



MEMORANDUM

DATE	October 15, 2020
TO	Multidisciplinary Advisory Committee (MDC)
FROM	Leah Shufelt, RVT Jamie Peyton, DVM
SUBJECT	Agenda Item 8. Discussion and Potential Recommendation Regarding Foreign Educated or Experienced Applicants for Veterinary Technician Registration

Background

During the July 2020 MDC meeting, the MDC received a request to look into a pathway for foreign candidates to become California registered veterinary technicians (RVTs). This request also was brought up during the July 2020 Veterinary Medical Board (Board) meeting, and the Board agreed to have the MDC look into this issue and provide recommendations to the Board.

MDC Chair, Kristi Pawlowski, RVT, created a Subcommittee to research this topic further and lead the discussions during MDC meetings. Ms. Shufelt and Dr. Peyton were appointed to this Subcommittee.

Subcommittee Deliberation and Plan

The Subcommittee met with the Board’s Executive Officer and a representative from the California Registered Veterinary Technicians Association (CaRVTA) to discuss the goals of the Subcommittee and determine the best plan of action.

The Subcommittee initially discussed whether Business and Professions Code (BPC) section [4841.5](#), subdivision (b)(1) would allow the Board to determine education and experience equivalency on a case-by-case basis by having RVT candidates appear before the Board during a Board meeting. BPC section [4841.5](#) provides that to be eligible to take the written and practical examination for RVT registration, the applicant must be 18 years of age and furnish satisfactory evidence of graduation from a two-year curriculum in veterinary technology, as specified, or the equivalent of graduation through a combination of education and clinical practice experience as determined by the Board.

As discussed further below, the Board has already determined through regulation the education and clinical practice experience equivalent of graduation (California Code of Regulations (CCR), title 16,¹ § [2068.5](#)); there is no provision authorizing or requiring an RVT candidate to appear before the Board during a public meeting for the purpose of determining the candidate’s eligibility.

¹ All references to sections of the CCR refer to sections under CCR, title 16.

The Subcommittee and CaRVTA discussed whether current RVT experience and education regulations could be used to find a pathway to RVT registration for foreign candidates or whether a new regulation may be necessary. Further, the Board's regulations were discussed to see if a foreign candidate could apply for registration under current regulations. Relevant regulatory provisions include:

- CCR section 2065 Minimum Requirements for Approved Schools or Degree Program
Subsection (f), paragraph (1) requires the faculty of a school or degree program seeking Board approval to include a California-licensed veterinarian employed by the program, and paragraph (3) requires the program director to hold a California license as a veterinarian or a registration as an RVT.
- CCR section 2066 Out of State Schools
Subsection (a) provides that candidates who have completed a course of study at a school or degree program located outside of California and accredited by the American Veterinary Medical Association (AVMA) shall be deemed to have completed the equivalent of a two-year curriculum in veterinary technology.

Subsection (b) provides that candidates who obtained their minimum educational requirements from a school or degree program located outside of California and not approved by the Board shall demonstrate to the Board that: (1) the education they have received is equivalent to educational requirements of CCR section 2065, subsections (a) and (b); and (2) the school or degree program has been approved by a state licensing body in the United States (U.S.), Canadian province or U.S. or Canadian territory. The burden to demonstrate educational equivalency is upon the candidate.

- CCR section 2068.5 Practical Experience and Education as Equivalent Curriculum
This section establishes the equivalent of graduation from a two-year curriculum referred to in BPC section 4841.5; subsection (g) requires the candidate to complete 4,416 hours of clinical practice under the direct supervision of a California-licensed veterinarian.
- CCR section 2068.6 Out of State Registration as Equivalent
For state examination eligibility using out-of-state registration, those applicants were required to be licensed, certified, or registered as a veterinary technician in the U.S., Canada, or U.S. territory in good standing, and have completed 4,416 directed clinical practice hours under direct supervision of a veterinarian in the U.S., Canada, or U.S. territory.

The Subcommittee discussed creating education and experience checklists for Board staff to individually review RVT applicants against the existing regulatory requirements for out-of-state candidates. The Subcommittee further discussed researching what pathways other states may have for foreign candidates. The Board's Executive Officer will research other states provisions for foreign candidates and report back to the MDC.

At this time, it appears there are only a small number of candidates who would benefit from an additional pathway. However, the Subcommittee is unsure of the actual numbers of such candidates. In addition, the AVMA also may be working on a pathway for foreign RVT candidates; the Subcommittee will need to research this further. It is also important to note that any potential regulatory amendments regarding foreign RVT candidate education and experience should be reviewed with the Board's current rulemaking proposal regarding the same topic.

Next Steps

- Determine the number of applicants that this may involve.
- Reach out to AVMA for their input on foreign RVT candidates and how they are working with them.
- Reach out to the American Association of Veterinary State Boards (AAVSB) to research how other states may be working with foreign RVT candidates.

The Subcommittee will continue to research the topic and bring updated information and possible recommendations for MDC consideration at its January 2021 meeting.