



MEMORANDUM

DATE	April 9, 2014
TO	Multidisciplinary Advisory Committee
FROM	Annemarie, Executive Officer DCA/Veterinary Medical Board
SUBJECT	RVT Alternate Route Program Approval

Background:

The eligibility criteria outlined in CCR 2068.5 is commonly referred to as the “Alternate Route” because it is a pathway that is an alternative to completing a two-year curriculum at an AVMA accredited RVT program. It was originally designed for individuals who were already working in the profession and for whom it was difficult or impossible to stop working in order to go to a full time two year program. A portion of the education requirements can be completed at a local community college and the RVT specific experience can be obtained by attending “approved” continuing education (CE) courses.

In the last five or six years, programs have come into existence that are teaching curriculum as a whole, but the Board does not have specific language in current law that outlines the approval criteria for programs offering “alternate route” RVT curriculum under the provisions of CCR 2068.5.

The RVT Task Force discussed and proposed changes to alternate route regulations at their March and June 2013 meetings. Significant amendments to the proposed language were made based on the Task Force discussion at the June 2013 meeting.

Statutory Reference:

BPC 4841.5

To be eligible to take the written and practical examination for registration as a registered veterinary technician, the applicant shall:

- (a) Be at least 18 years of age.
- (b) (1) Furnish satisfactory evidence of graduation from, at minimum, a two-year curriculum in veterinary technology, in a college or other postsecondary institution approved by the board, or the equivalent thereof as determined by the board. In the case of a private postsecondary institution, the institution shall also be approved by the Bureau for Private Postsecondary and Vocational Education.
- (2) For purposes of this subdivision, education or a combination of education and clinical practice experience may constitute the equivalent of the graduation requirement imposed under this subdivision, as determined by the board.

Section 4841.5 was amended in 2008 under SB 1584. The legislative digest of the bill includes the following: *Existing law requires that an applicant for registration as a veterinary technician furnish satisfactory evidence of graduation from a 2-year curriculum in veterinary technology in a college or postsecondary institution approved by the board. Alternatively, existing law authorizes an applicant to furnish satisfactory evidence of the equivalent of that requirement as determined by the board. **This bill would specify that education or a combination of education and clinical practice experience may constitute the equivalent of that requirement, as determined by the board.***

Issue:

Currently, the regulations require 300 hours of education in six general education categories and 5 RVT specific categories, but there are no minimum requirements for hours in each of those categories. For instance, one hour in any one subject meets the current requirement for that individual subject. One mitigating factor is that the education is combined with 4,416 hours of directed clinical experience in a veterinary practice and when combined, the experience and education – no matter how many hours in one subject – are deemed equivalent.

In order to establish **an equivalent course of study** to that required in a California Board-approved program, it is important to identify a minimum number of hours required in each education category. Further, is the issue of establishing an equivalent eligibility pathway between, 1) an organized alternate route program, or 2) an ad hoc combination of curriculum and on-the-job experience an applicant would accumulate on their own.

As codified in CCR section 2085.3, for purposes of continuing education, academic quarter and semester units are defined as 10 and 15 hours, respectively.

The Committee could consider a minimum number of hours in each of the specific education areas, general education (6) and RVT specific areas, while allowing some flexibility in the overall 300 hour requirement for education.

Action Requested:

The MDC should discuss and consider:

- Discuss Access Issues that were Original Motives for Creating Alternate Route
- Should the Alternate Route Ad Hoc Pathway Exist - or - Discuss Approved School Only Alternate Route
- How to Make Regulatory Changes to the Existing Alternate Route Eligibility Requirements “Equivalent” to Formal Training Program Criteria
- Set Hourly Limits for Educational Requirements

Attachments:

- Proposed language as modified at the November 14, 2013 RVT Task Force Meeting
- Proposed Regulatory Changes/Additions - RVT Approved Schools CCR Sections 2064-2066.1

**Title 16. Professional and Vocational Regulations
Division 20. Veterinary Medical Board**

***RVT Alternate Route Programs – Proposed Concept Language
4/2014***

§ 2065.6. School Approval Process.

The following procedures shall be applicable to an institution applying to the board for initial approval of its registered veterinary technician curriculum in accordance with sections 2065 and 2065.6.1 of these rules:

(a) The board shall conduct a qualitative review and assessment of the institution's registered veterinary technician curriculum through a comprehensive review process, performed by an inspection team impaneled by the board for that purpose.

(b) After reviewing the inspection team's evaluation report and recommendations, the board shall take one of the following actions:

(1) Grant provisional approval for a period not to exceed two years. An additional two-year provisional approval may be granted by the board for good cause.

(2) Disapprove the application.

(c) Full approval of an institution offering a registered veterinary technician curriculum in accordance with section 2065 and 2065.6.1 shall not be granted until the curriculum has been in operation under provisional approval for at least two years and the board has determined that the curriculum is in full compliance with the provisions of section 2065 and 2065.6.1.

2065.6.1. Criteria for Practical Experience and Education Equivalent Programs

Notwithstanding provisions in section 2065 of these rules, programs who offer education in compliance with the following criteria must be approved by the board and are deemed "the equivalent thereof as determined by the board" pursuant to Section 4841.5 of the code:

(a) Programs shall verify that students entering a program have completed 2,208 of the required 4,418 hours of directed clinical practice within the five (5) years immediately preceding entrance into the program.

(b) Education shall consist of a total of 20 semester units, 30 quarter units, or 300 hours of instruction.

(c) Animal health technology education shall consist of a minimum of 200 hours and minimum of 5 hours in each subject area of instruction in the following:

(1) Dental prophylaxis and extraction,

(2) Anesthetic machine, anesthetic equipment, induction and monitoring,

(3) Surgical nursing and assisting, including instrumentation and suturing techniques,

(4) Emergency veterinary care including IV Catheter placement and application of casts and splints.

(5) Imaging to include radiography, basic endoscopy and ultrasound principles.

(6) Patient examination.

(7) Diseases and nursing of animals including zoonotic disease.

(8) Laboratory procedures to include clinical biochemistry, cytology, hematology, immunology, basic microbiology, parasitology, and urine analysis testing.

(9) Veterinary pharmacology.

(10) Veterinary law and ethics.

(d) General education shall consist of a minimum of 100 hours and minimum of 5 hours in each subject area of instruction in the following:

(1) Chemistry.

(2) Mathematics.

(3) Biology and microbiology.

(4) Anatomy and physiology.

(5) Medical terminology.

(f) When seeking Board approval programs shall submit the following:

(1) Syllabi or course outlines for all courses:

(2) Sample of each form used in program:

(A) Registration forms

(B) Certificate of course completion

(C) Evaluation forms for students to evaluate program

(D) Record of attendance

(3) Names and qualifications of program director, instructors and other persons involved in education of students and verification of their qualifications.

(g) If the program seeking approval is part of a private postsecondary institution, the institution shall also be approved by the Bureau of Private Postsecondary Education.

(h) The institution shall have adequate resources for conducting the program and may include Internet resources.

(i) If there is a physical plant and equipment used for instruction in the academic teaching, it shall be adequate for the purposes intended.

(j)(1) The faculty shall include a California licensed veterinarian employed by the school or degree program as an advisor, administrator, or instructor. Instructors shall include, but need not be limited to, a California registered veterinary technician. If there is any change in the faculty, the board must be immediately notified.

(2) Instructors shall be knowledgeable, current, skillful, and possess at least two years of experience in performing or teaching in the specialized area in which they are teaching. Each instructor shall have or currently be receiving training in current teaching methods. School or degree programs shall effectively evaluate the teaching ability of each instructor.

(3) An approved school or degree program shall have a director who meets the requirements of subdivision (j)(2) and who shall hold a current active California license as a veterinarian or registration as an RVT. The director shall have a minimum of three years' experience as a veterinarian or RVT. This shall include one year of experience in teaching, administration, or clinical supervision or a combination thereof within the last five years. The director shall have completed or be receiving course work in administration.

(4) In the absence of a director an approved program may appoint an interim director. The interim director shall meet the requirements of (j)(3), except that the interim director may have applied for, but not yet have received licensure or registration. An approved program shall not have an interim director for a period exceeding eighteen months.

(k) The number of students enrolled shall be at a ratio to the number of faculty and size of the facilities which is not detrimental to the quality of education. When animal patients are used as part of the curriculum the ratio shall be adequate to protect the health and safety of the animal patients and the students, taking into consideration the species of animal being treated.

(l) All students admitted shall possess a high school diploma or its equivalent.

(m) The program shall be part of an institution which is approved by the Department of Consumer Affairs, Bureau of Private Postsecondary Education, unless otherwise exempted from Education Code section 94800 et seq.

(n) Every school or degree program shall be in compliance with the laws regulating the practice of veterinary medicine and the regulations adopted pursuant thereto.

(o) The programs shall provide all prospective students, prior to enrollment, with literature which discloses the program's pass rate for first time candidates and the state average pass rate for first time candidates on the board's registered veterinary technician examination during the two-year period immediately preceding the student's proposed enrollment and a description of the requirements for registration as a registered veterinary technician.

(p) All programs shall provide each prospective veterinary technology student prior to enrollment written information regarding transferability of the units they receive in the courses that they take. Said information shall be posted at all times in a conspicuous location at the program facility so that there is ample opportunity for it to be read by the veterinary technology students.

Note: Authority cited: Section 4808, Business and Professions Code. Reference: Sections 4841.5 and 4843, Business and Professions Code.

2068.5. Practical Experience and Education As Equivalent Curriculum.

In lieu of a two year curriculum in animal health technology, completion of a combination of practical experience and education in compliance with the following criteria is deemed to be “the equivalent thereof as determined by the board” pursuant to Section 4841.5 of the code:

(a) ~~The e~~Education shall consist of a total of ~~15-20~~ semester units, 30 quarter units, or 300 hours of instruction. The education shall be provided by a postsecondary academic institution or a qualified instructor as defined by Section 2068.5(eg). ~~The education shall be accumulated in the fundamentals and principles of all of the following subjects:~~

(b) Animal health technology education shall consist of a minimum of 200 hours and minimum of 5 hours in each subject area of instruction in the following:

(1) Dental prophylaxis and extraction.

(2) Anesthetic machine, anesthetic equipment, induction and monitoring.

(3) Surgical nursing and assisting, including instrumentation and suturing techniques.

(4) Emergency veterinary care including IV Catheter placement and application of casts and splints.

(5) Imaging to include radiography, basic endoscopy and ultrasound principles.

(6) Patient examination.

(7) Diseases and nursing of animals including zoonotic disease.

(8) Laboratory procedures to include clinical biochemistry, cytology, hematology, immunology, basic microbiology, parasitology, and urine analysis testing.

(9) Veterinary pharmacology.

(10) Veterinary law and ethics.

~~(1) Dental prophylaxis and extraction.~~

~~(2) Anesthetic, induction and monitoring.~~

~~(3) Surgical nursing and assisting, including instrumentation, suturing techniques, intravascular catheter placement and application of casts and splints.~~

~~(4) Radiography and radiation safety.~~

~~(5) Diseases and nursing of animals, including zoonotic diseases and emergency veterinary care.~~

~~(bc)~~ The General education shall ~~include~~ consist of a minimum of 100 hours and minimum of 5 hours in each subject area of instruction in chemistry, mathematics, biology, microbiology, anatomy and physiology, and medical terminology, or these subjects may be obtained as separate courses in the following:

(1) Chemistry.

(2) Mathematics.

(3) Biology and microbiology.

(4) Anatomy and physiology.

(5) Medical terminology.

(ed) All educational requirements in subsection (ab) shall have been completed by the applicant within five (5) years prior to the date of the examination for registration as a registered veterinary technician.

(de) Interactive distance-learning shall be accepted if the course meets all the criteria listed in this section and includes a certificate of attendance and completion.

(ef) The candidate shall provide the board with a syllabus or an outline for each course. The candidate shall provide documentation of attendance for each course in the form of one of the following:

(1) a certificate of attendance,

(2) an official transcript, or

(3) a letter on official stationery signed by the course instructor documenting that the candidate attended a particular course.

(fg)(1) In order for education to be approved for qualification under Section 2068.5, the instructor must meet at least two of the following minimum requirements:

(A) A license, registration, or certificate in an area related to the subject matter of the course. The license, registration, or certificate shall be current, valid, and free from restrictions due to disciplinary action by this board or any other health care regulatory agency;

(B) A master's or higher degree from an educational institution in an area related to the subject matter of the course;

(C) Training, certification, or experience in teaching the subject matter of the course; or

(D) At least two years' experience in an area related to the subject matter of the course.

(2) The instructor shall provide each participant with a course syllabus or detailed outline which includes a description of the material covered.

(gh) The directed clinical practice shall consist of at least 4,416 hours, completed in no less than 24 months, of directed clinical practice under the direct supervision of a California-licensed veterinarian who shall attest to the completion of that experience at the time the application is made to the board for the registered veterinary technician examination. This experience shall have been completed by the applicant within five (5) years prior to the date of the examination for registration as a registered veterinary technician.

(hi) The directed clinical practice required in subsection (g) shall have provided the applicant with knowledge, skills, and abilities in the areas of communication with clients, patient examinations, emergency procedures, laboratory procedures, diagnostic imaging, surgical assisting, anesthesia, animal nursing, nutrition, dentistry, animal behavior, and pharmacology. The supervising veterinarian(s) shall complete a check list attesting to proficiency in specific skill areas within the preceding categories.

Note: Authority cited: Section 4808, Business and Professions Code. Reference: Section 4841.5, Business and Professions Code.