# 2015 Environmental Scan Veterinary Medical Board

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# Introduction

One of the first steps in developing a strategic plan is to conduct a scan and analysis of the environment in which an organization operates. This analysis allows us to take a look at the factors that can impact the organization's success. This is a summary of the results of the environmental scan recently conducted by SOLID for the California Veterinary Medical Board in February 2015.

The purpose of this environmental scan is to provide a better understanding of stakeholder, Board members, and Board staff thoughts about the Board's performance within the following categories:

- 1. Enforcement
- 2. Licensing & Examinations
- 3. Customer Service & Administration

- 4. Legislation & Regulations
- 5. Outreach
- 6. Hospital Inspection Program

This document outlines areas where Board members, staff and stakeholders are in agreement and disagreement while providing additional insight to assist the Board in developing goals and objectives for the upcoming strategic plan.

Please review this information carefully in preparation for the upcoming strategic planning session on April 1<sup>st</sup> and 2<sup>nd</sup>. At this planning session, we will discuss and evaluate this information as a group to help us identify new strategic objectives the Board will focus on during the 2015 - 2019 strategic plan period.

If you have any questions about this report, please contact Noël Cornelia with SOLID at (916) 574-8343 or <u>Noel.Cornelia@dca.ca.gov</u>.

# Acronym Legend

AAVSB- American Association of Veterinary State Boards ACLS- Advanced Cardiac Life Support ALARA- Brand of X-ray equipment AVMA- American Veterinary Medical Association CAS Codes- Codes for the Consumer Affairs System CAVM- Complementary and Alternative Veterinary Medicine **CE-** Continuing Education CPR- Cardiopulmonary Resuscitation CSUS-California State University of Sacramento CURES- Controlled Substance Utilization, Review and Evaluation System CVMA- California Veterinary Medical Association DEA Logs- Drug Enforcement Administration logs that track controlled substances **DVM-** Doctor of Veterinary Medicine **EO- Executive Officer** Idexx SNAP- Brand name for a type of test to measure canine lipase levels MGL- Managing General Licensee OSHA- Occupational Safety & Health Administration RACE- Registry of Approved Continuing Education RAIVE Registry of Alternative and Integrative Veterinary Medical Education **RVT-** Registered Veterinary Technicians SPCA- Society for the Prevention of Cruelty to Animals UCD- University of California, Davis VACSP- Veterinary Assistant Controlled Substance Permit VCPR- Veterinarian Client Patient Relationship VMB- Veterinary Medical Board VT- Veterinary Technician VTNE Exam- Veterinary Technician National Examination

# Summary of Each Goal Area

The tables below illustrates external stakeholder, Board member and Board staff perceptions based on the following statement about each goal area:

In your opinion, how effective is the Board in the area of \_\_\_\_\_?

#1 Enforcement Effectiveness				
	Very effective	and effective	Poor and very poor	
External Stakeholders	50%	6	50%	
Board Members	100	%	0%	
Board Staff	100	%	0%	
Strengths			Weaknesses	
There are clearly delineate	ed rules. There shoul		d be a committee to evaluate a tead of just one person.	
There are an increased nui	mber of	The Board needs to be educated on the		
inspectors.	e		enforcement process.	
Responsiveness and accessibility have increased.		The Board needs to be involved in the disciplinary process.		
The Board does not let clin	ics operate	Some determinations made against		
without state licenses.		Registered Veterinary Technicians (RVTs)		
		are inaccura		
The Board has a quick response time with returned phone calls.		Results nee to view.	d to be on record for the public	

#2 Licensing and Examinations Effectiveness				
	Very effective	and effective	Poor and very poor	
External Stakeholders	779	6	23%	
Board Members	75%	6	25%	
Board Staff	100	%	0%	
Strengths			Weaknesses	
The testing procedure is ha	ard but fair.	The "alternative" ways of licensing for Registered Veterinary Technicians should		
		be a thing of the past.		
The process is timely and comprehensive.		Unlicensed a	activity is a huge problem.	
The Board has seasoned staff that understands program requirements and can process applications in a timely manner.		•	tinuing education is something bes not do well.	
There is an excellent effort to write relevant and meaningful exam questions.		The Board could reach out to licensees to explain the changes in the exams.		
Staff does an effective job of people ready for their exam	an effective job of getting ady for their exams.		The Board will face challenges with educating Registered Veterinary Technicians.	

#3 Custor	#3 Customer Service and Administration Effectiveness				
	Very effective a	nd effective	Poor and very poor		
External Stakeholders	61%	)	39%		
Board Members	78%	)	22%		
Board Staff	100%	6	0%		
Strengths	5		Weaknesses		
There is now an appropriate amount of staff.		Staff is trying to catch up on backlogs.			
New staff is dedicated to the consumers.		Board could do better at using social media.			
The Board has open meetings.		The Board s	should have more than just eetings.		
The new Executive Officer is good at customer service.		Phone etiquette could be better.			
Staff in Sacramento is extremely knowledgeable		Staff is not nice and they don't get back to people in a timely manner.			

#4 Le	#4 Legislation and Regulations Effectiveness				
	Very effective a	nd effective	Poor and very poor		
External Stakeholders	67%	)	33%		
Board Members	75%	)	25%		
Board Staff	50%	)	50%		
Strengths			Weaknesses		
Through online notification expeditiously made availal practitioners.	ns, changes are Once the B		oard puts forth a regulation, it gets wn in the Office of Administrative		
Most of their legislation is consistent with those who practice.		There are many pressing issues of today that can't be dealt with because we're still handling the problems of yesteryear.			
The Board is aware of the issues relating to the profession and discusses them regularly at Board meetings.		•	ulation packages need to be filed een on the "to do" list for several		
The Board does a great job of being involved and presents its concerns in a good way.		The Board needs to get better at closing loopholes.			
The Board is proactive.			could improve upon building with different stakeholders the state.		

#5 Outreach Effectiveness				
	Very effective and	l effective	Poor and very poor	
External Stakeholders	37%		63%	
Board Members	56%		44%	
Board Staff	29%		71%	
Strengths	6		Weaknesses	
The newsletter and website	e are very useful.	The Board should send out more information at the time of rule changes.		
The Executive Officer goes out to her area schools and gives talks.		The VMB Facebook page has only 32 likes - this is a huge failure.		
The Board sends out emails inviting members to participate and it keeps them informed.			t been involved in CVMA I know anything about the Board vorks.	
The Website is good and easy to navigate.		There are not enough people involved with outreach. It's a problem of limited resources.		
The Board is stepping into	social media.	The Board made.	d doesn't publish decisions	

#6 Ho	#6 Hospital Inspection Program Effectiveness				
	Very effective a	nd effective	Poor and very poor		
External Stakeholders	55%	Ď	45%		
Board Members	62%	þ	38%		
Board Staff	100%	6	0%		
Strengths			Weaknesses		
The inspectors are very the	brough and tell	The checklis	t used should be updated and		
exactly what is wrong.		have more d	etail.		
The number of inspections has increased.		The minimum requirements of the checklist are a 'one-size fits all', but there are multiple types of practices so it doesn't quite apply to everyone. It best suits a fixed small animal practice.			
This program helps to educate licensees about minimum standards and correct deficiencies.			rs are new and have no knowledge yet.		
The Board responded appropriately and		Each inspector seems to pick one area and			
fairly to some complaints the	nat were filed	is not consist	tent with other inspections.		
The inspectors have soften	ed somewhat.	The Board should consider a self-inspection honor system that is spot inspected.			

# **Detail of Each Goal Area**

The following strengths and weaknesses for each goal area are what were also shown in the Summary in the above section. For the detailed comments that led to these summaries please see the Comments section of this scan.

# **#1 Enforcement**

The rights of consumers and the health and safety of their animals are protected from the illegal, incompetent and unprofessional practice of veterinary medicine.

Enforcement includes complaint intake, internal investigations, licensee disciplinary actions, the hearing process, investigation cycle times, and the enforcement knowledge of Board staff. Enforcement also includes the Board's relationships with the Office of the Attorney General and with the Office of Administrative Hearings, as well as proactive Board activities that mitigate the need for enforcement.

Enforcement Effectiveness				
Rating	<u>External</u> Stakeholders	Board Members	Board Staff	
Very effective	6%	33%	25%	
Effective	44%	67%	75%	
Poor	43%	0%	0%	
Very poor	7%	0%	0%	
Total	100%	100%	100%	

# **Enforcement Strengths**

- 1. There are clearly delineated rules.
- 2. There are an increased number of inspectors.
- 3. Responsiveness and accessibility have increased.
- 4. The Board doesn't let clinics operate without state licenses.
- 5. The Board has a quick response time with returned phone calls.

## **Enforcement Weaknesses**

- 1. There should be a committee to evaluate a situation instead of just one person.
- 2. The Board needs to be educated on the enforcement process.
- 3. The Board needs to be involved in the disciplinary process.
- 4. Some determinations made against Registered Veterinary Technicians (RVTs) are inaccurate.
- 5. Results need to be on record for the public to view.

For the detailed comments that led to this summary please see the Comments section on page 15.

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## **DCA Performance Measures Summary**

The performance measures demonstrate DCA is making the most efficient and effective use of resources. Performance measures are linked directly to an agency's mission, vision, strategic objectives, and strategic initiatives. The chart below shows the number of days between the stages of investigating a consumer complaint for the Board. The column labeled "target" is the goal the Board has established for itself. The remaining columns show the actual number of days to move a complaint from one step of the investigation process to the next.

The Board is exceeding its targets in intake and investigation according to data for the last two quarters of 2014.

#### Glossary of Performance Measure Terms

Volume - Number of complaints and convictions received.

<u>Intake</u> - Average cycle time from complaint receipt to the date the complaint was assigned to an investigator.

<u>Intake & Investigation</u> - Average cycle time from complaint receipt to closure of the investigation process. This does not include cases sent to the Office of the Attorney General or other forms of formal discipline.

<u>Formal Discipline</u> - Average number of days to complete the entire enforcement process for cases resulting in formal discipline. (Includes intake and investigation by the Board/Board and prosecution by the Attorney General.)

<u>Probation Intake</u> - Average number of days from monitor assignment to the date the monitor makes first contact with the probationer.

<u>Probation Violation Response</u> - Average number of days from the date a violation of probation is reported, to the date the assigned monitor initiates appropriate action.

		Q4 April - June 2014	Q1 July - September 2014
Performance Measure	Target	Actual	Actual
Volume (number of complaints)		170	125
Intake (days)	10	62	82
Intake & investigation (days)	365	351	271
Formal discipline (days)	540	845	928
Probation intake (days)	10	n/a	n/a
Probation violation response (days)	7	n/a	n/a

# **#2 Licensing & Examinations**

Only qualified individuals are licensed as veterinarians or Registered Veterinary Technicians (RVTs).

Licensing refers to the initial application submission process for obtaining a license from the Board, as well as the renewal process. Licensing includes processing times, processing backlogs, responsiveness of Board staff to initial and renewal applicant inquires. Inquires may include information from the Board about the licensing process and licensing requirements, and eligibility criteria for licensure.

Licensing and Examinations Effectiveness				
Rating	<u>External</u> Stakeholders	Board Members	Board Staff	
Very effective	15%	25%	14%	
Effective	62%	50%	86%	
Poor	19%	25%	0%	
Very poor	4%	0%	0%	
Total	100%	100%	100%	

# Licensing and Examinations Strengths

- 1. The testing procedure is hard but fair.
- 2. The process is timely and comprehensive.
- 3. The Board has seasoned staff that understands program requirements and can process applications in a timely manner.
- 4. There is an excellent effort to write relevant and meaningful exam questions.
- 5. Staff does an effective job of getting people ready for their exams.

## Licensing and Examinations Weaknesses

- 1. The "alternative" ways of licensing for Registered Veterinary Technicians should be a thing of the past.
- 2. Unlicensed activity is a huge problem.
- 3. Tracking continuing education is something the Board does not do well.
- 4. The Board could reach out to licensees to explain the changes in the exams.
- 5. The Board will face challenges with educating Registered Veterinary Technicians.

For the detailed comments that led to this summary please see the Comments section on page 21.

# **#3 Customer Service and Administration**

Consumers, licensees, schools and all other stakeholders receive service in a prompt, courteous, accurate and cost-effective manner.

Customer service refers to the Board's and the staff's ability to respond to consumers, licensees, and other stakeholders in a timely and professional manner. Administration includes the staff's ability to fulfill the Board's requests and concerns while managing efficient internal processes and procedures.

Customer Service and Administration Effectiveness				
Rating	<u>External</u> Stakeholders	Board Members	Board Staff	
Very effective	5%	11%	43%	
Effective	56%	67%	57%	
Poor	32%	22%	0%	
Very poor	7%	0%	0%	
Total	100%	100%	100%	

# **Customer Service and Administration Strengths**

- 1. There is now an appropriate amount of staff.
- 2. New staff is dedicated to the consumers.
- 3. The Board has open meetings.
- 4. The new Executive Officer is good at customer service.
- 5. Staff in Sacramento is extremely knowledgeable.

# **Customer Service and Administration Weaknesses**

- 1. Staff is trying to catch up on backlogs.
- 2. Board could do better at using social media as a form of customer service.
- 3. The Board should have more than just quarterly meetings.
- 4. Phone etiquette could be better.
- 5. Staff is not nice and they don't get back to people in a timely manner.

For the detailed comments that led to this summary please see the Comments section on page 26.

# **#4 Legislation and Regulation**

The Board monitors and upholds the law and participates in the regulatory and legislative processes.

Laws and regulations include the federal laws governing the veterinary profession as well as California's clarifying regulations.

Legislation and Regulation Effectiveness				
Rating	<u>External</u> Stakeholders	Board Members	Board Staff	
Very effective	6%	25%	0%	
Effective	61%	50%	50%	
Poor	26%	25%	50%	
Very poor	6%	0%	0%	
Total	100%	100%	100%	

# Legislation and Regulation Strengths

- 1. Through online notifications, changes are expeditiously made available to practitioners.
- 2. Most of their legislation is consistent with those who practice.
- 3. The Board is aware of the issues relating to the profession and discusses them regularly at Board meetings.
- 4. The Board does a great job of being involved and presents its concerns in a good way.
- 5. The Board is proactive.

## Legislation and Regulation Weaknesses

- 1. Once the Board puts forth a regulation, it gets bogged down in the Office of Administrative Law.
- 2. There are many pressing issues of today that can't be dealt with because we're still handling the problems of yesteryear.
- 3. Several regulation packages need to be filed that have been on the "to do" list for several years.
- 4. The Board needs to get better at closing loopholes that people are getting around.
- 5. The Board could improve upon building consensus with different stakeholders throughout the state.

For the detailed comments that led to this summary please see the Comments section on page 30.

# **#5 Outreach**

Consumers and licensees are able to make informed decisions regarding the purchase and provision of veterinary medical services.

Outreach refers to the Board's ability to communicate with consumers, licensees, and other stakeholders using various techniques such as: social media, print, television and radio media and public forums.

Outreach Effectiveness				
Rating	<u>External</u> Stakeholders	Board Members	Board Staff	
Very effective	2%	11%	0%	
Effective	35%	45%	29%	
Poor	53%	22%	57%	
Very poor	10%	22%	14%	
Total	100%	100%	100%	

## **Outreach Strengths**

- 1. The newsletter and website are very useful.
- 2. The Executive Officer goes out to her area schools and gives talks.
- 3. The Board sends out emails inviting members to participate and it keeps them informed.
- 4. The website is good and easy to navigate.
- 5. The Board is stepping into social media.

## **Outreach Weaknesses**

- 1. The Board should send out more information at the time of rule changes.
- 2. The VMB Facebook page has only 32 likes this is a huge failure.
- 3. If I had not been involved in CVMA I would not know anything about the Board or how it works.
- 4. There are not enough people involved with outreach. It's a problem of limited resources.
- 5. The Board doesn't publish decisions made.

For the detailed comments that led to this summary please see the Comments section on page 34.

# **#6 Hospital Inspection Program**

This program is to educate veterinarians regarding the minimum standards requirements established by the California Veterinary Practice Act, and to attempt to prevent problems before they occur.

The Hospital Inspection Program refers to a process in which inspectors visit veterinary hospitals and clinics using a checklist against which they are reviewed. Veterinarians have access to the same checklist in advance of the site inspection so they can be prepared and will understand the assessment criteria.

Hospital Inspection Program Effectiveness			
Rating	External Stakeholders	Board Members	Board Staff
Very effective	5%	0%	29%
Effective	50%	62%	71%
Poor	36%	38%	0%
Very poor	9%	0%	0%
Total	100%	100%	100%

# **Hospital Inspection Program Effectiveness Strengths**

- 1. The inspectors are very thorough and tell exactly what is wrong.
- 2. The number of inspections has increased.
- 3. This program helps to educate licensees about minimum standards and correct deficiencies.
- 4. The Board responded appropriately and fairly to some complaints that were filed.
- 5. The inspectors have softened somewhat.

## **Hospital Inspection Program Effectiveness Weaknesses**

- 1. The checklist used should be updated and have more detail.
- 2. The minimum requirements of the checklist are a one-size fits all but there are multiple types of practices so it doesn't quite apply to everyone. It best suits a fixed small animal practice.
- 3. The inspectors are new and have no institutional knowledge yet.
- 4. Each inspector seems to pick one area and is not consistent with other inspections.
- 5. The Board should consider a self-inspection honor system that is spot inspected.

For the detailed comments that led to this summary please see the Comments section on page 38.

# Appendix A Expanded Comments for All Goal Areas

# **Stakeholder Comments Regarding Enforcement**

## **Enforcement Strengths**

### **Unlicensed Activity**

- 1. There are veterinarians who basically sell or loan their licenses to lay people (in rescue groups) who then gain access to prescription medication and start treating animals on their own. The Board has investigated a few of these veterinarians and issued citations.
- 2. The Board is finally able to (after many years) get unlicensed dentists to stop doing unsupervised non-anesthetic dental work.
- 3. I think your inspections are great. It is hard to be critical of the policing of illegal veterinary activity (e.g., unlicensed, etc.) because the consumers are voluntarily seeking lay people to do dentals, etc. As consumers are cooperating with this practice, they aren't filing complaints.

#### **Cycle Times**

- 1. The Board has a quick response time with returned phone calls.
- 2. The Board quickly evaluates problems with compliance in the field. It then seeks to resolve the issues and keeps its members informed of progress.

#### Consumer Awareness

- 1. The people responsible for enforcement do their best to educate consumers and practices of regulations and treat people fairly.
- 2. The Board is good at letting people know about incompetent professionals by posting in newsletters.
- 3. The Board has omnipresence through the availability of consumer access online, etc. This makes it easier for the consumer to verify licenses, etc.
- 4. People feel good just knowing that there is a group there for them if there is a problem.

#### Inspections/Investigations Quality

- 1. The Board is good at inspection, investigation and application of the jurisprudence.
- 2. The Board is responsive and fair with receipt of complaints and investigations.
- 3. The Board is effective at handling gross medical malpractice.
- 4. When veterinarians become aware of Board action it does create a sense of awareness that standards need to be maintained.
- 5. The Board seems to follow-up on reports.
- 6. The Board creates good laws and rules that should be enforced.
- 7. The Board acts on information submitted to them by individuals observing illegal, incompetent and unprofessional practices.
- 8. The Board is good at monitoring performance.

#### Quantity of Inspections

- 1. There are more hospitals being inspected on a routine basis.
- 2. The Board performs regular inspections and those stemming from the public's complaints.

#### Staff

- 1. It seemed that staff handled my complaint effectively.
- 2. The Board is adding new inspectors.
- 3. The Board's enforcement staff is professional and courteous even when they are not able to be more helpful.
- 4. The staff is thorough, serious and detailed.
- 5. The Inspector named Anne is good.
- 6. The enforcement staff is willing to listen to both sides of the story.
- 7. The staff is available to advise practitioners who have questions about enforcement. They are courteous and clear. They finally acted against Canine Care. That is huge!!

#### RVTs/CVTs

1. I feel that we are making progress in clarifying the differences in designations, such as RVT and CVT. The Board is legally enforcing those who practice medicine in a less than acceptable manner.

#### Other

- 1. The Board is setting standards for obtaining and maintaining a license.
- 2. Many have the perception that the Board is raising monetary funds with inspections.
- 3. The Board is disciplining the improper use of controlled substances and animal abuse.

## **Enforcement Weaknesses**

#### **Unlicensed Activity**

- 1. The Board is not doing anything for all the horse dentists out there that are not veterinarians.
- 2. Another weakness is that they are not acting on veterinarians that have been involved in multiple wrongdoings by taking or suspending their licenses.
- It is very common for vet technicians and others not licensed as veterinarians to perform procedures such a cat castrations and declaws with the owner / veterinarians' knowledge. As an associate, I was strongly urged not to report this to the Board and was eventually edged out of my job.
- 4. Medicines that are known to cause illness and death in dogs are still given by vets. The Board does not have the ability to enforce vets to discontinue medicines that cause paralysis and death.
- 5. Enforcement of illegal, unlicensed practice of veterinary care is VERY POOR. I know of breeders, groomers and pet shop owners that practice veterinary medicine with impunity. The most glaring example of this is all the groomers who practice dentistry. My colleagues and I joke that "the best way to avoid the wrath

of the Board when practicing veterinary medicine, surgery or dentistry is to not have a license."

- 6. Many "feed stores" are dispensing prescription and nonprescription therapies for small animal/companion patients.
- 7. Penalties for illegal practices are very weak.
- 8. Unlicensed veterinary technicians are referred to as vet techs on websites and in person -both are actively advertised on websites. They are easy to find and should be shut down.

#### Cycle Times

- 1. It takes way too long to bring to justice or (end) a case against an abuser.
- 2. The staff is VERY slow in processing complaints.

#### **Consumer/Vet Awareness**

- 1. I don't feel enough people are aware of the Board and how it can help them.
- 2. Little is known among veterinarians about the audit programs and enforcement.
- 3. I personally have not received updates recently on suspended licenses.
- The Board should immensely improve the way new information on laws and regulations governing the practice of veterinary practice is disseminated to all professionals concerned.
- 5. Results need to be on record for the public to view.

#### Inspections/Investigations Quality

- 1. It is hard to police competency without specific complaints. Some punishments may not enforce good behavior.
- 2. The Board seems to be somewhat arbitrary in the process—I'm never sure what the outcome is going to be.
- 3. The inspectors' over zealousness needs to be tempered with thoughtful investigation.
- 4. Sometimes the Board should listen to licensees and investigate other license holders.
- 5. The Board is not as effective in enforcing laws governing RVT tasks versus Vet assistant tasks. As an RVT, that is my area of concern.
- 6. Enforcement of non-value added procedures and policies is low. One example is that background checks on spouses should be mandatory if they participate in veterinary practice activities.
- 7. They either do not obtain knowledge of non-compliance or are too punitive with any complaint.
- 8. The Board experts are often incorrect but the enforcement action hinges so much on their opinion. Because they are paid by the Board, it is natural that if they want future business, they will make sure to see a case in a manner favorable to Board enforcement. The "specialists" themselves often have no greater credentials or experience than the respondent. It's time to make the specialists a PANEL of people like all the other medical Boards.
- 9. Expert witnesses do not provide consistent, coherent, or independently-verifiable testimony.

- 10. There is insufficient inspection of RVT schools and follow up on school passrates.
- 11. Hospital inspectors should be willing to give information on how to correct violations during inspection and should be more professional when they conduct routine inspection.

#### Inspections/Investigations Quantity

- 1. The Board does not have enough man power to investigate many incompetent veterinarians. A major problem is finding qualified and experienced veterinarians who are willing to investigate other veterinarians. Many outstanding veterinarians often see incompetent work but are reluctant to contact the Board about it.
- 2. There are too few investigators. Hospital visitations are infrequent. Many enforcement actions do not happen unless there is a specific complaint.
- 3. There are not enough resources (meaning manpower and money) to investigate reasonable inquiries.

#### Staff

- 1. The staff is disrespectful, rude, slow and won't respond.
- 2. The Board is unprepared for hearings and is not knowledgeable about CVPA. It does not follow the rules it is governed by.

## RVTs

- 1. RVT laws are completely ignored.
- 2. The Board is weak at interpreting section 2036 of RVT tasks.

## **Standards of Practice**

- 1. I have seen and worked in many hospitals, especially in the El Dorado County area, that do not follow the standards of practice. These hospitals seem to not get inspected. In the Bay Area inspectors would do their inspection about every two years.
- 2. We have many feed stores administering vaccines. The Board is not enforcing mobile vets, vaccine clinics, swap meets that administer vaccines, shelters, feed stores, etc. to the same standard with which they uphold veterinary hospitals.

## Standard of Care

- 1. Enforcement and the Standard of Care need to be more consistent.
- 2. The Board says things like, "your procedure was not up to the Standard of Care", which seems to be very vague. It is not written or spoken anywhere, yet it is applied with draconian violence.

#### Other

- 1. Hospital compliance is a weakness.
- 2. Sometimes, the Board spends too much time on frivolous cases.
- 3. The Board's infrequent inspections, the attitude of a few of the inspectors, and the long delay in the investigations are their weaknesses.

# **Board Member Comments Regarding Enforcement**

## **Enforcement Strengths**

#### Inspections/Investigations Quality

- 1. The Board evaluates what happened in some cases and hopefully educates and/or rehabilitates practitioners to provide good service.
- 2. The checklist helps vets have a better idea of how they're going to be judged.
- 3. The Board has taken an active role in making sure that those who don't take them seriously are pursued.
- 4. The Board gets the attention of vets and clinics and has developed credibility.

### Staff

- 1. Staff gathers facts and presents information.
- 2. Staff does a good job of intake, responding to people and moving the whole process along.
- 3. Candace is doing a great job.
- 4. They are improving things by training staff. They are improving on a technical and professional level.
- 5. Annemarie is catching up on backlogs and has a lot of new staff to help out.
- 6. The new Executive Officer is doing a great job.
- 7. The Board had training in fact-checking for the experts who carry out enforcement.

#### Other

- 1. The Board has a good handle on those they put on probation.
- 2. The Board is addressing consumer concerns in a timely fashion and with a level of expertise.
- 3. The Board has great responsiveness.

## **Enforcement Weaknesses**

#### Cycle times

1. Sometimes there have been complaints about something that occurred from five to six years ago and it's difficult to investigate and act on. There is no statute of limitations and there probably should be.

#### **Inspection Quality**

- 1. Some of the accusations against RVTs and veterinarians are not accurate.
- 2. There are not as many complaints that are coming to the Board, so the Board could improve at being proactive.
- 3. Some consultant vets have been either too lenient or not medically accurate.

#### Other

 The system is set up so we can't see any of the process until it comes back from the Attorney General's Office, so the Board bases their decisions on the judge's ruling. The Board decides whether the judge has followed the Board's guidelines, so we don't know if the animal lived or died. The Board would be involved in the disciplinary process but instead it's quite removed.

- 2. The Board doesn't get the full case and the full story because of the way the system is.
- 3. There should be a committee to judge matters, not just one person.
- 4. Education of the Board members on the steps of investigation, expert review, adjudication and probation monitoring is lacking.
- 5. It's not about punishment; it's about education and rehabilitation.
- 6. The Board shouldn't micromanage staff too much; we are constantly facing staff turnaround issues.

# Staff Comments Regarding Enforcement

## **Enforcement Strengths**

#### Staff

- 1. Staff is being supportive and educating consumers as to the process of enforcement.
- 2. Personnel is very invested in what we do.
- 3. We have a really good team here and that's a good start.
- 4. Increased staffing is good.
- 5. Specialized desks are effective.

#### **Cycle Times**

- 1. Cycle time targets and training issues are going well.
- 2. Shorter processing times are strengths.
- 3. The Board is making up for lost time.
- 4. We are doing a much better job at being responsive and accessible.

## **Enforcement Weaknesses**

- 1. Performance measures are not good.
- 2. The Board doesn't do well with case reviews and reading through them.
- 3. People said they never heard back from the Board after they filed complaints and consequently had to re-file.

# Stakeholder Comments Regarding Licensing and Examinations Licensing and Examinations Strengths

## Cycle Time

1. The Board has a timely and comprehensive process.

## Licensing

- 1. The licensing of veterinarians seems effective.
- 2. I appreciate the advance and timely nature of reminders when my license is due to be updated.
- 3. I appreciate the efforts to increase licensing and look forward to that value being disseminated to the clinicians and the public.
- 4. There is an easy process that anybody can follow.
- 5. The Board maintains the requirements mandated to qualify someone as a veterinarian or RVT.

## Examinations

- 1. The testing procedure is hard but fair.
- 2. There are strict guides and minimum requirements.
- 3. The Board definitely makes sure all exam costs are covered by the exam participants.
- 4. The test helps show that the technicians have the knowledge to do the job.
- 5. The Board makes an excellent effort to write relevant and meaningful exam questions.
- 6. This is what the Board is known for. For the most part California has excellent veterinarians and it is likely the standard for the Board exams has a lot to do with that.
- 7. Requiring a state veterinary licensing exam beyond the national Board is a good idea.
- 8. I like the idea of a two-exam system for RVT's. It's much more in line with other states' methods. I feel the exam could be altered to be a complete at-home exam like the veterinary law exam, and that could drastically reduce the fee.
- 9. The State Board test seems to still be an appropriate measurement of knowledge based information.
- 10. With regard to RVT preparation, California training programs focus on skills necessary for effective assisting in the field. Study questions are available to help with the preparation program, and the examination process is very streamlined and user friendly.
- 11. I feel that the way the dissolution of the RVT law exam was handled was abysmal.

## Education

1. The continuing education requirement is helpful.

#### Website

- 1. I have heard from other vets and technicians that you give complete explanations on everything when they find things on the website.
- 2. I am glad they moved to online tests.

## Licensing and Examinations Weaknesses

#### Cycle Time

- 1. The acceptance of applications, approval, processing and finally the scheduling of exams seems to take a long time, as well.
- 2. There can be a long back log in waiting to get a license.
- 3. Non-California veterinarians often have to wait months before getting a license.

#### Staff

- 1. Customer service is poor, which makes the whole process complicated.
- 2. Some of the comments we have received about staff specifically are: they are rude to people, they swear and hang up on people, they deliberately hold back licensing information, they deliberately delay sending licensing notices, they do not understand veterinary terminology and they single out schools like Barstow Community College as schools that they will not accept courses from.

#### Examinations

- 1. It shouldn't cost RVT's more than DVM's to take the licensing tests! The price for RVT's to take both the national and jurisprudence is excessively penalizing.
- 2. Is the exam cost appropriate? Is the exam delivery appropriate? Is the exam content appropriate? There are concerns that recent changes with the RVT exams are not appropriate with subject matter or delivery, as compared to the DVM exam.
- 3. Why impose another exam? Just give jurisprudence and then give a list of conditions and diseases unique to California.
- 4. There is confusion about how to complete the new testing requirements.
- 5. I think there should be a practical part of the exam. At the clinic where I work, there is a technician that is licensed but has no skills or experience to do the position. She does not take advice well, and thinks that since she is licensed, she knows it all.
- 6. The exams ask questions you never find the answer to if you get it wrong. They use the same questions year after year.
- 7. The majority of the questions on the veterinary licensing and technician exams are not relevant and are confusing. One of the most knowledgeable technicians I have failed the Board exam last year citing a large number of questions regarding working with llamas and other hoofstock that are not relevant to the majority of licensed technicians in this state. Additionally, it is nearly impossible for doctors to pass the exam without obtaining copies of previous exams. Questions for the DVM exam need to be rewritten and focus on ethics, laws and business. Finally, the testing centers are not appropriate as we are mixed in with people taking cosmetology and real estate exams which is extremely distracting

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and unprofessional. Perhaps the State should consider an open book jurisprudence exam like what the majority of other states offer. The requirement of taking the NAVLE within 5 years prohibits a lot of good doctors from choosing to move here.

- 8. The Board has been ineffective in communicating the changes in the RVT exam. No one has been able to tell me where the questions on the new state exam come from or even who created them. Students need to know what to study in order to pass this exam.
- 9. The State exam is far too expensive for RVT's. Most other states that have a similar examination system (VTNE and State law exam) have a much less expensive law exam, usually ranging from \$50-100, not the \$300 that ours is. Asking licensees to pay \$600 in examination fees, then the licensing fee on top of that is too much. As a comparison, the examination for Registered Nurses (their national licensing exam) is only \$200, with no state exam requirement. So the examination fees for RVT's are three times higher for a profession that, statistically speaking, will earn half as much than as an RN.
- 10. Sometimes some of the questions on exams are overly specialized or narrow and do not accurately assess the qualifications of the candidate.
- 11. I hope it is better now than in 2005. I have worked in other states where there was an open book test about legal issues like rabies protocols. This would be helpful. Also if you want to make sure people know about diseases in California, send them a packet and make them take an open book test or online so you know they read it. I was asked about injections in turtles using the Latin genus and species names that was a complete waste of everybody's time.
- 12. The State exam is a joke. 50 questions on ferrets and rabies laws? Veterinary technicians don't need to know any of that. Also, they need to create a more thorough exam blueprint. Why do other states have take-home exams for the jurisprudence? The fees are exorbitant, also.
- 13. Just because someone passes a test doesn't mean they are knowledgeable or responsible enough to be an RVT in practice.
- 14. The Board makes it very difficult coming from New York and having the national exam. Having two exams at the same cost is ridiculous.
- 15. Testing locations and time tables could increase.
- 16. RVTs have to jump through so many hoops and the exams are expensive, especially for someone who makes less than \$20.00/hr.
- 17. The California Law Exam for RVTs is (1) too expensive; and (2) much more difficult than the veterinarian's law exam. As is the case in other states, the exam should be a simple, open-book test with minimal overhead or staff time necessary.

## Licensing

- 1. The licensing of RVTs is very poor. Many RVT licenses are issued to poorly trained and incompetent individuals.
- 2. The "alternative" ways of licensing for RVTs should be a thing of the past; it is hardly comparable to true education at a school setting.
- 3. In my opinion, it's too easy to get licensed.

- 4. The Board is making little effort to consolidate interstate licenses.
- 5. While I realize that this may be outside of the Board's ability to change, the year spent under the supervision of a California licensed veterinarian in order to get licensed if seeking reciprocity is a joke. I had 12 years' experience when I came in to the State and was "supervised" by a California licensed veterinarian who had fewer years' experience than I, and technically they reported to me.
- 6. I think you need to delve deeper into background checks..
- 7. The Board should change licensing qualifications, i.e. RVT grandfather qualifications.

#### Education

- 1. We need more locations and sources of educational opportunities for potential candidates.
- 2. We should have to submit our CE logs rather than use the honor system.
- 3. Requiring continuing hours for the RVTs will probably cost money that they can't afford in flights and travel. There should be more on-line services.
- 4. Getting the 16 interactive CE units has proven challenging and the Board offers no support.
- 5. Some RVT training programs are absolutely worthless.
- 6. The process for Alternate Route for RVTs is inconsistent, inefficient and needlessly challenging.

#### Pay Rates/Fees/Costs

- 1. RVTs are some of the lowest paid professionals in medicine why are the license fees so high?
- 2. RVT exams are too expensive.

#### Website

- 1. Some of the links in the website of suppliers of RACE approved continuing education (CE) go to error and most are for non-interactive CE, which doesn't help me.
- 2. Why is nothing electronic? Check or money order?

#### Other

1. Internships---even unpaid ones---can be difficult to obtain. Perhaps the Board could help practices realize how valuable this process is for effective training in the field.

# Board Member Comments Regarding Licensing and Examinations Licensing and Examinations Strengths

#### Exams

1. OPES (Office of Professional Exam Services) does a great job.

2. Licensing has, over the past 15 years, been refined where we use a lot of national tests and also state tests.

#### Licensing

- 1. Having people coming out of school apply for licenses works pretty well.
- 2. They do a good job with administering licensing exams and tracking everything.

#### **Board Members**

1. It is a strength that some Board members are from both the vet clinical side and the technician side. They are able to bring opinions so that we get more input as to the direction we should go.

#### Staff

- 1. The Board does pretty well in this area even with lack of staff.
- 2. The Board has seasoned staff that understand program requirements and process applications in a timely manner.

# Licensing and Examinations Weaknesses

### Standard of Care

- 1. The Board should determine what the Standard of Care is- which is hard because it changes from year to year and geographically. It's important that we come to an agreement.
- 2. The Attorney General's office says there is one standard, but in reality it changes depending on where you live, --i.e., rurally or inner city.

#### Timeliness

- 1. Processing time is long.
- 2. The application process needs to be streamlined.

#### Education

- 1. Auditing and recording continuing education requirements is a weakness.
- 2. We will face challenges educating RVTs.
- 3. There needs to be a way that the Board can accredit the various schools to make sure that all the RVTs are getting the same education and that all the schools are upholding the same standards.
- 4. The ad hoc program seems like a way to get around educational requirements.

#### Fees

1. Examination fees for RVTs are too high and this group doesn't have a whole lot of money in the first place. There is inequity with the fees because they are the same for doctors who earn a lot more.

#### Examinations

1. Since the exam was changed recently (there are two now instead of one), there could be outreach to the licensees to explain the changes.

# **Staff Comments Regarding Licensing and Examinations**

# Licensing and Examinations Strengths

- 1. Staff does an effective job of getting people ready for their exams.
- 2. Staff doubled to two people.
- 3. They now have experienced licensing staff.
- 4. There are clear requirements not much is left to interpretation.
- 5. The Board is implementing a new Veterinary Assistant Controlled Substance Permit system.
- 6. The new permit brings more revenue.

# Licensing and Examinations Weaknesses

- 1. Staffing has been our biggest challenge and now we are addressing that.
- 2. Enforcement staff doesn't have licensing knowledge.
- 3. Staff could be cross-trained.
- 4. We need to work on customer service from staff.
- 5. We should educate the public on how to get licensed and how to take the exam.
- 6. There needs to be changes and updates to the phone tree.

# Stakeholder Comments Regarding Customer Service and Administration

## Customer Service and Administration Strengths Staff

- 1. Hopefully with new staff and direction, customer service will improve.
- 2. Administration is helpful when faxing information and is quick with address corrections.
- 3. Staff is pleasant and knowledgeable helpers when talking on the phone.
- 4. There is good follow through by professional personnel.
- 5. I have had nothing but positive interactions with the Board.
- 6. When actual representatives are accessed via telephone, my experience has been that they are very courteous as well as helpful.
- 7. They confirm when they receive a complaint.
- 8. I have been able to get questions answered in a timely fashion.
- 9. I have appreciated prompt responses whenever I have inquired about anything.
- 10. License renewals come on time and are processed quickly. When I've called with basic questions they have been answered well and politely.
- 11. Every time I have called the VMB (and it was many times last year while I was applying for my technician license) my calls were answered quickly, knowledgeably and everyone was very helpful.
- 12. They seem to keep records in order.
- 13. Ethan Mathes is great.

#### Website

- 1. When updated, the website is useful.
- 2. I have rarely engaged with the Board for information or service but I have found the website useful and informative.

## Cycle Times

- 1. I always get my bill in a timely manner.
- 2. I usually receive my paperwork for my license in plenty of time to renew. I usually get my license promptly.
- 3. Turn-around time on RVT applications has been much improved in the last couple of years.
- 4. They are good at providing a quick response to written or on-line requests for licensing.

## Communication

- 1. In addition to keeping members informed of currents trends in veterinary medicine, the Board seeks to enhance awareness of client needs.
- 2. I receive many communications via e-mail. That is a timely and cost-effective means of communication.
- 3. The Board is a good source of information on vet guidelines and comprehensive review of issues.

## **Customer Service and Administration Weaknesses**

#### Communication

- 1. I was disappointed in the amount of information that is (not) sent out regarding laws and regulation changes. When I sent in a letter regarding why nothing is sent out I did not receive any reply.
- 2. The public does not know the difference between an RVT and a certified Assistant.

#### Website, etc.

- 1. It would be nice if the Board could have a more user-friendly system to interact with the public.
- 2. It would make license renewals much more efficient if they were done electronically to avoid having to send checks and creating additional work/waste.
- 3. There is a lack of readily available information.
- 4. Add different types of media communication to the website.
- 5. Poor website design and information on where to find things and what to submit.
- 6. Not enough members of the public are aware of the Board or of its website.
- 7. There is not much help offered to guide licensees on how to get the 16 hours of interactive of CE. Some of the links of the suppliers in the Board's webpage go to error pages. The ones I have seen offer only non-interactive CE. I am all for continuing education, but I am having a hard time getting the "interactive" CE.

### RVTs

- 1. When applications for RVT licensure are not approved it's very difficult to find out why and resolve those issues.
- 2. There is no help for RVT-qualified individuals in registering for the exam.

## Communication

- 1. Sharing changes in laws and policies of the VMB in a broad and targeted manner would greatly improve compliance for practitioners.
- 2. The Board should publish up to date information on license suspensions.
- 3. The phone tree jail is bad.

## **Quality of Staff Knowledge**

- 1. They commonly leave answers up to interpretation and that is not helpful when dealing with laws.
- 2. Getting help with licensing or questions is virtually impossible I know numerous technicians who've just given up.
- 3. The person in charge of reviewing applications for the Alternate Route to RVT has no apparent background in veterinary technology education and is obstructive to people trying to obtain registration.
- 4. The Board does a very poor job giving clear and concise information. They don't publish legal opinions or guidance documents pertinent to what licensees need to know to be compliant. When they are asked questions, they either don't answer or give ambiguous and often wrong answers.
- 5. The office has little to no expertise in veterinary medicine or law.
- 6. Non-veterinary professionals are reviewing applications who don't understand veterinary-related topics.

## **Phone Responses**

- 1. Office personnel are rude on the phone.
- 2. It is very difficult for licensees to get answers to questions from phone inquiries or e-mails.
- 3. I receive nothing but complaints on customer service from the VMB.
- 4. My experience with the customer service aspect of the Board has always been lengthy waits for answers.
- 5. Too often you get a voicemail and when you actually talk to a live person, they are often adversarial.

## **General Staff**

- 1. Staff make promises to send forms or follow up on an issue, but often do not follow through. When you call back to check in they have no idea what you are taking about.
- 2. Staff is seen as unfriendly to vets instead of building a partnership to better compliance.
- 3. It seems like the office is understaffed and unable to respond to high volumes of inquiries.
- 4. I received communications that do not pertain to me.
- 5. Customer service? What customer service?
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- 6. As an educator for an alternate route program, several of my students have had difficulties with staff regarding their applications. They have been met with rude responses and a general unwillingness to help.
- 7. It seems like the office is understaffed and unable to respond to high volumes of inquiries.
- 8. Staff sends certified letters saying that they haven't received responses from you before they checked to see if the response is already in their inbox.

# Board Member Comments Regarding Customer Service and Administration

# **Customer Service and Administration Strengths**

## Website/Online Presence

- 1. The website is good; it is easy to look up a license.
- 2. Meeting dates and times are easy to find. Live broadcasting of our meetings is very, very good.
- 3. Transparency and availability to the public are strengths.
- 4. The Board is expanding on social media and Facebook.

## Staff

- 1. They are doing well with their processes and flow.
- 2. They respond well even though the number of staff is limited.
- 3. Staff in Sacramento is extremely knowledgeable.
- 4. There has been high turnover, but there is a lot of institutional knowledge.
- 5. The Executive Officer is very conscience of customer service.
- 6. With the increased staff we will be able to answer the phone calls in a timely manner.
- 7. New staff is extremely consumer oriented and dedicated to getting the information to the consumer and explaining the process.

# **Customer Service and Administration Weaknesses**

## General

- 1. Phone etiquette is a weakness.
- 2. Response time is a weakness.
- 3. There needs to be more than just quarterly meetings.

## Website/Online Presence

- 1. The website should be clearer and transparent. People should be able to look up a vet and see the problems or issues.
- 2. The Board could do better with social media and their website.

# Staff Comments Regarding Customer Service and Administration

# **Customer Service and Administration Strengths**

- 1. Good staff! We have the appropriate amount of staff for our workload.
- 2. The Board has committed staff.
- 3. Increased staffing is a plus.
- 4. Delegated work/staff to complete certain specialized tasks.
- 5. Staff are very sympathetic to animal owners.
- 6. Management support is a strength.

# **Customer Service and Administration Weaknesses**

- 1. Because we have more staff, we are now catching up.
- 2. Getting our staff trained will take time.
- 3. Effectively managing staff is a challenge. We need to make sure we stay on top of the work.
- 4. Staff need to make sure Board meetings, exam development, regulatory and budget processes run smoothly.
- 5. Staff were really just putting out fires for a while.
- 6. The phone tree is not specialized.
- 7. The website FAQs are not updated with current laws/regulations and instructions.

# Stakeholder Comments Regarding Legislation and Regulations Legislation and Regulations Strengths

## Legislation

- 1. The Board is good at government representation and thoroughness of review and position.
- 2. The Board likely provides excellent data for legislators when it is required.
- 3. The Board works well with the stakeholders to educate the public and legislators.
- 4. The Board does a great job of monitoring all animal and veterinary related legislation.
- 5. With the help of legal counsel, the Board is thorough and dedicated to this responsibility.

## Regulations

- 1. The Board is great at following the letter of the law.
- 2. I think they have been effective in some of the small animal fields regarding dentistry, abandoned animals and issues of animal cruelty.
- 3. The Board does try to make regulations that maintain the excellence in the veterinary field.

#### Website

1. Through online notifications, the changes are expeditiously made available to practitioners.

#### Other

- 1. The Board does a good job with small private clinics.
- 2. With the increased staffing, the backlog will be completed and we can really start tackling some of the issues of today.

## Legislation and Regulations Weaknesses

#### **Unlicensed Activity**

- 1. There is no effort to ensure that non-licensed staff are prohibited from RVT (and DVM) tasks.
- 2. I have been told of several inconsistencies in the Practice Act that the VMB has "tried" to improve- mostly dealing with practice without a license yet little has changed.
- 3. They do not advocate strongly enough for veterinarians and against unlawful activity.

#### Communication

- 1. There is a lack of clarification of regulations of the practice act when licensees ask for it. There are too many "grey areas" that are confusing to those needing to protect their license.
- 2. I never get updates those would be helpful.
- 3. If the Board is active in this area, they do a poor job of communicating it.
- 4. I am not aware of the Board playing a role in legislation. That always just seems to be the CVMA. Sometimes the VMB has a "ditto" position.

#### Education

- 1. The Board needs to review its alternate route regulations.
- 2. Things that don't need fixing (Alternate Route) are focused on more than standards of practice.

#### Licensing

1. We need updated minimum care standards and ethics requirements for continued licensing.

#### Fees

- Legislation was created to assess the necessity of the various professional Boards. You interpreted it as a reason to dramatically inflate licensing fees, including the very unfair practice of charging the same fee for an inactive license. Do you realize, these are the folks most likely experiencing a financial hardship?
- 2. If a vet has moved to another state to practice for a while, preserving the ability to return to California to practice later in life is very costly- as it is to have multiple state licenses.

#### Correspondence

- 1. It is hard to know what your interaction with the Legislature is without some correspondence.
- 2. I can't remember an article about the VMB involved in legislation; I'm sure they are, but the information is not easy to find.

#### **Quantity of Regulations**

1. I believe the Board regulates WAY TOO MUCH. It is focused on small animal issues and changes regulations for large animal veterinarians without much thought.

#### Timeliness

- 1. With the previous staff shortage, regulations have been taking too long to get through the process.
- 2. In my experience regulations take literally years to come to fruition. I understand there are processes that must be completed, but I think this is excessive.
- 3. I would say this area is "decent" but not effective. It takes forever for anything to pass.
- 4. Letting people know about changes in a timely manner is a weakness.
- 5. The Board took 20 + years to act against Canine Care but still allows teeth cleaning in pet shops!
- 6. Why does it take YEARS to address issues that have been plaguing the RVT profession?

#### Other

- 1. The Board needs to have similar ALARA and hazardous waste like protection that humans have for all staff at a vet hospital and general public.
- 2. Laws are on the books regarding a veterinarian's availability for rodeos, but they are not enforced.
- 3. They should be advocating for MORE, not LESS veterinary presence at events where animals are featured and may be injured.
- 4. The Board appears reluctant to investigate powerful companies such as Banfield and VCA.
- 5. The Board does not seem to enforce or investigate politically strong organizations such as major SPCAs.
- 6. They are slow to adapt to a changing professional environment.
- 7. The Board is not meshing smoothly with modern veterinary medicine.
- 8. The Board makes rules that cannot be enforced.
- 9. Legislation is fair. The regulations make practicing difficult.
- 10. The Board should hold licensees to statutory standards of practice.
- 11. The backlog of the legislative process is immense but is being handled.
- 12. Once the RVT Committee was disbanded, many RVT issues have been pushed asunder because of issues for veterinarians.
- 13. I feel there are too many tasks for the Multi-Disciplinary Committee to get through efficiently.

- 14. The RVT committee used to meet for a full day on RVT issues. Now there are only a few short hours of the Multi-Disciplinary Committee meetings to get stuff accomplished.
- 15. The Board seems to have the agenda of the CVMA in mind on legislation and not other State or Regional Associations.
- 16. Perception is that the office staff do not know what the regulations and legislation are.
- 17. It is our opinion that members of the Board are not cognizant of certain medicines given by veterinarians to animals. We believe the many complaints received regarding the death of an animal by a potentially lethal drug is not within the Board's realm to know.
- 18. All this effort on putting together a license plate- how does that protect consumers? How does it make veterinary practices practice better? It just FLAT OUT doesn't. It is a great, noble cause, but a blatant misuse of VMB staff time and efforts.

# Board Member Comments Regarding Legislation and Regulations Legislation and Regulations Strengths

- 1. The upper staff at the Board has established good relationships with legislators and when they testify or talk at Sunset Review, they are respected.
- 2. We have a very good relationship with DCA, the Office of Administrative Law and the Legislature.
- 3. The new Executive Officer has made the Board much more aware of the legislation that is going on.
- 4. We are active in updating and improving regulations.
- 5. The full Board makes a decision rather than just a committee of a few people.
- 6. The Board counsel researches everything we need to know and the Board sticks to the regulations.
- 7. The Board is now doing very well.
- 8. The Board is good at building consensus with different stakeholders throughout the state.

# Legislation and Regulations Weaknesses

- 1. The Board could work with professional association's to pool resources to monitor bills, etc.
- 2. We are not sure whether our interaction with the Legislature is effective or not.
- 3. Sunset review was denied and put on suspension for several years.
- 4. We spend a lot of our time cleaning up documents that the attorney should be cleaning up first and then bringing to the Board.
- 5. The race horse association wanted to go around the Board but, instead, we should work together.
- 6. The Board should be closing loopholes.
- 7. We need a representative who can focus on legislative activity so we can give veterinarians a heads up.
- 8. The Executive Officer is too busy with other issues to track legislation.

9. There is a backlog of regulation packages that need to be filed.

# Staff Comments Regarding Legislation and Regulations Legislation and Regulations Strengths

- 1. We attack the more complex issues and move forward in a very proactive and meaningful way.
- Given our resources, we try to the best of our ability to stay current and address and discuss issues as they come up with the Board and the Multi-Disciplinary Committee. We will act on them if necessary.
- 3. The Board has developed new programs.
- 4. There is additional staff dedicated to tasks. They have one dedicated person to focus on this type of work.
- 5. Lots of needed projects are in the works.

## Legislation and Regulations Weaknesses

- 1. The regulatory process is slow.
- 2. The problem is implementing the Board's regulations through all the levels.
- 3. New, inexperienced staff is a weakness.
- 4. Staff are performing without training.
- 5. Training for staff is only available infrequently.

## Stakeholder Comments Regarding Outreach

## **Outreach Strengths**

#### General

- 1. This survey is good for reaching out.
- 2. Board members go to local RVT college advisory Board meetings.
- 3. At least they are doing this survey. They are trying and things are getting better from what we can see.

#### Emails

- 1. Once you are on the list for announcements, emails are consistent. The Board does have a good system.
- 2. Emails and publications are easily accessible.
- 3. The Board makes a good effort in trying to keep licensees abreast of new information.
- 4. When you send out information it is very informative.
- 5. I appreciate the email updates.

#### Website/Newsletter/Online Presence

- 1. Posting of meeting minutes is a great step for transparency.
- 2. The Board makes efforts to inform professionals, support team members, and the general public about current developments via e-mail and its website.
- 3. There was a time when we got newsletters regarding actions and regulations/laws.
- 4. Online updates are strong.
- 5. The newsletter and website are useful.
- 6. I believe the newsletter and social media posts are helping, there just needs to be more of it.
- 7. It is good for those who check your website. But really how many in the profession check it?
- 8. It is easy to use the website and we can easily check for license information.
- 9. It seems that consumers can file a grievance easily online.

## **Outreach Weaknesses**

#### **Outreach to Consumers**

- 1. Let people know when you have received their email and are working/researching the answers to their questions.
- 2. I don't see any outreach to the general public; only advertising within veterinary circles.
- 3. I do not see much outreach activity in the southern California area.
- 4. The public is not well educated on the value/differences in licensed versus unlicensed professionals.
- 5. There is very little community knowledge about the existence of the Board and its role in some areas of the state.
- 6. I don't see any public education coming from the VMB.
- 7. I don't think people know what the VMB does- nor how to use the Board and its services.
- 8. More information for consumers about who is taking care of their animals in the veterinary hospital needs to be provided.
- 9. The Board needs more exposure at the local level --i.e., providing a speaker every two to three years.
- 10. Not enough people are involved in outreach.

#### **Outreach to the Profession**

- There are many veterinarians and RVT's who are not at all versed on current laws or regulations, as they change. Maybe there could be a yearly notice sent to every premise permit holder or licensed veterinarian and RVT highlighting changes that will be going into effect.
- 2. There should be people who are liaisons for each hospital, --i.e., That is, there should be someone who clinics can call directly and who stop by just to check in and not for inspections.
- 3. Records are not updated in a timely manner.
- 4. My colleagues think CVMA is the VMB.

- 5. Outreach to whom? The unlicensed laypeople don't seem to worry about the Board, and the really bad apples in the veterinary profession seem to continue to practice.
- 6. I have to hear of things months after something happened, and usually from someone who was at a meeting, or knew someone that was at a meeting.
- 7. The Board should send out more info at the time of rule changes.
- 8. The Board doesn't publish decisions made.
- 9. The VMB should be doing more to promote practices and practitioners who are doing things RIGHT!

#### Email

1. I would appreciate the Board emailing actions and regulations/laws on a regular basis.

#### Newsletter

- 1. The newsletter should be more frequent. Most licensees do not follow the VMB's activities and must be actively informed.
- 2. The newsletter does not come out on a regular basis.

#### Website/Online Presence

- 1. The VMB Facebook page has only 32 likes this is a huge failure.
- 2. You never see any communication from the Board except on their website.
- 3. Perhaps the Board could strengthen its social media connections as a source of dispersing information quickly.
- 4. Owners have to know of the VMB website and look around a lot before finding out that only licensed individuals are vet technicians.
- 5. Not everything on the website is current.
- 6. Searching for sound information and meeting minutes is not intuitive.

# **Board Member Comments Regarding Outreach**

## **Outreach Strengths**

- 1. The Board is doing more with the internet and the website. The website is very easy to navigate.
- 2. Filing complaints on the website are easy but the public needs to know about it!
- 3. The website and newsletter are good.
- 4. The Executive Officer is coming to her area schools and giving talks.
- 5. Press releases are very good.
- 6. The yearly visits to schools are fabulous.

## Outreach Weaknesses

1. The Board needs to reach out to the consumer and let them know that there is an avenue for their complaints.
- 2. Website could be improved as far as submitting complaints, both about licensees and unlicensed activity.
- 3. They need to reach out to the profession to educate them and make them better practitioners.
- 4. Without naming the veterinarian, the Board should specify what is happening with a case and what will come out of it.
- 5. The public doesn't realize what the Board is there for.
- 6. It needs to be clearer that the Board handles unlicensed activity cases, as well.
- 7. It is hard to navigate the website if you don't know what you're looking for.
- 8. Continuing education guidelines were not clear on website.
- 9. There is no newsletter.
- 10. Only two people have gone through the Maximus drug diversion program in the last three years.

# Staff Comments Regarding Outreach

## **Outreach Strengths**

- 1. The Board is stepping into social media and moving toward modes of operation that are more relevant.
- 2. We are very good at processing folks quickly.
- 3. The website is good.
- 4. Staff is there to give them the information on laws.
- 5. They will be getting more feedback from surveys.
- 6. Training staff for outreach activities is going well.
- 7. Forms are now coming back consistently fully filled out.
- 8. The Board had inspector training,
- 9. They have an expert witness review in place.

## **Outreach Weaknesses**

- 1. We are not proactive.
- 2. Information on the website could be easier to find and could address the needs of newcomers, especially.
- 3. The Board has Twitter but people can't find it and it's not being updated. It was created and then nothing was done with it.
- 4. The website and social media are not user friendly.
- 5. People unaware that our social media and our website exist.

# Stakeholder Comments Regarding Hospital Inspection Program Hospital Inspection Program Strengths

#### Inspectors

- 1. There are some good inspections. When an inspection has occurred at my hospital they have been supportive and helpful.
- 2. You have hired some very aggressive inspectors.
- 3. The inspectors appear to have consistent schedules and an established rubric for inspection.
- 4. This has improved significantly. There is a better quality of inspectors.
- 5. Inspectors have softened somewhat from what I hear.
- 6. The inspectors are very thorough and tell us exactly what is wrong, if anything is wrong.
- 7. The Board has a good attitude towards this current crop of inspectors.
- 8. Licensees appreciate that we are operating as consultants as much as inspectors to keep them up to date and out of trouble.
- 9. The inspectors are courteous.

## **Inspection Quantity**

- 1. I have had six hospitals for 40 years and never had an inspection.
- 2. I have never been inspected and don't know of any colleagues who have either.
- 3. The numbers of actual inspections have increased to previously unattainable numbers.

## Inspection Quality

- 1. The Board is getting better and more active.
- 2. It's still adversarial, but better than the way it was.
- 3. The standards expected are good.
- 4. When inspecting, you are able to find problems effectively.
- 5. I have known of a few hospitals in which complaints were filed either by clients or employees, and felt that the Board responded appropriately and fairly to those complaints.
- 6. The Board does a good job with private small animal veterinarians and clinics.
- 7. The Board attempts to point out problems before it is too late.
- 8. When inspected, information is shared with practices.
- 9. The VMB is open to receiving information that changes their inspection requirements- for instance, if a licensee can prove that an item on the VMB enforcement list is not supported by law, the VMB will make adjustments.
- 10. Planned improvements are coming.

## Education

- 1. The Board helps to educate licensees about minimum standards and correct deficiencies.
- 2. It is great to educate in this area, especially for OSHA.

- 3. I don't know what the Board does to educate veterinarians about the Practice Act.
- 4. There is good information available about what is required.

## General

- 1. This is effective if a hospital owner wishes to follow the Standard of Practice.
- 2. Veterinarians are concerned about such inspections, which is a good thing.
- 3. I appreciate the checklist. Allowing license holders to be able to do a mock inspection is very important.
- 4. The hospital self-evaluation checklist is great but we need more resources.
- 5. The Board gives respondents opportunities to correct deficiencies in routine inspections.

## **Hospital Inspection Program Weaknesses**

## Standards

1. The Board needs sub-class permits and standards for ambulatory, euthanasia and vaccine clinic practices.

## **Inspection Quantity**

- 1. So few veterinarians get randomly selected for inspection that most veterinarians are not even aware that it occurs unless they are in trouble.
- 2. Too few hospitals inspected per year. My hospital was inspected twice in the same year (with no complaints) so it seems random and disorganized.
- 3. There are not enough inspections. Most often it has taken a complaint for an inspection to occur, otherwise, inspections are too few.
- 4. Mobile vaccine clinics are very poorly regulated.
- It seems that the execution of ensuring compliance just isn't there. I've been in the field for over ten years and I have never seen this type of inspection performed.
- 6. Inspections are only reliant on complaints is there a more pro-active role?

## **Inspection Quality**

- 1. There is an over-enforcement of regulations- which are not even required in human hospitals.
- 2. We need more interaction and education.
- 3. They are doing a very poor job with some SPCAs and shelters that provide services to the public. Each inspector seems to pick on one area and is not consistent with other inspections.
- 4. Most veterinarians don't feel that the inspection program is intended to educate them.
- 5. I have heard from many hospitals that certain inspectors have written them up for things not covered by the VMB, like dog hair on a carpet or X-ray viewers in surgery not inset in the wall. These inspections have disrupted the hospital by taking hours to do the inspection and the inspectors were actually veterinarians who were in direct competition with the veterinarians they were inspecting, --i.e., their business was less than five miles away.

- 6. Does the inspector's rubric reflect current best practices?
- 7. The Board does not keep an updated list of active premises.
- 8. I don't know what the Board does to educate veterinarians about the Practice Act.
- 9. The laws seem outdated.
- 10. The Board doesn't account for different types of practices, such as a dermatology office versus a surgeon's office, and large animal versus small animal. The inspections are too restrictive in general but too weak in regard to vaccine clinics and spay/neuter clinics where there is often no valid veterinarian /client/patient relationship. Clients will tell me they never saw a veterinarian and yet their pet had surgery!
- 11. There is a failure to inspect all practices equally. Some practices have been inspected multiple times and others never.
- 12. There are all sorts of things inspectors tell licensees that may not be correct-DEA logs, effective separation between animals, etc. There are too many "gray" areas where it is open to interpretation.
- 13. There are no minimum standards published for several practice types.

## Self-Inspection

 Consider a self-inspection honor system that is spot inspected as we are now doing, but with each premise permit renewal have a self-inspection form completed and signed by the GML. Send an inspection booklet or have it be an on-line booklet so they know what the regulations are as they complete a selfinspection form to be submitted with premise applications for both new and renewal licenses.

#### Inspectors

- 1. I have been inspected by RVTs and never had a problem with them.
- 2. The Board needs more inspectors to keep up.
- 3. I have colleagues that have described inspections where they felt the inspectors were looking for a fight. They felt that the RVTs doing the inspection came in with a chip on their shoulder. I did not have that experience.
- 4. Was told inspections were for education, but the inspector was very dismissive, rude and threatening and did not allow us to ask questions. They dinged us on very small things that were deemed incomplete because of misunderstanding by us as to what was needed.
- 5. Inspectors often include their personal opinion rather than minimum standards when citing a premises permit holder.
- 6. Inspectors are overly aggressive and treat us like criminals.
- 7. The inspectors are inconsistent with their reviews.
- 8. The inspector that came to my hospital was difficult and rude.
- 9. There are not enough trained inspectors to cover a reasonable amount of permit inspections per year.
- 10. Some of the inspectors did not appear to have adequate knowledge of current field developments, --i.e., one inspector did not have knowledge of the commonly used Idexx "SNAP" tests used by many hospitals to rule out common dog/cat diseases.

## Standards

- 1. A large number of hospitals and clinics don't understand the minimum standards or the inspection program. If they were better informed, inspections would not be such a scary event.
- 2. Everyone should follow the Standard of Practice. This would improve our profession and decrease your work. Idealistic, yes, but, we can strive for that ideal.
- 3. I strongly feel we should increase the minimum standards and get publications to premise holders so they can better understand what's required of them.
- 4. The Board doesn't always educate hospital owners/managers on changes to the Practice Act.
- 5. Establishing standards that are almost impossible to meet in an old building is a problem.
- 6. By focusing on the minimum standards you set the bar low.
- 7. There are few resources available from the Board to assist licensees with demonstrating compliance.

## Unlicensed Activity

- 1. The Board allows veterinary services and surgery to take place outside a veterinary hospital.
- 2. I have done relief work in a lot of sub-par hospitals.
- 3. You need to realize some doctors are giving animals a lethal medication-especially if the animal is already disabled. There should be a thorough education on Convenia brand injectable solutions.

## **Customer Service**

1. There are long waiting periods and extremely poor communication from the VMB to respondents on the status of their case.

## General

- 1. There is no enforcement of non-value added policies. Displaying a copy of the original license instead of the original is cause for citation. Really! What difference does it make?
- 2. I have been unable to determine what practices do and do not require a premise license.
- 3. I cannot tell if this is a voluntary or a mandatory program.

# Board Member Comments Regarding Hospital Inspection Program Hospital Inspection Program Strengths

- 1. We created the checklist and now need a method for updating it.
- 2. The self-evaluation checklist to use before the inspector comes along is a strength.
- 3. This is an excellent program and a good educational tool.

- 4. The Board increased the number of inspectors performing inspections.
- 5. The new inspectors are executing their assignments with great integrity, consistency and constant communication with Board staff.
- 6. The inspectors are clear about their objective and about operating as agents of the state.

## **Hospital Inspection Program Weaknesses**

- 1. Increase the inspections.
- 2. Those getting inspected don't know they have a voice to complain against the inspector's interpretation.
- 3. The minimum requirements of the checklist are a one size fits all; but, there are multiple types of practices so the checklist doesn't quite apply.
- 4. The Board doesn't see any details or feedback about the inspection.
- 5. Inspectors should do it for many, many years to really understand the regulations.
- 6. The inspectors are new and have no institutional knowledge yet.

## **Staff Comments Regarding Hospital Inspection Program**

## **Hospital Inspection Program Strengths**

- 1. The Board is inspecting pet and mobile clinics.
- 2. This new program is great!
- 3. It is one of the Board's primary opportunities to educate the licensees. They do a really good job of that.
- 4. Generally, we have taken this a long way.
- 5. Inspections increased from 300 to 1300.
- 6. Staff is meeting the mandated goals.
- 7. They are doing at least 20% more per year than they used to.
- 8. Training hospital inspectors is good.
- 9. Patty R. did a great job recruiting and training 12 or 13 new inspectors as opposed to two.
- 10. The amount of inspectors increased. They are up to two dedicated people inhouse for hospital inspections.
- 11. Board went from three to 13 inspectors. They were all trained at same time which helped standardization.

## **Hospital Inspection Program Weaknesses**

- 1. There will be another staff person to help with the workload at some point.
- 2. Files are not consistent.
- 3. There are no written procedures.

# **Appendix B**

# **Major Trends and Changes**

There are many factors that may impact the future direction of the veterinary profession. These trends and/or changes could be opportunities the Board may want to capitalize on or threats that the Board may want to try to mitigate.

External stakeholders, Board members and Board staff were asked to list potential changes or trends outside of the Board that they felt could impact the profession and the Board's regulatory role. The lists below summarize common concerns:

## **Professional Practices or Techniques**

#### **New Techniques**

- There are constantly new skills, techniques, and knowledge that are being discovered. How the Board is discussing how these new skills, techniques, and knowledge are affecting the RVTs and DVMs is really behind the times. And when topics are brought up in regards to this, the Board is woefully slow in actually doing something to keep up with the fast pace of medical advancementslet alone acknowledging that something should be done.
- 2. Stem cell usage should be researched.

#### Costs

- 1. We are pricing ourselves so only a few people can afford our services. Nonprofits are taking the easy money under "animal welfare."
- 2. Spay/neuter clinics impact the fees of regular daily practice.
- 3. The middle class is shrinking and the pet owning public now has limited money to spend.
- 4. Making money is the modern pressure on veterinarians.

#### Website/Online Presence

1. Keep veterinary professionals up to date on everything and make things easier to find on your site.

#### **Unlicensed Activities/Expanded Duties**

- 1. There is rampant use of unregistered assistants to induce anesthesia, etc.
- 2. There are lay persons practicing medicine by doing herbal, acupuncture and chiropractic procedures without a DVM or license.
- 3. The Board should stop allowing supervised non-anesthetic dentals to continue.

#### **Standard of Practice**

1. The Board should continue to keep the bar high for standards of practice.

- 2. The Board should enhance the minimum standards of practice and require analgesia, IV Catheters and fluids. They should also require more anesthetic monitoring, regular training of staff and more RVT's.
- 3. The present standards are adequate if they are equally enforced.
- 4. The Board should poll clinicians in order to update the standards.

## Integrative Therapies

1. Alternative therapies and integrative medicine need to be acknowledged.

#### **Specialty Surgeries**

- 1. Ideal cat declawing procedures, non-anesthetic dentals in veterinary practices and certification courses for high volume spay/neuter techniques are trends.
- 2. Cat declawing should, if allowed at all, be a specialty surgery that requires specific training and certification. Protocols should be developed and adopted for every vet who ever treats a declawed cat to carefully examine the toes for bone chips or other problems. Periodic x-rays should be required.

## Training

- 1. The Board should offer webinars to cover new changes.
- 2. The Board should seek to constantly improve workplace safety by providing training opportunities.

#### **Electronic Medical Records**

1. We should transition to computerized medical records.

## RVTs

- 1. There should be more specialization for RVTs.
- 2. There will be a greater role for RVT's- especially those with advanced credentials.

## General

- 1. The VMB has to learn to recognize that fancy equipment, surgical and medical procedures do not necessarily mean high quality work.
- 2. Animal rehabilitation is changing.
- 3. There will be an increase demand for mobile practitioners.
- 4. Students graduating today are not as prepared as they need to be.
- 5. I think legal liability may become an issue for all staff. Insurance is representing more heavily and I think there should be someone who is an "advocate liaison" between the insurance companies and the patients.
- 6. Everyone is becoming more specialized, corporations are buying veterinary practices, and insurance is also starting to play a role.
- 7. Increasing documentation will become standard, i.e., surgeries might have to be videotaped, etc.
- 8. Ear cropping and breeding regulations are trends.
- 9. Integration with human medicine and human license holders will be happening.

## **Continuing Education and Educational Standards**

#### **Integrative Therapies**

- 1. Education for alternative therapies needs to be acknowledged.
- 2. The Board appears impotent in commenting on homeopathy and alternative medicine. Are we practicing evidence based medicine?

## **Enforcement of Continuing Education (CE)**

- 1. Increased enforcement and oversight of CE should be done.
- 2. There should be penalties for not completing CE's.
- 3. We need a way to certify CE.

## Costs

1. It is too hard on the RVT's for continuing education. The economy is too slow for having to spend extra on continuing education.

## Evaluators

- 1. RACE is problematic. We need more qualified and responsive groups evaluating CAVM CE. I suggest learning about RAIVE and involving them as an alternative to RACE. They have better trained evaluators and are far more responsive.
- 2. Review the alternate route.

## Access

- 1. There needs to be improved access to CE in California.
- 2. Continue the requirement but be open to different venues for CE
- 3. Encouragement for practices to hold in-house courses eligible for CE.

## Types of Continuing Education

- 1. The Board should require an updated exam on laws every five to 10 years for license renewal.
- 2. There should be an ethics requirement for CE at certain intervals.
- 3. We should consider CE in specific subject areas.
- 4. CE should be required for changing laws and/or societal norms, --i.e., how to recognize and report animal abuse. Most veterinarians do not know how, when, or where to report abuse or what their role in same should be.
- 5. The Board has a problem determining whether a vet is competent or not. Practical exams need to be more prominent rather than mostly written.
- 6. The Board could create "core competencies" modules for refreshers, like human medicine has ACLS and CPR re-certifications.
- 7. Educate veterinarians on medicines that result in the suffering and death of an animal.

## Standards

- 1. Standards need to be more demanding.
- 2. Standards are increasing, but this has a positive impact on the profession.

## **Online Tools for Continuing Education**

1. I would like to have an easy method to look up my amount of CE at any given time.

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- 2. I think more CE would be wonderful, or allowing a little more online CE as it is often difficult to afford the time off and travel expenses to achieve the appropriate amount of CE.
- 3. The CE requirement for RVT's is wonderful! There should be an electronic requirement of proof of CE for license renewal.
- 4. We should offer more condensed education, and more online options (as UCD is doing).
- 5. More education online would be good.
- 6. If there is so much weight on interactive CE, offer more free or affordable online options. It would be nice to virtually attend a seminar.
- 7. I wish the Board would allow more online or remote CE. It can be very hard sometimes to have to leave one's practice for a chunk of time due to the economy and personal situations. I am not saying you should decrease the hours/units but increase the flexibility to meet those units. CE is a wonderful thing but some years are just really tough and the added stress doesn't help.

## Laws and Regulations

#### New Laws

- 1. New laws allowing technicians to do more will free up the veterinarians to do more.
- 2. Standards for ambulatory home euthanasia and vaccine clinic practices should be created.
- 3. The law requiring veterinarians to report animal abuse, child abuse, etc. should be broad and include anything they become aware of in any capacity not just through the client/patient/vet relationship.
- 4. Laws should give more freedom on how a vet should practice. Avoid nit-picking, like making a judgment whether the handwriting of a doctor is readable or not. All you have to do is ask them to type a copy of the medical record if needed. Don't make it an issue that will result in the suspension or revocation of a license. The Board is overreaching on some cases where no injury resulted.

## Types of Laws

1. Laws and regulations should not only protect the public, but be practical and reasonable to implement.

## **Unlicensed Activity**

- 1. The Board is continuing to tighten unlicensed activity and strengthen the VCPR.
- 2. There are growing concerns about "rescue groups" who aren't taking proper care of their animals. It would be wonderful to see California move forward with having licensing requirements for rescues that include more than 501C3 status and listing an associated veterinarian.
- 3. There is continued unlicensed activity.
- 4. The Board should promote licensed veterinary technicians and veterinary assistants.
- 5. An increase in unlicensed services that may or may not be considered practicing medicine w/out a license and lack of public awareness
- 6. Investigations are needed for some questionable licensees.

## RVTs

- 1. Define RVT tasks, especially in the area of dental extractions.
- 2. Enforce the encroachments of non-professionals in the practice of veterinary medicine.
- 3. Enforce registered veterinary technician title protection
- 4. Increase the RVT specific job tasks, placing a greater emphasis on RVT's and less on assistants.
- 5. Increase legislation around veterinary technicians versus vet assistants.
- 6. Expand the scope of practice for RVT's.

## Enforcement

- 1. Stop local sites from setting their own rules.
- 2. Strengthen the Board's ability to punish non-license holders.
- 3. Before accepting complaints, a little research would be appreciated.

## Animal Abuse

1. I am excited that, federally, it is becoming a more criminal act to abuse animals, and can't wait to see that reflected at local levels.

## Other

- 1. There is a larger number of practicing veterinarians.
- 2. The Board should eliminate inactive license fees.
- 3. We need stiffer laws for veterinarians who cause the death of an animal. You need to find the bad ones!!
- 4. Over-regulation does not always lead to the intended goal and drives up the cost of care.
- 5. Laws and Regulations are increasing- many of them are pointless; but some of them have a powerful impact on the profession. There are TOO MANY laws and regulations for veterinarians.
- 6. It would be helpful to have pharmacists who are starting to dispense pet medications to be required to have some additional training in veterinary pharmacy through a certification course or CE situation.
- 7. Keep field practitioners informed of changes and developments that impact compliance with state laws.
- 8. Drug compliance should increase, including compounding.
- 9. CURES seems to be an antiquated and excessively time consuming process for clinics and is a huge frustration for all involved.
- 10. Regarding the operation of animal rescues/shelters in the state: We know there are a wide range of shelters from good to bad so stricter regulations would be ideal Be more supportive of DVMs/RVTs. I've worked at several hospitals and keep hearing stories of how Board doesn't support them.

# Economy

## Cost

- 1. Pet insurance needs to become the norm in this industry. Pet insurance is the key to helping everyone get paid a fair wage and keeps accounts in the black.
- 2. The cost of veterinary care is too high for too many people.

- 3. Generic and compounded drugs are an issue, and the 72 hour rule is not viable.
- 4. Consumers should be given more info on diagnoses and be able to "shop around."
- 5. Veterinarians should be able to practice, even if some expenses have to be avoided just to be able to help the pet on medication-- i.e., delaying tests due to owners' inability to spend.
- 6. The cost of service will increase to the point that fewer people will seek care for pets, or will not have pets.

#### Regulations

- 1. The Board should fine veterinary premises that allow assistants to call themselves technicians.
- 2. The Board should monitor web purchasing of medications.
- 3. Over regulation leads to increased costs.
- 4. The poor economy and oversupply of veterinarians is making it impossible for small clinics to comply with certain regulations. The Board needs to help these clinics as long as they practice good medicine.
- 5. The Board needs to keep veterinary professionals up to date and make information easier to find on the Board's website.
- 6. Make the licensing for technicians a more reasonable price.

## Other

- 1. The Board might consider capturing or understanding client mentality.
- 2. There is a combative peer dissention for veterinarians willing/able to support 'low cost' versus higher quality, elite level of care. Peer issue more than a public issue
- 3. The trend for profitable practices seems to be moving away from single doctor facilities and towards partnerships to meet growing needs for weekend and after hour services. What is going to happen to the older single doctor practices as they look to retire and their antiquated clinics are not able to be sold?

## **National or State Politics**

## Website

1. Keep vet professionals up to date on everything and make things easier to find on your site.

## Laws

- 1. Registry of Approved Continuing Education (RACE) issues will be at the forefront.
- 2. In California we have two cities that have banned cat declawing and New York is considering this. We need to address that the Board and doctors should be responsible for oversight, not city governments. Additionally I have concerns about Proposition 2 and where that is going to leave the food animal industry in the state in a few years. Many of our congressmen and both of our senators in Washington D.C. have little knowledge or concern about animal welfare and tend to lean to the radical liberal side of thought to attract voters from our larger cities.
- 3. Consumer groups are continuing to push "feel good" laws that have no scientific or economic rationale.

#### Monitoring and Regulations

- 1. The Board should continue to monitor national trends in the relationship between pets and their guardians.
- 2. There should be strict monitoring of hospital compliance to OSHA.
- 3. Pharmacy regulation should be a growing trend.
- 4. Over-regulation leads to increased costs.
- 5. Antibiotic and feed additive regulations should be attended to.

## RVTs

1. A more national standard title and education for RVT's.

## General

- 1. Reciprocity is important.
- 2. The Board should recognize the difference in Standard of Care between shelters versus owned animals.
- 3. Prescription regulations affecting mobile practitioners are a trend.
- 4. The use of licensed support to the full extent of the law and their license, --i.e., utilizing RVTs and vet assistants according to optimize patient care and profits for clinics.

## Technology

#### Telemedicine

- 1. Using veterinary services by phone, Skype or other is a change coming.
- 2. Be aware of the increased use of telepresence.
- 3. People are getting all kinds of prescription drugs without doctor/client relationships.
- 4. Web based diagnosis and prescriptions sites are trends.
- 5. Internet, digital imaging and CE interactive courses could be developed as a video game (for example: place either a Veterinary Technician or a Veterinarian in a surgery setting or triaging in an emergency setting, and ask them what to do, provide feedback of what was done correctly, what could be improved upon, etc.)
- 6. There will be more web based medicine that cannot be regulated.

## Electronic Medical Records

- 1. Increase utilization of computer generated medical records.
- 2. Veterinary software should also include information that can be reported and analyzed to better inform government and the public about animal health trends.
- 3. Be aware of electronic record keeping standards and non-invasive diagnostic tools, such as the "forehead" thermometer used in human medicine.
- 4. More and more clinics are becoming paper light, and the amount of veterinary software programs out there is great. It would be nice to see a more universal radiology software that makes it easier for clinics to share radiographs I find this is the biggest hurdle with transfer patients and their medical record. However, that is something that I think continuing to educate practice owners on the value of digital radiology and how to appropriately send as a jpeg would be great but is not something that rests in your responsibility.
- 5. Protection and the privacy of digital information will need to be addressed.

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## **Regulation Changes**

1. Technology will change how veterinary services are delivered. Regulations should be updated as necessary to allow for this technology to be effective in treating patients, recordkeeping, etc.

#### Social Media

 There are a lot of local Facebook pages starting up in rural areas where individuals are selling left over antibiotics or items to treat Parvo infection with. Individuals speak openly online about how doctors don't know what they're doing and that vaccines aren't needed. These avenues are harming pets. What can be done to censor these pages and stop the illegal trade/resale of prescription medications?

#### **Continuing Education**

- 1. Make continuing education tracking available online.
- 2. Have a working Controlled Substance Utilization, Review and Evaluation System (CURES) system.
- 3. Consider standards for cold laser use, --i.e., the equipment, education, etc.

## General

- 1. Hopefully Breeze will successfully transfer data. CAS should be cleaned up first.
- 2. Overall, technology has a positive impact, but is raising the bar.
- 3. The Board should consider online submission of applicants, tracking of continuing education hours, etc.
- 4. The Board should allow easy transition for practices implementing new technology.

## Other

## RVTs

- 1. More attention, focus, and resolution need to happen for RVT issues.. Bringing back the RVTC would be a good start to allow direct oversight by RVTs within the RVT profession.
- 2. It's time to completely get rid of the alternate route program for RVT's. It's served a valid purpose, but there are plenty of two year AVMA programs now.

## Enforcement

1. The Board should investigate the complaint and the complainer - not just the doctor for ANY errors.

## Staff

- 1. Customer service training for VMB staff is a good idea.
- 2. Education, veterinary terminology and basic concepts are a must for any VMB staffer who processes licenses.
- 3. Staff comes and goes so when one person leaves there should be a process and manual standard operating procedure.

#### Lethal Medicine

1. There needs to be awareness by veterinarians and the VMB on medicines that have caused death to animals.

## Specialization

1. We need to be more specialized, so we need to use specialists.

#### Workload

- 1. The Attorney General's Office is not keeping up with the increased turnaround time of enforcement staff.
- 2. The probation case load will be increasing.
- 3. The assistant program will increase enforcement workload.
- 4. The Board should come up with an acceptable set of regulations for these groups who all want to work with animals:
  - a. MSM Musculoskeletal Manipulation
  - b. Water therapy
  - c. Acupuncturists
  - d. Massage therapists
  - e. Chiropractors

#### Other

- 1. There is an increase in rescue groups seeking sub-optimal medical care and/or reduced fees.
- 2. Disaster relief should be more developed.
- 3. The consumer isn't always educated or aware. There is no consumer standard.
- 4. The Board should be ready for complicated complaints in the future, with all the new treatments being discovered.
- 5. The Board should partner with UC Davis, CVMA, Western, CSUS, etc.
- 6. The Board needs to continue being in the forefront of licensing and exams and not turn it over to national testing, because it's such a strength in this state.
- 7. There is a discrepancy between minimum standards and the high Standard of Care we are supposed to have.
- 8. There will be changes in federal regulations regarding the compounding of controlled substances.
- 9. Establishing the VACSP is a big challenge.
- 10. The Board should watch for ongoing trends in animal rehabilitation and medicine.

# Appendix C

# **Data Collection Method**

Information for this survey was gathered by surveying external stakeholders, Board members and Board staff using the following methods:

- Interviews were conducted with seven members of the Board, the Chair of the Multi-Disciplinary Committee, the Executive Officer and two managers, completed during the month of February 2015 to assess the challenges and opportunities the Board is currently facing or will face in the upcoming years.
- One focus group with Board staff on February 5, 2015 to identify the strengths and weaknesses of the Board from an internal perspective. Seven Board staff participated.
- An online survey was sent to 840 randomly selected external Board stakeholders in January 2015 to identify the strengths and weaknesses of the Board from an external perspective. 271 stakeholders completed the survey. The below table shows how stakeholders identified themselves in the online survey.

Stakeholders Breakdown		Number	% of Total
Professional licensee		211	78
Professional association		20	7
Consumer/member of the public		13	5
Retired licensee		5	2
School or college representation		5	2
Board staff member		1	0
Other		16	6
	TOTAL:	271	100%

# **Appendix D**

# **Survey Data Reliability**

Based on 271 external stakeholders who responded to the electronic survey, we can be 95% confident their opinions represent all veterinary stakeholders plus or minus six percent. For example, 77% of stakeholders rated the Board's overall licensing effectiveness as very effective and effective. Based on our response rate, we can be 95% confident between 71% and 83% of stakeholders would rate the Board's effectiveness the same way.<sup>1</sup>

To help improve data integrity, the online survey did not provide a neutral option when asking about overall effectiveness. Instead, stakeholders completing the survey chose between a positive choice (very effective or effective) and a negative choice (poor or very poor). This allows the Board to better understand whether stakeholders have a positive or negative view of the Board in various areas.

Notes

<sup>&</sup>lt;sup>1</sup> Source: University of Connecticut sample size calculator www.gifted.uconn.edu/siegle/research/samples/samplecalculator.htm



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