

May 12, 2011

Ms. Susan Geranen
Veterinary Medical Board
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Dear Ms. Geranen:

On February 17, 2011, the CVMA, held a task force meeting to examine the scope of practice in animal rehabilitation. The CVMA Animal Rehabilitation Task Force (ARTF) was chaired by Dr. Jon Klingborg. The charge of the task force was twofold – 1) to review the role of physical therapists and others trained or certified in animal physical rehabilitation and 2) to develop language regarding animal physical rehabilitation for submission to the Veterinary Medical Board (VMB) as proposed regulation in the Veterinary Medicine Practice Act.

The ARTF focused on the definition of animal rehabilitation and whether it includes any modalities that fit under the heading of "wellness" versus "the art and science of animal rehabilitation/physical therapy. They also discussed appropriate types of supervision (direct versus indirect), inspection and premise permit issues, liability and the ultimate responsibility to the animal patient.

The ARTF developed language pertaining to animal physical rehabilitation and the role of physical therapists. The language was recommended to the CVMA Board of Governors and was approved by the CVMA Board for submission to the Veterinary Medical Board. Also included is a recommended definition for "range setting" which is currently undefined in the California Veterinary Medicine Practice Act.

The recommended language is intended to help define animal physical rehabilitation, clarify who may render treatment, provide an increased level of safety for our animals and at the same time afford pet owners in California another level of protection. It would also help to decrease unlicensed activity in this area.

Members of the ARTF were: Jon Klingborg DVM, Diane Craig DVM, Dr. Richard Johnson DVM, Tom Kendall DVM, John Tolley DVM, Erin Troy DVM and Carol Schumacher RVT.

Presentations were made by guest speakers: Janet Van Dyke DVM, founder of the Canine Rehabilitation Institute, Jennifer Welter PT, Equine Therapeutic Solutions, James Syms PT, President of the California Physical Therapy Association, Jessica Waldman DVM, California Animal Rehabilitation, and Susan Geranen, Executive Officer of the Veterinary Medical Board.

The CVMA Board of Governors respectfully requests that the Veterinary Medical Board consider this proposed language as an addition to the California Code of Regulations.

Sincerely,



Dean Henricks, DVM
President

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Proposed CVMA “Animal Physical Rehabilitation” Language

§ . Animal Physical Rehabilitation.

(a) The term physical rehabilitation (PR) is the art and science of physical or corrective rehabilitation of any animal by the use of the physical, chemical and other properties of heat, light, water, electricity, sound, massage, and active, passive, and resistive exercise for the prevention, cure or relief of a wound, fracture, bodily injury, or disease of animals. PR shall include physical rehabilitation evaluation, treatment planning, instruction and consultative services. PR when performed upon animals constitutes the practice of veterinary medicine.

(b) PR may only be performed by the following persons:

(1) A veterinarian who has examined the animal patient and has sufficient knowledge to make a diagnosis of the medical condition of the animal, has assumed responsibility for making clinical judgments regarding the health of the animal and the need for medical treatment, including a determination that PR will not be harmful to the animal patient, discussed with the owner of the animal or the owner’s authorized representative a course of treatment, and is readily available or has made arrangements for follow-up evaluation in the event of adverse reactions or failure of the treatment regimen.

(2) A California licensed physical therapist (“Physical Therapist”) working under the direct supervision of a veterinarian. A physical therapist shall be deemed to be working under the direct supervision of a veterinarian where the following protocol has been followed:

(A) The supervising veterinarian shall comply with the provisions of subsection (b)(1) prior to authorizing a physical therapist to complete an initial evaluation of and/or perform treatment upon an animal patient.

(B) After the physical therapist has completed an initial evaluation of and/or treatment upon the animal patient, the physical therapist shall consult with the supervising veterinarian to confirm that PR care is appropriate, and to coordinate complementary treatment, to assure proper patient care.

(C) At the time a physical therapist is performing PR on an animal patient in an animal hospital setting, the supervising veterinarian shall be on the premises. At the time a physical therapist is performing PR on an animal patient in a range setting, the supervising veterinarian shall be in the general vicinity of the treatment area.

(D) The supervising veterinarian shall be responsible to ensure that accurate and complete records of PR treatments are maintained in the patient’s veterinary medical record.

(c) Where the supervising veterinarian has ceased the relationship with a physical therapist who is performing PR treatment upon an animal patient, the physical therapist shall immediately terminate such treatment.

(d)(1) A physical therapist who fails to conform with the provisions of this section when performing PR upon an animal shall be deemed to be engaged in the unlicensed practice of veterinary medicine.

(2) A veterinarian who fails to conform with the provisions of this section when authorizing a physical therapist to evaluate or perform PR treatments upon an animal shall be deemed to have engaged in unprofessional conduct.

§ . “Range setting” means on the same property and in the vicinity of where the animal(s) is being treated.