

Letter from Veterinary Innovation Council Board of Directors to AVMA regarding AVMA Practice  
Advisory Panel Final Report on Telemedicine

1 March 2017  
Dr. Janet Donlin  
AVMA CEO

Dear Dr. Donlin,

We reviewed the Advisory Panel's Final Report on Telemedicine in depth and applaud the AVMA for preparing a comprehensive analysis of telemedicine for the profession. There is growing excitement throughout the animal health industry for the potential of telemedicine tools to assist veterinary teams in delivering high quality healthcare to America's pets and veterinary patients of all species. As you know, the Veterinary Innovation Council (VIC) is conducting a series of telehealth pilots to guide the profession and industry in moving forward with these powerful tools. The Advisory Panel's report is timely and will provide all interested persons with an excellent overview of veterinary telemedicine opportunities and challenges.

We hope that the AVMA will consider our comments as it reviews the Final Report. Our starting point is that veterinary medicine stands on the shoulders of human medicine in examining the applications of telemedicine. The fifty states have spent over twenty years studying, discussing, and debating how to integrate telemedicine tools into the delivery of medical care to patients. States initially resisted these innovations, but Americans now enjoy widespread acceptance of the value of telemedicine for health consumers. 47 states in some manner allow the doctor-patient relationship to be formed through telemedicine engagements. We do not believe that veterinary medicine should wait twenty years to reach the same conclusion, but instead should learn a lesson from the flexibility displayed by human medical boards in incorporating these tools. At the appropriate time VIC gladly will share our views as to the most effective state regulatory precedents to adapt to veterinary medicine.

VIC's Board urges the AVMA to view the VCPR as a doorway into veterinary-guided healthcare, not as a wall. There are many ways to safeguard patients throughout a telemedicine encounter, and state veterinary boards should carefully study the human health precedents to determine the best fit for patient healthcare. While the Final Report recognizes that circumstances may evolve over time to build flexibility into VCPR regulations and accommodate telemedicine, we are concerned that the Final Report repeatedly emphasizes at every turn that the application of all telemedicine tools must be framed in terms of the existing VCPR. This repetition has the effect of minimizing telemedicine benefits for pet healthcare and ignores the advances of human medicine in incorporating telemedicine into the doctor's toolkit from an initial interaction with a patient. We believe that the challenge is not to defend the VCPR from attack,

but to understand how telemedicine may be used to bring more pet owners and pets into the veterinary world of regular, high quality care.

Ultimately, organized veterinary medicine must place more confidence in veterinarians to use their judgment about which tools work best in each situation with a patient. We have studied the debate over telemedicine in human healthcare over the past two decades and this issue has proved pivotal. Doctors are trained to make critical judgments every day, and veterinarians no less. The success of a particular diagnosis, treatment or procedure depends upon the doctor's experience-driven exercise of his or her judgment, and state boards must not focus unduly on prescribing regulatory formulas for the application of veterinary judgment. Veterinarians exercise their medical judgments every day, with the best interests of the client and patient in mind. Whether or not to assess a patient's condition solely through telemedicine is no different than whether or not a veterinarian should take a radiograph or obtain blood work. Whether or not conducting an in-person physical examination is necessary for the set of circumstances, or instead via telemedicine, should be viewed within the same context.

We are encouraged by these comments in Section 4.3.1 of the Final Report: "telemedicine is a vital tool for the veterinary profession and seems to be greatly desired by society." The Advisory Panel goes on to observe that telemedicine can enhance "client education, compliance and satisfaction", and "diminishes hurdles to veterinary medical care posed by distance, time and human resource restrictions." All of us understand that veterinary care is crucial for the quality and length of lives of our pets, yet too many pet owners fail to access veterinary care. Telemedicine is not the only answer to this challenge, but it is a vital tool that meets consumers at common points in their lives. Smartphones, tablets, and other electronic devices are woven into the fabric of our daily routines, and veterinary healthcare should embrace this reality for the opportunity it is. More patients will receive quality care, and veterinarians will see firsthand how telemedicine tools are good medicine and serve to expand practice potential. VIC's pilot projects are designed to explore this in depth.

Sincerely,  
The Veterinary Innovation Council Board of Directors

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