgical team shall put on an appropriate sanitary cap and sanitary mask that covers his or her hair and mouth, nose, and any facial hair, except for eyebrows or eyelashes. All members of the surgical team who will be handling the instruments or touching the surgical site shall wear sterilized surgical gowns with long sleeves and sterilized gloves. {2030 (g)(11)(A)}
 - (B) Ancillary personnel in the surgery room shall wear clean clothing, footwear, sanitary cap, and mask. {2030 (g)(11)(B)}
- (t) When performing clean surgery, the instruments used to perform such surgery shall have been sterilized, and the surgeon(s) and ancillary personnel shall wear appropriate apparel. {2030 (h)} -For purposes of this subsection, "clean surgery" shall mean the performance of a surgical procedure for the treatment of a condition and under circumstances that, consistent with the standards of good veterinary medicine, do not warrant the use of aseptic surgical procedures. {2030 (h)}

Note: Authority cited: Sections 4808 and 4854, Business and Professions Code. Reference: Sections 4854 and 4883, Business and Professions Code.

2030.7 -Minimum Standards – Animal Shelter Ambulatory Medicine

For purposes of ~~these regulations~~ this section, an “animal shelter ambulatory ~~practice~~ premises” shall mean the practice of veterinary medicine and its various branches provided to stray, unwanted, or seized animals shelter medicine at a location outside a fixed facility ~~where veterinary medicine and its various branches are being practiced~~. Animal shelter ambulatory ~~practice-premises~~ shall meet the following minimum standards:

- (a) All instruments, apparatus, and apparel shall be kept clean and sanitary at all times. **{2030}**
- (b) Prior notice shall be given to the client when the ~~practice premises~~ is closed. An answering machine or service shall be used to notify the public when the facility will be re-opened and where after-hours emergency care is available. If no after-hours emergency care is available, full disclosure shall be provided to the public prior to rendering services. **{2030 (e)}**
- (c) The disposal of waste material shall comply with all applicable federal, state, and local laws and regulations. **{2030 (f)(3)}**
- (d) The animal shelter ambulatory ~~premises practice~~ shall have the ability to provide diagnostic radiological services. Radiological procedures shall be conducted in accordance with Health and Safety Code standards. **{2030 (f)(4)}**
- (e) The animal shelter ambulatory ~~premises practice~~ shall have the ability to provide clinical pathology and histopathology diagnostic laboratory services **{2030 (f)(5)}**
- (f) All drugs and biologicals shall be stored and maintained according to the manufacturer’s recommendations and administered, prescribed, and dispensed in compliance with state and federal laws. **{2030(f)(6)}**
- (g) Current veterinary reference materials shall be readily available. **{2030(f)(9)}**
- (h) The animal shelter ambulatory ~~premises practice~~ shall have the appropriate drugs and equipment to provide immediate emergency care at a level commensurate with the specific veterinary medical services provided. **{2030 (f)(12)}**
- (i) When performing clean surgery, the instruments used to perform such surgery shall have been sterilized, and the surgeon(s) and ancillary personnel shall wear appropriate apparel. **{2030 (h)}** For purposes of this subsection, “clean surgery” shall mean the performance of a surgical procedure for the treatment of a condition and under circumstances that, consistent with the standards of good veterinary medicine, do not warrant the use of aseptic surgical procedures. **{2030 (h)}**

Note: Authority cited: Sections 4808 and 4854, Business and Professions Code. Reference: Sections ~~4825-1~~, 4854, and 4883, Business and Professions Code.

Commented [DA17]: Not needed, don't believe this exists.

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Requirements for

Dog Sellers and Dog Facility Operators

WISCONSIN DEPARTMENT OF AGRICULTURE, TRADE AND CONSUMER PROTECTION | DIVISION OF ANIMAL HEALTH

Wisconsin law requires that some dog breeders and others involved in dog sales, adoptions, and sheltering to be inspected and licensed. It also requires that dogs be examined by a veterinarian before they are sold or adopted for a fee, and prohibits sale of puppies until they are 7 weeks old, except under certain conditions. This is a summary of the requirements for facilities and animal care that licensees must meet.

Who needs a license under Dog Sellers and Shelters Program

- **Dog breeders** selling at least 25 dogs a year, from more than 3 litters that they have bred
- **Dog breeding facilities** from which at least 25 dogs a year are sold, from more than 3 litters
- **In-state dog dealers** selling at least 25 dogs a year that they did *not* breed and raise
- **Out-of-state dog dealers** who import at least 25 dogs a year into Wisconsin, regardless of whether they bred and raised them
- **Non-profit animal shelters and rescue groups** sheltering/fostering at least 25 dogs a year
- **Animal control facilities** that contract with a city, village, town or county

Who does *not* need a license under Dog Sellers and Shelters Program

- **Licensed veterinarians** who keep dogs only when providing veterinary care or treatment
- **A person conducting a one-time liquidation sale** from one location, with 30 days notice to DATCP, if:
 - There are 30 or fewer dogs owned or kept at the location when the sale starts, or at any time during the sale
 - No other dogs are moved to the location during the sale
 - No other owner sells dogs from the location during the sale
 - The seller was not licensed in the preceding license year, and didn't conduct a liquidation sale the previous license year.
- **Operators of temporary dog markets**, with 10 days notice to DATCP, if they:
 - Provide adequate facilities and take steps to assure humane care
 - Have a certified Wisconsin veterinarian examine dogs daily if the market runs more than one day
 - Gather and keep required information about the sellers and the dogs
 - Allow DATCP to inspect during market hours
- **Boarding kennels, dog groomers, pet owners**

Home custody providers/fosterers

- **Individuals who keep dogs at their homes for a licensed person** do not need to be licensed themselves. However, they may be subject to inspection.
- **Rescue groups and humane societies** that do not operate a shelter, but only send animals to foster homes, must be licensed if they shelter at least 25 dogs a year in foster homes.

License period

- In this first licensing period, we will issue temporary conditional licenses to applicants, on condition that all locations pass initial inspections. The license posted at each location will be modified after a successful inspection.
- **The first licenses will expire Sept. 30, 2012.** If DATCP inspection determines a licensee does not meet requirements, the license may be voided earlier.
- Thereafter, **licenses will expire Sept. 30 every year.**

Annual fees

- **Animal control facilities and shelters:** Flat fee of \$125
- **Breeders, breeding facilities and in-state dealers** pay according to how many dogs they sell annually:
 - 25-49 dogs: \$250
 - 50-99 dogs: \$500
 - 100-249 dogs: \$750
 - 250 or more dogs: \$1,000
- **Out-of-state dealers:**
 - 25-49 dogs: \$370
 - 50-99 dogs: \$750
 - 100-249 dogs: \$1,125
 - 250 or more dogs: \$1,500
- **Late renewal:** Normal fees plus 20 percent
- **Operating without a license in the previous year:** Normal fees for current license, plus the fee that would have been required the previous year

Inspections

- DATCP may inspect locations listed on the license and other locations where someone else keeps dogs for the license holder. (See Home custody providers/fosterers)
- Except for the initial temporary conditional license, facilities will have to pass inspection before licenses are issued.
- Beginning Oct. 1, 2012, license holders will be inspected once every two years.
- Inspections include dog health, standards of care, and record-keeping.
- License holders may be charged a re-inspection fee of \$150 if DATCP has to return after a routine inspection to verify that violations have been corrected. Licenses will not be renewed without payment of re-inspection fees.

Record-keeping requirements

- **Records in written or readily readable electronic form,** must be kept at least 5 years at the license holder's principal place of business, available to DATCP on request
- **Address** of every location where license holder keeps dogs, the name of the person responsible for administering each location, and the name and address of anyone to whom dogs are consigned for home custody
- **Records required for each dog:**
 - **Health records** including vaccinations, observation and treatment records (regardless of who administered the treatment)
 - **Breed registration records,** if any
 - **Written behavior and socialization plan**

Record-keeping requirements (continued)

- **For all dogs under the license holder's custody or control during the license year,** including those in home custody:
 - Description including breed or type, sex, birth date or approximate age, color, distinctive markings
 - Location where each is kept
 - Any USDA official ID and any other ID tag, tattoo or microchip information available
- **For dogs born under license holder's custody or control,** statement to that effect
- **For dogs not born under license holder's custody or control:**
 - Date license holder acquired the dog
 - Identity of person from whom the license holder acquired the dog, including name, address and USDA facility license or registration number, if any
- **For dogs no longer under license holder's custody or control:**
 - Date the dog left the license holder's custody or control
 - Where the dog went
 - Name of person who took custody or control, if anyone
 - Copy of any certificate of veterinary inspection that accompanied the dog

Dog sales and adoptions for fee/certificates of veterinary inspection

- **Dogs less than 7 weeks old** cannot be sold unless accompanied by dam or approved by DATCP in writing.
- *Whenever a licensee sells or adopts out a dog for a fee, a certificate of veterinary inspection must accompany the dog.*
- **Certificates of veterinary inspection (CVI)**
 - If issued in Wisconsin, must be completed and signed by Wisconsin certified veterinarian; if issued for dogs entering Wisconsin, must be completed and signed by a veterinarian accredited by USDA and state of origin
 - CVIs issued in Wisconsin must be on a form provided by DATCP; those issued in other states must be on forms from USDA or state of origin.
 - CVIs will be sold only to veterinarians, not to license holders directly.
 - CVIs must include:
 - Seller's name and address
 - Dog's breed, sex and age
 - Whether dog is spayed, neutered or intact
 - Vaccination records, including name of manufacturer, serial and lot numbers, date of vaccination, and person who administered them
 - For imported dogs, any required information under current import rules (These may change based on disease outbreaks and other factors, so before importing, check http://datcp.wi.gov/Animals/Animal_Movement/index.aspx or call 608-224-4872.
 - For intact dogs sold at public auction, documentation of a negative brucellosis test within 30 days before sale
 - Veterinarian's statement: Dogs listed show no signs of communicable disease not noted, vaccinations and test results are as indicated, and the CVI is not a warranty
 - Veterinarian's signature and date, within 10 days after he/she examines the dogs
 - CVI remains valid for 30 days after examination.
 - Copies to buyer, seller, issuing veterinarian

Standards of care:
General

- **Food and water requirements**
 - Feeding at least once a day, unless health needs demand a different schedule
 - Proper amount and type of nutrition based on age, size, weight, health and condition
 - Uncontaminated and palatable food, stored in clean containers
 - Fluid and uncontaminated water, available all day or as often as necessary to keep dogs well-hydrated
 - Durable, clean, sanitized food and water containers
- **Health and veterinary care requirements**
 - Humane handling, without physical harm or unnecessary injury
 - Daily body, mobility and behavior checks
 - Grooming as often as necessary to prevent abnormal matted hair and overgrown nails
 - Dogs with communicable diseases separated from other susceptible animals
 - Veterinary exams as often as necessary to assure adequate care
 - Timely veterinary care for sick, diseased or injured dogs and when necessary, legal and humane euthanization
- **Exercise requirements**
 - Reasonable daily exercise based on breed, size, age and condition
 - Daily access to an indoor or outdoor area where dogs can run
 - No repetitive unsupervised activity such as running on a treadmill, except for good cause
- **Grouping and separation requirements**
 - Separation into compatible groups
 - Females in estrus kept separated from sexually intact males except for breeding
 - Potentially harmful aggressive dogs kept separate from other dogs
 - Puppies under 4 months kept separate from all adults except dam or foster dam, unless under direct supervision
- **Behavior and socialization requirements**
 - Daily, full-body physical contact with other compatible dogs, unless there's good cause to avoid it
 - Daily positive human contact besides feeding time
 - Safe toys in the primary enclosure, unless there's a good cause to remove them
 - Written plan for meeting these requirements, with instruction to employees and agents
- **Veterinary care**
 - DATCP may require a license holder to have a licensed veterinarian examine a dog that shows signs of illness, injury or neglect.

A primary enclosure is the place where the dog spends most of its time.

**Standards of care:
Indoor primary
enclosures**

- *Must be at least 12 inches taller than the standing height of the tallest dog in it*
- **For multiple dogs that get at least 30 minutes of exercise a day**, required floor space is determined by size of the largest dog, measured from the tip of the nose to the base of the tail, and by the size and total number of dogs in the enclosure
 - *First calculate size needed for the largest dog in the enclosure:*
 - Largest dog up to 10 inches nose to tail, 4.5 square feet
 - Largest dog 11-16 inches nose to tail, 8 square feet
 - Largest dog 17-22 inches nose to tail, 12 square feet
 - Largest dog 23-26 inches nose to tail, 18 square feet
 - Largest dog 26-30 inches nose to tail, 24 square feet
 - Largest dog more than 30 inches nose to tail, 30 square feet
 - *Then add this much space for each additional dog:*
 - Each dog up to 10 inches nose to tail, 3.375 square feet
 - Each dog 11-16 inches nose to tail, 6 square feet
 - Each dog 17-22 inches nose to tail, 9 square feet
 - Each dog 23-26 inches nose to tail, 13.5 square feet
 - Each dog 26-30 inches nose to tail, 18 square feet
 - Each dog more than 30 inches nose to tail, 22.5 square feet
 - Every dog in the enclosure needs 30 minutes of exercise daily in an indoor or outdoor area big enough for the dog's size and temperament, considering the number of dogs using the area at the same time, and big enough to allow dogs to run.
- **For one dog that gets at least 120 minutes of exercise a day**, floor space requirements depend on the dog's size:
 - Up to 10 inches nose to tail, 4 square feet
 - 11-16 inches nose to tail, 6 square feet
 - 17-22 inches nose to tail, 10 square feet
 - 23-26 inches nose to tail, 14 square feet
 - 27-30 inches nose to tail, 18 square feet
 - More than 30 inches nose to tail, 20 square feet
 - The dog needs 120 minutes of exercise daily in an indoor or outdoor area big enough for the dog's size and temperament, considering the number of dogs using the area at the same time, and big enough to allow the dog to run.
 - *These space requirements are for an enclosure containing only one dog. If multiple dogs are in the enclosure, it needs to meet the space requirements for dogs getting at least 30 minutes of exercise, even if they get 120 minutes or more.*
- **Whelping enclosures** are primary enclosures for a single whelping dam and her puppies. Requirements differ from those for general primary enclosures. Whelping enclosures must:
 - Have a solid floor where the puppies are kept
 - Be an appropriate type for the breed
 - Be tall enough for the dam to stand normally and comfortably

**Standards of care:
Indoor primary
enclosures
(continued)**

- Be large enough for the dam to stretch out so all puppies can nurse at the same time, and for the number and temperament of the puppies
- Include an area where the dam is not accessible to the puppies (solid floor not required in this area)
- **Nursery enclosures** are primary enclosures for puppies between weaning and 4 months. They must be large enough to allow all the puppies to turn around, stand up, lie down, and move normally, and to encourage socialization and exercise.
- **Temporary enclosures for one dog** do not have to meet primary enclosure size standards if:
 - Only one dog is in the enclosure at a time
 - The dog is in the enclosure for 12 hours a day or less
 - The enclosure is large enough to accommodate the length of the dog's body from tip of the nose to base of the tail
 - The dog can stand normally and comfortably, turn around, and lie down.
- **Floors and interior surface requirements**
 - Dirt floors prohibited
 - Floors and other interior surfaces must be built and maintained to keep dogs clean, dry and safe, and must be regularly cleaned and sanitized.
 - Metal wire mesh floors are allowed if:
 - The wire is coated to prevent injury to dogs' feet
 - The wire is a heavy enough gauge to prevent sagging and injury to dogs' feet
 - Openings in stainless steel or wire mesh floors must be small enough to prevent the smallest dog's feet from going through or becoming entangled
- **Stacked primary enclosure requirements**
 - Floor of top enclosure 52 inches or less from the floor of the room
 - Stacking arrangement that allows for safe dog handling, adequate ventilation and temperature control, easy cleaning and sanitization, and easy inspection
 - Fully ventilated front and solid floor that is easy to clean and sanitize in each stacked enclosure
 - Stacked enclosures stable when filled to maximum capacity
 - No feces, urine, dirt or debris falling from higher enclosures to those below
- **Lighting, temperature and ventilation requirements**
 - Enough natural or artificial light on a day-night cycle to assure proper care, maintenance and inspection of the facility and the dogs
 - Heating and cooling based on the ability of breed to adjust to temperature changes, with protection from heat, cold and humidity that may harm the dogs' health
 - Adequate ventilation with fresh or filtered air to minimize odors, drafts, ammonia levels and condensation
 - Indoor-outdoor air exchange required
- **Cleaning and sanitizing requirements**
 - Feces removed from primary enclosures and other holding areas at least once a day and more often if necessary for dogs' health and comfort
 - Primary enclosures and other holding areas cleaned and sanitized as often as necessary to keep them free of accumulated dirt, debris and disease hazards

**Standards of care:
Indoor primary
enclosures
(continued)**

- Primary enclosures cleaned and sanitized before new dogs placed in them
- Dogs removed from enclosures and holding areas before cleaning and sanitizing and not returned until the area is dry
- Clean, dry, breed-appropriate bedding or solid resting place appropriate for breed, age, and condition, unless other arrangements are necessary for dog's health and safety

**Standards of care:
Outdoor primary
enclosures**

- **Dogs kept outdoors must be:**
 - Able to tolerate temperatures and conditions based on breed, age, health, and condition
 - Acclimated to the temperatures that may occur
- **Minimum area**, not including any dog shelter, is determined by size of the largest dog, measured from the tip of the nose to the base of the tail, and by the size and total number of dogs in the enclosure.
 - *First calculate size needed for the largest dog in the enclosure:*
 - Largest dog up to 10 inches nose to tail, 4.5 square feet
 - Largest dog 11-16 inches nose to tail, 8 square feet
 - Largest dog 17-22 inches nose to tail, 12 square feet
 - Largest dog 23-26 inches nose to tail, 18 square feet
 - Largest dog 26-30 inches nose to tail, 24 square feet
 - Largest dog more than 30 inches nose to tail, 30 square feet
 - *Then add this much space for each additional dog:*
 - Each dog up to 10 inches nose to tail, 3.375 square feet
 - Each dog 11-16 inches nose to tail, 6 square feet
 - Each dog 17-22 inches nose to tail, 9 square feet
 - Each dog 23-26 inches nose to tail, 13.5 square feet
 - Each dog 26-30 inches nose to tail, 18 square feet
 - Each dog more than 30 inches nose to tail, 22.5 square feet
- **Construction requirements**
 - Built and maintained to prevent escape
 - Any roof or overhead screen at least 12 inches higher than standing height of tallest dog
- **Dog shelter requirements**
 - Accessible by all dogs in the enclosure
 - Made of durable material with four sides, a roof and a flat solid floor
 - One shelter big enough to accommodate all dogs without crowding, to allow the tallest dog to stand normally and comfortably, and to allow all dogs to turn around and lie down, *or*
 - Multiple shelters that together provide enough space for these conditions and activities
 - Built to prevent injury, allow all dogs to hold or give off enough body heat for health and comfort, stay dry and clean, and protect from predators
- **Shade and wind break**, other than the dog shelter, required adequate to accommodate all dogs in the enclosure

**Standards of care:
Outdoor primary
enclosures
(continued)**

- **Outdoor tethering permitted** only if:
 - Dog is of a breed, age, health, and condition that can tolerate tethering
 - Dog can easily enter and lie down in the dog shelter
 - Dog is not pregnant or nursing pups
 - Tether is at least 6 feet long and longer if necessary for the size of the dog, has an anchor swivel, cannot become entangled with anything, and is attached to a non-tightening collar or harness large enough for the dog
- **Outdoor tethering prohibited** at animal shelters or control facilities for more than 4 hours a day meeting above conditions, with a responsible person present
- **Run or exercise area requirements**
 - Access at least 30 minutes a day
 - Large enough for the dog's size and temperament, considering the number using the area at the same time, and so the dog can run
 - Shade area big enough for all dogs using the exercise area
 - Shelter not needed unless the area is also the primary enclosure
- **Maintenance**
 - Feces removed at least daily
 - Pests and parasites controlled as necessary to maintain health and comfort
 - Clean, dry, breed-appropriate bedding or solid resting place appropriate for breed, age, and condition, unless other arrangements are necessary for dog's health and safety

Transporting dogs

- **Portable enclosure requirements**
 - Water-resistant and cleanable material with ventilation, designed to keep all dogs inside clean, dry and safe
 - Securely closed when in use
 - Cleaned and sanitized between use for different dogs, and more often as necessary
 - Secured to prevent reasonably foreseeable movement that could injure dogs, and positioned to provide enough air for all dogs to breathe normally, to keep the entrance accessible for emergencies, to protect all dogs from the elements, and to prevent excreta from falling on dogs
- **Care during transport**
 - Protect at all times from hypothermia or hyperthermia, including use of heating or cooling if necessary.
 - Enough room for each dog to turn, stand and lie down, except if dogs are transported during a dog trial
 - Food and water according to "General standards of care" listed above
 - Separate incompatible dogs.
 - Visually inspect each dog every 4 hours.
 - Remove each dog from the vehicle at least every 12 hours, and allow to urinate, defecate and exercise unless the vehicle is equipped to meet those needs.
 - Remove dogs from the vehicle in a timely fashion at the destination

**Transporting dogs
(continued)**

- **Transport vehicle requirements**

- All dogs need fresh or filtered air, without injurious drafts
- Dog cargo space built and maintained to minimize exhaust fumes seeping in

Prohibited conduct

- License holders, their employees or their agents may not:
 - Interfere with a DATCP inspection or assault an inspector
 - Fail to produce evidence or records requested by DATCP, without just cause
 - Misrepresent a dog's breed or pedigree
 - Move a diseased dog in violation of current laws
 - Knowingly accept dogs from someone not properly licensed, unless that person accepted the dogs to protect them and promptly reported the acceptance to DATCP

**Need more
information?**

- Go to <http://datcp.wisconsin.gov>, and look under "Animals" button
- Email DATCPanimals@wi.gov
- Call 608-224-4872





Rescues and Shelters

WISCONSIN DEPARTMENT OF AGRICULTURE, TRADE AND CONSUMER PROTECTION

Wisconsin law requires licensing and inspection for many dog-related operations. Under this law, rescue groups and animal shelters are treated the same. Both must be licensed if they shelter at least 25 dogs a year, whether it is in one central shelter or in foster facilities. If a shelter is legally incorporated as a non-profit organization, it may be licensed as a shelter. If a shelter is not legally incorporated as a non-profit organization, it must be licensed as a dog dealer. Regardless of the type of operation, they must meet the standards of care specified in the law, and must provide certificates of veterinary inspection when they sell (adopt) dogs.

Below are the answers to some frequently asked questions about rescues and shelters. Please use this information only as a guide, and contact us if you have any questions about your requirements.

Q. What do you consider an animal shelter?

A. Under this law, an animal shelter is a facility that shelters at least 25 dogs in a license year and is operated by a non-profit organization for the welfare, protection and humane treatment of animals.

Q. What is a home custody provider?

A. A home custody provider is someone who keeps dogs at his or her home for a licensed shelter or breeder, but doesn't need to be licensed. Think of it as a foster home.

Q. What is a CVI?

A. CVI stands for certificate of veterinary inspection. You cannot get these forms. A veterinarian must buy them from the Department of Agriculture, Trade and Consumer Protection. He or she must examine the dog and complete the form, which attests to the dog's apparent freedom from infectious disease and vaccination status. Copies should be distributed to you and to the person who adopts the dog.

There are two different forms. One is an *interstate* CVI, which has always been required for dogs entering Wisconsin from another state or leaving Wisconsin for another state. The other is a new form, an *intrastate* CVI for dogs sold by licensed dog sellers or shelters within Wisconsin.

Either CVI must be signed within 10 days of the date the veterinarian examines the dog, and is good for 30 days from the date of the examination. Dogs entering Wisconsin with an *interstate* CVI and sold within that 30-day window do not need an *intrastate* CVI.

Q. What if an individual or group rescues dogs, but isn't incorporated as a non-profit organization?

A. You must still be licensed if you shelter at least 25 dogs a year in Wisconsin, either in a central location or with home custody providers. If you are incorporated as a non-profit organization, you will be licensed as an animal shelter and pay the flat \$125 annual fee. If you are not a legal non-profit organization, you will be licensed as a dog dealer if your business location is in Wisconsin, or as an out-of-state dog dealer if you do not have a business location in Wisconsin. These licenses have higher fees than the shelter license.

If you want to be licensed as a non-profit shelter, you must submit proof that your shelter is formally incorporated as a 501(c)(3) organization.

Q. Our rescue group has a number of shelters in Wisconsin. Can we put them all under one license?

A. If you have actual animal shelters, rather than a number of home care providers, each facility would have to be licensed and inspected separately. This protects you. If all were licensed as one, and one of the facilities did not

meet the standards of care, all could be shut down.

Q. The law talks about selling dogs, but we don't sell dogs. People adopt them. Are we exempt?

A. The law says that if you *shelter* at least 25 dogs a year, you must be licensed.

The law says dogs must have certificates of veterinary inspection when they are sold, and defines *sell* as “conveying ownership for consideration.” So, if money or anything else of value changes hands, it is considered a sale. Whether you call it an adoption fee, covering expenses of caring for the dog, a donation, or bartering, the law regards it as a sale if the person adopting the dog gives you anything of value.

Q. We don't have a central shelter. We use foster homes. Do we need a license? Do the foster homes need a license?

A. If you shelter 25 or more dogs a year, regardless of where you shelter the dogs, you need a license. You need to declare a central business location and contact – one of your foster care providers or someone in your organization. This is where you will keep all your records. The rest of the foster homes would be considered home custody providers. They do not need to be licensed, but they may be subject to inspection.

If you shelter fewer than 25 dogs a year, you don't need a license.

Q. We are a national rescue organization with our headquarters in another state, but we have foster homes in Wisconsin. Do we need to be licensed?

A. If you shelter 25 or more dogs a year with Wisconsin home custody providers, you need to be licensed. You can be licensed either as an out-of-state dog dealer, or as a shelter if you are a legal non-profit. In the latter case, you would declare a central business location and contact – one of your foster care providers or someone in your organization. This is where you will keep all your records. The rest of your Wisconsin foster homes would be considered home custody providers. They do not need to be licensed, but they may be subject to inspection.

If you shelter fewer than 25 dogs a year in Wisconsin foster homes, you don't need a license.

Q. Our rescue group is a national organization with a contact in Wisconsin, but we don't shelter 25 dogs a year in Wisconsin. Do we need a license?

A. You probably don't need a license. However, a dog coming to your contact even for one day and then being sold (adopted out for a fee or other consideration) counts as one dog sheltered in Wisconsin. If that happens 25 times in a year, you would need to be licensed. You could be licensed as an out-of-state dealer, or if you are a legal non-profit, you could be licensed as a shelter, if you make your contact's address the central location in Wisconsin where records are kept.

Dogs entering Wisconsin from another state need to be accompanied by an interstate CVI, regardless of whether they are staying or passing through.

Q. Our rescue group does not have any foster homes in Wisconsin, but we may rescue dogs from Wisconsin or place dogs in Wisconsin. Do we need to be licensed?

A. If you move more than 25 dogs into Wisconsin in a year, you must be licensed as an out-of-state dog dealer.

If you move any dogs into Wisconsin, they must be accompanied by a certificate of veterinary inspection, regardless of whether you need to be licensed.

Q. Our shelter facility also contracts with the county (city, village, town) to be the local animal control facility. Do we need two licenses?

A. As long as it's only one location, you need only one license.

Q. I have a breeding operation, from which I sell dogs. I also have a rescue operation. Do I need to license

both?

- A.** This is a very complicated question. If you have not done so already, you should first address all the issues with your tax attorney and the Internal Revenue Service. When you have the business arrangements in place, contact us and we will consider what licenses are necessary.
- Q. What if I don't apply for a license now, but end up sheltering 25 or more dogs in a year?**
- A.** Once you take in the 25th dog, you need to be licensed. You can apply for a license at any time; however, the license will always expire on Sept. 30 and you will have to pay the full annual fee even if you receive your license part way through the license year.
- Q. If I take in dogs from an out-of-state shelter, does that shelter need to be licensed?**
- A.** No, because transfers for no consideration between shelters are not considered sales. However, since the dogs would be coming from out of state, they would need *interstate* CVIs, as the requirement has always been.
- Q. What if I take in a dog from someone who should be licensed, but isn't?**
- A.** If you accept the dog to protect its health, safety or welfare, you must report the acceptance and provide relevant information to us about the transaction. If you don't do this, possible penalties include fines and license revocation.
- Q. Do we need to list our foster homes on our license application?**
- A.** No, but you must provide a list of foster homes to the inspector at the time of inspection.
- Q. I know that my rescue does not need a license, because I shelter fewer than 25 dogs a year. Do the dogs I place need to have certificates of veterinary inspection?**
- A.** No, not when you place them. However, regardless of license status, any dog that you bring into Wisconsin needs to be accompanied by an interstate certificate of veterinary inspection.
- Q. If we adopt dogs out to homes in other states, do we need to provide both the *interstate* CVI and the *intrastate* CVI required for adoptions under the new law?**
- A.** No, only the *interstate* CVI is necessary.
- Q. We often take in dogs from other Wisconsin shelters and rescues. Do these dogs need CVIs?**
- A.** No. Transfers between shelters are not considered sales as long as no fees or anything else of value is exchanged, so they don't require CVIs.
- Q. Will licensees be listed on the Department of Agriculture, Trade and Consumer Protection website?**
- A.** Yes. License information is available at: https://mydatcp.wi.gov/documents/dah/datcp_DAH_DogSeller_MyDatcp.pdf. Complete inspection reports will not be available online, but are public records, available to anyone who asks. Inquiries are welcome via phone or email to check the status of businesses or organizations.
- Q. We are a non-profit and will have trouble paying the costs of meeting all the standards of care. Is there any exemption?**
- A.** No, all licensees have to meet the standards of care in order to ensure humane treatment of the dogs.
- Q. Our rescue is near the state border and we often transfer dogs across state lines all the time. What are our requirements?**
- A.** When you bring dogs into Wisconsin, they need to arrive with interstate CVIs, just as they always have. If you don't shelter 25 or more dogs a year in Wisconsin, nothing further is required.

If you do shelter 25 or more dogs a year in Wisconsin, regardless of what state they came from, you will need a license. In that case, if someone adopts a dog that came from out of state within 30 days of the date it was examined, no further CVI is necessary. If the dog remains in a shelter or home custody care longer than that, it will need another CVI when it is adopted – *interstate* or *intrastate*, depending on where the adoptive home is.

Dogs that you take in from Wisconsin do not need a CVI until someone adopts them. Then they need an *interstate* or *intrastate* CVI, depending on where the adoptive home is.

Q. Where can I get more information?

A. Online: <http://datcp.wisconsin.gov> (look under “Animals” tab)

Email: DATCPanimals.wi.gov

Phone: 608-224-4872

Wisconsin Dog Breeders & Sellers Law

https://datcp.wi.gov/Pages/Programs_Services/DogBreedersSellersLaw.aspx

Wisconsin's law regulating dog breeding, sales, and adoption-for-fee requires inspection and licensing of many dog breeders, dealers, and sellers, as well as shelters and rescues that foster and adopt out dogs. The law also prohibits selling puppies less than 7 weeks old unless they go with their mothers, and requires that certificates of veterinary inspection – health certificates – accompany dogs that are sold or adopted for a fee.

The intent is to protect the welfare of dogs and to protect consumers who buy or adopt them.

Who Needs a License

These are the individuals and organizations that need to be licensed:

- Dog breeders selling at least 25 dogs a year, from more than 3 litters that they have bred
- Dog breeding facilities from which at least 25 dogs a year are sold, from more than 3 litters
- In-state dog dealers selling and offering to sell at least 25 dogs a year that they did not breed and raise
- Out-of-state dog dealers who import at least 25 dogs a year into Wisconsin, regardless of whether they bred and raised them
- Non-profit animal shelters and rescue groups sheltering/fostering at least 25 dogs a year
- Animal control facilities that contract with a city, village, town or county

There is no license or inspection required for pet owners, dog trainers, dog groomers, boarding kennels or anyone else.

If you're in one of the groups that need licenses, you can apply online and find application materials.

[Apply for a license](#)

[Requirements for license holders](#)

[Inspections & fees](#)

[Dog Seller Inspector Map](#)

[Rescue groups & shelters FAQ](#)

[Certificates of Veterinary Inspection FAQ](#)

[Find a licensed breeder/seller](#)

[File a complaint](#)

[2014 Dog Sellers Program Report](#)

[Statute: Chapter 173](#)

[Rules: ATCP 16](#)

Related Information

[Canine Brucellosis](#)

Contact

Dog Sellers Program Associate

(608) 224-4889

chelsey.kelley@wisconsin.gov



November 12, 2018

Jeff Pollard, DVM
Chair
Multidisciplinary Advisory Committee
California Veterinary Medical Board
1747 N. Market Blvd, Ste. 230
Sacramento, CA 95834

RE: Shelter Medicine Recommendation; 11/13/18 Agenda Item No. 5

Dear Dr. Pollard:

The California Animal Welfare Association (“Cal Animals”) appreciates the hard work of the Minimum Standards and Protocols for Shelter Medicine Subcommittee. Sorting through the myriad of unique issues associated with the practice of veterinary medicine in a shelter setting is challenging but vitally important to the welfare of animals in California’s shelters. I am writing with feedback on the shelter medicine recommendations contained in the Memorandum from Andrea Drummond, Administrative Programs Coordinator, to the Multidisciplinary Advisory Committee dated November 13, 2018. Cal Animals sought input from shelter veterinarians and shelter directors. However, because we have had just two weeks to review the materials, what follows for your consideration is initial feedback and not an exhaustive list of all concerns and recommendations.

16 CCR § 2035. Duties of Supervising Veterinarian

(a) and (b): Many shelters do not have a staff veterinarian. Instead they rely on private practice veterinarians in the community to provide care. With this arrangement, it would be both unreasonable and unfair to hold the veterinarian responsible for determining the competency of shelter staff. Not only does the veterinarian have no control over the hiring, firing, and training of shelter staff, the veterinarian is not present in the shelter on a daily basis. Therefore, he or she does not have the opportunity to oversee and observe staff. In a traditional practice setting, this oversight responsibility makes sense because the supervising veterinarian oversees and evaluates hospital staff on an ongoing basis in the course of a normal work day. It is important to note that some shelters do not even have a veterinary hospital within a reasonable distance of the shelter. Recommendation: Explore the idea of requiring online training for shelter staff on basic health care tasks. This training would eliminate the requirement that the supervising veterinarian be responsible for determining competency of shelter staff.

(c): The term “disposition” here should exclude things like adoption, transfer to rescue, and euthanasia. These do not fall under the duties of a supervising veterinarian in an animal shelter, even when the veterinarian is on staff.

(e) How will a veterinarian know what this means in a shelter setting? This language is quite vague.

Proposed 16 CCR § 2035.5. Duties of Supervising Veterinarian and Animal Health Care Tasks for R.V.T., VACSP Holder, and Veterinary Assistant in the Shelter Setting

(a)(2)(B) and (C): Most shelters, particularly those that are small and rural, do not have RVTs. Therefore, VACSP holders and veterinary assistants should also be able to treat medical conditions based on an animal's symptoms pursuant to written protocol. This is especially true for minor medical issues such as URI, kennel cough, or pain management after a spay. As written, this proposal would require shelters without a staff veterinarian or RVT to transport animals to a veterinarian for treatment of these conditions. These shelters have neither the resources nor the staff to do these transports, particularly when the nearest veterinary hospital willing to treat shelter animals is far away. Recommendation: Explore the idea of requiring online training for shelter staff in treating medical conditions based on an animal's symptoms pursuant to written protocol.

(a)(3) Most shelters do not have RVTs. VACSP holders and veterinary assistants should also be able to render certain emergency treatment. Recommendation: Explore the idea of requiring training for shelter staff in providing emergency treatment.

(d) What would this look like? What type of "physical presence" would be reasonable?

(e) Presumably, this applies to animals that are adopted and then returned to the shelter for ongoing treatment only (i.e. the owner is not relinquishing ownership of the animal to the shelter). If so, a word other than "returned" should be used. Use of the word "returned" could be interpreted as meaning the animal is being surrendered, not brought in for ongoing treatment.

(f) This section should clarify that it applies to owner returns and surrenders that result in relinquishment of ownership.

Proposed 16 CCR § 2036.6. Minimum Standards – Animal Shelter Ambulatory Medicine

Introductory paragraph: Need to clarify that these standards apply to the part of the shelter facility where veterinary medicine is actually performed and not to the entire shelter facility.

(f) This should read ". . . where spay or neuter, or other veterinary services, are provided to the public . . ."

(i) and (j) Some rural shelters do not have a veterinary facility within a reasonable distance. These shelters would be unable to comply with this requirement.

(l) The Committee should explore whether equipment, such as oxygen, should be required when it is equipment that shelter staff would not be allowed to use in the absence of an onsite veterinarian.

(n) This subsection be revised to clarify that it applies only to the situation in which a member of the public submits an animal to a shelter for treatment.



(p) What if the shelter does not have anesthetic equipment because it does not perform anesthesia?

(r) In a shelter setting, disposition of a deceased animal should occur per shelter protocol.

Again, Cal Animals applauds your hard work and focus on this important matter and looks forward to continuing the discussion on minimum standards in a shelter setting that reflect the unique needs and realities of animal shelters.

Very truly yours,

A handwritten signature in black ink that reads "Erica Hughes". The signature is written in a cursive style.

Erica Hughes
Executive Director