January 27, 2012

Jon Klingborg, DVM
Multidisciplinary Committee
Veterinary Medical Board
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VIA EMAIL: vmb@dca.ca.gov

Dear Dr. Klingborg:

This letter is to provide input regarding issues raised in The Animal Rehabilitation Task Force Orientation Letter published online by the Veterinary Medical Board, with particular focus on regulations contemplated by the VMB that would restrict the ability of trained animal massage therapists and acupressure practitioners who are not veterinary assistants to engage in their trade and would restrict the freedom of animal owners to choose their animals' care.

1. Primary Issue #1: What is Animal Rehabilitation and what isn't? Does AR include or not include: massage, stretching, exercise (active, passive, resistance), hydrotherapy, application of heat or cold, physical, chemical and other properties of heat, light, water, electricity, sound, stimulation (via laser, electrical, magnetic field, or ultrasound?)

> *Comment:* "Animal Rehabilitation" may include any of the modalities mentioned, but use of these modalities does not necessarily imply that the application is used for rehabilitative purposes. In many cases, use of these modalities is for the comfort and wellbeing of the animals, much as, e.g., people might get a massage to address a sports injury, or might get one for relaxation. In other words, the same modality might address different issues and therefore, the VMB cannot specify that a modality must always be used for a particular purpose.

2. Secondary Issue: Are there any modalities or interventions that would fit under the heading of 'Wellness' and not constitute the science and art of Animal Rehabilitation and/or Physical Therapy?

> *Comment:* All of the modalities referenced above would fit under the heading of "Wellness" as "complementary modalities," as well as additional modalities, such as acupressure (not acupuncture, unless practiced by or under the supervision of a veterinarian), aromatherapy, which is now popular in many over-the-counter products, and flower essences. They also constitute the science and art of Animal Rehabilitation and/or Physical Therapy.
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> One way to look at the differences between, e.g., massage and physical therapy is as follows:
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> - physical therapy follows a strict protocol based on a specific diagnosis;
> - physical therapy requires the patient to participate, following therapist directions to create specific movements, including both muscles and the skeleton;
> - physical therapy uses tools, instruments, and accessories (e.g., weights, resistance devices, machinery, etc.);
> - physical therapy more often than not requires the patient to perform specific activities, with regulation according to a protocol, on a regular basis in between formal physical therapy sessions;

- physical therapy is designed and applied as an outcome-based treatment;
- physical therapy is a treatment prescribed by a physician/veterinarian and cannot be self-prescribed
- massage tends to be passive on the part of the client;
- massage will manipulate muscles but rarely the skeleton;
- massage does not use tools, instruments, or accessories;
- massage does not require any supplemental activity on the part of the client; and
- massage is a self-prescribed wellness activity.

3. Primary Issue #2: What type of supervision is appropriate for those who perform AR? Current regulations require that all Physical Therapy and Animal Rehabilitation either be performed by a veterinarian or under the direct supervision of a veterinarian (in the same building.) There is pressure by some Physical Therapists to allow for AR via indirect supervision, and there are a number of animal 'massage therapists' who believe that there should be no supervision for their activities (i.e. that animal massage should not fall under any sort of regulation or constitute the practice of physical therapy, animal rehabilitation or veterinary medicine.)

> *Comment:* There are many trained practitioners of complementary modalities. By the standards of training, these people do not diagnose or treat, any more than a human massage therapist would diagnose or treat a client's illness. When an animal is under veterinarian care for a medical problem, we do not disagree that the practitioner should directly or indirectly be supervised by the veterinarian in order to effect an optimal outcome. However, when an animal owner chooses to provide massage, acupressure, or other modality for the comfort and wellbeing of the animal, this falls outside the purview of medical practice and should not be regulated by the VMB.

4. Who would have the liability? Who would ultimately be responsible if something happened to the animal? If there is no veterinarian on site, what would the PT do if something went wrong?

> *Comment:* Our comment addresses only practitioners of complementary modalities (not Animal Rehabilitation Practitioners or Physical Therapists). Please note that there is liability insurance available to persons who have graduated from reputable training programs. Animal owners who choose to have such work done on their animal are able to ask about such insurance. Responsible training programs address "scope of practice" issues, training specifically about working collaboratively with veterinarians and encouraging owners to advise their veterinarians that such work is being done.

5. What would the curriculum look like for a PT to be qualified to open their own practice? What would the veterinarian's role be in follow up assessment? Would the PT/PR be required to follow a treatment protocol agreed to in advance with the DVM or change the plan as they want?

> *Comment:* There are many excellent training programs available with already-developed curricula. If there is a diagnosis with an agreed-upon protocol, it is responsible care that the therapists and the veterinarian communicate fully regarding the desired outcomes and the follow-up communication and assessment. If the work falls into the category of "wellbeing," there is no need for a follow-up assessment because there is no diagnosis on which to base evaluation of changes.

We would encourage the Animal Rehabilitation Task Force to take these comments under consideration

and would be very happy to offer our ongoing input on the creation of guidelines and language, should the Committee desire. Shelah, in particular, has been looking at these issues from various perspectives based on nearly two decades of experience in health, wellness and massage.

Sincerely,

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