

September 30, 2020

Washington State Department of Health
Veterinary Board of Governors
Attn: Lorelei Walker
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Olympia, WA 98504-7852

To the Veterinary Board of Governors,

In this letter, the undersigned directors of the established veterinary technology programs in our state would like to express our concern regarding the proposed Licensed Veterinary Technician (LVT) apprenticeship program being sponsored by Cascade Veterinary Clinics. As veterinary technician educators we are aware of the challenges involved in training and educating veterinary technician students to ensure they can meet the skill standards required by American Veterinary Medical Association's Committee on Veterinary Technician Education and Activities (CVTEA) which accredits veterinary technology programs in the U.S. and Canada. We find it difficult to believe that the proposed LVT apprenticeship program will be able to provide the appropriate level of education and training as provided by our accredited programs for the following reasons:

1. The training standards in the apprenticeship program are most consistent with the training standards of a veterinary assistant program but they are not equivalent to the nationally accepted standards for veterinary technician programs set by CVTEA.
2. The apprenticeship program proposal indicates how much time students must spend trying to learn the skill standards but not how acquisition of those skills will be assessed, if at all.
3. Similarly, the Related/Supplemental Instruction portion of the training has a time requirement but no curriculum and no learning objectives by which to measure the acquisition of knowledge.
4. It's not clear who will assess whether students are achieving the training standards and how that will be measured.
5. It's also not clear if the WSATC, who will have oversight over the program to verify training standards are being met, will include one or more veterinary professionals with knowledge of the responsibilities for which the students are being trained on its oversight team.
6. A stated goal in the apprenticeship program proposal is that students completing the training will be allowed to sit for the state exam needed for LVT licensure. Currently, the state requires successful completion of the Veterinary Technician National Examination (VTNE) for LVT licensure. It is our understanding that the American Association of Veterinary State Boards (AAVSB) owns, administers, and has jurisdiction over who can take the exam. Will AAVSB allow apprenticeship program students to take the VTNE? If they are not allowed to do so, it would be a disservice to the students to approve the apprenticeship program.

It is our opinion that the apprenticeship program proposal evidences lack of proper planning in regards to its curriculum and educational processes.

The sponsor of the apprenticeship program proposal indicates that this program is needed to provide potential students in Chelan and Douglas Counties a veterinary technician training program in their local area that would also allow them to work while completing their training. But such programs already exist in the form of online veterinary technology programs that are available to individuals living anywhere in the State of Washington. These online programs are CVTEA-accredited and allow students to complete their training while working in veterinary hospitals in their local area. The cost of attending these programs is comparable to attending an on-campus state-supported program.

The reality of veterinary technician shortage in our state and across the country is undeniable. But it is not a shortage that can be addressed merely by creating new training programs. The reality is that we have five campus-based training programs and a handful of online training program in our state that have enough capacity to accommodate any interested students.

We are concerned that the apprenticeship program proposal represents an attempt to return to the on-the-job training (OJT) model for veterinary technician licensure that the state discontinued in 2015. Perhaps, it would a good time to reconsider the reasons the Veterinary Board of Governors (VBOG) decided to eliminate that training option before moving to approve another version of the same thing.

Lastly, we feel that approval of this apprenticeship program as a pathway to LVT licensure will set back the veterinary technician profession and demean the credentials of veterinary technicians that have been/are being/will be trained in rigorous CVTEA-accredited programs with high educational standards. Standards that practicing veterinarians and the public expect to see to ensure the safe delivery of quality medical care to all our animal patients.

Sincerely,

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