



Washington State
Veterinary Medical Association

August 18, 2021

Ms. Lorelei Walker, Program Manager
Veterinary Board of Governors
WA State Dept. of Health
P. O. Box 47852
Olympia, WA 98504-7852

Re: Updated opposition to the proposed apprenticeship program

Dear Ms. Walker and the Washington Veterinary Board of Governors:

The Washington State Association of Veterinary Technicians and Washington State Veterinary Medical Association have listened to multiple discussions about the proposed apprenticeship program by Cascade Veterinary Clinic (CVC) and the North Central Workforce Development Council (NCWDC). In the interest of our members, the veterinary profession at large, and the public, we feel it's critical for the Board to hear our concerns, which continue to develop in light of discussions at the June 7, 2021 Board meeting.

First and foremost, the WSAVT and WSVMA insist that any pathway to veterinary technician licensure, including the proposed apprenticeship program, must be accredited by the AVMA CVTEA.

Simply put, *equivalency* to CVTEA standards is not sufficient to ensure a high-quality veterinary technician educational program and maintain safety for patients and the public. AVMA CVTEA accreditation exists not only to ensure quality control with educational standards, but provides the critical oversight missing from the proposed apprenticeship program. The AVMA CVTEA standards of accreditation include institutional accreditation, finances, physical facilities and equipment, resources for clinical instruction, library and informational resources, admissions, students, faculty and staff, curriculum, and outcomes assessment. *Achieving AVMA CVTEA accreditation should be considered the minimum standard in developing a program that will produce highly-skilled veterinary technicians.*

In a recent document from the Department of Health (DOH), stakeholder questions were listed with responses from DOH, CVC and NCWDC. Here is our response to some of their comments.

- The point has been made many times that there are online AVMA-accredited programs that effectively graduate veterinary technicians. When asked why CVC employees wouldn't instead take advantage of these established programs, their response was that their employees had little or no success in completing them, and the problem could only be solved by a local OJT training solution provided by an apprenticeship program, which other professions rely on to establish pathways to employment.

CVC's lack of success with helping their team succeed in attending an online program is concerning. If their leadership team is unable to help their associates complete an established curriculum, how will they be able to make time to execute a quality apprenticeship program and ensure participants successfully complete it?

CVC and NCWDC state that the apprenticeship would allow for the development of technical skills while earning an income. Due to their flexibility, AVMA-accredited online programs allow students to work in practice, earn an income, and acquire technical skills while enrolled, all while remaining in their local geographical area.

- Contrary to what's been said, the effectiveness of a registered apprenticeship program has not been demonstrated with veterinary technician programs. The NCWDC cited the Community College of Denver (CCD) as a successful apprenticeship program for veterinary technicians, but that is a *critical misrepresentation*. CCD's program has multiple, substantial differences from the program proposed by CVC and NCWDC:
 - The CCD program is AVMA accredited, and CCD delivers all of the educational curriculum, including 20 hours of online modules weekly and one day per week of in-person instruction at CCD.
 - CCD provides oversight through their student guidelines for working in veterinary hospitals.
 - Large animal, exotics, laboratory animal, and other critical skills are completed at CCD.

CVC's proposal does not include AVMA accreditation, nor oversight by a credible veterinary educational institution. In addition, CVC and NCWDC have stated there are no plans to provide hands-on skills for large animals, exotics, or laboratory animals, all of which are critical to licensure for Veterinary Technicians.

- Additional questions were posed regarding oversight and how skills and training standards will be met by the proposed program. The responses from CVC and NCWDC indicated veterinary oversight and verification of medical competency will be approved only by CVC's LVT and/or DVM staff.

Without the oversight by the AVMA CVTEA, there is no guarantee that the standards that CVC's LVTs and DVMs utilize will be accurate and up to the most recent medical standards. Neither the NCWDC nor the Dept. of Labor & Industries has the appropriate veterinary medical expertise to provide proper oversight.

CVC and NCWDC have repeatedly stated that the proposal is not a return to the OJT route to obtain licensure in Washington State. However, without the oversight of AVMA CVTEA, there is little, if any, difference between the proposal and the former OJT route.

- With the critical need for highly trained veterinary technicians, our respective associations have an obligation to ensure we advance the profession in a sustainable manner. While the profession, including AAVSB, is engaging in conversations as to how to reduce barriers to work across jurisdictions, the apprenticeship program will serve to do the opposite. Unlike graduating from an AVMA-accredited program, there is no guarantee that an apprenticeship-trained LVT can successfully achieve licensure in another state, which poses a threat to their ability to maintain financial stability in the event they need to relocate. Their time and money are more

effectively utilized graduating from an AVMA-accredited program where they will have no roadblocks to obtaining licensure in other states.

Veterinary technicians are highly skilled medical professionals similar to nurses, and whose training and job requirements far exceed other professions served by apprenticeship programs. With medical advances that occur with increasing frequency, this is not the time to reduce the quality of their training, but to ensure they receive the highest quality education possible which can only be provided through an accredited program administered by the veterinary experts at AVMA-CVTEA.

We oppose any veterinary technician training program that is not AVMA-accredited and implore the Board to ensure that AVMA CVTEA accreditation is a guaranteed minimum requirement for any new program going forward.

Respectfully,

Handwritten signature of Ashley Byrne, LVT in black ink.

Ashley Byrne, LVT
President, WSAVT

Handwritten signature of Candace Joy in black ink.

Candace Joy
CEO, WSVMA