

Veterinary Medical Board

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MEMORANDUM

DATE	November 14, 2018
TO	Veterinary Medical Board
FROM	Amanda Drummond, Administrative Programs Coordinator
SUBJECT	Agenda Item 8F. Comments Received for Regulatory Proposal Regarding Sections 2070 & 2071, Article 7, Division 20, Title 16 of the CCR Regarding Proposed Fee Increases

Background

The regulatory proposal for Fee Schedule was submitted as an emergency regulation and approved by the Office of Administrative Law (OAL) and went into effect on [March 5, 2018](#). Per Government Code section [11346.1\(e\)](#), the Veterinary Medical Board (Board) is required to submit a regular notice and comment period and full rulemaking file (known as a Certificate of Compliance) within 180-days from the effective date of the emergency regulation. The Board can re-adopt the emergency regulation through two 90-day extensions if additional time is needed past the initial 180-days.

On [August 1, 2018](#), OAL approved a 90-day re-adoption of the emergency regulations and on [October 16, 2018](#), OAL approved a second 90-day re-adoption of the emergency regulations. The certificate of compliance has a final due date of March 5, 2019.

The [Certificate of Compliance for fee schedule](#) was noticed by OAL on [October 12, 2018](#) which began the 45-day comment period. The 45-day comment period will close on November 26, 2018. The Board has received a total of five (5) responses during each comment period: one (1) response during the initial emergency comment period, two (2) responses during the re-adoption of the emergency regulations, and two (2) responses during the Certificate of Compliance. Following the 45-day comment period, Board staff will prepare the final rulemaking package that includes the Final Statement of Reasons which will address all comments received during the comment periods.

Board staff aggregated the comments received to date and has recommended responses to the comments for the Board's consideration and review.

Emergency Regulation Comment (Comment period 02/21 – 02/28/2018)

- Summary of comment one (1):

The Board is not meeting projected numbers of veterinary assistant controlled substance permit (VACSP) applicants as originally anticipated, and there is a lack of revenue from the VACSP program because of this shortfall.

The Board should raise VACSP fees due to the lack of applicants projected.

- Board staff recommended response to comment one (1):

While the number of VACSP applicants has not met anticipated volume, this is not necessarily due to a Board overestimation. The veterinary assistant profession appears to have been slower to adopt the new license than was anticipated, but the Board continues to see a continued high rate of VACSP application submissions since the program was implemented. Additionally, per [Business and Professions Code \(BPC\) section 4836.2](#), the VACSP fee is already at the statutory cap and can only be increased with a legislative bill and subsequent filing of regulations.

- Summary of comment two (2):

High costs for RVT applicants are due to Office of Professional Examination Services (OPES) examination development and the Board could reduce costs for RVTs by asking the American Association of Veterinary State Boards (AAVSB) to include California-specific law questions in the national examination and provide a California mail out exam.

- Board staff recommended response to comment two (2):

Prior to the fee increase, examination fees collected for the California RVT examination were not accounting for actual costs of development, preparation, and administration of the examination, as was illustrated in the independent fee audit conducted by the Board. Additionally, consideration of the RVT salary levels (as compared to veterinarians) has always been a factor in attempting to keep RVT fees reasonable.

OPES recommended the Board maintain authority of the RVT examination due to examination security and to ensure a psychometrically sound examination and therefore does not recommend AAVSB administer the California veterinary technician examination.

- Summary of comment three (3):

High costs for the RVT examination and application presents barriers of entry to RVT candidate and a further increase of fees would cause RVTs to opt out of taking the examinations.

- Board staff recommended response to comment three (3):

In accordance with [BPC section 4800.1](#), the Board's highest priority is protection of the public in exercising its regulatory, licensing, inspection, and disciplinary functions. The Board is a self-supporting, special fund agency that generates its revenues from fees charged for licensing and registration. To perform its regulatory, licensing, inspection, and disciplinary functions, the Board must generate sufficient revenues from fees associated with licensing and registration. The Board is also required to maintain a Contingent Fund reserve of no less than three (3) months and no more than ten (10)

months of annual authorized expenditures, pursuant to BPC section [BPC section 4905\(o\)](#).

Beginning in FY 2014-2015, Board revenue has not kept pace with its authorized expenditures, thereby creating a structural imbalance where the Board's Contingent Fund (i.e. "savings account") is declining. That is, the Board's revenues, on a FY basis, are less than its expenditures creating a budget deficit. In order to make up for the operating budget deficit, the Board subsidizes its structural imbalance via funds from its Contingent Fund, which, in its current state, is declining and unable to subsidize the structural imbalance.

The Board's last fee schedule increase was effective in March 2012. At that time, the Board noted its need for increased fees were due to increased costs for services provided by the Division of Investigation (DOI) and Attorney General's Office (AG), personnel, and other general costs. These costs have continued to climb. In addition, an increased enforcement workload has contributed to higher expenditures specific to the DOI, AG, and Office of Administrative Hearings (OAH). Further, the Board conducted an independent fee audit that showed the need to increase fees to account for these continued rising costs.

As the Board's costs associated with performing its core functions have risen sharply, the Board is currently experiencing a severe fiscal imbalance. This proposed fee increase would increase fees associated with veterinarian licensure, premises permits, and registered veterinary technician registrations so that the Board can continue to perform its core functions and properly protect the public. These proposed fee increases would resolve the structural imbalance of the Board, while maintaining compliance with [BPC section 4905\(o\)](#).

The Board considered the fee increases based on the ability of the individual applicant or licensee to absorb the increased costs. For example, the 100% hospital fee increase is based on the determination that veterinary hospital premises can absorb a larger fee increase due to the larger amounts of revenue that they generate, as opposed to an individual applicant or licensee. In addition, the Board chose a smaller increase to RVT fees because it would be more financially taxing and difficult for RVTs to absorb a higher fee increase than that of a veterinarian or a hospital premises based on their earning ability. A portion of the \$600 fee is not due to Board expenses, but is a standard expense included in the VTNE. The AAVSB mandates the cost of the VTNE and set the fee, which is not under the Board's control.

Additionally, the Board reviewed other similar Department fees for comparison. The fees from boards with licensees similar to the Board reflected that the Board had one of the smaller fees per license type and the proposed fee increases were not out of line with other similar professions.

- Summary of comment four (4):
Premises have a greater means of bearing the additional costs associated with a fee increase than RVTs. Increasing costs of premise permits by an additional \$12 annually would generate the same amount of revenue as the proposed RVT fee increase.

- Board staff recommended response to comment four (4):
The Board is unable to further increase veterinary premises fees as they are already at their [\\$400 statutory cap](#) and may only be increased with a legislative bill and subsequent filing of regulations.

Re-Adoption of Emergency Regulation Comments (Comment period 07/26 – 08/01/2018)

- Comment five (5):
“Is the budget shortfall actually due to insufficient revenue or is it due to mismanagement?”
- Board staff recommended response to comment five (5):
In accordance with [BPC section 4800.1](#), the Board’s highest priority is protection of the public in exercising its regulatory, licensing, inspection, and disciplinary functions. The Board is a self-supporting, special fund agency that generates its revenues from fees charged for licensing and registration. In order to perform its regulatory, licensing, inspection, and disciplinary functions, the Board must generate sufficient revenues from fees associated with licensing and registration. The Board is also required to maintain a Fund Condition reserve of no less than three (3) months and no more than ten (10) months of annual authorized expenditures, pursuant to BPC section [BPC section 4905\(o\)](#).

Beginning in FY 2014-2015, Board revenue has not kept pace with its authorized expenditures, thereby creating a structural imbalance where the Board’s Contingent Fund (i.e. “savings account”) is declining. That is, the Board’s revenues, on a FY basis, are less than its expenditures creating a budget deficit. In order to make up for the operating budget deficit, the Board subsidizes its structural imbalance via funds from its Contingent Fund, which, in its current state, is declining and unable to subsidize the structural imbalance.

The Board’s last fee schedule increase was effective in March 2012. At that time, the Board noted its need for increased fees were due to increased costs for services provided by the Division of Investigation (DOI) and Attorney General’s Office (AG), personnel, and other general costs. These costs have continued to climb. In addition, an increased enforcement workload has contributed to higher expenditures specific to the DOI, AG, and Office of Administrative Hearings (OAH).

As the Board’s costs associated with performing its core functions have risen sharply, the Board is currently experiencing a severe fiscal imbalance. This proposed fee increase would increase fees associated with veterinarian licensure, premises permits, and registered veterinary technician registrations so that the Board can continue to perform its core functions and properly protect the public.

The Board’s current structural imbalance is a byproduct of several factors, some within the Board’s control and others outside of the Board’s control. These factors include the following:

- *Almost a 100% increase in consumer complaint volume and case processing from fiscal year (FY) 2013-2014 to FY 2016-2017.*
- *Interdepartmental fee increases for services performed by the AG and OAH.*
- *Legislative mandates enacted by Senate Bill (SB) 304 (Lieu, Chapter 515, Statutes of 2013) to increase veterinary premises inspections to 20% of premises*

per year and to enact the Veterinary Assistant Controlled Substances Permit (VACSP) program.

- o Revenues from the VACSP program have materialized at a slower rate than projected leading to a deficiency in needed revenue from the program.*
 - o Increases to Personnel Services including general salary increases negotiated by the State and mandated health care and retirement contributions.*
 - o Intradepartmental increases in pro rata including the DOI, Office of Professional Examination Services, and BreEZe database costs.*
 - o Increase in Subject Matter Expert and Hospital Inspector contracted compensation.*
 - o Increases in authorized staff positions from 12.8 in FY 2013-2014 to 23.8 in FY 2014-2015 and ongoing for the enforcement, premises inspection, and VACSP programs.*
- Summary of comment six (6):
A fee increase would cause a barrier to licensure for RVTs and reduce consumer protection due to RVTs opting out of taking the examination. The Board should reduce staff in lieu of raising fees.
 - Board staff recommended response to comment six (6):
In accordance with [BPC section 4800.1](#), the Board's highest priority is protection of the public in exercising its regulatory, licensing, inspection, and disciplinary functions. The Board is a self-supporting, special fund agency that generates its revenues from fees charged for licensing and registration. In order to perform its regulatory, licensing, inspection, and disciplinary functions, the Board must generate sufficient revenues from fees associated with licensing and registration. The Board is also required to maintain a Fund Condition reserve of no less than three (3) months and no more than ten (10) months of annual authorized expenditures, pursuant to BPC section [BPC section 4905\(o\)](#).

Beginning in FY 2014-2015, Board revenue has not kept pace with its authorized expenditures, thereby creating a structural imbalance where the Board's Contingent Fund (i.e. "savings account") is declining. That is, the Board's revenues, on a FY basis, are less than its expenditures creating a budget deficit. In order to make up for the operating budget deficit, the Board subsidizes its structural imbalance via funds from its Contingent Fund, which, in its current state, is declining and unable to subsidize the structural imbalance.

The Board's last fee schedule increase was effective in March 2012. At that time, the Board noted its need for increased fees were due to increased costs for services provided by the Division of Investigation (DOI) and Attorney General's Office (AG), personnel, and other general costs. These costs have continued to climb. In addition, an increased enforcement workload has contributed to higher expenditures specific to the DOI, AG, and Office of Administrative Hearings (OAH).

As the Board's costs associated with performing its core functions have risen sharply, the Board is currently experiencing a severe fiscal imbalance. The fee increase increases fees associated with veterinarian licensure, premises permits, and registered veterinary technician registrations so that the Board can continue to perform its core functions and properly protect the public.

To address the Board's structural imbalance and need for additional revenue, staff contracted with Capitol Accounting Partners (CAP) to conduct a comprehensive fee audit and report that included cost analysis of the Board's administrative, licensing, premises and enforcement programs as well as prepared fee and revenue projections. Additionally, staff researched other Department of Consumer Affairs (DCA) boards for fee equivalency within its applicant and licensing populations.

The CAP audit report confirmed the structural imbalance of the Board and the need for additional revenue. The CAP audit report recommended that to be structurally solvent, the Board must immediately generate at least \$5.3 million in total revenue each FY to fund its operational costs and maintain the mandatory healthy Contingent Fund reserve of 3-10 months. The audit showed the Board's fees generate approximately \$4.3 million in revenues, leaving a structural imbalance of approximately \$1 million. The Board's fee schedule increase proposal focuses on fees that generate 97% of the Board's revenue by drawing from fee categories with a larger volume of fees as opposed to smaller fee sources where the impact to the fee, and, ultimately, the number of individual applicants or licensees, must be greater to make up the requisite revenue. Specific fees were calculated based on total additional revenue required to maintain fund solvency, the Board's fee audit, a review of each licensee's ability to absorb an increase to individual fees, and comparative analysis of similar professional fees.

The Board's fee increase for RVTs is a 14% rise in fees, while veterinarian increase is 20% and premises permits are 100%. The Board considered RVT salary when determining the fee increase, but due to the increased costs facing the Board, predominantly as a result of the dramatic complaint increase and associated costs, the Board must increase fees for licensure because fees generate 97% of the Board's revenue (45% revenue from initial application fees, licensing, and examination fees plus 52% revenue from renewal fees) and the Board was facing a shortfall of approximately \$1 million to meet the Contingent Fund minimums as mandated by [BPC section 4905\(o\)](#).

Certificate of Compliance Comments (Comment period 10/12 – 11/26/2018)

- **Summary of comment seven (7):**
Small veterinary practices face difficulties affording the premise fee increase as compared to a large veterinary practice and the Board should base premise permit fee amounts based on the size of the practice.
- **Board staff recommended response to comment seven (7):**
The Board chose to increase the premise permit fees to the statutory cap of \$400 based on the CAP fee audit, review of similar licenses, and the veterinary premises ability to absorb the fee increase. The Board was tasked with addressing its structural imbalance and did so while taking into the consideration individual license types and their ability to absorb additional fees.

Further, the Board does not have a means to track the size of a veterinary premises based on employment figures. A premise may report it has a certain number of employees; however, this can change on a daily basis and the Board has no reasonable means of tracking or ensuring the practice provides accurate information.

Attachments

- Comments received to date regarding the regulatory proposal for fee increase.

Emergency Regulation Comments

Comment Period Effective February 21, 2018 - February 28, 2018



February 23, 2018

Ethan Mathes, Licensing Manager
Veterinary Medical Board
1747 N Market Blvd.
Sacramento CA 95834

Dear Mr. Mathes:

Re: Proposed Emergency Regulations

Our association has serious concerns regarding the proposed emergency regulations.

Outlined below is a summary of our concerns:

1. The VMB states that it estimated 10,000 VACSPs were likely to be generated in 2016/17 but only 3665 have been issued as of January 2018. CaRVTA always asserted that these estimates were way too high, with a more realistic number being 1 VACSP per premise, if that. The VMB also requested 5.5 positions to handle the larger VACSP program and has since prepared a Budget Change Proposal to make those positions permanent based on the complexity of application review. This means that with a fee of \$50 and a population of permit holders that is significantly less than anticipated, the program is not fiscally solvent and is being subsidized by other licensing fees, e.g., veterinarians, RVTs and premise permits. Since the Board is in such dire straits, why hasn't the Board requested a fee increase for the VACSP program along with all the other fee increases since this program is clearly not generating the income anticipated?
2. RVTs were told that the cost of the California RVT Exam would most likely go down when we transitioned to using the national examination (VTNE) and the California exam became just a law exam. Instead, the VMB is proposing increases in the application *and* exam fees. The higher fees are due in part to the convoluted process that OPES has imposed on the Board for a simple law exam for RVTs. One cost saving measure for the VMB would be to ask the American Association of Veterinary State Boards (AAVSB) to include a few law questions on the VTNE for California RVT candidates and to then create a mail out or electronic law exam similar to the one used for veterinarians. The high costs associated with preparing a law exam for RVTs who work only under supervision of a veterinarian are unwarranted.
3. Application and exam fees were already too high for RVT candidates who usually make a relatively low wage. Prior to the transition to the VTNE in 2014, it cost RVT candidates \$300 to apply for and take the licensing examination. It now costs candidates a total of \$615, a 105% increase. The proposal adds another \$50, raising the fees to candidates by 121% over the prior costs. The Board states in its request

that there is no significant impact on licensees or businesses; however, a significant number of RVT graduates already opt out of taking the licensing exams due to cost, which has a significant impact on the potential RVTs and the veterinarians trying to hire them.

4. CaRVTA has alerted the VMB about our concerns over high fees for RVTs and its impact on the profession for years. We included this issue in our most recent Sunset response. The only response we have seen from the VMB is fee increases.
5. ***There are other options than the ones proposed by the VMB. Additional fees should be paid by the hospitals that generate the income, not RVT candidates. Raising the Premise Permit fee by an additional \$12 per year would generate the same amount of revenue as the \$25 increases on RVT application and exam fees.***

We believe that the fee increases on RVT candidates as proposed would be a serious barrier to licensure and *reduce*, not enhance the VMB mission of consumer protection by reducing the number of RVT candidates. The VMB has other options to improve its financial condition, including insuring that all staff positions are being fully productive, reviewing the cost effectiveness of the RVT exam process, and insuring that each program within its jurisdiction is funded appropriately. If fees must be raised, the VMB should raise them for all license categories, including VACSPs and premises that can afford them rather than for RVT candidates who cannot.

Yours truly,

Nancy Ehrlich, RVT
Regulatory/Legislative Advocate, CaRVTA
cc: OAL
Cheryl Waterhouse, Board President

1017 L St. #389 Sacramento CA 95814 916 244-2494 www.carvta.com

Re-Adoption of Emergency Regulation Comments
Comment Period Effective July 26, 2018 – August 1, 2018



July 26, 2018

Amanda Drummond, Administrative Programs Coordinator
Veterinary Medical Board
1747 N Market Blvd.
Sacramento CA 95834

RECEIVED
JUL 30 2018
VMB/RVTC

Dear Ms Drummond:

Re: Emergency Fee Increase

Our association has the same serious concerns regarding the extension of the emergency fee increase regulations that we did when first proposed.

Outlined below is a summary of our concerns:

1. Is the budget shortfall actually due to insufficient revenue or is it due to mismanagement?
2. Has the DCA conducted an internal audit during the last 4-5 years?
3. The VMB says it estimated that 10,000 VACSPs were likely to be generated in 2016/17, but only 3972 have been issued as of April 2018. According to the VMB's 2015 Sunset Report, they were actually estimating 13,600 VACSPs would be issued (\$680,000 divided by \$50 application fee). CaRVTA always asserted that these estimates were way too high, with a more realistic number being 1 VACSP per premise.
4. RVTs were told that the cost of the California RVT Exam would most likely go down when we transitioned to using the national examination (VTNE). Instead, the VMB is increasing both the application *and* exam fees.
5. Application and exam fees were already too high for RVT candidates. A significant number of RVT graduates opt out of taking the licensing exams due to cost.
6. Increasing RVT application and exam fees will reduce the number of RVT candidates, decreasing consumer protection.
7. CaRVTA has alerted the VMB about our concerns over high fees for RVTs for years. We included this issue in our most recent Sunset response.

There are other options than the ones proposed by the VMB. If fees must be increased, they should be paid by the hospitals that generate the income, not RVT candidates. Raising the Premise Permit fee by an additional \$12 per year would generate the same amount of revenue as the \$25 increases on RVT application and exam fees. Another way to save money would be to eliminate all the committees working on the RVT exam and create an open-book electronic exam on the law just as veterinarians have. The AAVSB could add several law questions to the exam for California as they do for some other states. Pro-rata costs to OPES could be reduced accordingly.

We believe that the fee increases on RVT candidates as already instituted will be a serious barrier to licensure and reduce, not enhance the VMB mission of consumer protection. The VMB has other options to improve its financial condition, including downsizing unnecessary staff, insuring that all staff positions are being fully productive and reviewing the cost effectiveness of the RVT exam process. If fees must be raised, the VMB should raise them for premises that can afford them rather than for RVT candidates who cannot.

Yours truly,

Nancy Ehrlich, RVT
Regulatory/Legislative Advocate, CaRVTA

cc: OAL

1017 L St. #389 Sacramento CA 95814 916 244-2494 www.carvta.org

Gladys A. Blose
333 Corte Madera Ave.
Mill Valley, CA 94941

Amanda Drummond, Administrative Program Coordinator
1747 N. Market Blvd.
Sacramento, CA 95834

RECEIVED
AUG 02 2018
VMB/RVTC

July 27, 2018

Dear Ms. Drummond,

Re: Emergency Fee Increase

As a future Registered Veterinary Technician candidate in the state of California, I am very concerned that the Veterinary Medical Board is not addressing issues of importance to RVTs.

I believe that the fee increases on RVT candidates as already instituted will be a serious barrier to licensure and reduce, not enhance the VMB mission of consumer protection. The VMB has other options to improve its financial condition, including downsizing unnecessary staff, insuring that all staff positions are being fully productive and reviewing the cost effectiveness of the RVT exam process. If fees must be raised, the VMB should raise them for premises that can afford them rather than for RVT candidates who cannot.

Thank you for the attention to this matter.



Gladys A. Blose
LVT

Certificate of Compliance Regulation Comments

October 12, 2018 - November 26, 2018

From: info@sdvetbehavior.com
To: Drummond.Amanda@DCA
Subject: concerns with 100% increase in premise annual license!
Date: Friday, October 12, 2018 1:08:01 PM
Attachments: [image003.png](#)
Importance: High

To whom it may concern:

Since you did not provide an e-mail address to cc to Office of Admin Law (Office of Administrative Law 300 Capitol Mall, Suite 1250 Sacramento, CA 95814) please forward this message to them since you apparently want to cc them as well to comments:

As a single specialty practitioner in a relatively low gross (<\$150K) veterinary practice where I am the ONLY Veterinary Behaviorist based out of San Diego, the 100% increase in premise license is a BIG increase in overhead for my specialty practice especially since I only lease an exam room for selected days within a larger veterinary facility run by a relatively large corporation that already pays a premise fee for the facility.

The Premise fee in general and the huge increase specifically targeted to fill a budget gap on the back of premise license holders following the practice regulation requirements seems like a very regressive tax as my tiny single specialty doctor practice (only employee is my wife that works from our home office) is the same \$400 as a huge facility like VCA Animal Specialty group or VCA Mission Valley specialty hospital, etc. that employ dozens of veterinarians and likely have a gross well of several million \$ per year. It is insane that we pay the same premise fee where mine is hundreds of times higher proportion of my gross than any other large veterinary multi-doctor practice that only has to have 1 premise fee. When the premise fee was around \$100/yr and I only leased an exam room from a large practice that was already annoying to have to have multiple fees for the same premise but now that is \$400/yr that is really outrageous and costly. Since pet parents must usually get rid of their pet or euthanize it if they cannot get specialty help with the pet's behavior (all too often the presentation to Veterinary Behaviorists throughout North America), I try hard to keep the client fees relatively reasonable so that pet parents of all socio-economical levels since our life-saving specialty services (since most pets live their full lives as beloved pets and utilizing a lifetime of veterinary services and pet products) but practice overhead (license fees, prescription/DEA fees, memberships, etc.) all must be passed on the the consumer as you must know.

A much better and appropriate premise permit approach would be to make the premise permit amount somehow based on the size of the practice like the San Diego business license that is based on the number of employees (represents the size of the business in most governmental analyses) or the number of individual veterinary licenses using the premise permit (\$100 each for single doctor practices pay relatively less and very large practices with a multitude of doctors pay commensurately more for the annual premise permit) or square footage of the actual owned or leased space, which, again would vary based on size of the practice and generally track the gross. In this way the premise permit would bring in likely MORE revenue to help the board but not be so onerous on tiny practices as the \$400/yr current formula just to lease a tiny exam room is for my practice.

Your attention to phasing in a more progressive and fair premise tax would be most appreciated by hundreds of small practitioners throughout the state.

PM

Patrick Melese DVM, MA, DACVB

Board Certified Veterinary Behaviorist



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October 24, 2018

Amanda Drummond, Administrative Program Coordinator
Veterinary Medical Board
1747 N Market Blvd.
Sacramento CA 95834

Dear Ms Drummond:

Re: Proposed Fee Increases

Our association has strong objections to the proposed fee increases for Registered Veterinary Technicians (RVTs).

It appears that RVTs are being asked to pay for the mistake the Veterinary Medical Board (VMB) made in overestimating the number of VACSPs that would be issued. As of August 2018 there was a total of 4022 clear VACSPs. The VMB states that this is due to slow sign ups. The reality is that the original estimate was unreasonably high and the number of VACSPs is unlikely to grow much. If the VMB insists on maintaining the current level of staffing for the VACSP program, then the fee for that program should be raised. Why has that not been proposed?

RVTs were told that the cost of the California RVT Exam would most likely go down when the national examination (VTNE) was added. Instead, the VMB is proposing increases in the application *and* exam fees. Prior to this increase, application and exam fees were already too high for RVT candidates who usually make relatively low wages. A significant number of RVT graduates opt out of taking the licensing exams due to cost, which has a significant impact on the ability of veterinarians who need to hire RVTs. Increasing RVT application and exam fees will reduce the number of RVT candidates, decreasing consumer protection.

There are other options than the ones proposed by the VMB. Fee increases should be borne by the hospitals that generate the income, not RVTs or RVT candidates. A modest increase in the Premise Permit fee could generate the same amount of revenue as the increases on RVT application and exam fees.

We believe that the fee increases on RVTs and RVT candidates as proposed will be a serious barrier to licensure and reduce, not enhance the VMB mission of consumer protection.

Yours truly,

Nancy Ehrlich, RVT
Regulatory/Legislative Advocate, CaRVTA