



March 4, 2021

Ms. Lorelei Walker, Program Manager  
Veterinary Board of Governors  
WA State Dept. of Health  
P. O. Box 47852  
Olympia, WA 98504-7852  
Via Lorelei.walker@doh.wa.gov

**RE: Opposition to proposal to establish apprenticeship program for Licensed Veterinary Technicians**

Dear Ms. Walker,

On behalf of our nation's veterinarians, who are dedicated to promoting animal health and welfare and public health, we're writing in opposition to a proposal submitted to the Veterinary Board of Governors that would allow the board to license a veterinary technician who has trained through an apprenticeship program.

We support licensure for veterinary technicians as a way to recognize their professional abilities, as well as enhance veterinary medicine by providing professional accountability and public protection.

Veterinary professionals play a key role in disease prevention, identification and treatment of zoonotic diseases, ensuring the safety of food and feed, dog bite injury prevention, animal control, and ensuring the functional health of working animals, such as service dogs. In Washington State, as elsewhere, the veterinary technician's role is to provide professional health care in conjunction with the veterinarian. This includes working closely with veterinarians in dispensing and administering medications, including controlled substances; inducing and monitoring anesthesia on patients; managing and completing laboratory tests; taking radiographs and understanding radiographic technique; and following proper disease prevention and sanitation protocols.

A veterinary technician must be knowledgeable in the care and handling of animals, their normal and abnormal life processes, medical and surgical nursing, anesthesiology, diagnostic imaging, and clinical laboratory procedures. To become a licensed veterinary technician in Washington State, an applicant must successfully complete required examinations administered or approved by the board and a post-high school course approved by the board in the care and treatment of animals.

The AVMA Committee on Veterinary Technician Education and Activities (CVTEA) accredits veterinary technology programs. All AVMA CVTEA-accredited programs in veterinary technology must meet the Standards of Accreditation of the CVTEA to ensure the quality of the educational experience and the assessment of student knowledge and skills. CVTEA Standards of Accreditation state that admission to an accredited program requires applicants to have a high school diploma or equivalent. Successful matriculation through a veterinary technology program includes a rigorous curriculum at an appropriate educational level requiring a solid foundation of biology, chemistry, and math concepts. Successful completion of the curricula prepares the graduate to successfully complete the Veterinary Technician National Examination (VTNE). In addition, these graduates are fully capable of performing in a wide variety of professional roles within the veterinary field and have attained entry-level skills needed to

support companion animal, equine, and food animal practice, biomedical research, and other veterinary medical activities.

We are concerned that an apprenticeship model, which doesn't exist for this field, would not be able to successfully prepare an applicant for a licensing examination or provide an applicant with the knowledge base and skillset needed to perform the roles of a licensed veterinary technician. That is why the state legislature removed the "on-the-job" pathway to licensure in Washington several years ago.

None of the entities that would be involved in establishing and managing the proposed apprenticeship program have the expertise required to develop a curriculum anywhere near that of AVMA-accredited programs. There is no need to reinvent the wheel when a quality review process exists and is readily available.

We join the Washington State Veterinary Medical Association and the National Association of Veterinary Technicians in America to ask that you reject this proposal, and instead encourage veterinary practices to support their employees in attending accredited programs, some of which are now available online. This would help alleviate staff shortages by elevating veterinary technicians, while promoting high standards of care for our animal patients. They deserve nothing less.

Thank you for your consideration. We look forward to continuing to work together to promote animal health, animal welfare, and public health in Washington State.

Sincerely,

A handwritten signature in black ink that reads "Janet D. Donlin DVM, CAE". The signature is written in a cursive, flowing style.

Janet D. Donlin, DVM, CAE  
Executive Vice President and Chief Executive Officer

***About the AVMA***

*As one of the oldest and largest veterinary medical organizations, with more than 97,000 member veterinarians worldwide engaged in a wide variety of professional activities and dedicated to the art and science of veterinary medicine, the mission of the AVMA is to lead the profession by advocating for its members and advancing the science and practice of veterinary medicine to improve animal health and welfare and human health.*