



MEMORANDUM

DATE	April 9, 2014
TO	Multidisciplinary Advisory Committee
FROM	Annemarie Del Mugnaio, Executive Officer DCA/Veterinary Medical Board
SUBJECT	RVT Student Exemption

Background:

AB 1980 (Hayashi), Chapter 538, effective January 1, 2011, created a provision in law (BPC Section 4841.1) for RVT students in the clinical portion of their final year of study in a board-approved California veterinary technology program to perform the job tasks for registered veterinary technicians as a part of their educational experience including students both on and off campus acting under the supervision of a licensed veterinarian in good standing.

The bill also required the Board to adopt regulations defining the parameters of supervision required for the students who were to perform such tasks. The consensus of the former RVT Committee and its recommendation to the Board at its last meeting in June 2011 was that the level of supervision should be "immediate" supervision meaning the supervision was physically present and the supervision was one on one.

There was also discussion regarding students in structured two year programs verses alternate route candidates and the RVT Committee recommended that the Board include in the regulations the parameters under which all RVT students could have experience actually performing the RVT job tasks at some time toward the end of their clinical training.

The RVT Task Force discussed and proposed changes to student exemption regulations at their March and June 2013 meetings. Amendments to the proposed language were made based on the Task Force discussion at the June 2013 meeting.

Statutory References:

4841.1. (a) This article shall not apply to students in the clinical portion of their final year of study in a board-approved California veterinary technology program who perform the job tasks for registered veterinary technicians as part of their educational experience, including students both on and off campus acting under the supervision of a licensed veterinarian in good standing, as defined in paragraph (1) of subdivision (b) of Section 4848.

(b) The board shall adopt regulations defining the parameters of supervision required for the students described in subdivision (a).

4848 (b) For purposes of reciprocity, the board shall waive the examination requirements of subdivision (a), and issue a license to an applicant to practice veterinary medicine if the

applicant meets all of the following requirements and would not be denied issuance of a license by any other provision of this code:

(1) The applicant holds a current valid license in good standing in another state, Canadian province, or United States territory and, within three years immediately preceding filing an application for licensure in this state, has practiced clinical veterinary medicine for a minimum of two years and completed a minimum of 2,944 hours of clinical practice. Experience obtained while participating in an American Veterinary Medical Association (AVMA) accredited institution's internship, residency, or specialty board training program shall be valid for meeting the minimum experience requirement.

Issue:

Regulations may only be crafted and clearly discussed once there is a policy decision as to whether the term "students" or "program" as defined in BPC Section 4848.1 should include alternate route (ad hoc) applicants who are obtaining work experience through on-the-job training. Only then, can the Board move forward with defining regulations in terms of supervision of the RVT student and the criteria under which the RVT students qualifies to perform such tasks. Items to consider:

1. If the alternate route (ad hoc) applicant is deemed a student for the purposes of gaining the specified clinical experience (performing the RVT job tasks), how will the Board determine whether the applicant has met the criteria to qualify for the student exemption?
2. Should RVT students/applicants be granted a provisional or temporary license during their last year of clinical experience authorizing the students to perform the RVT job tasks?

Action Requested:

The MDC is requested to consider and make recommendations regarding:

1. Discuss whether the terminology in section 4841.1 regarding "Board Approved Programs" Should Include the Ad Hoc Alternate Route "student."
2. Discuss Whether Alternate Route Approved Programs Should Include an Externship to Allow for Performing RVT Job Tasks Prior to Graduation.