



MEMORANDUM - REVISED

DATE	October 22, 2020
TO	Veterinary Medical Board
FROM	Tara Welch, Board Counsel, Attorney III Department of Consumer Affairs, Legal Affairs Division
SUBJECT	Agenda Item 9.E. Section 2038.5, Article 4, Division 20, Title 16 of the California Code of Regulations (CCR) Regarding Animal Physical Rehabilitation

Background

Note: For more detailed background and links to all past meeting materials regarding this issue, see Attachment 1.

Beginning in 2011, the Veterinary Medical Board (Board) and Multidisciplinary Advisory Committee (MDC) began discussing the expanding veterinary specialty of animal rehabilitation (AR). Discussions included: the definition of AR; the regulation of AR; who may perform AR; and the level of supervision required when AR is not performed by a veterinarian. In response to these discussions, proposed regulatory language was considered and approved by the Board in 2013.

At the [January 20](#) and [April 28, 2015](#) Board meetings, revisions to the proposed language were considered and approved by the Board, which resulted in the original proposed regulatory action being published by the Office of Administrative Law (OAL) on July 17, 2015. However, in response to comments received during the 45-day public comment period, testimony provided at the September 10, 2015 public hearing, and several policy and legal issues raised during that time, the Board voted to [withdraw](#) the proposed regulations from OAL at its [October 20, 2015](#) meeting. Additionally, the Board voted to refer the issue back to the MDC in order to: re-address the definition of AR; address minimum education requirements and level of supervision required for individuals performing AR; discuss the premises permit requirement whenever veterinary medicine is being practiced; and address barriers and the issue of physical therapists being exempt from licensure by the Board.

At its [January 19, 2016](#) meeting, the MDC discussed the issue but refrained from further action until recommendations were provided as a result of the Board's Sunset Review process. At its [April 20, 2016](#) meeting, in response to the California State Legislature's recommendation, the Board voted to create the Animal Rehabilitation Task Force (Task

Force), which was comprised of a diverse group of stakeholders and representatives. The Task Force's objective was to develop and provide a recommendation to the Board regarding an approach to regulating individuals who provide AR. The Task Force met on [June 20, 2016](#), [October 4, 2016](#), and [February 2, 2017](#).

At its [April 19, 2017](#) meeting, the Board reviewed and voted on each of the recommendations proposed by the Task Force. At its [July 26, 2017](#) meeting, the Board voted on an additional provision, requiring that a veterinary assistant (VA) be under direct supervision of a veterinarian if they are delegated to provide animal physical rehabilitation (APR). At its [October 18, 2017](#) meeting, the Board voted on final language to again be published by OAL for a 45-day public comment period.

In response to the Board's latest proposed rulemaking, on February 16, 2018, [Assembly Bill \(AB\) 3013](#) (Chu, 2018) Veterinary medicine: animal physical rehabilitation was introduced. This bill, with subsequent amendments on April 2 and April 17, 2018, proposed to codify the Task Force's recommendations and:

- authorize a licensed physical therapist with a Board issued certificate in APR to provide APR to an animal if certain requirements were met, including that the APR is performed in certain settings and under the supervision of a supervising veterinarian;
- authorize an APR assistant working under the direct supervision of a supervised physical therapist to assist with delegated APR tasks if certain conditions were met;
- require the Board to create an application form for APR certification and facilities and determine the application process for the APR certificate;
- require an APR facility to be registered with the Board and pay a registration fee;
- require the Board and the Physical Therapy Board of California, in cooperation, to determine the qualifications necessary for a physical therapist to receive an APR certificate issued by the Board, as provided, and authorize the Board to charge a fee for issuance and renewal of a certificate;
- provide that a supervised physical therapist with an APR certificate or an APR assistant is solely liable for any delegated APR tasks and remove any liability of the supervising veterinarian for APR performed by the supervised physical therapist or APR assistant; and
- authorize the Board to discipline a supervised physical therapist with an APR certificate.

At the Board's [May 23, 2018](#) meeting, it was reported that the Board's Executive Committee had adopted an opposed position on AB 3013 and submitted an opposition letter. Additionally, it was explained that the bill would have created a significant fiscal impact to the Board and mandated that the Board provide accreditation services, inspections, and to register APR premises. In the California State Assembly Committee on Appropriations analysis of AB 3013, the fiscal impacts of AB 3013 to both the Board and the Physical Therapy Board of California were described as follows:

- 1) Costs to the Physical Therapy Board within the Department of Consumer Affairs (DCA) in the range of \$100,000 for two years for licensing, enforcement, and administrative workload (Physical Therapy Fund).

2) Costs to the Veterinary Medical Board as follows, assuming about 250 individuals register (all costs are VMB Contingent Fund):

a) One-time costs in the range of \$600,000 for examination development, information technology, and potential facilities costs to house additional staff.

b) Ongoing costs in the range of \$125,000 annually for registration, enforcement, examinations, and information technology.

c) Fee revenue is uncertain. If 250 individuals registered, the fee would be \$1,000 every two years to support ongoing costs. One-time costs could be covered by a special fund loan if funds area [sic] available, but fees would need to increase even further to pay back the loan. (Assem. Com. on Approps., Analysis of AB 3013 (2017-2018 Reg. Sess.), as amended Apr. 17, 2018, p. 1.)

At the Board's [August 29, 2018](#) meeting, it was reported that AB 3013 had died in committee.

In early 2019, the Board's new rulemaking package was submitted to DCA for the initial phase of review. After approval by the DCA Legal Affairs Division, Budget Office, DCA Director, and Business, Consumer Services, and Housing Agency, the package was submitted to OAL on March 3, 2020, and [published](#) on March 13, 2020. The 45-day public comment period began on March 13, 2020, and ended on April 27, 2020. During the 45-day public comment period (March 13 through April 27, 2020), the Board received:

- 38 comments/letters in **SUPPORT** of the regulatory proposal (**Attachment 2**).
- 146 comments/letters in **OPPOSITION** of the regulatory proposal (**Attachment 3**).
- A [petition](#) by the California Association of Animal Physical Therapists/Animal Physical Therapy Coalition in **OPPOSITION** to the regulatory proposal, signed by 4,117 individuals (at the time of submittal to the Board on April 13, 2020) (**Attachment 4**).
- 1 comment/letter regarding a wildlife rehabilitation exemption (**Attachment 5**).

Between April 28, 2020 and August 12, 2020, the Board received additional public comment (**Attachment 6**). During the Board's [August 13, 2020](#) meeting, the Board held a hearing on the APR rulemaking pursuant to a March 12, 2020 public request for hearing. On the day of the Board meeting, the Board received additional public comment on the proposed rulemaking (**Attachment 7**). The Board also received additional public comment after the August 13, 2020 hearing (**Attachment 7**).

Summaries of and Proposed Responses to Objections to the Proposal

In accordance with Government Code section [11346.9](#), subdivision (a)(3), the Board, in its final statement of reasons supporting the rulemaking, must summarize each objection or recommendation made regarding the specific adoption, amendment, or repeal proposed, together with an explanation of how the proposed action has been changed to accommodate each objection or recommendation, or the reasons for making no change.

Although the Board approved responses to many of the objections to and recommendations on the proposal, the Board received several comments during and after the hearing that should be included in the responses. The proposed responses to the summaries provided below include the additional public comments received on the rulemaking and revise the prior responses to simplify and clarify the responses. The Board is asked to review the proposed responses below for inclusion in the Board's final statement of reasons for this rulemaking.

- 1. Veterinary Medicine Practice Act (Practice Act) does not authorize veterinarians to practice physical therapy.** The California Association of Animal Physical Therapists (CAAPT) and the Animal Physical Therapy Coalition (APTC), in opposition to the rulemaking, argue that BPC section [4826](#) does not authorize licensed veterinarians to practice physical therapy or provide physical therapy modalities. Opponents assert that physical therapy is not defined in the Practice Act; rather, physical therapy is defined only in the Physical Therapy Practice Act (BPC § 2620, subd. (a)). As such, opponents argue that while veterinarians can diagnose a condition and prescribe physical therapy or APR under the Practice Act, they must refer the animal patient to a physical therapist to administer physical therapy or APR pursuant to the Physical Therapy Practice Act.

Proposed Response: Opponents' assert that because "physical therapy" is only defined in the Physical Therapy Practice Act and not under the Practice Act, only physical therapists can administer physical therapy or APR treatment to animals; however, that argument is not supported by statute. Opponents cite to BPC section [2620](#), subdivision (a), which defines physical therapy for purposes of the Physical Therapy Practice Act and licensure of individuals performing physical therapy thereunder. However, BPC section [2620](#), subdivision (b) states that: "Nothing in this section shall be construed to restrict or prohibit other healing arts practitioners licensed or registered under this division from practice within the scope of their license or registration." The division referenced in that statute is Division 2 of the BPC. Veterinary medicine practitioners are healing arts practitioners who are licensed, registered, and permitted under the Practice Act, established in Chapter 11 under Division 2. Accordingly, BPC section 2620 does not apply to healing arts practitioners licensed, registered, or permitted under Division 2, Chapter 11, Veterinary Medicine.

Further, BPC section [4826](#), subdivision (b) authorizes diagnosing and prescribing treatment of whatever nature on an animal, and subdivision (c) authorizes administering treatment of whatever nature to an animal; in both subdivisions, the California State Legislature included physical therapy and APR within the broad scope of the phrase "of whatever nature." Support for this interpretation comes directly from the California State Legislature. The Assembly Committee on Business and Professions of the California State Legislature analyzed Assembly Bill (AB) 3013 (Chu, 2018) and stated:

In California, only licensed veterinarians may provide veterinary medicine to an animal for a wound, fracture, and bodily injury, which includes all treatment, including physical therapy, except that [registered veterinary technicians (RVTs)] and unlicensed veterinary assistants may treat animals under a veterinarian's

supervision. (Assem. Com. on Bus. and Prof., Analysis of AB 3013 (2017-2018 Reg. Sess.), as amended Apr. 2, 2018, p. 5.)

The Assembly Committee analysis clearly states that current law authorizes only licensed veterinarians, or individuals performing under a veterinarian's supervision, to perform physical therapy on animals. AB 3013 would have enacted a certificate program administered by the Board through which physical therapists could provide APR to an animal patient if certain requirements were met, including that the APR was performed at a premises registered with the Board and the physical therapist worked under the supervision (direct or indirect, as determined by the veterinarian) of a licensed veterinarian who had an established veterinarian-client-patient relationship (VCPR) with the animal, among other things. AB 3013 was sponsored by APTC, one of the groups making the opposition argument against this rulemaking that the scope of BPC section [4826](#) does not authorize veterinarians to perform physical therapy. (Assem. Com. on Bus. and Prof., Analysis of AB 3013 (2017-2018 Reg. Sess.) as amended Apr. 2, 2018, p. 8.) Given APTC's sponsorship of and involvement in AB 3013, APTC already knows the Legislature's intended scope of practice of veterinary medicine provided in BPC section [4826](#) includes physical therapy and APR.

More recently, the Background Paper for the Joint Sunset Review Oversight Hearing, March 17, 2020, of the California State Assembly Committee on Business and Professions and California State Senate Committee on Business, Professions and Economic Development reiterated that only California licensed veterinarians, or individuals performing treatment under veterinarian supervision, may provide physical therapy to animals under the Practice Act:

Under current California law, only licensed Veterinarians may provide veterinary medicine to an animal for a wound, fracture, and bodily injury, which includes all treatment, including physical therapy. In some instances, RVTs and VAs may treat animals under a veterinarian's supervision. (Assem. Com. on Bus. and Prof. and Sen. Com. on Bus., Prof. and Econ. Dev., Background Paper for Joint Sunset Review Oversight Hearing, Mar. 17, 2020, p. 23.)

Accordingly, the argument that BPC section [4826](#) does not authorize a veterinarian to practice physical therapy on animals is inconsistent with the California State Legislature's own interpretation of the scope of veterinary medicine in this statute. The Practice Act does authorize veterinarians to perform physical therapy on animal patients.

Further, the Physical Therapy Practice Act only authorizes licensed physical therapists to perform physical therapy treatment on a person, not an animal. (BPC § [2620](#).) The limitation of a physical therapist's ability to treat animal patients was discussed in the Assembly Committee on Business and Professions analysis of AB 3013:

Currently, a licensed PT who wants to perform physical therapy on an animal must pursue additional licensure as a veterinarian, pursue registration as RVT, or work under the direct supervision of a licensed veterinarian as a veterinary assistant.

Direct supervision means the supervising veterinarian is on-site, is readily available, and performs necessary examinations on the animal patient. (Assem. Com. on Bus. and Prof., Analysis of AB 3013 (2017-2018 Reg. Sess.) as amended Apr. 2, 2018, p. 6.)

Similarly, the Background Paper for the Joint Sunset Review Oversight Hearing, March 17, 2020, of the California State Assembly Committee on Business and Professions and California State Senate Committee on Business, Professions and Economic Development reiterated the limitations of a licensed physical therapist to treat animal patients as follows;

Therefore, if a licensed Physical Therapist wants to perform physical therapy on an animal, the PT must pursue additional licensure as a Veterinarian or RVT, or work under the supervision of a Veterinarian. (Assem. Com. on Bus. and Prof. and Sen. Com. on Bus., Prof. and Econ. Dev., Background Paper for Joint Sunset Review Oversight Hearing, Mar. 17, 2020, p. 23.)

As explained by the California State Legislature, the authority to perform physical therapy treatment on an animal patient comes from licensure under the Practice Act, not licensure under the Physical Therapy Practice Act. Accordingly, opponents' assertion that a veterinarian must refer an animal patient to a licensed physical therapist to perform physical therapy is not supported by law or the California State Legislature's interpretation of the Practice Act.

- 2. Proposed APR regulation violates the Administrative Procedure Act (APA) and improperly attempts to enlarge scope of Practice Act.** Opponents assert that Government Code section [11349.1](#) requires the Office of Administrative Law (OAL) to review regulatory proposals to determine whether they comply with statutory standards set forth in Government Code section [11349](#), which requires the proposed regulation to be reviewed for consistency (in harmony with and not in conflict) with existing statutes, court decisions, or other provisions of law. Opponents argue that the proposed APR regulation fails to comply with the APA because the proposal enlarges the scope of the Practice Act as specified in BPC section [4826](#) and, therefore, is inconsistent with existing statutes.

Proposed Response: BPC section [4825](#) requires a Board-issued veterinarian license to practice veterinary medicine. BPC section [4826](#) defines the practice of veterinary medicine to include diagnosing, prescribing, or administering treatment of whatever nature for the prevention, cure, or relief of a wound, fracture, bodily injury, or disease of an animal. BPC section [4826](#), subdivision (c) authorizes an individual who does not have a Board-issued veterinarian license to perform those acts at the direction of and under the direct supervision of a Board-licensed veterinarian.

As discussed above, the California State Legislature provided a broad scope of treatment under BPC section [4826](#) a veterinarian may provide to animal patients, which includes physical therapy. This broad scope was recently described in the Assembly Committee on Business and Professions analysis of AB 3013 and the

Background Paper for the Joint Sunset Review Oversight Hearing, March 17, 2020, to specifically include physical therapy. As such, the Board's proposed regulation addressing APR falls within the scope of veterinary medicine defined under BPC section [4826](#).

Further, the Assembly Committee on Business and Professions analysis of AB 3013, as quoted above, noted that a licensed physical therapist is required to pursue additional licensure as a veterinarian, pursue registration as an RVT, or work under the direct supervision of a licensed veterinarian as a VA. (Assem. Com. on Bus. and Prof., Analysis of AB 3013 (2017-2018 Reg. Sess.) as amended Apr. 2, 2018, p. 6.) That analysis refers to the Practice Act, which authorizes RVTs and VAs to perform specified animal health care services under the supervision of a veterinarian licensed or authorized to practice in California. (BPC § [4840](#).)

The Board is statutorily required to adopt regulations establishing animal health care tasks and an appropriate degree of supervision required for those tasks that may be performed only by an RVT or licensed veterinarian (BPC § [4836](#), subd. (a).) For animal health care tasks that may be performed by a VA as established by the Board, the appropriate degree of supervision by an RVT or licensed veterinarian over the VA to perform those tasks must be established and set at a degree higher than, or equal to, the degree of supervision required when an RVT performs the task. (BPC § [4836](#), subd. (b).)

The APR proposal clarifies that APR is an animal health care task that may be performed by an RVT or VA and the level of supervision required therefor. Since the California State Legislature has determined that physical therapy treatment on an animal patient falls within the scope of veterinary medicine practice provided in BPC section [4826](#), and because the APR rulemaking involves the practice of veterinary medicine through treatment on an animal patient, the Board's rulemaking is entirely consistent with, and not in conflict with or contradictory to, BPC section [4826](#). The rulemaking also is consistent with BPC sections [4836](#) and [4840](#) because it establishes a health care task (i.e., APR) that may be performed by an RVT or VA and clarifies the appropriate level of veterinarian supervision for an RVT or VA to perform that task.

- 3. Direct supervision not necessary when VCPR established.** Opponents assert that once the veterinarian has established a VCPR under CCR, title 16, section [2032.1](#), the veterinarian has sufficient knowledge of the animal to provide relevant information to a physical therapist with advanced certification in APR and then provide indirect supervision of the physical therapist providing services at an APR premises regulated by the Board. Opponents argue that direct supervision over a physical therapist is unnecessary. According to opponents, the veterinarian has sufficient information to communicate to the physical therapist, who would establish a treatment plan and perform physical therapy on the animal patient.

Opponents further contend that the veterinarian and physical therapist have a symbiotic relationship in that each can provide services the other cannot; the veterinarian performs a thorough examination of the animal and determines a

diagnosis, and the physical therapist establishes a treatment plan and performs modalities not included in the Practice Act consistent with advanced training and experience.

Proposed Response: As discussed above, opponents' contention that only a physical therapist, not a veterinarian, can perform physical therapy on an animal patient is not supported by law or legislative history. The California State Legislature crafted the Practice Act broadly enough to include physical therapy within the treatment a licensed veterinarian, or an individual supervised by the veterinarian, can provide to an animal patient, and recent legislative history supports this interpretation. Thus, the symbiotic relationship opponents describe is statutorily prohibited. Rather, the licensed veterinarian is responsible for diagnosis, prescription, and treatment of animal patients receiving physical therapy treatment.

Further, a physical therapist cannot establish a treatment plan for performance of APR on an animal patient. Although physical therapists licensed by the Physical Therapy Board of California are authorized to prepare a plan of care for a human patient (BPC § [2620.1](#), subd. (a)(4)), physical therapists are not statutorily authorized to practice veterinary medicine, including preparing a treatment plan and performing physical therapy treatment. For animal patients, the veterinarian must establish a VCPR to diagnose and treat the animal patient.

To establish the VCPR, CCR, title 16, section [2032.1](#), subsection (b)(3) requires the veterinarian to communicate with the client a course of treatment appropriate to the circumstance. As such, the veterinarian is required to advise the client the specific physical therapy treatment appropriate for the animal patient's medical condition, before the animal patient could be evaluated by a physical therapist to perform the course of treatment. In addition, CCR, title 16, section [2035](#) requires the supervising veterinarian of an RVT, permit holder, or VA to make all decisions relating to the diagnosis, treatment, management, and future disposition of the animal patient. This requirement reiterates that the supervising veterinarian must prepare the treatment plan for the animal patient. Opponents' proposal to allow the physical therapist to establish the treatment plan conflicts with existing regulation.

In addition, opponents assert that indirect supervision is the appropriate level of supervision to apply to physical therapists performing APR. Yet, these opponents also recommend using the last Task Force recommendation (discussed further below). However, the last Task Force recommendation did not recommend indirect supervision; rather, the recommendation would have left the level of required supervision, direct or indirect, up to the supervising veterinarian. Thus, opponents' assertion that indirect supervision is the correct level of supervision does not comport with their recommendation to implement the Task Force recommendation.

It also is important to note that existing law, BPC section [4826](#), requires direct supervision of an unlicensed person performing animal health care tasks. Direct supervision, as defined by CCR, title 16, section [2034](#), subsection (e), requires the supervising veterinarian to be physically present at the location where animal health

care job tasks are to be performed and be quickly and easily available. Notably, this definition does not require the supervising veterinarian to be looking over the shoulder of the individual performing the health care job task as opponents asserted during the August 13, 2020 hearing; however, the supervising veterinarian would be immediately available if a medical issue arose during treatment.

At the Board's August 13, 2020 APR hearing, supporters of the bill stressed the importance of having a veterinarian on-site when APR is performed on the animal patient. One supporter noted that, while a physical therapist could check an animal patient's heart rate, under current law, they could not diagnose heart problems. Rather, when the animal patient experiences a medical emergency during physical therapy treatment, such as vomiting, diarrhea, instability, or pain, the veterinarian would be able to diagnose and treat the animal patient immediately. There is ample support for the Board's rulemaking requiring direct supervision of unlicensed and unregistered individuals performing APR.

For all of these reasons, the Board's APR proposal requires direct veterinarian supervision over physical therapists not otherwise licensed or registered with the Board. The APR proposal is consistent with the Practice Act and specifically, BPC section [4826](#), subdivision (c), by requiring direct supervision of the performance of APR by an individual not licensed or registered (i.e., a VA) with the Board. The proposal also is consistent with BPC sections [4836](#) and [4840](#), which authorize or require the Board to adopt regulations establishing animal health care tasks and an appropriate degree of supervision required for those tasks that may be performed by a VA or only by an RVT or licensed veterinarian.

- 4. Proposed regulation will force physical therapist practices to close and result in significant adverse impact on physical therapists; APR is being monopolized by the veterinary profession; proposed regulation is a restraint of trade and violates anti-trust laws.** Opponents allege that if this proposed regulation is enacted, several established APR practices will no longer be allowed to exist and will be forced to close. Opponents assert that the regulation will have a severe adverse impact on physical therapists, as job opportunities and the ability to earn a living will be dramatically reduced.

Opponents further assert that the proposal is an attempt by the veterinary profession to monopolize APR services, when some veterinarians do not even have time or the ability to provide APR services, and would mandate that qualified physical therapists work under direct supervision and only on a veterinary premises. Opponents argue that this limits the practices of physical therapists, prevents talent from entering the profession, and subjects those individuals to lower pay. Opponents assert that the rulemaking will result in appropriately certified/licensed physical therapists not being recognized as legitimate providers of APR services. Opponents allege that veterinary practices are unable to sustain employment of a physical therapist due to the expense, and not all animals require such care by a physical therapist. Opponents further assert that the proposal is an unlawful attempt to restrain trade in violation of anti-trust laws.

Proposed Response: Opponents' contention that there are APR practices that currently operate without a supervising veterinarian does not recognize that physical therapists currently are not statutorily authorized, under either the Practice Act or the Physical Therapy Practice Act, to practice veterinary medicine, including physical therapy, on animal patients unless they are a licensed veterinarian or directly supervised by a licensed veterinarian.

The California State Legislature has clearly articulated in the Practice Act that the practice of veterinary medicine on animals requires licensure as a veterinarian and includes, among other things, diagnosing, prescribing treatment of whatever nature, and administering treatment of whatever nature for the prevention, cure, or relief of a wound, fracture, bodily injury, or disease of animals. (BPC § [4826](#), subds. (b), (c).) Further, the Physical Therapy Practice Act only authorizes a licensed physical therapist to perform treatment on a person, not an animal. (BPC § [2620](#).) Accordingly, a physical therapist, who is not a licensed veterinarian or RVT, may administer APR treatment to an animal as a VA and only at the direction of and under the direct supervision of a licensed veterinarian. (BPC § [4826](#), subd. (c).)

Opponents argue the APR proposal is an attempt by the veterinary profession to monopolize APR services and is an unlawful attempt to restrain trade in violation of anti-trust laws. However, as discussed above, the Physical Therapy Practice Act only authorizes a physical therapist to perform physical therapy on humans, and the Practice Act requires veterinarian licensure or supervision of a licensed veterinarian to perform physical therapy on animals. (BPC §§ [2620](#), [4825](#), [4826](#), subds. (b), (c).) Thus, both the Practice Act and Physical Therapy Practice Act inherently, logically, and ordinarily result in the displacement of licensed physical therapists from competing with licensed veterinarians in the practice of veterinary medicine and provision of APR treatment on animals. The State's policy is to place limitations on the treatment of animal patients. Examination of the Practice Act and Physical Therapy Practice Act makes clear that the State's policy expressed in those statutes, not the APR proposal, displace competition.

In addition, the California State Legislature has affirmatively expressed that performing physical therapy on an animal patient is included in the practice of veterinary medicine, and that a physical therapist who wants to perform physical therapy on an animal patient is subject to the limitations in the Practice Act. As previously noted, the California State Assembly Committee on Business and Professions analysis of AB 3013 stated that:

Currently, a licensed PT who wants to perform physical therapy on an animal must pursue additional licensure as a veterinarian, pursue registration as RVT, or work under the direct supervision of a licensed veterinarian as a veterinary assistant. Direct supervision means the supervising veterinarian is on-site, is readily available, and performs necessary examinations on the animal patient. (Assem. Com. on Bus. and Prof., Analysis of AB 3013 (2017-2018 Reg. Sess.), as amended Apr. 2, 2018, p. 6.)

The APR proposal continues the California State Legislature's statutory mandate and express policy that a licensed physical therapist, as an individual not licensed or registered by the Board, must work under the direct supervision of a licensed veterinarian. Thus, the APR proposal does not establish a new veterinarian monopoly on performing APR treatment or restrain trade. Rather, the Practice Act and Physical Therapy Practice Act, as enacted by the California State Legislature, already have established the limitations on the performance of APR by a licensed physical therapist.

Consequently, if an APR practice does not employ a licensed veterinarian to directly supervise the performance of APR by physical therapists, that APR practice is operating in violation of existing law. Further, opponents' argument that currently there are physical therapists operating a practice and/or performing physical therapy on animals without veterinarian supervision justifies the need to provide clarity in the regulations that physical therapy on animals or APR must be performed in accordance with the Practice Act enforced by this Board, not the Physical Therapy Board of California, which is only authorized to regulate physical therapy on persons.

- 5. Public not protected and public interest not served by proposed regulation; proposal limits access to quality animal care; proposal increases animal physical therapy costs to consumers.** Opponents assert that the public will not be protected because the proposed regulation does not require veterinarians, RVTs, or VAs to receive advanced certification in APR, or any training or certification at all. In addition, opponents assert the public interest is not served by the proposed regulation as consumer access to qualified/licensed animal care providers will be reduced and/or limited, rural areas will continue to be underserved, and consumers will seek unregulated services. Opponents contend that consumers and veterinarians need to have choices available for treatment of animal patients.

Proposed Response: The proposed regulation responds to the increased use of physical therapy on animals over the past 20 years. Since 2003, the Board has received five consumer complaints referred from the Physical Therapy Board of California involving the practice of physical therapy on animals. As more physical therapists are offering veterinary medical services they are not licensed to perform, the Board determined it necessary to provide specific regulation over the practice of APR to inform both consumers and practitioners of what practices under the Practice Act are allowed to be performed and by whom. Further, it is necessary to clarify that the practice of APR falls under the Board's jurisdiction, not the jurisdiction of the Physical Therapy Board of California.

The Board has been discussing the issues of performing physical therapy on animal patients for nine years, and it has become clear that physical therapists and consumers are unaware that physical therapists may only perform physical therapy or APR on animal patients under direct supervision of a licensed veterinarian. The need to clarify which professionals are authorized by law to perform APR and provide appropriate consumer protection in regulation was demonstrated during the August 13, 2020 hearing. One consumer expressed gratitude at having a veterinarian on-site, which saved the lives of three of their five animals that were experiencing additional

medical problems during physical therapy that the physical therapist could not diagnose, but the veterinarian was able to diagnose and treat quickly.

One supporter of the proposal noted the following situations that demonstrate the need for direct veterinarian supervision during physical therapy treatment as follows:

We've had patient seizures as they walk in the therapy room, we've had dogs collapse in the underwater treadmill, we've had dogs with congestive heart failure that the family thought were just having an off day, we've had a diabetic crisis and the family thought the dog had just played too hard the day before. If a vet had not been on-site with these pets and families, they would have suffered. [Physical therapists (PTs)] may be able to take a temperature, but they can't diagnose an irregular heartbeat or heart murmur, or check the blood pressure or a blood glucose on the patient.

...

Many pets who come to rehab are older and have multiple diseases and are on multiple medications, none of which a PT should have to manage. It's not fair to the pet, or the family, or the PT to not have a vet on-site to assist these patients that are panting, have blood in their urine, increased appetite, decreased water intake, have vomiting or diarrhea. We all address these on-site as they happen, so the pet does not have to suffer from delay in care, and the family does not have to suffer the frustration of trying to find a vet appointment in days, or as our current situation, sometimes weeks.

The Board's regulatory proposal does not place additional limitations on existing law or restrict consumer access to legitimate APR services and should not increase costs for APR. Rather, the APR proposal continues the California State Legislature's statutory mandate and express policy that a licensed physical therapist may perform APR treatment only under the direct supervision of a licensed veterinarian.

It is important to note that BPC sections [4836](#) and [4840](#) provide the Board with authority to establish health care tasks that may be performed by an RVT or VA and require the Board to set the appropriate level of veterinarian supervision for an RVT or VA to perform those tasks. The Board has established specific animal health care tasks that may be performed by an RVT under direct or indirect supervision. (CCR, tit. 16, § [2036](#).) Separately, the Board established that, subject to the restrictions listed in CCR, title 16, section [2036](#), VAs can perform only auxiliary animal health care tasks under direct or indirect veterinarian supervision or direct RVT supervision. (See CCR, tit. 16, § [2036.5](#).)

Although not specifically defined in regulation, auxiliary animal health care tasks are those tasks that can be performed by a lay person with low risk to the animal patient. The term "auxiliary animal health care tasks" was enacted in 1982, when the old comprehensive task lists for RVTs (previously titled animal health technicians (AHTs)) and VAs (previously titled unregistered assistants) were removed and replaced. (See

CCR, tit. 16, §§ 2036, 2036.5, Register 82, No. 43 (Oct. 23, 1982) pp. 166.2.6-7.) Before 1982, CCR, title 16, section 2036 listed the specific tasks an AHT could perform under immediate, direct, and indirect veterinarian supervision. Those lists were repealed and replaced with a smaller list of tasks that were prohibited from being performed by an AHT or that required direct or indirect veterinarian supervision, and left all other animal health care tasks up to the supervising veterinarian to determine the degree of supervision required, consistent with standards of good veterinary medical practices.

Separately, CCR, title 16, section 2036.5 was repealed and replaced to prohibit an unregistered assistant from performing the specific tasks that required direct or indirect supervision of an AHT as listed in CCR, title 16, section 2036, and authorized an unregistered assistant to perform only auxiliary animal health care tasks under direct or indirect supervision of a licensed veterinarian or direct supervision of an AHT. The 1982 amendments to CCR, title 16, sections 2036 and 2036.5 show the increased abilities for RVTs to perform animal health care tasks but also, the need to pare down the scope of animal health care tasks that could be performed by unregistered assistants for the safety of the animal patients.

Currently, the Board interprets APR to be outside the scope of an auxiliary animal health care task because of the higher risk it presents for the animal patient. VAs are not required to have Board licensure, or any formal education or training required for licensure, prior to performing auxiliary animal health care tasks. Accordingly, with respect to a VA's ability to perform APR, the level of supervision required to perform APR defaults to the direct supervision requirement for animal health care tasks established in BPC section [4826](#), subdivision (c). Thus, APR can be performed by a VA only under direct supervision.

As discussed further below, opponents, themselves, contend that APR requires highly trained, qualified, and skilled practitioners to provide this specialized service. The Board agrees with this contention in so far as APR is not an auxiliary animal health care task that can be performed by VAs under indirect veterinarian supervision. Due to the potential confusion regarding whether APR is an auxiliary animal health care task, the regulation is necessary to define APR and clarify who may perform APR treatment and the level of supervision required. In addition, consumers will be better informed as to which licensing entity has jurisdiction over the practice of APR on animals. The Board anticipates that the public and potential APR practitioners will benefit from this clarification.

- 6. APR Competency.** Opponents assert the regulatory proposal does not ensure educational competency of practitioners and that a true provision of consumer protection would include mandatory educational standards for all who practice APR, which opponents contend is a specialty not currently taught and tested for in veterinary or veterinary technician schools. Opponents argue that the proposed regulation asserts that a veterinarian is more knowledgeable and experienced in rehabilitation than an appropriately certified and licensed physical therapist. Opponents allege most veterinarians do not have the knowledge or skillset to provide physical rehabilitation

services and that veterinarians are no more qualified than human physicians to perform rehabilitation on their patients. Opponents contend that APR requires highly trained, qualified, and skilled physical therapists, who are the best possible providers of this specialized service.

Proposed Response: Opponents' argument that veterinarians are not educated or trained to perform APR does not take into account the breadth of the veterinary medicine that licensed veterinarians are authorized to practice. Unlike other health care professionals licensed under the BPC, such as dentists, chiropractors, physical therapists, ophthalmologists, and podiatrists, veterinarians are educated and trained, and subsequently licensed and authorized under the Practice Act, to perform all health care services on animal patients. While some veterinarians may not specialize in APR, the Practice Act authorizes only licensed veterinarians, or individuals supervised by licensed veterinarians, to perform APR treatment. (BPC §§ [4825](#), [4826](#), subd. (b); Assem. Com. on Bus. and Prof., Analysis of AB 3013 (2017-2018 Reg. Sess.), as amended Apr. 2, 2018, p. 5; Assem. Com. on Bus. and Prof. and Sen. Com. on Bus., Prof. and Econ. Dev., Background Paper for Joint Sunset Review Oversight Hearing, Mar. 17, 2020, p. 23.)

Opponents' assertion that highly trained, qualified, and skilled physical therapists are the best possible providers of a specialized service does not acknowledge the fact that the Practice Act does not authorize physical therapists to perform APR. Notably, opponents do not assert that every other veterinary medical specialty should be performed on animals only by individuals licensed to provide those specialized services to humans. Under the opponents' assertions, the entire Practice Act would need to be rewritten to accommodate all veterinary medicine specialties similar to how the BPC provides for human medicine. Until such time as the California State Legislature either authorizes human medicine practitioners to perform services on animals without veterinarian supervision or authorizes the Board to promulgate regulations to address these specialties, the Board is limited to promulgating regulations that specify the animal health care tasks that may be performed by non-veterinarians and the level of supervision necessary for those tasks. (See BPC § [4836](#).) The Board's proposed regulation does not go beyond what is already prohibited or authorized by statute.

Supporters and opponents alike acknowledge that APR needs to be addressed by law. Opponents' own argument that proper performance of APR requires education and training reiterates the need for direct veterinarian supervision of VAs performing APR. Again, the Board does not have statutory authority to promulgate regulations that would resolve opponents' desire to establish education and experience requirements for physical therapists who want to perform APR unsupervised. Authorizing physical therapists to perform APR would require a new license or certification, which would have to be created by the California State Legislature. To protect the health, safety, and welfare of consumers, the Physical Therapy Practice Act establishes licensing requirements, with experience, education, and accreditation requirements, to perform physical therapy on human patients. Similarly, statutory licensing requirements must be established for non-veterinarians to perform APR. The

Board does not have authority to create a new licensing scheme for the performance of APR by non-veterinarians, such as physical therapists, without appropriate veterinarian supervision.

Proposed Alternatives to the Regulation

In accordance with Government Code section [11346.9](#), subdivision (a)(4), the Board, in its final statement of reasons supporting the rulemaking, must make a determination with supporting information that no alternative considered by the Board would be more effective in carrying out the purpose for which the regulation is proposed, would be as effective and less burdensome to affected private persons, or would be more cost effective to affected private persons and equally effective in implementing the statutory policy or other provision of law. The Board also must explain the reasons for rejecting any proposed alternatives that would lessen the adverse economic impact on small businesses. (Gov. Code § [11346.9](#), subdivision (a)(5).)

Below are the alternatives proposed in the public comments received by the Board after submission of its Initial Statement of Reasons and the proposed Board determinations and explanations regarding those alternatives.

- 1. Task Force Recommendation.** Opponents assert that legitimate alternatives to the proposed regulation have not been considered and that the alternative recommended by the Task Force was not listed in the Notice of Proposed Regulatory Action. Opponents argue the Task Force had recommended an “indirect supervision” model that would have allowed licensed physical therapists with certification in APR to practice on their own premises under veterinarian direction and referral of the animal patient for APR, but not require that a veterinarian be on-site or be their direct employer.

Opponents contend the Board’s Task Force recommendation should be implemented instead of the proposed APR regulation. Opponents CAAPT and APTC assert:

At the February 2, 2017 Animal Task Force meeting, the Task Force approved the following language:

California licensed physical therapists with advanced certification in [APR] (with such certification to be defined by the Veterinary Medical Board and Physical Therapy Board working cooperatively) may provide [APR] under the degree of supervision to be determined by the veterinarian who has established a veterinarian-client-patient relationship, on a veterinary premises or an [APR] premises (as defined in regulation by the Veterinary Medical Board and the Physical Therapy Board working cooperatively), or a range setting.

This common-sense language does not conflict with the [Practice] Act. A [VCPR] must be established, which is vital and allows the veterinarian to manage the care provided to the animal. The veterinarian and physical therapist work together.

This language protects the public because in addition to the veterinarian establishing a VCPR, the physical therapist must obtain *advanced* certification in [APR]. The advanced training/certification would include courses that are approved by the Registry for Approved Continuing Education (RACE). The public is further protected by the Board's oversight of an APR premises license, for which the requirements are to be determined and defined by the Board working cooperatively with the Physical Therapy Board. The Board will ensure protection of the public by developing appropriate minimum standards for an APR premises. (Steven L. Simas, Esq., Simas & Associates, Ltd., letter to Board, Aug. 12, 2020, italics in original.)

Proposed Response: First, the Board does not have statutory authority to create education and experience requirements for physical therapists who want to perform APR. Rather, the Board has regulatory authority to specify animal health care tasks and the level of supervision required for RVTs and VAs to perform APR. (See BPC § [4836](#).) As such, all individuals who want to perform APR but who are not licensed or registered with the Board would be performing APR as VAs under the proposal. As argued by opponents, APR requires education and training, which supports the Board's proposal to require direct, not indirect, supervision over VAs performing APR.

Second, at the Board's July 26, 2017 meeting, the Board discussed the Task Force provision to authorize physical therapists with advanced certification in APR to perform APR on animals under supervision as determined by the veterinarian. The Board only has authority to enforce education and experience qualifications on individuals the Board licenses or registers, and the Board has no statutory authority to license or enforce such qualifications against physical therapists, who are licensed by the Physical Therapy Board of California. Thus, the Task Force provision to authorize physical therapists with advanced certification in APR was not included in the Board's proposed APR regulation, because it exceeded the Board's authority.

A statutory amendment to the Practice Act would be necessary to require qualifications compliance by physical therapists. Unless licensed as a veterinarian or registered as an RVT pursuant to the Practice Act, a physical therapist can only perform auxiliary animal health care tasks as a VA. In accordance with BPC section [4826](#), subdivision (c), which authorizes an RVT or VA to administer treatment of whatever nature for the prevention, cure, or relief of a wound, fracture, bodily injury, or disease of animals under the direct supervision of a licensed veterinarian, the proposed regulation would require direct veterinarian supervision of a VA to perform APR.

Third, opponents assert the public would be protected under the Task Force recommendation by the Board's oversight of an APR premises license. As with the physical therapist certification recommendation, the Board does not have statutory authority to license an APR premises as envisioned by opponents. BPC section [4853](#), subdivision (a) requires all premises where veterinary medicine is being practiced to be registered with the Board. To obtain a premises registration, a licensed veterinarian (the managing licensee) must be identified as the person who will be responsible for

maintaining the premises and ensuring the veterinary practice performed at the premises complies with all laws. (BPC §§ [4853](#), subdivision (c), [4853.5](#); CCR, tit. 16, § [2030.05](#).) To ensure compliance with the law for the safe provision of veterinary medical care at a veterinary premises, a managing licensee's veterinarian license is subject to discipline for failure to maintain the premises according to law. (BPC § [4883](#).)

However, the enforcement mechanisms for an APR premises with no managing licensee, operated by a physical therapist who is not licensed by this Board, would be insufficient to protect the public. Without a managing licensee, no premises registration could be issued or disciplined. The physical therapist operating the APR premises could only be cited, not formally disciplined, for the unlicensed practice of veterinary medicine. This result likely is not what opponents want and would not protect the public or animal patients. For all of these reasons, opponents' request to include the certification provisions of the Task Force recommendation falls outside the scope of the Board's statutory authority and would not ensure full compliance with the Practice Act and statutory premises registration requirements. Accordingly, opponents' request to include these Task force provisions in the proposal is rejected.

- 2. Other States and AB 3013.** Opponents argue that other states (i.e., Nevada, Utah, Colorado, and Oregon) have established APR in statute and created successful models for indirect supervision, providing for collaboration between license groups to the benefit of the pet-owning public. Opponents assert the Board should follow in the footsteps of these states. Opponents also stated that AB 3013 was a logical legislative solution in California that would have properly included physical therapists; but the bill had an inflated cost estimate.

Proposed Response: As mentioned above, the Board is authorized to promulgate regulations. However, the Board is unable to create a new APR certification because it does not have the authority to enact new statutes. Although the Board may propose legislative recommendations regarding the functionality of licensing and enforcement processes, the Board does not propose scope of practice legislation. Rather, individuals seeking to expand their scope of practice can submit legislative proposals to the California State Legislature for review and enactment.

It is important to note the current issue before the Board is whether physical therapists should be able to perform APR and under what level of supervision. Yet, opponents' arguments on this issue fail to recognize the other health care practitioners who are licensed to practice on humans but want to perform their respective speciality's treatments on animals. Submitting a legislative proposal to provide financial and professional benefits to one health care profession to the exclusion of all other health care professions is outside the scope of the Board's legislative mandate of protection of the public and animal patients. For these reasons, opponents' recommendation falls outside the scope of the Board's statutory authority and does **not** fall under the Board's mandate to ensure full compliance with the Practice Act. Accordingly, the Board is rejecting the request to pursue a legislative recommendation to create a new physical therapist certification.

- 3. Human Medical/Physical Therapy Model.** Opponents assert that the human medical model works well and does not require a primary care physician to be on location with a physical therapist. Opponents recommend the APR proposal utilize a similar model that would provide for indirect supervision of a physical therapist performing APR. Opponents contend that once a VCPR is established, direct supervision or having a veterinarian on premise is an unnecessary barrier. Opponents assert that a veterinarian can refer the animal patient to a physical therapist, who would prepare a treatment plan and perform APR under indirect supervision.

Proposed Response: The human medical model does not apply easily to the treatment of animals. Animals are unable to converse about their treatment plan or effectively communicate pain or discomfort from or during treatment. Providing APR under indirect supervision and without the presence of a licensed veterinarian places the animal patient in potential danger if the physical therapist is not well-versed in the potential complications and side-effects of APR for the specific animal patient.

Further, at the August 13, 2020 hearing, opponents requesting indirect supervision of physical therapists performing APR described a scenario where the veterinarian refers the animal patient to the physical therapist, who would prepare the treatment plan and performs APR at a location separate from the veterinarian. A treatment referral is a document that recommends a particular treatment, such as a physician providing a physical therapy referral to a human patient; the referral merely states the patient needs physical therapy but may not describe the specific methods to perform the physical therapy.

The Physical Therapy Practice Act allows a human patient to initiate physical therapy treatment directly from a licensed physical therapist without initial evaluation by a physician. (BPC § [2620.1](#), subds.(a), (c)(1).) Physical therapists are required within 45 calendar days or 12 visits, whichever occurs first, to receive from a California licensed physician a dated signature on the physical therapist's plan of care indicating approval of the physical therapist's plan of care. (BPC § [2620.1](#), subd. (a)(4).) Approval of the physical therapist's plan of care requires the physician to make an in-person patient examination and evaluation of the patient's condition and, if indicated, testing by the physician. (*Ibid.*) Thus, the human physical therapy model allows a patient to directly refer themselves to the physical therapist and follow up with a physician at a later time. Alternatively, the patient can be examined first by the physician, who then refers the patient to a physical therapist for treatment.

However, those referral and treatment statutes do not apply to treatment on animal patients. To treat animal patients, a licensed veterinarian first must establish a VCPR. (CCR, tit. 16, [2032.1](#).) Under CCR, title 16, section [2032.1](#), subsection (b)(3), the veterinarian is required to communicate with the client a course of treatment appropriate to the circumstance. This means before the client can be "referred" for physical therapy treatment of the animal patient, the veterinarian must provide the treatment plan to the client. As such, a physical therapist who is not a licensed veterinarian cannot create a treatment plan to perform APR on an animal patient.

Further, a physical therapist who is not a licensed veterinarian or RVT cannot treat an animal patient on the basis of a referral from a veterinarian under indirect veterinarian supervision. First, the Practice Act provides for employment of an RVT or VA by a licensed veterinarian or governmental agency which employs veterinarians. (BPC § [4940.9](#).) Yet, under opponents' referral model, the physical therapist would appear to not be employed by the referring veterinarian and, thus, could not be supervised, directly or indirectly, by the veterinarian.

Second, CCR, title 16, section [2034](#), subsection (f) defines "indirect supervision" to include when the supervising veterinarian is not physically present at the location where animal health care job tasks are to be performed but has given either written or oral instructions ("direct orders") for treatment of the animal patient. Notably, a referral is not considered "direct orders" in the veterinary profession; rather, veterinary referrals are used when an originating veterinarian advises the client to take the animal patient to another veterinarian for diagnosis and/or treatment of the animal patient.

On the other hand, direct orders, as required for indirect supervision, describe the specific actions to be performed to complete the animal health care task. Direct orders may be given to RVTs or VAs depending on the nature of the requests and the licensure and ability of the staff. Examples of direct orders are:

- Perform a CBC, blood chemistries, and Spec cPL.
- Take a right lateral and V/D Xray view of the abdomen.
- Give 100 mg of cefazolin intravenously TID.
- Place an IV catheter and administer LRS at a rate of 5ml/kg/ hour.
- Perform underwater treadmill exercise for 20min twice weekly, at 0% incline.
- Dispense 250 mg metronidazole, #20, one po BID.

Depending upon the competency of the individual, the veterinarian may determine whether direct or indirect supervision of the individual is required to perform these tasks. In order for a physical therapist to perform physical therapy or APR on an animal under indirect supervision as opponents have proposed, the physical therapist would have to receive direct orders for the specific APR treatments to be performed from the supervising veterinarian, who established the treatment plan for the animal patient. There is no law that authorizes a physical therapist to establish a treatment plan for animal patients. Thus, the concept of a physical therapist performing APR on the basis of a referral and indirect veterinarian supervision cannot be accomplished; the VCPR and indirect supervision regulations require the veterinarian to create the APR treatment plan with direct, specific orders for the performance of the APR treatment by the physical therapist.

In addition, subject to the restrictions listed in CCR, title 16, section [2036](#), VAs can perform only auxiliary animal health care tasks under direct or indirect veterinarian supervision or direct RVT supervision. (See CCR, tit. 16, § [2036.5](#).) Those tasks must

be performed in an animal hospital setting, defined to mean a premises registered with the Board. (CCR, tit. 16, §§ [2034](#), subs. (g), [2036.5](#).) Although not specifically defined in regulation, auxiliary animal health care tasks are those tasks that can be performed by a lay person with low risk to the animal patient. Currently, the Board interprets APR to be outside the scope of an auxiliary animal health care task because of the higher risk to the animal patient. VAs are not required to have Board licensure, or any formal education or training required for licensure, prior to performing auxiliary animal health care tasks. Supporters of the proposal noted that improper exercises or placement of a medical appliance can cause significant or permanent harm to the animal patient. Accordingly, with respect to a VA's ability to perform APR, the level of supervision required to perform APR defaults to the direct supervision requirement for animal health care tasks established in BPC section [4826](#), subdivision (c). Thus, APR can be performed by a VA only under direct supervision. As discussed above, the rulemaking is necessary to clarify that APR cannot be performed by a VA under indirect veterinarian supervision.

The proposal to adapt the human model of physical therapy referrals for APR does not ensure compliance with the Practice Act and supporting regulations and, therefore, is not effective in achieving the purpose of the APR proposal. The Practice Act and supporting regulations require direct orders, not referrals, to meet the indirect supervision requirement. Further, the BPC establishes licensing requirements and an enforcement scheme for health care professionals to protect consumer health, welfare, and safety. Although physical therapists are licensed by the Physical Therapy Board of California to perform physical therapy treatment on persons, physical therapists are not licensed by the Board to provide APR. As such, unless the physical therapist is licensed as a veterinarian or is an RVT, the physical therapist must be considered a VA under the Practice Act. The Board's proposal clarifies existing law and the California State Legislature's interpretation of that law, which requires a VA to be directly supervised by a veterinarian to perform animal health care tasks. For these reasons, the Board rejects the recommendation to use the human model for physical therapy referrals with indirect veterinarian supervision for the performance of APR by a physical therapist.

- 4. Wildlife Rehabilitation Exemption.** One individual submitted correspondence (**Attachment 5**) to the Board that wildlife rehabilitation remains a point of confusion – it is a very active field in this state and nearly 100,000 animals go through the hands of wildlife rehabilitators each year under permits from California Department of Fish and Wildlife (CDFW) and U.S. Fish and Wildlife Service (USFWS). The individual noted that there is nothing in the Board's rules that exempts these animals from falling under the proposed "physical rehabilitation" rules. The individual asked that the following text be considered for inclusion in the proposed rulemaking language: "This regulation does not apply to wild animals being rehabilitated under permits from CDFW and USFWS." The commenter further explained that wildlife in rehabilitation frequently need physical therapy prior to release, and neither domestic animal veterinarians nor RVTs are trained to do it.

Discussion: At the April 19-20 and July 26-27, 2017 meetings, the Board deliberated on the APR proposal, and at the October 18-19, 2017 meeting, the Board adopted the proposed language and directed Board staff to proceed with developing the regulatory package. To determine the most appropriate phrase to advise the public and practitioners of what activities the term encompassed, the Board considered using the term “animal rehabilitation.” Public comment noted the existing statutory term “wildlife rehabilitation” and the potential need to differentiate the term “animal rehabilitation” from “wildlife rehabilitation.” Government Code section [8670.61.5](#) defines “wildlife rehabilitation” to mean those actions necessary to fully mitigate for the damage from a spill caused to wildlife, fisheries, wildlife habitat, and fisheries habitat and is overseen by the CDFW. As the Board does not oversee wildlife rehabilitation, the proposal was revised from “animal rehabilitation” to “animal physical rehabilitation” to better differentiate the activities regulated by this proposal from “wildlife rehabilitation” activities regulated by CDFW.

In addition, the proposal requires a valid VCPR to be established prior to performing or authorizing APR. (Prop. CCR, tit. 16, § 2038.5, subs. (b).) A VCPR is not required for treatment of a wild animal. (CCR, tit. 16, § [2032.1](#), subs. (a).) Although the Board has attempted to limit the application of the APR proposal to non-wild animals by inserting the term “physical” into the term “Animal Physical Rehabilitation,” and the VCPR regulation does not apply to wild animals, the Board should consider whether the APR regulation should be clarified further to specifically exclude wild animals.

Potential additional subsection (f) to proposed CCR, title 16, section 2038.5:

(f) This section shall not apply to wildlife rehabilitation regulated by the United States Fish and Wildlife Service or the California Department of Fish and Wildlife.

5. **APR on Large Animals.** During the August 13, 2020 hearing, the Board received oral public comment that the APR proposal should provide different guidelines for small and large animals. Unlike rehabilitation for small animals that may be accomplished at a veterinary premises with the animal housed at home, large animal rehabilitation requires housing and treatment of the animals at large facilities. Typically, veterinarians are unable to treat large animals at a veterinary premises due to the size and number of large animal patients. Equine centers that receive large animals, such as Kentucky Derby race horses and Olympic jumpers, for rehabilitation are sent to those centers by veterinarians. Equine centers report they provide rehabilitation pursuant to veterinarian orders; however, the rehabilitation is not directly supervised daily by the referring veterinarian.

Discussion: During the August 13, 2020 hearing, Board members discussed the potential need to define rehabilitation on large animals separate from small animals. Board members also discussed why the proposal requires a veterinarian to directly supervise an RVT or VA performing APR on a small animal in a facility, but APR performed on a large animal at an equine facility or in a range setting could be

supervised with the veterinarian located further away because the proposed regulation only requires the veterinarian to be “in the general vicinity of the treatment area.”

As one Board member noted, most equine veterinarians do not have a standing practice (fixed veterinary premises) but, instead, travel from farm to farm, and track to track as a mobile veterinary practice. In those instances, veterinary staff work on one animal patient under veterinarian instructions, while the veterinarian goes to another area on the property to observe another animal patient. The farm or track is the location where the veterinarian and their team are working. If the veterinarian is on one end of the property a few acres away, veterinary staff performing APR are able to call the veterinarian.

The APR proposal would require direct veterinarian supervision of VAs performing APR. “Direct supervision” requires the supervisor to be physically present at the location where the animal health care job task is being performed and quickly and easily available. (CCR, tit. 16, § [2034](#), subs. (e).) To accommodate large animals receiving APR on a ranch or other large property, rather than at the veterinary premises, the current APR proposal would authorize VAs to perform APR in a range setting with the supervising veterinarian in the general vicinity. (Prop. CCR, tit.16, § 2038.5, subs. (d).)

Currently, the only reference in regulation to “in a range setting” is located in CCR, title 16, section [2038](#), which is applicable to musculoskeletal manipulation. The Task Force originally added the range setting provision at their October 4, 2016 meeting to address the scenario where there is no premises or building where the animal receives treatment. The proposal ultimately approved by the Board maintained the range setting provision as applicable to VAs.

Supervision of animal health care tasks performed in an animal hospital setting and in a range setting has evolved over time. Since at least 1977, the Board has recognized the different needs between small and large animal practice, the different locations where treatment must be performed, depending on the size of the animal, and the supervision required in each location.

“Direct supervision” previously was defined to mean “the supervisor is on the premises in an animal hospital setting or in the same general area in a range setting,” but was amended, instead, to mean “the supervisor is physically present at the location where animal health care job tasks are performed.” (CCR, tit. 16, § 2030, Register 79, No. 26 (June 30, 1979) pp. 166.2.1; CCR, tit. 16, § 2035, Register 79, No. 42 (Oct. 20, 1979) p. 166.2.6; CCR, tit. 16, § 2034, Register 2002, No. 23 (July 3, 2002).) The definition of direct supervision affects the supervision requirements for RVTs (previously named animal health technicians or AHTs). Prior to 2002, there were no provisions authorizing an AHT to perform animal health care tasks under direct or indirect supervision in a range setting; rather, AHTs were limited to performing tasks only in an animal hospital setting. “Animal hospital setting” means “all veterinary premises which are required by Section 4853 of the Code to be registered with the board.” Subsequently, CCR, title 16, section 2036 was revised to authorize RVTs to

perform specified procedures under direct, indirect, or direct or indirect supervision, without limitation on where, in an animal hospital or range setting, the task was performed. (CCR, tit. 16, § 2036, Register 82, No. 43 (Oct. 23, 1982) pp. 166.2.6-.7; CCR, tit. 16, § 2036, Register 2002, No. 23 (July 3, 2002).)

Although RVT supervision requirements have changed to no longer restrict RVTs to performing animal health care tasks in an animal hospital setting, the regulations applicable to VAs always have limited the performance of animal health care tasks to animal hospital settings. Current regulation only authorizes a VA in an animal hospital setting to perform auxiliary animal health care tasks under direct or indirect veterinarian supervision or direct RVT supervision. (CCR, tit. 16, § [2036.5](#).) Under BPC section [4826](#), the current statutory default supervision requirement over VAs performing APR is direct supervision.

As demonstrated by the over 40-year regulatory history of the term “direct supervision,” the Board has long recognized the differing needs between small and large animal practice and that treatment of the animal patient may occur at a registered premises, in an animal hospital setting, or at the location where the animal is housed, in a range setting. Under the existing definition of “direct supervision,” the veterinarian must be present at the location and quickly and easily available. That definition does not require the veterinarian personally to view the performance of an animal health care task and no longer differentiates between veterinary premises or the same general area in a range setting. Locations where the supervising veterinarian would be present could include, but not be limited to, a facility, farm, or ranch. As such, as long as the veterinarian is at the location, an identifiable property such as a farm or ranch, and the veterinarian is quickly and easily available to the VA performing APR, the direct supervision requirements can be met without separately providing for range settings.

Accordingly, the Board should consider whether the APR proposal needs to maintain the special provision for a “range setting.” A possible revision to address the issues raised is to remove the provision specific to a range setting, as follows:

Potential revision to Proposed CCR, title 16, section 2038.5:

(d) Veterinary assistants may perform APR under the direct supervision of a veterinarian. ~~If at the time the veterinary assistant is performing APR on an animal patient in a range setting, the supervising veterinarian shall be in the general vicinity of the treatment area.~~

Equine facility stakeholders also asserted that a veterinarian should be able to provide APR instructions to the individuals working at the equine facility, who would perform APR on the animal in accordance with those instructions but without the presence of the veterinarian. It is unclear in what capacity the individuals (as employees of an entity under contract with the animal’s owner or as agents of the animal’s owner) at the equine facility would be performing the treatment. However, public testimony made clear that equine facility staff receive the animal after it has been discharged from the

veterinarian; as such, the equine facility staff are not treating animals as VAs associated with the supervising veterinarian. Therefore, a regulation to authorize indirect supervision of a VA treating large animals would not apply to equine facility staff performing APR. Rather, the veterinarian must supervise the RVT or VA associated with the veterinarian and/or veterinary premises for the performance of APR. Thus, the Board must reject the recommendation to authorize indirect supervision over an individual performing APR who is not directly associated as an RVT or VA with the supervising veterinarian and/or veterinary premises.

Action Requested: The Board is asked to consider and approve proposed responses to written and oral comments received on the APR proposal for inclusion in the Board's final statement of reasons. The Board also is requested to discuss proposed revisions to address wildlife rehabilitation and APR performed on large animals.

If the Board agrees with the proposed responses to written and oral comments, please entertain a motion to approve the responses to written and oral comments for inclusion in the Board's Final Statement of Reasons in support of the APR rulemaking file.

If the Board determines modifications to the rulemaking text are necessary, please entertain a motion to approve the proposed modified text for a 15-day comment period, and if there are no adverse comments received during that 15-day public comment period, delegate to the Executive Officer the authority to adopt the proposed regulatory changes as modified, and delegate to the Executive Officer the authority to make any technical or non-substantive changes that may be required in completing the rulemaking file.

Attachments:

1. Past Meeting Dates when AR/APR was Discussed & Links to Meeting Materials and Minutes
2. 38 comments/letters in SUPPORT of the regulatory proposal
3. 146 comments/letters in OPPOSITION of the regulatory proposal
4. [Petition](#) by California Association of Animal Physical Therapists/Animal Physical Therapy Coalition in OPPOSITION to the regulatory proposal
5. One comment regarding wildlife rehabilitation exemption
6. Additional comments received after the close of the 45-day public comment period through August 12, 2020
7. Additional comments received on and after August 13, 2020, the day of the APR hearing
8. [Notice of Proposed Changes](#)
9. [Proposed Regulatory Language](#)
10. [Initial Statement of Reasons](#)
11. [Notice of Public Hearing](#)

**Past Meeting Dates when AR/APR was Discussed &
Links to Meeting Materials and Minutes**

August 29, 2018 - Board Meeting

[Agenda Item 7 K](#) - 2018 Legislation Report; Possible Action to Adopt Positions on Legislative Items / [AB 3013 \(Chu, 2018\)](#) Veterinary medicine: animal physical rehabilitation
[Meeting Minutes](#)

May 23, 2018 - Board Meeting

[Agenda Item 7K](#) - 2018 Legislation of Interest; Review and Possible Board Action to Adopt Positions on Legislative Bills / [AB 3013 \(Chu, 2018\)](#) Veterinary medicine: animal physical rehabilitation
[Meeting Minutes](#)

October 18, 2017 - Board Meeting

[Agenda Item 6B iv.](#) - Add Section 2038.5 to Article 4, Division 20, Title 16 of the CCR Regarding Animal Physical Rehabilitation
[Meeting Minutes](#)

July 26, 2017 - Board Meeting

[Agenda Item 7](#) - Review, Discussion, and Possible Board Action on Potential Legislation and Regulations Proposals Regarding Animal Physical Rehabilitation
[Meeting Minutes](#)

April 19, 2017 - Board Meeting

[Agenda Item 8A](#) - Review, Discussion, and Possible Board Action on Recommendations of the Animal Rehabilitation Task Force / Discuss Concepts for Possible Inclusion in Construct of Animal Physical Rehabilitation Legislation
[Meeting Minutes](#)

[February 2, 2017](#) - VMB Animal Rehabilitation Task Force Meeting

October 19, 2016 - Board Meeting

[Agenda Item 12](#) - Discussion and Consideration of Recommendation(s) from Animal Rehabilitation Task Force
[Meeting Minutes](#)

[October 4, 2016](#) - VMB Animal Rehabilitation Task Force Meeting

[Meeting Minutes](#)

July 20, 2016 - Board Meeting

[Agenda Item 9A](#) - Board Chair Report - Dr. Mark Nunez / Update on the Animal Rehabilitation Task Force
[Meeting Minutes](#)

June 20, 2016 - VMB Animal Rehabilitation Task Force Meeting
[Meeting Minutes](#)

April 20, 2016 - Board Meeting

[Agenda Item 7D](#) - Discussion and Potential Approval of Sunset Review Background Document and Joint Legislative Committee Recommendations / Discuss Composition of the Task Force to Examine Goals for Regulating the Practice of Animal Rehabilitation
[Meeting Minutes](#)

January 19, 2016 - MDC Meeting

[Agenda Item 5](#) - Discuss Draft Regulatory Language Regarding Animal Rehabilitation [California Code of Regulations, Title 16, Division 20, Section 2038.5]; Potential Recommendation to Full Board
[Meeting Minutes](#)

October 20, 2015 - Board Meeting

[Agenda Item 5C](#) - Proposed Regulations / Review Public Comments on the Animal Rehabilitation Regulations and Consider Modifications to the Proposed Language. [California Code of Regulations, Title 16, Division 20, section 2038.5]
[Meeting Minutes](#)

April 28, 2015 - Board Meeting

[Agenda Item 4E](#) - Proposed Regulations / Review Board Approved Language for Animal Rehabilitation and Discuss Justification for Rulemaking Documents
[Meeting Minutes](#)

January 20, 2015 - Board Meeting

[Agenda Item 4E](#) - Proposed Regulations / Review and Possible Approval of Updates to Approved Proposed Animal Rehabilitation Regulations
[Meeting Minutes](#)

April 24, 2013 - Board Meeting

January 30, 2013 - Board Meeting

**Title 16. Professional and Vocational Regulations Division
Division 20. Veterinary Medical Board
Article 4
Animal Physical Rehabilitation, § 2038.5**

45-Day Public Comment Period: March 13, 2020 through April 27, 2020

Christine Droessler <cmdroessler@gmail.com>
Mon 4/27/2020 3:20 PM

- DCA Director's Office; PT@DCA; Sotelo, Justin@DCA; Rodda, Timothy@DCA

Dear Mr. Sotelo and Mr. Rodda,

I am a concerned pet owner in California. I am submitting this letter to SUPPORT the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their pets and the California Veterinary Medical Board has pursued regulatory language to continue with the inclusion of licensed physical therapists wishing to provide services to animals. The ability to foster inter-professional relationships and collaborate is not currently hindered and the consumer's ability to access these professionals is not restricted.

The regulation of physical therapists is currently recognized as an 'unlicensed veterinary assistant' and subjects them to work under direct supervision of a veterinarian and in a veterinarian's hospital/clinic is in the best interests of consumer protection, harm reduction and patient safety. As a dedicated pet owner, I demand that my pet's veterinary care be directed by a DVM who is physically in the facility, determines who provides care and can oversee the level of supervision, monitor patient response to prescribed treatment, and respond to medical emergencies should they arise.

Respectfully,

Christine

Christine Droessler
cmdroessler@gmail.com

gmhead@gmail.com
Mon 4/27/2020 2:17 PM

- DCA Director's Office; PT@DCA; Sotelo, Justin@DCA; Rodda, Timothy@DCA

Client letter support regs.pdf
188 KB

Please see [attached](#) PDF

George Head
gmhead@gmail.com
510-305-2745

April 27, 2020

George Head
2603 Jacobs St
Hayward, CA 94541

California Department of Consumer Affairs

Attn: Justin Sotelo
Timothy Rodda

**RE: CONSUMER SUPPORT TO CA VMB ANIMAL PHYSICAL REHABILITATION
PROPOSED REGULATIONS**

Dear Mr. Sotelo and Mr. Rodda,

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Respectfully,



George M. Head

emailed to:

DCA.DirectorsOffice@dca.ca.gov
PT@dca.ca.gov
Justin.Sotelo@dca.ca.gov
Timothy.Rodda@dca.ca.gov

Sarah Endsley <sarahjoyendsley@gmail.com>
Mon 4/27/2020 1:44 PM

- DCA Director's Office; PT@DCA; Sotelo, Justin@DCA; Rodda, Timothy@DCA

[Client letter support regs.pdf](#)
63 KB

Hello,

Please see our [attached](#) letter in support for the Canine Rehab Regulations.

Many thanks,
Sarah and Nick Endsley

RE: CONSUMER SUPPORT TO CA VMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

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Respectfully,
Sarah and Nick Endsley

Priscilla Hoffnagle <hoffgar@gmail.com>
Mon 4/27/2020 11:00 AM

- Sotelo, Justin@DCA

[MullerLtrCanineRehabApril2020.pdf](#)
564 KB

RE: CONSUMER SUPPORT TO CA VMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

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Respectfully,

Priscilla Hoffnagle
5757 Westview Place
San Pablo, CA 94806

Katherine Bortoli <kbortoli@seiler.com>
Mon 4/27/2020 9:37 AM

- DCA Director's Office; PT@DCA; Sotelo, Justin@DCA; Rodda, Timothy@DCA

[Canine Rehab Regulations Support Letter.pdf](#)
71 KB

Hello,

Please accept the **attached** letter in support of the new regulations to allow physical therapists to provide veterinary patients.

Thank you,
Katherine Austin Bortoli

RE: CONSUMER SUPPORT TO CA VMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

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Respectfully,

Katherine Austin Bortoli

Chris McAdams <chris@jswinsurance.com>
Mon 4/27/2020 9:21 AM

- DCA Director's Office; PT@DCA; Sotelo, Justin@DCA; Rodda, Timothy@DCA
[Client letter support regs .pdf](#)
117 KB

Please see [attached](#).

Thank you,
Chris McAdams

RE: CONSUMER SUPPORT TO CA VMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

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Respectfully,



Trisha Graham <tacg73@gmail.com>
Mon 4/27/2020 12:20 AM

- DCA Director's Office; PT@DCA; Sotelo, Justin@DCA; Rodda, Timothy@DCA

Dear Mr. Sotelo and Mr. Rodda,

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Respectfully,

Trisha Graham
Concerned Pet Owner in California

Daniel Lanier <panthersice7@gmail.com>
Sun 4/26/2020 9:41 AM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA; VMB@DCA

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to SUPPORT the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals and my veterinarian should be able to continue this without interruption. The California Veterinary Medical Board's approach to support the current regulatory language and not include an exemption for licensed physical therapists who have undergone the necessary training on animals does not limit my choice of and access to these qualified and licensed animal care providers because they already exist in regulation.

By relegating licensed physical therapists who have been specifically trained on animals to an 'unlicensed veterinary assistant' and enforcing them to work only under the direct supervision of and for a veterinarian is consistent with previous collaborative approaches in human and animal healthcare.

The language adopted in this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF). The proposed language does not move to monopolize the market on animal health care and retains provisions to continue with the inclusion of licensed physical therapists (or other healthcare providers not regulated by the veterinary medical board). As a consumer, I want choice of and access to essential healthcare services for my pet with my veterinarian responsible for my pet's treatment.

Provision of consumer protection requires licensed professionals to retain enough knowledge and skill to safely deliver and prescribe treatment to reduce harm to the animal patient. I trust my veterinarian has the professional integrity to uphold their oath to 'do no harm' and retains educational standards for themselves and all who practice in the specialty niche of animal rehabilitation in their practice. The teaching and testing of the specialty of animal rehabilitation in veterinary or vet tech schools continues to grow and there is a growing number of veterinarians and veterinary technicians attaining additional credentialing endorsed by national organizations. The only way to ensure competency of all those who practice (physical therapist) on animals is to mandate proper training and licensing in veterinary medicine before being allowed to perform treatments on my pet. The proposed regulation preserves this for me and my pet's safety or protection.

I support these regulations because it preserves the safety of myself and my pet. My choice of and access to a qualified animal physical therapist, is not any more limited than it would be for any of the veterinary specialties. I do not believe requiring additional educational competency training outside of the current requirements for maintenance of licensure for any of the

practitioners who would be allowed to practice on my animal is necessary unless this is required for all of the branches of veterinary specialties (e.g. dentistry, surgery, internal medicine, emergency and critical care). It is unreasonable to require this of only one branch of veterinary medicine.

This has been going on for far too long and the failure of AB 3013 (Animal Physical Rehabilitation Bill of 2018) in the Appropriations committee revealed the intentions of the bill supporters, to practice on my animal without a licensed veterinary professional directly supervising my pet.

I urge you to put a stop to any regulatory efforts opposing the proposed changes and support the current language to protect my pet in California.

Sincerely,

Name: Daniel Lanier

Email address: PanthersIce7@gmail.com

Jon Klingborg <drklingborg@me.com>
Sun 4/26/2020 9:28 AM

- VMB@DCA; Sotelo, Justin@DCA; Rodda, Timothy@DCA

[APR Letter April 2020- Klingborg.pdf](#)
91 KB

Please accept my **letter** in Support of the proposed language for 2038.5.

Jon Klingborg, DVM

April 26, 2020

Dear Veterinary Medical Board:

As a member of the Multi-Disciplinary Committee for nine years, I've had a front row seat to the discussions surrounding Animal Physical Rehabilitation. I understand and respect the Board's important role in protecting the public and animals of California.

I support the language being considered for CCR 2038.5 Animal Physical Rehabilitation. It is important to note that this language has already been through three different deliberative vetting processes. Scores of hours of testimony, debate, discussion and committee work went into the language before the VMB. It began as work performed by an MDC SubCommittee and was refined by the VMB's Animal Rehabilitation Task Force. With the exception of the language pertaining to Veterinary Assistants, this language was also approved by the Veterinary Medical Board in April 2017.

Unfortunately, I understand that the need to codify this language in the Veterinary Practice Act creates a predictable opportunity for some individuals to attempt to "re-litigate" this issue. There has been a small vocal group who have advocated that the Veterinary Medical Board should create a new pathway for Physical Therapists to work on animals.

I will attempt to quickly address the most commonly made arguments against the proposed language that I've heard over the past decade and share some brief background.

Does this APR language unfairly exclude Physical Therapists from using their knowledge to help animals?

No. PTs are absolutely allowed to work on animals under direct veterinary supervision.

Remember: not even the Physical Therapists' *own practice act* gives them the authority to work on animals. Wouldn't you think that PTs should start with changing *their own practice act* before coming to the VMB? They haven't pursued this because APR is not a mainstream focus of the Physical Therapy profession. Instead, a small group has been driving this 'APR bus' for year.

Access Issues?

It has been stated that there is an Access issue that unfairly disadvantages animal owners seeking APR services (when APR is restricted to DVM supervision only.)

The reality is that in California there are *more* Veterinary practitioners* of Animal Physical Therapy than there are Veterinary Ophthalmologists, Cardiologists or Neurologists. *Clients aren't waiting for weeks to see a qualified veterinarian for APR services.*

(*Practitioners= Board Certified Specialists and/or DVMs with a certificate in Animal Physical Rehabilitation.)

There has never been any proof offered that there is an 'access' issue.

Moreover, Access is not the 'Mission' of a Licensing Board. The discussion in front of the Veterinary Medical Board is appropriately focused on maintaining a Minimum Standard of Care for patients and consumer protection.

"Follow The Income Stream"

It has been suggested that the VMB is simply trying to protect a veterinarian's 'income stream' when attempting to regulate APR.

What is ironic is that the most vocal advocates of additional certification programs and allowing PTs to provide off-site APR services are the same people who stand to benefit economically.

One of the strongest advocates for PTs is a veterinarian who manages a certification course in Colorado (\$7,500+ tuition for the program.) Another is a PT offering a 3 day APR workshop for \$1200/person.

These 'certification' courses are unaccredited and not overseen by *any* governing educational Body. Two years ago, this was pointed out and they were "looking into becoming accredited. This still hasn't happened.

Yes, 'income stream and conflict-of-interest' are clearly evident . . . 'nuff said.

The Aggregate

A lot was made of the fact that Nevada has allowed PTs direct access to animal patients since 2004 and there has only been one complaint (as of 2017.) (Also, this information was not corroborated.)

Somehow, this 1 complaint (since 2004) was extrapolated into 73 years (?) of 'aggregated' service without any problems.

The reality is that 'absence of evidence is not evidence of absence':

- 1) the sample size upon which to base this aggregate is very small,
- 2) clients don't always know when harm has been done,
- 3) there are multiple barriers to filing a complaint and many clients choose not to do so.

If COVID-19 has taught us anything, it's that it is difficult to extrapolate from small data sets what is really going on in a population.

“Veterinarians are not sufficiently trained to properly perform APR”

All 50 states allow a veterinarian to perform APR without additional certifications and without any additional restrictions.

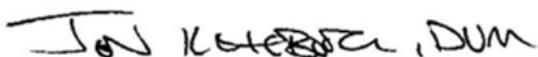
Conclusion:

We live in a State that has laws designed to protect animals and consumers. Sometimes, a Licensing Board has a duty to protect the consumer from himself.

Yes, there are many examples where the consultative relationship between a veterinarian and a physical therapist has benefitted the consumer and the patient, but the farther apart these two are geographically (e.g. in different facilities) the more likely an adverse event will occur. There are major and significant issues with liability when an animal is harmed by treatment that occurs outside of veterinary supervision.

APR is the practice of veterinary medicine. As such, it should remain under the watchful eye and engaged brain of the Supervising Veterinarian. The language before you accomplishes this quite effectively and clearly.

Respectfully submitted,



Jon Klingborg, DVM

Tammy Rieser <tamara.rieser@yahoo.com>
Sat 4/25/2020 9:06 PM

- DCA Director's Office; PT@DCA; Sotelo, Justin@DCA; Rodda, Timothy@DCA

Client letter support regs .docx
17 KB

Hello,

I have **attached** a letter for review. Thank you, I want to support them.

Tammy Rieser

RE: CONSUMER SUPPORT TO CA VMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

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Respectfully,

*Tamara C. Rieser
104 Emerson Court
Pleasant Hill, Ca. 94523*

Roy Swain <w4caster@pacbell.net>
Sat 4/25/2020 5:40 PM

- Sotelo, Justin@DCA

[rehabilitation regulations.docx](#)
17 KB

For your consideration..

Thank you...

Roy Swain

RE: CONSUMER SUPPORT TO CA VMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

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Respectfully,

Roy Swain

tbs <ted.stirm@gmail.com>
Sat 4/25/2020 4:19 PM

CONSUMER SUPPORT TO CA VMB ANIMAL PHYSICAL.pdf
468 KB

**RE: CONSUMER SUPPORT TO CA VMB ANIMAL PHYSICAL
REHABILITATION PROPOSED REGULATIONS**

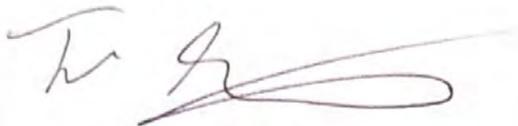
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Respectfully,

A handwritten signature in dark ink, appearing to be 'T. S.', written in a cursive style.

Erin Troy <etroy@mullervet.com>
Sat 4/25/2020 3:37 PM

- DCA Director's Office; PT@DCA; Sotelo, Justin@DCA; Rodda, Timothy@DCA

Burk letter.pdf
534 KB

Please accept the **attached** letter from an interested pet owner.

Erin Troy DVM CCRP CVPP
Medical Director
Muller Veterinary Hospital
The Canine Rehabilitation Center
2735 N Main St
Walnut Creek, CA 94597
925 934 8042
www.mullerveterinaryhospital.com
www.thek9rehabcenter.com

SUPPORT - 45-DAY PUBLIC COMMENT PERIOD
RE: CONSUMER SUPPORT TO CA VMB ANIMAL PHYSICAL
REHABILITATION PROPOSED REGULATIONS

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Respectfully,

Ruth Burn
4/25/2020

Sierra Barnes <ssbarnes@email.wm.edu>
Sat 4/25/2020 12:48 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA; VMB@DCA

April 25, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: SUPPORT OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

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I urge you to put a stop to any regulatory efforts opposing the proposed changes and support the current language to protect my pet in California.

Sincerely,

Sierra Barnes
2080 Coombsville Road
Napa, CA 94558
707-812-3784
ssbarnes@email.wm.edu

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Darin Peterson <darinepeterson@gmail.com>
Sat 4/25/2020 12:17 PM

- DCA Director's Office; PT@DCA; Sotelo, Justin@DCA; Rodda, Timothy@DCA

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Respectfully,

Darin E. Peterson

Christine Killory <davikill@pacbell.net>
Sat 4/25/2020 11:08 AM

- DCA Director's Office; PT@DCA; Sotelo, Justin@DCA; Rodda, Timothy@DCA

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Respectfully,

Christine Killory

1501 37th Avenue, A2
Oakland CA 94601
T 510 532 3202

Donna Antraccoli <d.m.antraccoli@gmail.com>
Sat 4/25/2020 10:06 AM

- Sotelo, Justin@DCA

**RE: CONSUMER SUPPORT TO CA VMB ANIMAL PHYSICAL REHABILITATION
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Dear Mr. Sotelo and Mr. Rodda,

I am a concerned pet owner in California . I am submitting this letter to **SUPPORT** the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their pets and the California Veterinary Medical Board has pursued regulatory language to continue with the inclusion of licensed physical therapists wishing to provide services to animals. The ability to foster inter-professional relationships and collaborate is not currently hindered and the consumer’s ability to access these professionals is not restricted.

The regulation of physical therapists is currently recognized as an ‘unlicensed veterinary assistant’ and subjects them to work under direct supervision of a veterinarian and in a veterinarian’s hospital/clinic is in the best interests of consumer protection, harm reduction and patient safety. As a dedicated pet owner, I demand that my pet’s veterinary care be directed by a DVM who is physically in the facility, determines who provides care and can oversee the level of supervision, monitor patient response to prescribed treatment, and respond to medical emergencies should they arise.

Respectfully,
Donna Antraccoli
42 Pascale Court
Napa CA 94558

Janine O'Malley <josoriginal@hotmail.com>
Sat 4/25/2020 10:04 AM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA; VMB@DCA

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to SUPPORT the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals and my veterinarian should be able to continue this without interruption. The California Veterinary Medical Board's approach to support the current regulatory language and not include an exemption for licensed physical therapists who have undergone the necessary training on animals does not limit my choice of and access to these qualified and licensed animal care providers because they already exist in regulation.

By relegating licensed physical therapists who have been specifically trained on animals to an 'unlicensed veterinary assistant' and enforcing them to work only under the direct supervision of and for a veterinarian is consistent with previous collaborative approaches in human and animal healthcare.

The language adopted in this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF). The proposed language does not move to monopolize the market on animal health care and retains provisions to continue with the inclusion of licensed physical therapists (or other healthcare providers not regulated by the veterinary medical board). As a consumer, I want choice of and access to essential healthcare services for my pet with my veterinarian responsible for my pet's treatment.

Provision of consumer protection requires licensed professionals to retain enough knowledge and skill to safely deliver and prescribe treatment to reduce harm to the animal patient. I trust my veterinarian has the professional integrity to uphold their oath to 'do no harm' and retains educational standards for themselves and all who practice in the specialty niche of animal rehabilitation in their practice. The teaching and testing of the specialty of animal rehabilitation in veterinary or vet tech schools continues to grow and there is a growing number of veterinarians and veterinary technicians attaining additional credentialing endorsed by national organizations. The only way to ensure competency of all those who practice (physical therapist) on animals is to mandate proper training and licensing in veterinary medicine before being allowed to perform treatments on my pet. The proposed regulation preserves this for me and my pet's safety or protection.

I support these regulations because it preserves the safety of myself and my pet. My choice of and access to a qualified animal physical therapist, is not any more limited than it would be for any of the veterinary specialties. I do not believe requiring additional educational competency training outside of the current requirements for maintenance of licensure for any of the

practitioners who would be allowed to practice on my animal is necessary unless this is required for all of the branches of veterinary specialties (e.g. dentistry, surgery, internal medicine, emergency and critical care). It is unreasonable to require this of only one branch of veterinary medicine.

This has been going on for far too long and the failure of AB 3013 (Animal Physical Rehabilitation Bill of 2018) in the Appropriations committee revealed the intentions of the bill supporters, to practice on my animal without a licensed veterinary professional directly supervising my pet.

I urge you to put a stop to any regulatory efforts opposing the proposed changes and support the current language to protect my pet in California.

Sincerely,

Janine O'Malley
311 S. Hartson St. Napa, CA 94559
(707) 637-3023
josoriginal@hotmail.com

Briana O'Malley <bomalley1530@gmail.com>
Sat 4/25/2020 10:01 AM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA; VMB@DCA

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to SUPPORT the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals and my veterinarian should be able to continue this without interruption. The California Veterinary Medical Board's approach to support the current regulatory language and not include an exemption for licensed physical therapists who have undergone the necessary training on animals does not limit my choice of and access to these qualified and licensed animal care providers because they already exist in regulation.

By relegating licensed physical therapists who have been specifically trained on animals to an 'unlicensed veterinary assistant' and enforcing them to work only under the direct supervision of and for a veterinarian is consistent with previous collaborative approaches in human and animal healthcare.

The language adopted in this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF). The proposed language does not move to monopolize the market on animal health care and retains provisions to continue with the inclusion of licensed physical therapists (or other healthcare providers not regulated by the veterinary medical board). As a consumer, I want choice of and access to essential healthcare services for my pet with my veterinarian responsible for my pet's treatment.

Provision of consumer protection requires licensed professionals to retain enough knowledge and skill to safely deliver and prescribe treatment to reduce harm to the animal patient. I trust my veterinarian has the professional integrity to uphold their oath to 'do no harm' and retains educational standards for themselves and all who practice in the specialty niche of animal rehabilitation in their practice. The teaching and testing of the specialty of animal rehabilitation in veterinary or vet tech schools continues to grow and there is a growing number of veterinarians and veterinary technicians attaining additional credentialing endorsed by national organizations. The only way to ensure competency of all those who practice (physical therapist) on animals is to mandate proper training and licensing in veterinary medicine before being allowed to perform treatments on my pet. The proposed regulation preserves this for me and my pet's safety or protection.

I support these regulations because it preserves the safety of myself and my pet. My choice of and access to a qualified animal physical therapist, is not any more limited than it would be for any of the veterinary specialties. I do not believe requiring additional educational competency training outside of the current requirements for maintenance of licensure for any of the

practitioners who would be allowed to practice on my animal is necessary unless this is required for all of the branches of veterinary specialties (e.g. dentistry, surgery, internal medicine, emergency and critical care). It is unreasonable to require this of only one branch of veterinary medicine.

This has been going on for far too long and the failure of AB 3013 (Animal Physical Rehabilitation Bill of 2018) in the Appropriations committee revealed the intentions of the bill supporters, to practice on my animal without a licensed veterinary professional directly supervising my pet.

I urge you to put a stop to any regulatory efforts opposing the proposed changes and support the current language to protect my pet in California.

Sincerely,

Briana O'Malley
PO Box 585, Napa CA 94559
(707) 627-3705
bomalley1530@gmail.com

Liz Hughston, RVT, VTS (SAIM, ECC) <liz@vettechxpert.com>
Sat 4/25/2020 8:22 AM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA; VMB@DCA

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter in SUPPORT of the currently proposed animal physical rehabilitation regulations.

As a registered veterinary technician (RVT) in California, I have been monitoring this issue closely for years. As is often the case, watching non-veterinary groups attempt to infringe on the restricted tasks assigned to RVTs and veterinary assistants has been disappointing.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. The proposed California Veterinary Medical Board regulatory language protects my professional license, my ability to perform work within the profession, and prevents unnecessary educational expense (outside of current licensing renewal requirements). Including an exemption for licensed physical therapists who have undergone the necessary training on animals in the practice act is unnecessary. I would encourage those individuals (regardless of licensure or certification in other healthcare areas) to pursue education and registration as a veterinary professional if they wish to work on animals in California outside of DIRECT supervision.

As both statute and regulation currently stand, licensed physical therapists who have been specifically trained on animals may already practice their craft on animals as a "veterinary assistant" under the direct supervision of a veterinarian or RVT. This provides consumer protection and harm reduction for the animal patient and all providers associated with care. I support the CVMB's definition of animal rehabilitation as the practice of veterinary medicine; this is consistent with language from the American Veterinary Medical Association and other national organizations. Under current statute and regulatory authority, a licensed physical therapist with advanced training on animals has ample job opportunities, numerous opportunities to earn a living (in TWO different industries), and consumer access to care is not limited.

Other states who have regulated this field (eg, Nevada, Colorado and Nebraska) do not have the same regulatory standards for licensing of veterinary professionals as we do in California. Specifically, those states do not have statutory TITLE PROTECTION nor DESIGNATED HEALTHCARE tasks restricted to licensees. Should California regulatory language change, the RVT will suffer infringement on duties, further title protection violations, loss of potential jobs, and unfair wage competition. Furthermore, a physical therapist is a licensee of the VMB and, therefore, does not have the authority to supervise the RVT without veterinarian supervision.

The issue of animal physical rehabilitation has been debated for far too long. I SUPPORT the regulations as written.

Liz Hughston, MEd., RVT, CVT, LVT, VTS (SAIM) (ECC)
VetTechXpert
Certified Veterinary Cannabis Counselor
RECOVER Certified Veterinary CPR Instructor
Co-Chair Credentialing Committee and Webmaster, AIMVT
President, National Veterinary Professionals Union
Co-Founder, Veterinary Cannabis Academy

Audra Nilssen <auds777@me.com>
Sat 4/25/2020 7:35 AM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office

RE: VETERINARY SUPPORT TO CA VMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am a licensed veterinarian in California. I am submitting this letter to SUPPORT the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals and the California Veterinary Medical Board has pursued regulatory language to continue on with the inclusion of licensed physical therapists wishing to provide services to animals. My ability to foster inter-professional relationships and collaborate is not currently hindered and the consumer's ability to access these professionals is not restricted.

The regulation of licensed physical therapists is currently recognized as an 'unlicensed veterinary assistant' and subjects them to work under direct supervision of a veterinarian and in a veterinarian's hospital/clinic is in the best interests of consumer protection, harm reduction and patient safety. As a veterinarian I am able to access a trained physical therapist, if deemed necessary or desired, by having them physically in my facility which enables me to oversee the level of supervision, monitor patient response to prescribed treatment, and respond to medical emergencies should they arise.

The veterinarian is to evaluate, diagnose, and determine the best course of treatment. It is not within the currently regulatory language, nor appropriate, to send my patients to an animal physical therapist without an individual licensed by the CA VMB directly on site. While I recognize the majority of veterinarians do not have the same skillset as a licensed physical therapist, in converse, the physical therapist does not have the skillset to evaluate and respond to animal medical needs. It is the highest standard of professional medical care for me to be able to refer my patients for professional services by those who are competent in this specialty to a facility with a veterinarian and physical therapist, who both have appropriate training and knowledge. I am most comfortable with a DVM providing direct oversight of physical rehabilitation of my patients to ensure their safety.

I urge you to put a stop to any regulatory effort that drastically changes the supervision level from direct to indirect supervision, redefines referral methods to paraprofessional healthcare providers (such as the physical therapist) and creation of supplementary categories of individuals who may provide services (animal physical rehabilitation assistant). Specifically, qualified and licensed physical therapists should continue to work under the direct supervision of a veterinarian and do not allow them to work on animals at a facility not overseen by a veterinarian after a veterinarian has established a Veterinary-Client-Patient-Relationship (VCPR), made a

diagnosis, and determined that rehab would be a safe and beneficial intervention for their animal patients. Allowing qualified physical therapists to practice on their own animal physical rehabilitation premises under indirect supervision would NOT further increase safe access for consumers. Veterinarians have been collaborating with other licensed professionals of their choice, while simultaneously protecting the consumer, within the boundaries of their facilities or by direct supervision for decades. This approach is consistent with the CA VMB's current regulatory language, the outcome of the 2018 Appropriations committee failure to pass AB 3013, and the CVMA position. Additionally, using recommendations consistent with the other states that have gone before us (like Colorado, Nevada and Nebraska) is not in the best interests of California regulatory law in general because our state is unique with demographics, geography and existing approaches to medicine. Inclusion of properly qualified and licensed physical therapists in the Veterinary Practice Act is already encompassed by utilizing the "veterinary assistant" terminology and creation of additional definitions is redundant to our profession and is confusing to the consumer.

The issue of animal physical rehabilitation has been going on for far too long and legislative "remedies" have required extensive effort and time without a clear resolution (akin to AB 3013—the Animal Physical Rehabilitation Bill of 2018). Should there be a legislative fix, based on a collaborative effort between both professions, to include a licensed professional regulated by the CA VMB I would support such a change. For example, an animal physical rehabilitation facility where the CA licensed veterinarian establishes the VCPR and services shall be provided includes a registered veterinary technician and a qualified and licensed physical therapist. This is a reasonable compromise for both professions and consumers protection and reduction of harm to the animal patient is mitigated.

Regards,

Audra Nilssen DVM

simeje01@gmail.com
Fri 4/24/2020 10:44 PM

- DCA Director's Office; PT@DCA; Sotelo, Justin@DCA; Rodda, Timothy@DCA

Dear Mr. Sotelo and Mr. Rodda,

I am a concerned pet owner in California . I am submitting this letter to **SUPPORT** the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their pets and the California Veterinary Medical Board has pursued regulatory language to continue with the inclusion of licensed physical therapists wishing to provide services to animals. The ability to foster inter-professional relationships and collaborate is not currently hindered and the consumer's ability to access these professionals is not restricted.

The regulation of physical therapists is currently recognized as an 'unlicensed veterinary assistant' and subjects them to work under direct supervision of a veterinarian and in a veterinarian's hospital/clinic is in the best interests of consumer protection, harm reduction and patient safety. As a dedicated pet owner, I demand that my pet's veterinary care be directed by a DVM who is physically in the facility, determines who provides care and can oversee the level of supervision, monitor patient response to prescribed treatment, and respond to medical emergencies should they arise.

Respectfully,

Jennifer Simeone

Alex Spoon <aspoon@sonic.net>
Fri 4/24/2020 8:24 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA; VMB@DCA

April 24, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

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Timothy.Rodda@dca.ca.gov
DCA.DirectorsOffice@dca.ca.gov
PT@dca.ca.gov

vmb@dca.ca.gov

RE: SUPPORT OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to SUPPORT the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals and my veterinarian should be able to continue this without interruption. The California Veterinary Medical Board's approach to support the current regulatory language and not include an exemption for licensed physical therapists who have undergone the necessary training on animals does not limit my choice of and access to these qualified and licensed animal care providers because they already exist in regulation.

By relegating licensed physical therapists who have been specifically trained on animals to an 'unlicensed veterinary assistant' and enforcing them to work only under the direct supervision of and for a veterinarian is consistent with previous collaborative approaches in human and animal healthcare.

The language adopted in this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF). The proposed language does not move to monopolize the market on animal health care and retains provisions to continue with the inclusion of licensed physical therapists (or other healthcare providers not

regulated by the veterinary medical board). As a consumer, I want choice of and access to essential healthcare services for my pet with my veterinarian responsible for my pet's treatment.

Provision of consumer protection requires licensed professionals to retain enough knowledge and skill to safely deliver and prescribe treatment to reduce harm to the animal patient. I trust my veterinarian has the professional integrity to uphold their oath to 'do no harm' and retains educational standards for themselves and all who practice in the specialty niche of animal rehabilitation in their practice. The teaching and testing of the specialty of animal rehabilitation in veterinary or vet tech schools continues to grow and there is a growing number of veterinarians and veterinary technicians attaining additional credentialing endorsed by national organizations. The only way to ensure competency of all those who practice (physical therapist) on animals is to mandate proper training and licensing in veterinary medicine before being allowed to perform treatments on my pet. The proposed regulation preserves this for me and my pet's safety or protection.

I support these regulations because it preserves the safety of myself and my pet. My choice of and access to a qualified animal physical therapist, is not any more limited than it would be for any of the veterinary specialties. I do not believe requiring additional educational competency training outside of the current requirements for maintenance of licensure for any of the practitioners who would be allowed to practice on my animal is necessary unless this is required for all of the branches of veterinary specialties (e.g. dentistry, surgery, internal medicine, emergency and critical care). It is unreasonable to require this of only one branch of veterinary medicine.

This has been going on for far too long and the failure of AB 3013 (Animal Physical Rehabilitation Bill of 2018) in the Appropriations committee revealed the intentions of the bill supporters, to practice on my animal without a licensed veterinary professional directly supervising my pet.

I urge you to put a stop to any regulatory efforts opposing the proposed changes and support the current language to protect my pet in California.

Sincerely,

Alexandria King
1954 Alamo Ln, Santa Rosa, CA
707-790-9492
aspoon@sonic.net

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Siefertman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Tarra Robinson <tarraarobinson@gmail.com>
Fri 4/24/2020 8:23 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA

**RE: CONSUMER SUPPORT TO CA VMB ANIMAL PHYSICAL REHABILITATION
PROPOSED REGULATIONS**

Dear Mr. Sotelo and Mr. Rodda,

I am a concerned pet owner in California. I am submitting this letter to **SUPPORT** the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their pets and the California Veterinary Medical Board has pursued regulatory language to continue with the inclusion of licensed physical therapists wishing to provide services to animals. The ability to foster inter-professional relationships and collaborate is not currently hindered and the consumer's ability to access these professionals is not restricted.

The regulation of physical therapists is currently recognized as an 'unlicensed veterinary assistant' and subjects them to work under direct supervision of a veterinarian and in a veterinarian's hospital/clinic is in the best interests of consumer protection, harm reduction and patient safety. As a dedicated pet owner, I demand that my pet's veterinary care be directed by a DVM who is physically in the facility, determines who provides care and can oversee the level of supervision, monitor patient response to prescribed treatment, and respond to medical emergencies should they arise.

Respectfully,

Tarra Robinson

Angelise Alexander <angeliservt@gmail.com>
Fri 4/24/2020 7:26 PM

- Sotelo, Justin@DCA; DCA Director's Office; PT@DCA; VMB@DCA

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to SUPPORT the proposed animal physical rehabilitation regulations.

As a registered veterinary technician (RVT) in California, I have been monitoring this issue closely for years and have been repeatedly disappointed with the egregious attempts from opposing individuals and groups to undermine the regulatory authority of the Board, the restricted healthcare duties assigned to the RVT in California and mandate additional training in a single specialty (advanced certification) in veterinary medicine.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals and the proposed California Veterinary Medical Board regulatory language protects my professional license, ability to perform work within the profession and prevents unnecessary educational expense (outside of current licensing renewal requirements). Including an exemption for licensed physical therapists who have undergone the necessary training on animals in the practice act is unnecessary. It is my recommendation for these individuals to pursue education and licensing in veterinary medicine should they desire a different level of supervision outside of DIRECT.

Licensed physical therapists who have been specifically trained on animals may already practice their craft on animals as an 'unlicensed veterinary assistant' under the direct supervision of a veterinarian or RVT. This provides consumer protection and harm reduction for the animal patient and all providers associated with care. I support the CVMB definition of animal rehabilitation as the practice of veterinary medicine and is consistent with language from the American Veterinary Medical Association and other national organizations. A licensed physical therapist with advanced training on animals does not need more reasonable guidelines, job opportunities and ability to earn a living are not dramatically reduced and consumer access to care is not limited. This regulation is not a restraint of the trade for a physical therapist because of the current and proposed language.

Other states who have regulated this field (i.e. Nevada, Colorado and Nebraska) do not have the same regulatory standards for licensing of veterinary professionals as we do in California. Specifically, TITLE PROTECTION and DESIGNATED HEALTHCARE tasks. Should California regulatory language change, the RVT may suffer infringement on duties, further title protection violations, loss of potential jobs or unfair wages with the creation of an Animal Physical Rehabilitation Assistant designation. Furthermore, a physical therapist is not an appropriate licensee and does not have the authority to supervise the RVT without veterinarian supervision.

The issue of animal physical rehabilitation has been going on for far too long. Assembly Bill 3013 - Animal Physical Rehabilitation Bill of 2018 failed in Appropriations and I do not support

the Bill. I am SUPPORT to this regulation as written. Should the time come where a compromise is needed, I SUPPORT the position of the California Registered Veterinary Technician Association.

Sincerely,

Angelise Alexander, RVT
Senior Manager of Medical Operations, Humane Society of Sonoma County
Adjunct Faculty, Santa Rosa Junior College, Veterinary Technician Alternate Route

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Siefertman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

gretchen <gretchen7@gmail.com>
Fri 4/24/2020 7:20 PM

- DCA Director's Office; PT@DCA; Sotelo, Justin@DCA; Rodda, Timothy@DCA

**RE: CONSUMER SUPPORT TO CA VMB ANIMAL PHYSICAL REHABILITATION
PROPOSED REGULATIONS**

Dear Mr. Sotelo and Mr. Rodda,

I am a concerned pet owner in California. I am submitting this letter to **SUPPORT** the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their pets and the California Veterinary Medical Board has pursued regulatory language to continue with the inclusion of licensed physical therapists wishing to provide services to animals. The ability to foster inter-professional relationships and collaborate is not currently hindered and the consumer's ability to access these professionals is not restricted.

The regulation of physical therapists is currently recognized as an 'unlicensed veterinary assistant' and subjects them to work under direct supervision of a veterinarian and in a veterinarian's hospital/clinic is in the best interests of consumer protection, harm reduction and patient safety. As a dedicated pet owner, I demand that my pet's veterinary care be directed by a DVM who is physically in the facility, determines who provides care and can oversee the level of supervision, monitor patient response to prescribed treatment, and respond to medical emergencies should they arise.

Respectfully,
Gretchen Pfeffer
3767 Barrington Drive
Concord, CA 94518

lenoraclark@aol.com
Fri 4/24/2020 7:14 PM

- Sotelo, Justin@DCA; mullervetwc@gmail.com

**RE: CONSUMER SUPPORT TO CA VMB ANIMAL PHYSICAL REHABILITATION
PROPOSED REGULATIONS**

Dear Mr. Sotelo and Mr. Rodda,

I am a concerned pet owner in California. I am submitting this letter to **SUPPORT** the proposed animal physical rehabilitation regulations.

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Respectfully,

Lenora & Richard Clark
1747 Dolphin Place
Discovery Bay, CA 94505

925-634-9614

"Vision without Action is a daydream...Action without Vision is a nightmare."

Sandy Block <drblock@mycaringvet.com>
Fri 4/24/2020 5:42 PM

- Sotelo, Justin@DCA

RE: VETERINARY SUPPORT TO CA VMB ANIMAL PHYSICAL REHABILITATION
PROPOSED REGULATIONS

Dear Mr. Sotelo,

I am a licensed veterinarian in the state of California. I am submitting this letter to SUPPORT the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals and the California Veterinary Medical Board has pursued regulatory language to continue on with the inclusion of licensed physical therapists wishing to provide services to animals. My ability to foster inter-professional relationships and collaborate is not currently hindered and the consumer's ability to access these professionals is not restricted.

The regulation of licensed physical therapists is currently recognized as an 'unlicensed veterinary assistant' and subjects them to work under direct supervision of a veterinarian and in a veterinarian's hospital/clinic is in the best interests of consumer protection, harm reduction, and patient safety. As a veterinarian I am able to access a trained physical therapist if deemed necessary or desired, by having them physically in my facility which enables me to oversee the level of supervision, monitor patient response to prescribed treatment, and respond to medical emergencies should they arise. The veterinarian is to evaluate, diagnose, and determine the best course of treatment. It is not within the current regulatory language, nor appropriate, to send my patients to an animal physical therapist without an individual licensed by the CA VMB directly on site. While I recognize the majority of veterinarians do not have the same skillset as a licensed physical therapist, in converse, the physical therapist does not have the skillset to evaluate and respond to animal medical needs. It is the highest standard of professional medical care for me to be able to refer my patients for professional services by those who are competent in this specialty to a facility with a veterinarian and physical therapist, who both have appropriate training and knowledge. I am most comfortable with a DVM providing direct oversight of the physical rehabilitation of my patients to ensure their safety.

I urge you to put a stop to any regulatory effort that drastically changes the supervision level from direct to indirect supervision redefines referral methods to paraprofessional healthcare providers (such as the physical therapist) and creation of supplementary categories of individuals who may provide services (animal physical rehabilitation assistant). Specifically, qualified and licensed physical therapists should continue to work under the direct supervision of a veterinarian and do not allow them to work on animals at a facility not overseen by a veterinarian after a veterinarian has established a Veterinary-Client-Patient-Relationship (VCPR), made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. Allowing qualified physical therapists to practice on their own animal physical

rehabilitation premises under indirect supervision would NOT further increase safe access for consumers. Veterinarians have been collaborating with other licensed professionals of their choice, while simultaneously protecting the consumer, within the boundaries of their facilities or by direct supervision for decades. This approach is consistent with the CA VMB's current regulatory language, the outcome of the 2018 Appropriations committee failure to pass AB 3013, and the CVMA position. Additionally, using recommendations consistent with the other states that have gone before us (like Colorado, Nevada and Nebraska) is not in the best interests of California regulatory law in general, because our state is unique with demographics, geography and existing approaches to medicine. Inclusion of properly qualified and licensed physical therapists in the Veterinary Practice Act is already encompassed by utilizing the "veterinary assistant" terminology and creation of additional definitions is redundant to our profession and is confusing to the consumer. The issue of animal physical rehabilitation has been going on for far too long and legislative "remedies" have required extensive effort and time without a clear resolution (akin to AB 3013—the Animal Physical Rehabilitation Bill of 2018). Should there be a legislative fix, based on a collaborative effort between both professions, to include a licensed professional regulated by the CA VMB I would support such a change. For example, an animal physical rehabilitation facility where the CA licensed veterinarian establishes the VCPR and services shall be provided includes a registered veterinary technician and a qualified and licensed physical therapist. This is a reasonable compromise for both professions and consumer protection and reduction of harm to the animal patient is mitigated.

Sandy Block, DVM
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Kristen Hagler <goldengaitk9@gmail.com>
Fri 4/24/2020 5:23 PM

- Kristen Hagler <goldengaitk9@gmail.com>; Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA; VMB@DCA

April 24, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

vmb@dca.ca.gov

RE: SUPPORT OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to SUPPORT the proposed animal physical rehabilitation regulations.

As a registered veterinary technician (RVT) in California, I have been participating in this issue intimately for years and have been repeatedly disappointed with the egregious attempts from opposing individuals and groups to undermine the regulatory authority of the Board, the restricted healthcare duties assigned to the RVT in California and attempts to mandate additional training in a single specialty (advanced certification) in veterinary medicine.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals and the proposed California Veterinary Medical Board regulatory language protects my professional license, ability to perform work within the profession and prevents unnecessary educational expense (outside of current licensing renewal requirements). Including an exemption for licensed physical therapists who have undergone the necessary training on animals in the practice act is unnecessary. It is my recommendation for these individuals to pursue education and licensing in veterinary medicine should they desire a different level of supervision outside of DIRECT.

Licensed physical therapists who have been specifically trained on animals may already practice their craft on animals as an 'unlicensed veterinary assistant' under the direct supervision of a veterinarian or RVT. This provides consumer protection and harm reduction for the animal

patient and all providers associated with care. I support the CVMB definition of animal rehabilitation as the practice of veterinary medicine and is consistent with language from the American Veterinary Medical Association and other national organizations. A licensed physical therapist with advanced training on animals does not need more reasonable guidelines, job opportunities and ability to earn a living are not dramatically reduced and consumer access to care is not limited. This regulation is not a restraint of the trade for a physical therapist because of the current and proposed language.

Other states who have regulated this field (i.e. Nevada, Colorado and Nebraska) do not have the same regulatory standards for licensing of veterinary professionals as we do in California. Specifically, TITLE PROTECTION and DESIGNATED HEALTHCARE tasks. Should California regulatory language change, the RVT may suffer infringement on duties, further title protection violations, loss of potential jobs or unfair wages with the creation of an Animal Physical Rehabilitation Assistant designation. Furthermore, a physical therapist is not an appropriate licensee and does not have the authority to supervise the RVT without veterinarian supervision.

The issue of animal physical rehabilitation has been going on for far too long. Assembly Bill 3013 - Animal Physical Rehabilitation Bill of 2018 failed in Appropriations and I do not support the Bill. I am SUPPORT to this regulation as written. Should the time come where a compromise is needed, I also SUPPORT the position of the California Registered Veterinary Technician Association in their position of support for the practice of animal physical rehabilitation in California.

Sincerely,

Kristen Hagler
PO BOX 875
Cotati, CA 94903
Gdengaitk9@gmail.com

Kristen L Hagler BS(An.Phys) RVT VTS (Physical Rehabilitation-OC) CCRP CVPP COCM
CBW VCC

- California Veterinary Medical Board (MDC) Animal Physical Rehabilitation Task Force Member
- CVMA, CaRVTA, REVTA, and NAVTA member
- Academy of Physical Rehabilitation Veterinary Technicians/ Organizing Committee/President
- American Association of Rehabilitation Veterinarians - past technician associate member board member
- Penn HIP Associate Member

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Siefertman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California

Physical Therapy Board of California Members

Notice to Recipient:

Information contained in this message may be privileged, confidential and protected from disclosure. If you are not an intended recipient, it is strictly prohibited to use, disseminate or copy this communication. If you have received this in error, please reply to the sender and then delete the message.

Angela Ortiz <ortiz.rvt@gmail.com>
Fri 4/24/2020 4:37 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA; VMB@DCA

April 24, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: SUPPORT OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to SUPPORT the proposed animal physical rehabilitation regulations.

As a registered veterinary technician (RVT) in California, I have been monitoring this issue closely for years and have been repeatedly disappointed with the egregious attempts from opposing individuals and groups to undermine the regulatory authority of the Board, the restricted healthcare duties assigned to the RVT in California and mandate additional training in a single specialty (advanced certification) in veterinary medicine.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals and the proposed California Veterinary Medical Board regulatory language protects my professional license, ability to perform work within the profession and prevents unnecessary educational expense (outside of current licensing renewal requirements). Including an exemption for licensed physical therapists who have undergone the necessary training on animals in the practice act is unnecessary. It is my recommendation for these individuals to pursue education and licensing in veterinary medicine should they desire a different level of supervision outside of DIRECT.

Licensed physical therapists who have been specifically trained on animals may already practice their craft on animals as an 'unlicensed veterinary assistant' under the direct supervision of a veterinarian or RVT. This provides consumer protection and harm reduction for the animal patient and all providers associated with care. I support the CVMB definition of animal rehabilitation as the practice of veterinary medicine and is consistent with language from the American Veterinary Medical Association and other national organizations. A licensed physical therapist with advanced training on animals does not need more reasonable guidelines, job opportunities and ability to earn a living are not dramatically reduced and consumer access to care is not limited. This regulation is not a restraint of the trade for a physical therapist because of the current and proposed language.

Other states who have regulated this field (i.e. Nevada, Colorado and Nebraska) do not have the same regulatory standards for licensing of veterinary professionals as we do in California. Specifically, TITLE PROTECTION and DESIGNATED HEALTHCARE tasks. Should California regulatory language change, the RVT may suffer infringement on duties, further title protection violations, loss of potential jobs or unfair wages with the creation of an Animal Physical Rehabilitation Assistant designation. Furthermore, a physical therapist is not an appropriate licensee and does not have the authority to supervise the RVT without veterinarian supervision.

The issue of animal physical rehabilitation has been going on for far too long. Assembly Bill 3013 - Animal Physical Rehabilitation Bill of 2018 failed in Appropriations and I do not support the Bill. I am SUPPORT to this regulation as written. Should the time come where a compromise is needed, I SUPPORT the position of the California Registered Veterinary Technician Association.

Sincerely,

Angela Ortiz
251 Samantha Ct
Windsor, Ca 95492
Ortiz.rvt@gmail.com

Sandy Block <drblock@mycaringvet.com>
Fri 4/24/2020 3:52 PM

- Sotelo, Justin@DCA

**RE: CONSUMER SUPPORT TO CA VMB ANIMAL PHYSICAL REHABILITATION
PROPOSED REGULATIONS**

Dear Mr. Sotelo,

I am a concerned veterinarian and pet owner in California. I am submitting this letter to **SUPPORT** the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their pets and the California Veterinary Medical Board has pursued regulatory language to continue with the inclusion of licensed physical therapists wishing to provide services to animals. The ability to foster inter-professional relationships and collaborate is not currently hindered and the consumer's ability to access these professionals is not restricted.

The regulation is that physical therapists are currently recognized as an 'unlicensed veterinary assistant' and subjects them to work under the direct supervision of a veterinarian and in a veterinarian's hospital/clinic is in the best interests of consumer protection, harm reduction, and patient safety. As a dedicated veterinarian and pet owner, I demand that my pet's veterinary care be directed by a DVM who is physically in the facility, determines who provides care and can oversee the level of supervision, monitor patient response to prescribed treatment, and respond to medical emergencies should they arise!

Sandy Block, DVM
Bollinger Canyon Animal Hospital
400 Montgomery St.
San Ramon, CA 94583
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877-821-9288 FAX
drblock@mycaringvet.com
www.mycaringvet.com

sandy gregory <sandragregory@mac.com>
Fri 4/24/2020 2:56 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office

APPROVAL OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS.docx
20 KB

Hello,

Thank you for your considerations in my **approval** for this regulation.

Kind regards,
Sandy Gregory

Sandy Gregory, M.Ed, RVT, VTS (Physical Rehabilitation), CCRA
Instructor
Veterinary Technology Program
Foothill College
12345 El Monte Rd
Los Altos Hills, CA 94022
Cell 650-520-8436
sandragregory@mac.com
gregorysandy@fhda.edu

April 24, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: APPROVAL OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to APPROVE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals.

By relegating licensed physical therapists who have been specifically trained on animals does not mean that they are merely an 'unlicensed veterinary assistant'. What it is stating is that they have to have the supervision of the veterinarian to assist with skills that veterinarians are licensed to do. That is Diagnose, Prescribe and Prognose (as it pertains to physical rehab).

I have personally worked with human physical therapists in the animal physical therapy world and agree absolutely that they have a part in this field. They have a wealth of knowledge that can be applied to the canine world. My concerns that I have seen first hand is they don't know the simple, basic skills or understandings of veterinary medicine like a DVM or even in my case, a veterinary technician. Simple things like figuring out what a tick is, how to remove it, dealing with a rabbit, cat, behavior for a challenging dog, etc. are not skills that they possess. I can say first hand, we did not have a vet on the premise of a former rehab facility and multiple questions came up repeatedly. I was that person to answer them because there was no other skilled person in veterinary medicine on the premise. Thankfully, I was there when the dog collapsed in the doorway, another had blood coming from the nose and was sent away to the vets, the senior dog with an abnormally low heart rate, or the anxious dog that I was able to calm. Not the physical therapist but the veterinary technician.

A number of times, I have heard cases where the physical therapist was recommending medications and supplements. They are not licensed to do that! I have seen them casting, splinting and bandaging dogs, which again they are not licensed to do.

According to Code 2036 Animal Health Care Tasks for a R.V.T. in California, we are licensed to apply casts and splints. This is a skill that would be taken away from us as a veterinary technician, that we went to school for and a PT is not licensed to do on an animal.

I was on the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), and heard all sides including the consumers view. I feel like while they have their understanding of how a PT has helped them as an individual, it does not give a complete picture of the education that a physical therapist goes through to convert their knowledge to the canine. Which in those courses IS only the canine patient and the education is not extensive enough to begin to understand the canine patient.

I strongly encourage the APPROVAL of a physical therapist being under the Direct Supervision of Veterinarian for the safety of the patient and keeping the skills to the veterinary team that are licensed to do so.

There are only a handful of stand-alone physical therapist in the state of California who would be affected by this regulation. I feel like it is within the interest of the consumer and the consideration of the years of education of a veterinarian that this regulation be APPROVED.

I urge you to finalize the regulatory efforts, consider the safety of the animals and preserve the role of the veterinary technician.

Sincerely,

Sandy Gregory, M.Ed, RVT, VTS (Physical Rehabilitation), CCRA
Instructor
Veterinary Technology Program
Foothill College
12345 El Monte Rd
Los Altos Hills, CA 94022
Cell 650-520-8436
sandragregory@mac.com
gregorysandy@fhda.edu

DS Friedman <dsfaec@gmail.com>
Fri 4/24/2020 2:20 PM

- Sotelo, Justin@DCA

RE: VETERINARY SUPPORT TO CA VMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am a licensed veterinarian in California. I am submitting this letter to SUPPORT the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals and the California Veterinary Medical Board has pursued regulatory language to continue on with the inclusion of licensed physical therapists wishing to provide services to animals. My ability to foster inter-professional relationships and collaborate is not currently hindered and the consumer's ability to access these professionals is not restricted.

The regulation of licensed physical therapists is currently recognized as an 'unlicensed veterinary assistant' and subjects them to work under direct supervision of a veterinarian and in a veterinarian's hospital/clinic is in the best interests of consumer protection, harm reduction and patient safety. As a veterinarian I am able to access a trained physical therapist, if deemed necessary or desired, by having them physically in my facility which enables me to oversee the level of supervision, monitor patient response to prescribed treatment, and respond to medical emergencies should they arise.

The veterinarian is to evaluate, diagnose, and determine the best course of treatment. It is not within the currently regulatory language, nor appropriate, to send my patients to an animal physical therapist without an individual licensed by the CA VMB directly on site. While I recognize the majority of veterinarians do not have the same skillset as a licensed physical therapist, in converse, the physical therapist does not have the skillset to evaluate and respond to animal medical needs. It is the highest standard of professional medical care for me to be able to refer my patients for professional services by those who are competent in this specialty to a facility with a veterinarian and physical therapist, who both have appropriate training and knowledge. I am most comfortable with a DVM providing direct oversight of physical rehabilitation of my patients to ensure their safety.

I urge you to put a stop to any regulatory effort that drastically changes the supervision level from direct to indirect supervision, redefines referral methods to paraprofessional healthcare providers (such as the physical therapist) and creation of supplementary categories of individuals who may provide services (animal physical rehabilitation assistant). Specifically, qualified and licensed physical therapists should continue to work under the direct supervision of a veterinarian and do not allow them to work on animals at a facility not overseen by a veterinarian after a veterinarian has established a Veterinary-Client-Patient-Relationship (VCPR), made a

diagnosis, and determined that rehab would be a safe and beneficial intervention for their animal patients. Allowing qualified physical therapists to practice on their own animal physical rehabilitation premises under indirect supervision would NOT further increase safe access for consumers. Veterinarians have been collaborating with other licensed professionals of their choice, while simultaneously protecting the consumer, within the boundaries of their facilities or by direct supervision for decades. This approach is consistent with the CA VMB's current regulatory language, the outcome of the 2018 Appropriations committee failure to pass AB 3013, and the CVMA position. Additionally, using recommendations consistent with the other states that have gone before us (like Colorado, Nevada and Nebraska) is not in the best interests of California regulatory law in general because our state is unique with demographics, geography and existing approaches to medicine. Inclusion of properly qualified and licensed physical therapists in the Veterinary Practice Act is already encompassed by utilizing the "veterinary assistant" terminology and creation of additional definitions is redundant to our profession and is confusing to the consumer.

The issue of animal physical rehabilitation has been going on for far too long and legislative "remedies" have required extensive effort and time without a clear resolution (akin to AB 3013—the Animal Physical Rehabilitation Bill of 2018). Should there be a legislative fix, based on a collaborative effort between both professions, to include a licensed professional regulated by the CA VMB I would support such a change. For example, an animal physical rehabilitation facility where the CA licensed veterinarian establishes the VCPR and services shall be provided includes a registered veterinary technician and a qualified and licensed physical therapist. This is a reasonable compromise for both professions and consumers protection and reduction of harm to the animal patient is mitigated.

Sincerely,

Deborah Friedman, DVM, Dipl ACVO

mona <monasdvm@aol.com>
Fri 4/24/2020 10:57 AM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office

DVM support of Regis.docx
10 KB

Hi Mr. Sotelo and Mr. Rodda,

Please find attached my letter to **support** the proposed animal physical rehabilitation regulations.

Thank you for your consideration,
Mona S. Miller, DVM
CA license #10840

RE: VETERINARY SUPPORT TO CA VMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am a licensed veterinarian in California. I am submitting this letter to SUPPORT the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals and the California Veterinary Medical Board has pursued regulatory language to continue on with the inclusion of licensed physical therapists wishing to provide services to animals. My ability to foster inter-professional relationships and collaborate is not currently hindered and the consumer's ability to access these professionals is not restricted.

The regulation of licensed physical therapists is currently recognized as an 'unlicensed veterinary assistant' and subjects them to work under direct supervision of a veterinarian and in a veterinarian's hospital/clinic is in the best interests of consumer protection, harm reduction and patient safety. As a veterinarian I am able to access a trained physical therapist, if deemed necessary or desired, by having them physically in my facility which enables me to oversee the level of supervision, monitor patient response to prescribed treatment, and respond to medical emergencies should they arise.

The veterinarian is to evaluate, diagnose, and determine the best course of treatment. It is not within the currently regulatory language, nor appropriate, to send my patients to an animal physical therapist without an individual licensed by the CA VMB directly on site. While I recognize the majority of veterinarians do not have the same skillset as a licensed physical therapist, in converse, the physical therapist does not have the skillset to evaluate and respond to animal medical needs. It is the highest standard of professional medical care for me to be able to refer my patients for professional services by those who are competent in this specialty to a facility with a veterinarian and physical therapist, who both have appropriate training and knowledge. I am most comfortable with a DVM providing direct oversight of physical rehabilitation of my patients to ensure their safety.

I urge you to put a stop to any regulatory effort that drastically changes the supervision level from direct to indirect supervision, redefines referral methods

to paraprofessional healthcare providers (such as the physical therapist) and creation of supplementary categories of individuals who may provide services (animal physical rehabilitation assistant). Specifically, qualified and licensed physical therapists should continue to work under the direct supervision of a veterinarian and do not allow them to work on animals at a facility not overseen by a veterinarian after a veterinarian has established a Veterinary-Client-Patient-Relationship (VCPR), made a diagnosis, and determined that rehab would be a safe and beneficial intervention for their animal patients. Allowing qualified physical therapists to practice on their own animal physical rehabilitation premises under indirect supervision would NOT further increase safe access for consumers. Veterinarians have been collaborating with other licensed professionals of their choice, while simultaneously protecting the consumer, within the boundaries of their facilities or by direct supervision for decades. This approach is consistent with the CA VMB's current regulatory language, the outcome of the 2018 Appropriations committee failure to pass AB 3013, and the CVMA position. Additionally, using recommendations consistent with the other states that have gone before us (like Colorado, Nevada and Nebraska) is not in the best interests of California regulatory law in general because our state is unique with demographics, geography and existing approaches to medicine. Inclusion of properly qualified and licensed physical therapists in the Veterinary Practice Act is already encompassed by utilizing the "veterinary assistant" terminology and creation of additional definitions is redundant to our profession and is confusing to the consumer.

The issue of animal physical rehabilitation has been going on for far too long and legislative "remedies" have required extensive effort and time without a clear resolution (akin to AB 3013—the Animal Physical Rehabilitation Bill of 2018). Should there be a legislative fix, based on a collaborative effort between both professions, to include a licensed professional regulated by the CA VMB I would support such a change. For example, an animal physical rehabilitation facility where the CA licensed veterinarian establishes the VCPR and services shall be provided includes a registered veterinary technician and a qualified and licensed physical therapist. This is a reasonable compromise for both professions and consumers protection and reduction of harm to the animal patient is mitigated.

Erin <muller1@earthlink.net>
Fri 4/24/2020 9:30 AM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office

Dear Mr. Sotelo and Mr. Rodda,

I am a licensed veterinarian in California and a member of the CVMA. I am submitting this letter to SUPPORT the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals and the California Veterinary Medical Board has pursued regulatory language to continue on with the inclusion of licensed physical therapists wishing to provide services to animals. My ability to foster inter-professional relationships and collaborate is not currently hindered and the consumer's ability to access these professionals is not restricted.

The regulation of licensed physical therapists is currently recognized as an 'unlicensed veterinary assistant' and subjects them to work under direct supervision of a veterinarian and in a veterinarian's hospital/clinic is in the best interests of consumer protection, harm reduction and patient safety. As a veterinarian I am able to access a trained physical therapist, if deemed necessary or desired, by having them physically in my facility which enables me to oversee the level of supervision, monitor patient response to prescribed treatment, and respond to medical emergencies should they arise.

The veterinarian is to evaluate, diagnose, and determine the best course of treatment. It is not within the currently regulatory language, nor appropriate, to send my patients to an animal physical therapist without an individual licensed by the CA VMB directly on site. While I recognize the majority of veterinarians do not have the same skillset as a licensed physical therapist, in converse, the physical therapist does not have the skillset to evaluate and respond to animal medical needs. I have many experiences that I can share of a patient requiring veterinary care when coming in for APR. These pets would have suffered if a DVM had not been on the premises. Please prevent this from happening to any pet in California.

Thank you for keeping our patients cared for and safe.

Erin Troy DVM. CCRP CVPP
Medical Director
Muller Veterinary Hospital
The Canine Rehabilitation Center
2735 N Main St
Walnut Creek, CA 94597

Ashley McCaughan DVM <amccaughandvm@gmail.com>
Fri 4/24/2020 8:24 AM

- Sotelo, Justin@DCA

**RE: CONSUMER SUPPORT TO CA VMB ANIMAL PHYSICAL REHABILITATION
PROPOSED REGULATIONS**

Dear Mr. Sotelo and Mr. Rodda,

I am a concerned pet owner in California. I am submitting this letter to **SUPPORT** the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their pets and the California Veterinary Medical Board has pursued regulatory language to continue with the inclusion of licensed physical therapists wishing to provide services to animals. The ability to foster inter-professional relationships and collaborate is not currently hindered and the consumer's ability to access these professionals is not restricted.

The regulation of physical therapists is currently recognized as an 'unlicensed veterinary assistant' and subjects them to work under direct supervision of a veterinarian and in a veterinarian's hospital/clinic is in the best interests of consumer protection, harm reduction and patient safety. As a dedicated pet owner, I demand that my pet's veterinary care be directed by a DVM who is physically in the facility, determines who provides care and can oversee the level of supervision, monitor patient response to prescribed treatment, and respond to medical emergencies should they arise.

Respectfully,

Dr. Ashley McCaughan
Dr Ashley McCaughan

Marina Village Veterinary
943 Marina Village Parkway, Alameda, CA 94501
www.marinavillagevet.com

Office: **510-939-8340**
Fax: 510-939-8342
amccaughandvm@gmail.com

Stephen Atwater <Stephen.Atwater@vca.com>
Fri 4/24/2020 6:58 AM

- Sotelo, Justin@DCA

DVM support of Regis.docx
18 KB

Please see the **attached** letter I have signed.

Stephen Atwater, DVM, MS, DACVIM
VCA Encina Veterinary Medical Center
2803 Ygnacio Valley Road, Walnut Creek, CA 94596
925-937-5001 voice | 925-937-8519 fax
Stephen.Atwater@vca.com

RE: VETERINARY SUPPORT TO CA VMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am a licensed veterinarian in California . I am submitting this letter to SUPPORT the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals and the California Veterinary Medical Board has pursued regulatory language to continue on with the inclusion of licensed physical therapists wishing to provide services to animals. My ability to foster inter-professional relationships and collaborate is not currently hindered and the consumer's ability to access these professionals is not restricted.

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I urge you to put a stop to any regulatory effort that drastically changes the supervision level from direct to indirect supervision, redefines referral methods

to paraprofessional healthcare providers (such as the physical therapist) and creation of supplementary categories of individuals who may provide services (animal physical rehabilitation assistant). Specifically, qualified and licensed physical therapists should continue to work under the direct supervision of a veterinarian and do not allow them to work on animals at a facility not overseen by a veterinarian after a veterinarian has established a Veterinary-Client-Patient-Relationship (VCPR), made a diagnosis, and determined that rehab would be a safe and beneficial intervention for their animal patients. Allowing qualified physical therapists to practice on their own animal physical rehabilitation premises under indirect supervision would NOT further increase safe access for consumers. Veterinarians have been collaborating with other licensed professionals of their choice, while simultaneously protecting the consumer, within the boundaries of their facilities or by direct supervision for decades. This approach is consistent with the CA VMB's current regulatory language, the outcome of the 2018 Appropriations committee failure to pass AB 3013, and the CVMA position. Additionally, using recommendations consistent with the other states that have gone before us (like Colorado, Nevada and Nebraska) is not in the best interests of California regulatory law in general because our state is unique with demographics, geography and existing approaches to medicine. Inclusion of properly qualified and licensed physical therapists in the Veterinary Practice Act is already encompassed by utilizing the "veterinary assistant" terminology and creation of additional definitions is redundant to our profession and is confusing to the consumer.

The issue of animal physical rehabilitation has been going on for far too long and legislative "remedies" have required extensive effort and time without a clear resolution (akin to AB 3013—the Animal Physical Rehabilitation Bill of 2018). Should there be a legislative fix, based on a collaborative effort between both professions, to include a licensed professional regulated by the CA VMB I would support such a change. For example, an animal physical rehabilitation facility where the CA licensed veterinarian establishes the VCPR and services shall be provided includes a registered veterinary technician and a qualified and licensed physical therapist. This is a reasonable compromise for both professions and consumers protection and reduction of harm to the animal patient is mitigated.

Sincerely,
Stephen Atwater, DVM, MS, DACVIM (O)

Richard Sullivan <sullydvm@gmail.com>
Fri 4/17/2020 11:56 AM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA

[VMBlletterAPR0420.pdf](#)
652 KB

Dear Justin,

[Attached](#) is my letter of support for the APH as proposed.

Thank you and thank you for all of the work that you do for the public and the profession especially in this difficult time.

Dick Sullivan

Richard J. Sullivan, DVM
Bay Cities Pet Hospital
20447 Hawthorne Blvd.
Torrance, CA 90503
April 17, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: Written Comment on the Proposed Animal Physical Rehabilitations (APR) regulations.

Dear Ms. Sotelo,

I am a small animal practitioner in Torrance, CA. I am presently on the Veterinary Medical Board's (Board) Multi-disciplinary Advisory Committee (MDC.) I am a past member of the Board and have been involved in every MDC and VMB meeting that discussed this issue. I also attended the first APR public hearing in 2015 and later the first two of the three task force meetings that was requested by the Senate Business and Professions Committee. Although I was unable to attend the third task force meeting, I was able to listen to it entirely on the webcast. I also made it my responsibility to visit a practice the was dedicated to APR that had a staff of veterinarians, licensed physical therapist, Registered Veterinary Technicians (RVT), and veterinary assistants (VA.) This was an unannounced visit and I spent about four hours there observing the patients and reading the medical records of these patients. The timeframe from our first MDC meeting, an all day public hearing, Board meetings, and the three task force meetings was a period of over eight years.

After a number of meetings in 2012-14 of the MDC, we proposed regulations to the Board that had some problems. After a full day public hearing in 2015, it was apparent that we did not have the correct wording; it needed more work. That regulation was withdrawn and we addressed all of the deficiencies that we heard at the hearing by defining terms better, by narrowing what APR was and what it wasn't. The revamped regulation was a great improvement and was forwarded to the Board but was stalled by the requirement of a senate committee that required the Board to form a task force to bring in stakeholders to review the proposed regulations. Those same stakeholders were at all of the publicly held MDC and Board meetings. The task force met three times over the course of about 9 -10 months and made some recommendations to the Board which were thoroughly discussed over the course of two meetings with the final vote approving the present language. Most of the recommendations made by the task force were approved but some were not.

From this background, I believe that I did my due diligence in studying, researching, investigating, listening, and understanding the issues that went into making my decision to vote for the regulations as written. I believe that the rest of the Board did likewise.

My decision to approve direct supervision for physical therapist was based on several important facts:

1. There was testimony of several clients who had animals that had an emergency medical issue during APR at a clinic with no veterinarian present and the client was under the impression that they were on the premises.
2. In my visit to a clinic that was dedicated to APR only I observed that the majority of patients had significant medical conditions that did need supervision when they were being treated. In human clinics, if a patient has a problem, they call 911; that is not available in veterinary medicine. Besides, instinctively, animals suppress their symptoms of pain or illness because in the wild that would attract predators. Veterinarians are trained and have experience in determining this and physical therapists are not.
3. Another common comment was that access was a problem. However, it was pointed out that there are three times more APR practices with direct supervision of a veterinarian in California than there are clinics specializing in dermatology, or clinics specializing in cardiology, or clinics specializing in neurology. So in the world of veterinary medicine, there is not a problem with access to APR.
4. There is nothing in this language that says a physical therapist cannot own a business as long as they have a veterinarian on staff and present. As a matter of fact, there is just such a practice up the street from our practice that we refer to.

When I voted to pass this regulation as proposed, my decision was based upon what is best for our patients. This is the practice of veterinary medicine and in my opinion, there needs to be veterinarian on the premises to make sure the patient is diagnosed correctly, is healthy enough for the task being done, and is present if there is an emergency. For the Board to do anything less is not protecting the public.

Thank you.

Sincerely,



Richard J. Sullivan, DVM

**Title 16. Professional and Vocational Regulations Division
Division 20. Veterinary Medical Board
Article 4
Animal Physical Rehabilitation, § 2038.5**

45-Day Public Comment Period: March 13, 2020 through April 27, 2020

Victor Johnson <vjohanson44@sbcglobal.net>
Mon 4/27/2020 11:15 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

April 28, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal

rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Victor Johnson

216 Baldwin Ave
Ventura CA

805-647-7420

vjohnson44@sbcglobal.net

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Jeanine Freeberg <jeaninefreeberg@yahoo.com>
Mon 4/27/2020 8:53 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

April 23, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED

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I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Jeanine Freeberg
10501 S. St. Louis Avenue
Chicago, IL 60655
(773)531-4350

jeaninefreeberg@yahoo.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Samara Love <samaratullia@yahoo.com>
Mon 4/27/2020 8:44 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

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I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Samara Love
2918 Florence St. #3 Berkeley, CA
510-508-0079
Samara T. Love
510-508-0079
laughingdogs.net

Amber Heckler <amheckler@hotmail.com>
Mon 4/27/2020 7:58 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

[PT oppose template letter 4.21.2020F .pdf](#)
75 KB

April 27, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a licensed physical therapist in California, I have been monitoring this issue closely for years and have been repeatedly disappointed with the egregious attempts this Board has taken to monopolize this area of animal healthcare.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to practice my craft under reasonable guidelines.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, my job opportunities and ability to earn a living would be dramatically reduced. **This regulation would be a restraint of my trade.**

Other states have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am OPPOSED to this regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before us on this matter).

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly

included the physical therapists. Unfortunately, the CVMB opposed that bill largely based on the misrepresentations by members of the veterinary profession who successfully were able to sway Board opinion.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals *after* a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

Amber Heckler, PT, CCRT

920 E Virginia Ave, Denver, CO 80209

amheckler@hotmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Kelley Mattos <toadberry21@hotmail.com>
Mon 4/27/2020 6:54 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

VMB Opposition letter Watkins4.22.2020.docx
18 KB

Thank you for reviewing and considering my **letter**.

Amy Watkins

April 22, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

Re: Opposition to VMB Animal Rehab Regulations

Dear Mr. Sotelo, Mr. Rodda and the California Veterinary Medical Board Members,

I have been following the issue of regulating Physical Therapists practicing on animals. I testified at the VMB's Animal Rehab Regulations public hearing in Sacramento in 2015 (and after traveling for hours to attend, I was disappointed that the Board was not present to listen to my comments). I was happy to hear that since then, the language was withdrawn and I commended your effort to appoint a Stakeholder's Task Force to help create a more suitable solution. I submitted another letter on April 4, 2017 to show my support for the solution that your Task Force came up with to allow physical therapists with certification in animal rehab to practice on their own premises as long as the pet has been seen by a veterinarian first to determine the animal is a good candidate for such services.

But now you have reversed everything again and you discarded the good work your Stakeholder's Task Force did in determining an appropriate solution for including animal physical therapists. Now you are attempting to do what we all objected to back in 2015 by relegating qualified and licensed PT's to "unlicensed veterinary assistants" and forcing them to work under direct supervision of a veterinarian and only in a veterinary hospital/clinic. Why is that? Thousands of California consumers have already voiced our desires for more choice of and access to PT's for our animals. Why are you not listening us?

I currently reside with my wife and dog Lacey in the city of Hanford, CA. Our three-year-old dog suffered a torn ligament in her left knee back in January of 2015. We visited our local veterinarian for a diagnosis and solution. After three trips to the vet, which included sedation and two sets of x-rays, we were instructed to kennel our dog and she was prescribed an anti-inflammatory. After two months and a worsening condition, I requested a referral to UC Davis Veterinary Hospital for a second opinion.

May of 2015, we arrived to UC Davis and met our doctors who immediately diagnosed Lacey with a torn ligament. She underwent TPLO surgery. When we received our discharge instructions and treatment plan, the Dr. handed us a list of certified rehab therapists in California. The surgeon strenuously objected to us taking Lacey therapist that was not certified as it could derail the TPLO surgery and her ability to recover properly.

As we viewed the list of potential CCRT's we noted that all of the options were located three or more hours away. I discussed with the surgeon that I knew of a local veterinary clinic in Fresno claiming to provide physical therapy to dogs, under a veterinarian's license. I noticed though, that the Fresno location was not on the list my surgeon provided. The surgeon offered to call the business and ask the necessary questions. After vetting the Fresno location, the surgeon called us and advised that she spoke with an employee who knew little to nothing about the proper physical therapy treatments for a TPLO patient. She strongly urged us to choose another location that had a certified professional.

After viewing several locations, we chose to drive 3.5 hours each way to Santa Barbara for Lacey's rehab. We chose Santa Barbara because they had many stories of success with all cases but more specifically TPLO patients. After a referral from the surgeon, we received approval to begin a treatment plan. When we arrived to the rehab clinic in Santa Barbara, we were astonished by the level of proficiency and depth of knowledge displayed by the certified animal physical therapist and her staff. It was immediately obvious that the treatment was going to be vital to Lacey's recovery. The certified PT treated the injury and the other parts of Lacey's body that were affected by the body compensating for the injury. In all my years of owning dogs, I had never seen a professional more equipped to handle the care of my animal. I truly feel that this type of practice is valuable and necessary for the continuing advancement of proper pet health and treatment.

I have been the victim of two woefully under practiced and uninformed veterinarians who the VMB says will "be safer" for my dog when seeking physical therapy. I can tell you with overwhelming certainty that this is not the case. If the physical therapist is licensed and shows a clear level of education and training on animals, then those CCRT's should have the ability to practice independent of a veterinarian.

As a consumer, it is my right and frankly my responsibility to make sure I am receiving the best care for my pet. My story is an example of how restricting access to qualified professionals is a disservice to the consumers and pets of California. I had to drive 7 hours in one day just to get treatment by a qualified physical therapist for Lacey. Clearly there are not enough of these professionals around. Access MUST be broadened to Physical Therapists certified in animal rehabilitation.

As my family and I look back to our decision to treat Lacey with Karen Atlas, it is undeniable that we made the right decision, as Lacey never had another issue with her legs. We truly believe that the treatment given to Lacey by Karen Atlas made all the difference in our animal's ability to not only heal but to be fully restored to her quality of life prior to the injury. Friends of mine with animals, who suffered the same injury, have undergone surgery and not recover in the same manner after remaining under a veterinarians care only. The animals maintained obvious limps and never returned to their mobility enjoyed prior to injury.

I strongly oppose the animal rehabilitation regulations being proposed by the Veterinary Medical Board.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified your Stakeholder's Task Force language.

Please do the right thing and abandon these regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California. It is long overdue.

Sincerely,

Amy Watkins

Visalia, CA

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Siefertman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members

OPPOSITION - 45-DAY PUBLIC COMMENT PERIOD

Attachment 3

Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Jenny Moe <jenjonesdpt@me.com>
Mon 4/27/2020 6:14 PM

- Sotelo, Justin@dca; Rodda, Timothy@dca; DCA Director's Office; PT@dca

April 27, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a licensed physical therapist in California, I have been monitoring this issue closely for years and have been repeatedly disappointed with the egregious attempts this Board has taken to monopolize this area of animal healthcare.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to practice my craft under reasonable guidelines.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, my job opportunities and ability to earn a living would be dramatically reduced. **This regulation would be a restraint of my trade.**

Other states have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am OPPOSED

to this regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before us on this matter.).

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists. Unfortunately, the CVMB opposed that bill largely based on the misrepresentations by members of the veterinary profession who successfully were able to sway Board opinion.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals *after* a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

Jennifer Moe
2606 31st Ave
San Francisco, CA 94116
jenjonesdpt@me.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members Jenny Moe, PT, MS, DPT, CCRT, APT
Doctor of Physical Therapy
Certified Canine Rehabilitation Therapist
Animal Physical Therapist (Nevada)

Pawesome PT

www.pawesomept.com (under construction)

pawesomept@icloud.com

(775) 292-9544 Pawesome PT (call or text)

Jeff Atlas <jdatlas2@gmail.com>
Mon 4/27/2020 5:51 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

[Opposition of VMB APR Regulations.pdf](#)
166 KB

Dear Mr. Sotelo and Mr. Rodda,

Please see [attached](#) opposition letter for the APR regulations. Thank you for your consideration.

Jeff Atlas, Exec. Producer
www.backhandproductions.com
(626) 351-4390 (O)

April 27, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

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So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

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I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,



Jeff Atlas
4864 Payton Street
Santa Barbara, CA 93111
909-227-3310
jdatlas2@gmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Francisco Maia <francisco@thek9pt.com>
Mon 4/27/2020 4:49 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a licensed physical therapist in Illinois and have my own canine rehabilitation business. Here in Illinois we are allowed to practice with general supervision of a veterinarian, which has worked extremely well for all parties involved. In addition, I also serve as the current Vice-President for the Animal Physical Therapy Specialty Interest Group within the American Physical Therapy Association.

I have been monitoring this issue closely for years and have been repeatedly disappointed with the egregious attempts this Board has taken to monopolize this area of animal healthcare.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to practice my craft under reasonable guidelines.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, job opportunities and ability to earn a living would be dramatically reduced. If such changes happen in California, it could potentially lead into other states doing the same. **This regulation would be a restraint of my trade if something similar was ever implemented in Illinois.**

Other states have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am OPPOSED to this regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before us on this matter.).

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists. Unfortunately, the CVMB

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I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals after a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states, including Illinois. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

Dr. Francisco Maia, PT, DPT, CCRT
4521 W. Lawrence Avenue, Suite 108
Chicago, IL, 60630
francisco@thek9pt.com

Heidi Hutmaker <redwoodanimalacupuncture@gmail.com>
Mon 4/27/2020 4:24 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

Dear Mr. Sotelo and Mr. Rodda,

I am a licensed veterinarian in California and have been certified in and practicing animal rehabilitation for over a decade. I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

I have worked in multiple animal rehabilitation facilities in multiple states over the last ten years. And I can unequivocally state that the physical therapists that I have had the honor to work with have been a phenomenal addition to the care of my patients. Supporting these regulations is dismissing the years of training that physical therapists have committed to improving animal rehabilitation. We owe physical therapists a debt of gratitude for expanding this field and improving the care of our companion animals and will only continue to advance this field with their help.

Physical therapists are well trained in their role in medicine. They have developed a good working relationship with physicians, and countless people have benefited from this relationship as most physicians are not trained in physical rehabilitation skills. Similarly, most veterinarians are not trained in animal rehabilitation. The best way to improve the access of animal rehabilitation is to create a good working relationship between veterinarians and physical therapists that have additional training in animal rehabilitation. These regulations will do the exact opposite of what has been proven to work in human medicine. These regulations will limit my ability to collaborate with physical therapists and will further limit companion animals from receiving animal rehabilitation by a trained professional. The wait time for a companion animal to be seen by a rehabilitation veterinarian in the Bay Area is often at least 1-2 months. Unfortunately, I can tell you that I have personally known multiple people who have made the agonizing decision to euthanize their companion animal because they were unable to wait that long to receive care for their beloved pet.

One of the veterinarians supporting these regulations has supplied her clients with form letters that she has asked them to send you. A couple of those clients felt manipulated by her and decided against sending the letter stating that they did not understand the purpose of the letter. One of those clients questioned me about the proposed regulations because she incorrectly presumed that the staff who worked on her dog at this veterinarian's rehabilitation facility were physical therapists or at least registered veterinary technicians who were certified in animal rehabilitation. We cannot expect the public to understand the education or licensing that goes into what we do; that is the role of the veterinary medical board. Oversight and regulation is important to protect the consumer and their companion animals. And the best way to do that is make every effort to ensure that all practitioners (not just veterinarians) are licensed and have received adequate training. The mission statement of the California Veterinary Medical Board (CVMB) is not to protect the financial interests of veterinarians. It is "To protect consumers and animals..." And these regulations fail to do that.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed physical therapists to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals after a veterinarian has established a Veterinary-Client-Patient-Relationship (VCPR), made a diagnosis, and determined that rehabilitation would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified physical therapists to practice on their own APR premises under INDIRECT supervision (after the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us (Colorado, Nevada and Nebraska). Exempting properly qualified and licensed physical therapists from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

The issue of animal physical rehabilitation has been going on for far too long. A legislative remedy is the clear solution (akin to AB 3013—the Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists.

Thank you for your consideration in this matter.

Sincerely,

Heidi L. Hutmaker, DVM, CVA, CCRT, CVTP, CVSMT, CVCH, CTPEP, CVFT
Redwood Animal Acupuncture
2151 Salvio St. Suite A2-562
Concord, CA 94520
DrH@redwoodanimalacupuncture.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Margery Walker <margery.holman@ascension.org>
Mon 4/27/2020 3:25 PM

- Rodda, Timothy@DCA; Sotelo, Justin@DCA; DCA Director's Office; PT@DCA

April 21, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a licensed physical therapist and licensed veterinary technician in New York, I have been monitoring this issue closely for years and have been repeatedly disappointed with the egregious attempts this Board has taken to monopolize this area of animal healthcare.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to practice my craft under reasonable guidelines.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, my job opportunities and ability to earn a living would be dramatically reduced. This regulation would be a restraint of my trade.

Other states have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am OPPOSED to

this regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before us on this matter.).

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists. Unfortunately, the CVMB opposed that bill largely based on the misrepresentations by members of the veterinary profession who successfully were able to sway Board opinion.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals after a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

Margery Walker
2232 Slaterville Rd
Ithaca, NY 14850

Margery.Holman@yahoo.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Peak Animal Wellness Services <info@pawsvet.ca>
Mon 4/27/2020 2:38 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

California VMB letter of opposition.pdf
377 KB

Please see the **attached** letter.

Raceeta MacKenzie, B.Sc., DVM
with Certification Courses in Veterinary Acupuncture, Animal Chiropractic, and Canine
Physical Rehabilitation

Peak Animal Wellness Services
Unit 1 - 6280 202 St.
Langley, BC. V2Y 1N2

Phone: 778-955-PAWS (7297)
Website: www.pawsvet.ca
Email: info@pawsvet.ca



Date: April 27, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: VETERINARY OPPOSITION TO CVMB ANIMAL PHYSICAL REHABILITATION
PROPOSED REGULATIONS

Dear Mr. Sotelo and Members of the California Veterinary Medical Board,

I am a licensed veterinarian in Langley, British Columbia. I am submitting this letter to OPPOSE the California Veterinary Medical Board's proposed animal physical rehabilitation regulations.

While completing my veterinary degree at the Ontario Veterinary College in 2012, I realized that I have a passion for canine physical rehabilitation. In 2018, I completed the Certified Canine Rehabilitation Therapist program through the Canine Rehabilitation Institute. One of the requirements of this certification program is the completion of a 40 hour internship with a certified canine rehabilitation therapist. I was fortunate to complete my internship with licensed physical therapist (certified in canine rehabilitation), Karen Atlas at Atlas Rehabilitation for Canines in Santa Barbara.

While learning under Ms. Atlas, I was surprised to hear how the California Veterinary Medical Board was choosing to regulate the specialty field of animal rehabilitation, particularly that it does not allow a licensed physiotherapist with additional training in veterinary physical rehabilitation to practice on animals without direct supervision of a veterinarian. As a veterinarian, I know how challenging it is to stay up to date on the latest techniques and therapies available to help our patients, and I feel that it is impossible for any one veterinarian to be knowledgeable in every single aspect of veterinary medicine, let alone additional integrative therapies that are not taught in veterinary school. It is unreasonable to believe that veterinarians have the same skillset as a PT, much less even want to offer specialty rehab services themselves.

Allowing the veterinarian to evaluate, diagnose, and determine the best course of treatment is appropriate. If the best course of treatment is to send my patients to an animal physical therapist, then I would like the choice to be able to do that for my patients and clients. It would be the highest standard of professional medical care for me to be able to refer my patients out to the professionals who are competent in this specialty. I have personally seen the differences in outcomes from the services of a licensed physical therapist certified in canine rehabilitation and therefore recognize the



Date: April 27, 2020

important role these professionals play in the care and well-being of our companion animals.

I urge you to allow experts in different fields to work together *with* us veterinarians by putting a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals *after* a veterinarian has established a Veterinary-Client-Patient-Relationship (VCPR), made a diagnosis, and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (after the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer.

I encourage you to abandon your regulatory efforts and instead pursue the proper legislative remedy to get this ongoing issue resolved.

Sincerely,

A handwritten signature in blue ink that reads "R. MacKenzie".

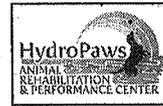
Raceeta MacKenzie, B.Sc., DVM, CAC, CCRT
Unit 1 – 6280 202 St.
Langley, BC. V2Y. 1N2
info@pawsvet.ca

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Siefertman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Jess Kirksey <leila525@hotmail.com>
Mon 4/27/2020 2:59 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

[KirkseyPTletter.pdf](#)
246 KB



<p>San Roque Pet Hospital 3034 State Street Santa Barbara, CA 93105 ph: 805 682-2647 fax: 805 569-4087 sanroquepethospital.com sanroquepethospital@gmail.com</p>	<p>HydroPaws 3034 State Street Santa Barbara, CA 93105 ph: 805 687-4131 office fax: 805 617-4064 hydropaws.com hydropawsanimalrehab@gmail.com</p>	<p>Montecito Pet Hospital 1252 Coast Village Circle Montecito, Ca 93108 ph: 805 969-2213 fax: 805 969-2210 montecitopethospital.com montecitopet@gmail.com</p>	<p>Goleta Airport Pet Hospital 300 Storke Road Goleta, CA 93117 ph: 805 968-4300 fax: 805 968-5018 (website under construction) goletapet@gmail.com</p>
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April 27, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
 Timothy Rodda, Administration/Licensing Manager
 Veterinary Medical Board
 1747 North Market Blvd., Suite 230
 Sacramento, CA 95834

RE: VETERINARY OPPOSITION TO CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am a licensed veterinarian in California and a member of the CVMA. I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to inter-professionally collaborate and hinders the consumer's ability to access these professionals.

Allowing the veterinarian to evaluate, diagnose, and determine the best course of treatment is appropriate. If the best course of treatment is to send my patients to an animal physical therapist, then I would like the choice to be able to do that for my patients and clients. It is unreasonable to believe that veterinarians have the same skillset as a PT, much less even want to offer specialty rehab services themselves. It would be the highest standard of professional medical care for me to be able to refer my patients out to the professionals who are competent in this specialty. I have personally seen the differences in outcomes from the services of a licensed physical therapist certified in canine rehabilitation and therefore recognize the important role these professionals play in the care and well-being of our companion animals.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals *after* a veterinarian has established a Veterinary-Client-Patient-Relationship (VCPR), made a diagnosis, and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (after the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us (like Colorado, Nevada and Nebraska). Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

The issue of animal physical rehabilitation has been going on for far too long. A legislative remedy is the clear solution (akin to AB 3013—the Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists.

Sincerely,



Jessica Kirksey, DVM

436 Skyhigh Drive

Ventura, California 93001

Leila525@hotmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Katharina Hromas-Wood <katharina.hromaswood@gmail.com>
Mon 4/27/2020 10:53 AM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

April 25, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Katharina Hromas-Wood
418 Winding Way, San Carlos, CA 94070
650.455.8397
katharina.hromaswood@gmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Grant Harvey <p.grant.harvey@gmail.com>
Mon 4/27/2020 10:24 AM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

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I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Grant Harvey

P. Grant Harvey
230 Family Farm Rd, Woodside, California, 94062
650-814-31100
P.Grant.Harvey@gmail.com

Jennifer Benton PT <beinginbalancept@gmail.com>
Mon 4/27/2020 9:37 AM

- Sotelo, Justin@DCA

April 25, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a licensed physical therapist in California, I have been monitoring this issue closely for years and have been repeatedly disappointed with the egregious attempts this Board has taken to monopolize this area of animal healthcare.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to practice my craft under reasonable guidelines.

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Other states have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am OPPOSED to this regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before us on this matter.).

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists. Unfortunately, the CVMB opposed that bill largely based on the misrepresentations by members of the veterinary profession who successfully were able to sway Board opinion.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals *after* a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

Jennifer Benton
1185 Keeler Ave Berkeley Ca 94708
beinginbalancept@gmail.com

Jennifer Benton, PT, CCRT
Being In Balance Physical Therapy
Phone/Text: 510-543-1637
1498 Solano Ave.
Albany, Ca. 94706

Check out my reviews on [Yelp](#)
Find helpful information on my [Facebook Page](#)

Cici Lipset <lipset@comcast.net>
Mon 4/27/2020 12:42 AM

- Sotelo, Justin@DCA

April 25, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

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This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.
Sincerely,

Name Cici Lipset
Address 4250 El Camino Real, D-136, Palo Alto, CA 94306
Phone 650-465-5419
Email address lipset@comcast.net

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Jennifer Benton PT <beinginbalancept@gmail.com>
Mon 4/27/2020 12:26 AM

- Rodda, Timothy@DCA; Sotelo, Justin@DCA; DCA Director's Office; PT@DCA

April 26, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

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The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists. Unfortunately, the CVMB opposed that bill largely based on the misrepresentations by members of the veterinary profession who successfully were able to sway Board opinion.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals *after* a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

Jennifer Benton
1185 Keeler Ave. Berkeley, Ca. 94708
beinginbalancept@gmail.com

Jennifer Benton, PT, CCRT
Being In Balance Physical Therapy
Phone/Text: 510-543-1637
1498 Solano Ave.
Albany, Ca. 94706

Scott <spinsam@aol.com>
Sun 4/26/2020 8:31 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

Please see letter below – **NOT LEGIBLE DUE TO IMAGE QUALITY**

heart regi <elsaregina6@gmail.com>
Sun 4/26/2020 7:16 PM

- DCA Director's Office; Sotelo, Justin@dca.ca.gov; PT@dca.ca.gov; Rodda, Timothy@dca.ca.gov

April 26, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical

therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Name Elsa regina

Address 20617 hartland

Phone 8184412882

Email address elsaregina6@gmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs

Jessica Sieferman, Executive Officer, California Veterinary Medical Board

California Veterinary Medical Board Members

Jason Kaiser, Executive Officer, Physical Therapy Board of California

Physical Therapy Board of California Members

Ashlee <ashleezombie@aim.com>
Sun 4/26/2020 6:55 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

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I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Ashlee mcdougall
205 geneive circle Camarillo, CA 93010
8052050021
Ashleezombie@aim.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Cindy Maurer <maurercc@aol.com>
Sun 4/26/2020 6:52 PM

- Sotelo, Justin@dca; Rodda, Timothy@dca; DCA Director's Office; PT@dca

April, 26, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a licensed physical therapist in California, I have been monitoring this issue closely for years and have been repeatedly disappointed with the egregious attempts this Board has taken to monopolize this area of animal healthcare.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to practice my craft under reasonable guidelines.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, my job opportunities and ability to earn a living would be dramatically reduced. **This regulation would be a restraint of my trade.**

Other states have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am OPPOSED to

this regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before us on this matter.). **The certification process is rigorous for Vets, PT's or Vet Tech's, this DOES INSURE SAFETY for our animals.** I encourage you to familiarize yourselves with the programs through the University of Tennessee and Canine Rehab institute. The issue of animal physical rehabilitation has been going on for far too long.

The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists. Unfortunately, the CVMB opposed that bill largely based on the misrepresentations by members of the veterinary profession who successfully were able to sway Board opinion.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals *after* a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. . This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

Cindy Maurer PT, DPT, OCS, CCRP in progress
Board Certified Orthopedic Clinical Specialist
5145 Whitecap St
Oxnard CA, 93035
maurercc@aol.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Bushnell, Laura <LBushnell@KSLAW.com>
Sun 4/26/2020 6:16 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

April 26, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Laura Bushnell
1015 Sherman Ave
Menlo Park, CA 94025
650.888.6240
labushnell@gmail.com
lbushnell@kslaw.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

katherine millar <millark@sbcglobal.net>
Sun 4/26/2020 5:59 PM

- Sotelo, Justin@dca; Rodda, Timothy@dca; DCA Director's Office; PT@dca

April 25, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

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I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Katherine Millar
2530 Lincoln Avenue
Belmont, 94002-1426
650-759-3585
millark@sbcglobal.net

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Molly Clement <Molly@kitkaufman.com>
Sun 4/26/2020 4:32 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

April 26, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

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I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Carlyn Clement
19 Blue Ridge Lane, Woodside, CA 94062
650 851 5172
molly@kitkaufman.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Chris Carter <crcarter10@gmail.com>
Sun 4/26/2020 3:54 PM

- Sotelo, Justin@DCA

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

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Sincerely,

Chris Carter
4043 Dean Drive
Ventura, CA 93003
805-746-6601
Email address

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

jrenne17@gmail.com
 Sun 4/26/2020 2:33 PM

- Sotelo, Justin@dca; Rodda, Timothy@dca; DCA Director's Office;
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" <PT@dca.ca.gov>
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April 26, 2020

Justin Sotelo, Lead Administrative & Policy Analyst

Timothy Rodda, Administration/Licensing Manager

California Veterinary Medical Board

1747 North Market Blvd., Suite 230

Sacramento, CA 95834

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

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rely on unlicensed veterinary assistant and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

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I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more an

imals can get the care they need, where they need it in California.

Sincerely,

Joan=C2=A0 Renne

1669 Avanti Drive, Roseville, CA 95661

916-203-8847

Jrenne17@gmail.com

C=C2=A0 Kimberly Kirchmeyer, Director, California Department of Consumer Affairs

Jessica Sieferman, Executive Officer, California Veterinary Medical Board

California Veterinary Medical Board Members

Jason Kaiser, Executive Officer, Physical Therapy Board of California

Physical Therapy Board of California Members

Physical Therapy Board of California Members

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Howard Dorre <howard.dorre@gmail.com>
Sun 4/26/2020 2:16 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Howard Dorre
14934 Valley Vista Blvd, Sherman Oaks, CA, 91403
217-637-7390
howard.dorre@gmail.com

Mari Bukofsky <marshobu@gmail.com>
Sun 4/26/2020 2:10 PM

- Sotelo, Justin@dca; Rodda, Timothy@dca; DCA Director's Office; PT@dca

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

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Sincerely,

Mari Bukofsky
1020 Glenneyre St, Laguna Beach, CA 92651
949-715-5133
marshobu@gmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Ward Bukofsky <wardbukofsky@gmail.com>
Sun 4/26/2020 2:00 PM

- Sotelo, Justin@dca; Rodda, Timothy@dca; DCA Director's Office; PT@dca

April 26,2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

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Sincerely,

Ward Bukofsky
1020 Glenneyre St, Laguna Beach, CA 92651
310.480.2212
wardbukofsky@gmail.com

Erin Bukofsky <erinhbee@gmail.com>
Sun 4/26/2020 1:28 PM

- Sotelo, Justin@dca; Rodda, Timothy@dca; DCA Director's Office; PT@dca

April 26, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a licensed physical therapist in California, I have been monitoring this issue closely for years and have been repeatedly disappointed with the egregious attempts this Board has taken to monopolize this area of animal healthcare.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to practice my craft under reasonable guidelines.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, my job opportunities and ability to earn a living would be dramatically reduced. **This regulation would be a restraint of my trade.**

Other states have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am OPPOSED

to this regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before us on this matter.).

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists. Unfortunately, the CVMB opposed that bill largely based on the misrepresentations by members of the veterinary profession who successfully were able to sway Board opinion.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals *after* a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

Erin Bukofsky, PT, DPT, CCRT
Doctor of Physical Therapy
Certified Canine Rehabilitation Therapist
18837 Hawthorne Blvd, Torrance, CA 90504
ebukofsky@beachanimalrehab.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

JIM WASYLEWSKI <rocnruthwas@comcast.net>
Sun 4/26/2020 12:49 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office

OPPOSITION to CVMB Animal Physical Rehab Proposed Regulations .pdf
1 MB

Dear Sirs

We oppose the proposed animal physical regulations, our pet had an FTO performed on her left hip last September and required physical therapy as part of her recovery process. We were taking her to Atlas Rehabilitation for Canine's in Santa Barbara for physical therapy prior to Governor Newsom's COVID-19 "Shelter-In-Place" edict. Atlas is highly regarded by Central Coast Veterinarians as one of the best places for animal physical therapy.

Atlas' staff are state certified animal physical therapist, they are very professional, compassionate toward the animals and their owners, and are knowledgeable with regards to animal rehab protocols and programs having the animal's best interests in mind. These attributes are not always found in a vet's office when it comes to physical therapy for animals.

Attached please find my letter opposing the proposed animal physical regulations.

Thank you

Jim & Ruth Wasylewski

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

April 26, 2020

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

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So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

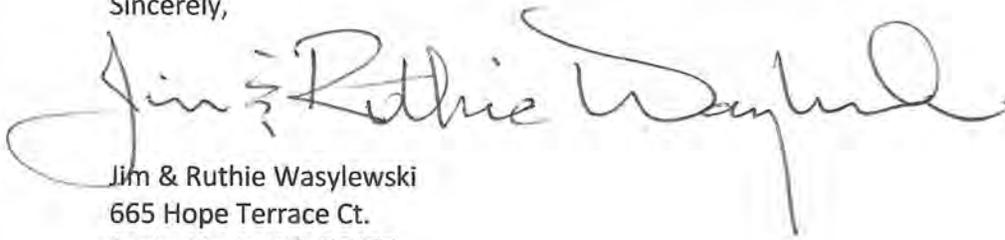
Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be

competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

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I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

A handwritten signature in black ink that reads "Jim & Ruthie Wasylewski". The signature is written in a cursive, flowing style.

Jim & Ruthie Wasylewski
665 Hope Terrace Ct.
Santa Maria, CA. 93455
(805) 937-1532
rocnruthwas@comcast.net

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

San Buenaventura Physical Therapy <sbvpt@aol.com>
Sun 4/26/2020 12:45 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

April 26, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

Dear Mr. Sotelo and Mr. Rodda,

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Sincerely,

Sierra Meyers
7027 La Fonda Ct.
Ventura, CA 93003
805.415.6436
Sierram23@aol.com

San Buenaventura Physical Therapy <sbvpt@aol.com>
Sun 4/26/2020 12:42 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

April 26,2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

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A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

Ryan Meyers, PT, DPT, MTC
2807 Loma Vista Road Suite 104
Ventura, CA 93003
San Buenaventura Physical Therapy
805.641.3843

Sandy Orlando <sandyo1267@gmail.com>
Sun 4/26/2020 12:23 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

Dear Mr. Sotelo and Mr. Rodda,

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I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Sandy Orlando

MARY WHITEHILL <marydvm@aol.com>
Sun 4/26/2020 12:11 PM

- DCA Director's Office; Rodda, Timothy@DCA; Sotelo, Justin@DCA

I urge you to put a stop to any regulatory effort that drastically changes the supervision level from direct to indirect supervision, redefines referral methods to paraprofessional healthcare providers (such as the physical therapist) and creation of supplementary categories of individuals who may provide services (animal physical rehabilitation assistant). Specifically, qualified and licensed physical therapists should continue to work under the direct supervision of a veterinarian and do not allow them to work on animals at a facility not overseen by a veterinarian after a veterinarian has established a Veterinary-Client-Patient-Relationship (VCPR), made a diagnosis, and determined that rehab would be a safe and beneficial intervention for their animal patients. Allowing qualified physical therapists to practice on their own animal physical rehabilitation premises under indirect supervision would NOT further increase safe access for consumers. Veterinarians have been collaborating with other licensed professionals of their choice, while simultaneously protecting the consumer, within the boundaries of their facilities or by direct supervision for decades. This approach is consistent with the CA VMB's current regulatory language, the outcome of the 2018 Appropriations committee failure to pass AB 3013, and the CVMA position. Additionally, using recommendations consistent with the other states that have gone before us (like Colorado, Nevada and Nebraska) is not in the best interests of California regulatory law in general because our state is unique with demographics, geography and existing approaches to medicine. Inclusion of properly qualified and licensed physical therapists in the Veterinary Practice Act is already encompassed by utilizing the "veterinary assistant" terminology and creation of additional definitions is redundant to our profession and is confusing to the consumer.

The issue of animal physical rehabilitation has been going on for far too long and legislative "remedies" have required extensive effort and time without a clear resolution (akin to AB 3013—the Animal Physical Rehabilitation Bill of 2018). Should there be a legislative fix, based on a collaborative effort between both professions, to include a licensed professional regulated by the CA VMB I would support such a change. For example, an animal physical rehabilitation facility where the CA licensed veterinarian establishes the VCPR and services shall be provided includes a registered veterinary technician and a qualified and licensed physical therapist. This is a reasonable compromise for both professions and consumers protection and reduction of harm to the animal patient is mitigated.

Sincerely,



Mary Whitehill, DVM
Medical Director

Inna Magner <magner@innavet.com>
Sun 4/26/2020 12:08 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA; karen.atlas@yahoo.com; Krista Niebaum <krista@scoutshouse.com>

April 25, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: VETERINARY OPPOSITION TO CVMB ANIMAL PHYSICAL REHABILITATION
PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am a licensed veterinarian in California and a member of the CVMA. I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to inter-professionally collaborate and hinders the consumer's ability to access these professionals.

Allowing the veterinarian to evaluate, diagnose, and determine the best course of treatment is appropriate. If the best course of treatment is to send my patients to an animal physical therapist, then I would like the choice to be able to do that for my patients and clients. It is unreasonable to believe that veterinarians have the same skillset as a PT, much less even want to offer specialty rehab services themselves. It would be the highest standard of professional medical care for me to be able to refer my patients out to the professionals who are competent in this specialty. I have personally seen the differences in outcomes from the services of a licensed physical therapist certified in canine rehabilitation and therefore recognize the important role these professionals play in the care and well-being of our companion animals.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals after a veterinarian has established a Veterinary-Client-Patient-Relationship (VCPR), made a diagnosis, and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (after the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us (like Colorado, Nevada and Nebraska). Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

The issue of animal physical rehabilitation has been going on for far too long. A legislative remedy is the clear solution (akin to AB 3013—the Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists.

Sincerely,

Name: Inna Magner DVM, CVA, CVTP
Address: 1074 Tiller Lane, Foster City, CA
Email address: magner@innavet.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Ben Tychsen <btychsen311@yahoo.com>
Sun 4/26/2020 12:00 PM

- Sotelo, Justin@DCA

[Tychsen, Ben Consumer Oppositon Letter.docx](#)
16 KB

Dear Mr. Sotelo,

Please see my [attached](#) opposition to the CVMB's proposed regulations on animal physical rehab.

Thank you for your time,

Ben Tychsen

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

April 6, 2020

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Benjamin Tychsen
1049 Elm Ln
Carpinteria, CA 93103
(562) 895-8821
Btychsen311@yahoo.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

kaley mcdougall <kaleymcdougall@gmail.com>
Sun 4/26/2020 11:39 AM

- Sotelo, Justin@DCA

[McDougall, Kaley Consumer opposition letter.pdf](#)
67 KB

Hello Mr. Sotelo,

Here is my **attached** letter opposing CVMB's proposed animal physical rehab regulations. As a consumer I believe there should be more access to Certified Canine Rehab Therapists. Please see my letter of opposition attached.

Thank you for your time,

Kaley McDougall

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

April 6, 2020

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

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Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Kaley McDougall
1049 Elm Ln Apt #1

Carpinteria, CA 93103

(805) 509-0635
Kaleymcdougall@gmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Siefertman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

H [REDACTED]
Sun 4/26/2020 11:05 AM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

April 25, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations

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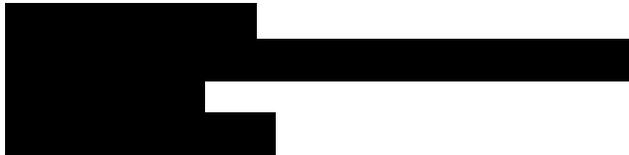
So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

A large black rectangular redaction box covering the signature area.

Cc:

1. Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
2. Jessica Siefertman, Executive Officer, California Veterinary Medical Board
3. California Veterinary Medical Board Members
4. Jason Kaiser, Executive Officer, Physical Therapy Board of California
5. Physical Therapy Board of California Members

katherine millar <millark@sbcglobal.net>
Sun 4/26/2020 9:27 AM

- Sotelo, Justin@DCA; PT@DCA; DCADirectionsOffice@dca.ca.gov; Rodda, Timothy@DCA; karen.atlas@yahoo.com

To: Katherine Millar <millark@sbcglobal.net>
Sent: Sunday, April 26, 2020, 8:22:46 AM PDT
Subject: RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

April 25, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 N. Market Boulevard, Suite 230
Sacramento, California 95834-2987

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Katherine Millar
Address 2530 Lincoln Ave.
Phone 650-759-3585
Email address millark@sbcglobal.net

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Ria Acciani <dogpt@mac.com>
Sun 4/26/2020 9:21 AM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

April 23, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a licensed physical therapist in California, I have been monitoring this issue closely for years and have been repeatedly disappointed with the egregious attempts this Board has taken to monopolize this area of animal healthcare.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to practice my craft under reasonable guidelines.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, my job opportunities and ability to earn a living would be dramatically reduced. This regulation would be a restraint of my trade.

Other states have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am OPPOSED to this regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before us on this matter.).

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists. Unfortunately, the CVMB opposed that bill largely based on the misrepresentations by members of the veterinary profession who successfully were able to sway Board opinion.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals after a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

Ria Acciani, PT, MPT, CCRP
& David Acciani, PT, CCRP

Ria Acciani, MPT, CCRP
David Acciani, PT, CCRP
Advanced Canine Rehabilitation
166 Mountainview Road
Warren, NJ 07059
www.dogpt.com
908-447-3876/ 908-337-5842

Katherine Miller <ksharkyshark@gmail.com>
Sun 4/26/2020 9:12 AM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

April 23, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Katherine Miller
7424 Mitchell Dr., Rohnert Park, CA 94928
530-386-6575
ksharkyshark@gmail.com

Elizabeth Day <eday@feinday.com>
Sun 4/26/2020 8:58 AM

• Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA
April 25, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

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I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Elizabeth Day
136 Felton Drive
Menlo Park, CA 94025
650-324-1154

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Christine Talbott <talbott707@gmail.com>
Sun 4/26/2020 8:54 AM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

April 25, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

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This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

On a personal note, my dog suffered spinal and nerve damage four years ago, and loss the use of a back leg. There was nothing more the vets could or would do. (We even tried UC Davis) Physical Therapy and some wonderful therapists have given Kaylee back more than 85% use of her leg.

Sincerely,

Name Christine Talbott
Address 16 Middlebury Lane Los Altos CA 94022
Phone 650.941.5956
Email address talbotcm@aol.com

Cecilia Macchiavelli <macchiavelli.cecilia@gmail.com>
Sun 4/26/2020 8:05 AM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

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This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Cecilia Perkins
1345 prevost st.
San Jose, CA 95125
510-334-1168

auggiedoggie@startmail.com
Sun 4/26/2020 7:29 AM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@dcac.a.gov

April 25, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Gregory A. Auger
109 Hobart Avenue
San Mateo, CA 94402
(650) 242-6618
auggiedoggie@startmail.com

P.S. I have used the services of Scouts House in San Mateo for my dog's PT for well over a year now (partially torn CCL) with fantastic / positive results. To restrict or reduce this practice would be a great loss and a huge disservice in my opinion. Please **DO NOT** restrict or limit the law to what these fine people do for our animals...they are a big value and asset to the animal community.

Terri Cooper, MA, LMFT <terricooper@verizon.net>
Sat 4/25/2020 11:52 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

April 26, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

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Sincerely,

Terri Cooper, M.A.,LMFT
3739 Mariana Way
Santa Barbara, Ca. 93105
805 682-3025
terricooper@verizon.net

cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Alice Wight <wight.alice@yahoo.com>
Sat 4/25/2020 10:31 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA; karen.atlas@yahoo.com

April 25, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

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Alice Wight
1013 Woodborough Court San Jose Ca 95116
408 438 1513
Wight.alice@yahoo.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Siefertman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

bfeagins <bfeagins@aol.com>
Sat 4/25/2020 9:35 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA; karen.atlas@yahoo.com

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
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Sincerely,

Brian Feagins
470 Munich Street
415 515 5319
Bfeagins@aol.com

Pat Lavender <twohandsforpaws@gmail.com>
Sat 4/25/2020 8:55 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits their ability to practice their craft under reasonable guidelines.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, their job opportunities and ability to earn a living would be dramatically reduced. **This regulation would be a restraint of their trade.**

Other states have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am OPPOSED to this regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before on this matter.).

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals *after* a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow

increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

Pat Lavender
1274 Tanemura Cres,
Kelowna B.C.
Canada
V1P1R5
twohandsforpaws@gmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Carmen Kwong <kwongcarmen@yahoo.com>
Sat 4/25/2020 8:25 PM

- Sotelo, Justin@DCA; Sotelo, Justin@DCA; Timonthy.Rodda@dca.ca.gov <timonthy.rodde@dca.ca.gov>; Timonthy.Rodda@dca.ca.gov <timonthy.rodde@dca.ca.gov>; DCA Director's Office; DCA Director's Office+3 others

April 25, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

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Sincerely,

Carmen Kwong
1161 Schooner Street
Foster City, CA 94404
415-609-3909
kwongcarmen@yahoo.com

lsteensma1179@gmail.com on behalf of Lynne Steensma <Lynne@steensma.net>
Sat 4/25/2020 7:55 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

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Sincerely,

Lynne Steensma
5224 Beachcomber St
Oxnard, CA 93035
Lynne@Steensma.net

Jeanny <chenjeanny888@gmail.com>
Sat 4/25/2020 7:25 PM

- Sotelo, Justin@dca; Rodda, Timothy@dca; DCA Director's Office; PT@dca; Jane Brown <harperswoods@sprintmail.com>; karen.atlas@yahoo.com

Consumer oppose template letter 4.6.2020F.docx
16 KB

April 25, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

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Sincerely,

Jeanny Chen
6518 Kauffman Avenue
858-204-0254
Chenjeanny888@gmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Jeanny Chen

Shannon Herdegen <shanherdegen@gmail.com>
Sat 4/25/2020 4:35 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA; Jill Marti <jillrkuhl@gmail.com>

April 25, 2020

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Sincerely,

Shannon Scofield
Shanherdegen@gmail.com

Julie Bolanos <jsbolanos@sbcglobal.net>
Sat 4/25/2020 3:46 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA; Julie Bolaños <jsbolanos@sbcglobal.net>

April 25, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
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Sacramento, CA 95834

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Sincerely,

Julie Bolanos, MSPT
2026 Hull Avenue
Redwood City, CA 94061
jsbolanos86@gmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Lydia Eve Stein <stein.lydiaeve@gmail.com>
Sat 4/25/2020 3:27 PM

- Sotelo, Justin@DCA

April 25, 2020

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Timothy Rodda, Administration/Licensing Manager
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Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Lydia Eve Stein
2811 Newlands Ave
Belmont CA 94002
650-922-2598
stein.lydiaeve@gmail.com

Annamarie Traver <a_traver@yahoo.com>
Sat 4/25/2020 3:06 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA; karen.atlas@yahoo.com

April 25, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

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I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Name: AnnaMarie Traver
Address: 501 8th Ave, Menlo Park, CA 94025
Phone: 408 375 3617
Email address: a_trave@yahoo.com

Beth McLellan Alvarez <fwabma@pacbell.net>
Sat 4/25/2020 3:04 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

April 25, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

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Sincerely,

Beth McLellan Alvarez
60 Clay Drive, Atherton, CA 94027
650 723-2075
fwabma@pacbell.net

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Marilyn Francesco <mafrancesco@hotmail.com>
Sat 4/25/2020 2:39 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

April 25, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

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I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Marilyn Francesco
10580 Castine Ave.
Cupertino, CA 95014
408-730-8755
mafrancesco@hotmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Teresa Fleckenstein <tmfleck@hotmail.com>
Sat 4/25/2020 2:30 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a sporting dog owner, I engage in a lot of physical activity with my pet. That means my dogs are more prone to orthopedic and activity-related injuries. If my dog is injured, I would like to be afforded with the best options for his care. If my dog ever needed physical therapy, I would like to be able to see an actual licensed physical therapist who is certified in animal rehabilitation without having unnecessary regulatory barriers that would limit my access and choice. The California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

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I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Teresa Miller, RVT
4566 Donlon Road
Somis, CA 93066
PH: 805-452-1848
tmfleck@hotmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Siefertman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

wendy mak <wmak1228@yahoo.com>
Sat 4/25/2020 2:24 PM

- Sotelo, Justin@DCA; Timonthy.Rodda@dca.ca.gov; DCA Director's Office; PT@DCA; karen.atlas.@yahoo.com

April 25, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

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I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Wendy Mak
1161 Schooner St., Foster City, CA 94404
(650) 393-0382
wmak1228@yahoo.com

Catherine Harvey <catherine@benchmark.com>
Sat 4/25/2020 2:13 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

April 25, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

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True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

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I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Catherine Harvey
230 Family Farm Rd. Woodside 94062
650-529-1101
charvey@benchmark.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

[Catherine Harvey](#)

Krista Niebaum <krista@scoutshouse.com>
Sat 4/25/2020 1:29 PM

- Sotelo, Justin@dca; Rodda, Timothy@dca; DCA Director's Office

April 25, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a licensed physical therapist in California, I have been monitoring this issue closely for years and have been repeatedly disappointed with the egregious attempts this Board has taken to monopolize this area of animal healthcare.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to practice my craft under reasonable guidelines.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, my job opportunities and ability to earn a living would be dramatically reduced. **This regulation would be a restraint of my trade.**

Other states have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am OPPOSED to

this regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before us on this matter.).

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists. Unfortunately, the CVMB opposed that bill largely based on the misrepresentations by members of the veterinary profession who successfully were able to sway Board opinion.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals *after* a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Krista Niebaum
PO Box 122, El Granada, CA 94018
Krista@scoutshouse.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Siefertman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Krista Niebaum, MPT, CCRT
Director of Rehabilitation Therapy
Scout's House
(650) 328-1430
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Josh Telsey <jtelsey93@gmail.com>
Sat 4/25/2020 11:16 AM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a licensed physical therapist in California, I have been monitoring this issue closely for years and have been repeatedly disappointed with the egregious attempts this Board has taken to monopolize this area of animal healthcare.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to practice my craft under reasonable guidelines.

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Sincerely,

Dr. Joshua M Telsey, DPT, COMT, CCRT
6865 Alderwood Drive
Carlsbad, CA 92011
Jtel93@sbcglobal.net

Natasha Bui <natashahbui@gmail.com>
Sat 4/25/2020 10:33 AM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a licensed physical therapist in multiple states, I have been monitoring this issue closely for years and have been repeatedly disappointed with the egregious attempts this Board has taken to monopolize this area of animal healthcare.

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Sincerely,

Natasha Bui, PT, DPT
710 W 14th St, 301, Chicago, IL 60607
Natashabui@gmail.com

Natasha Bui
(832) 465-2126

Heather Kramer <heather.kramer@daemen.edu>
Sat 4/25/2020 6:45 AM

- Sotelo, Justin@dca; Rodda, Timothy@dca; DCA Director's Office

April 25, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a licensed physical therapist in the United States, I have been monitoring this issue closely for years and have been repeatedly disappointed with the egregious attempts this Board has taken to monopolize this area of animal healthcare.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to practice my craft under reasonable guidelines.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, my job opportunities and ability to earn a living would be dramatically reduced. **This regulation would be a restraint of my trade.**

Other states have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am OPPOSED to

this regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before us on this matter).

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists. Unfortunately, the CVMB opposed that bill largely based on the misrepresentations by members of the veterinary profession who successfully were able to sway Board opinion.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals *after* a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

Heather Smyrski, PT, DPT, Cert. MDT, C2
Cert. Schroth Scoliosis Therapist
122 4th Avenue
Holtsville, NY 11742
heather.kramer@daemen.edu

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Kate Christian <kateerinchristian@gmail.com>
Sat 4/25/2020 5:53 AM

- Rodda, Timothy@DCA; DCA Director's Office; Sotelo, Justin@DCA; PT@DCA

[PT oppose template letter 4.21.2020F .docx](#)
17 KB

April 21, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a licensed physical therapist in California, I have been monitoring this issue closely for years and have been repeatedly disappointed with the egregious attempts this Board has taken to monopolize this area of animal healthcare.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to practice my craft under reasonable guidelines.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, my job opportunities and ability to earn a living would be dramatically reduced. **This regulation would be a restraint of my trade.**

Other states have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am OPPOSED to this regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before us on this matter.).

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly

included the physical therapists. Unfortunately, the CVMB opposed that bill largely based on the misrepresentations by members of the veterinary profession who successfully were able to sway Board opinion.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals *after* a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

Name

Address

Email address

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Siefertman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Brian Sublett <brian_sublett@prodigy.net>
Fri 4/24/2020 4:45 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Brian Sublett
6811 Gardner Ranch Road
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(650) 269-0569
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Sue Van Evra <svanevra@gmail.com>
Fri 4/24/2020 4:37 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a licensed physical therapist in Alberta, Canada, and as a member of the Advocacy Committee of the Animal Rehabilitation Division of the Canadian Physiotherapy Association, I have been monitoring this issue closely for years.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits the ability of physical therapists in California to practice their craft under reasonable guidelines.

Physical Therapists are experts in rehabilitation. For anyone who has taken course in comparative anatomy, physiology, biomechanics, etc – it is easy to see how physical therapists with training in animal rehabilitation are qualified to assess and rehabilitate animals once they have been screened for medical problems by a qualified veterinarian. Physical therapists are not trying to practice veterinary medicine – they are capable of evaluating functional limitations due to injury or disease process and of creating a rehabilitation plan to restore and maximize function. Physical therapists offer an adjunct to veterinary care.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd – particularly if the veterinarian has no specific training in rehabilitation... If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, it would severely affect physical therapists' ability to earn a living and would also be a disservice to the public.

Other states have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am OPPOSED to this regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before us on this matter.).

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a

veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals after a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer.

Sincerely,

Sue Van Evra
326 Point McKay Gardens NW
Calgary, Alberta, Canada, T3B 4V8
email: svanevra@gmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Siefertman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Lisa Stahr <lbstahr@hotmail.com>
Fri 4/24/2020 4:25 PM

- Sotelo, Justin@dca; Rodda, Timothy@dca; PT@dca

24 April 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230 Sacramento, CA 95834

Justin.Sotelo@dca.ca.gov
Timothy.Rodda@dca.ca.gov
DCA.DirectorsOffice@dca.ca.gov PT@dca.ca.gov

RE: OPPOSITION TO CVMA'S PROPOSED ANIMAL PHYSICAL REHABILITATION REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am writing to **STRONGLY OPPOSE** CVMA's proposed animal physical rehabilitation regulations currently under consideration by the Veterinary Medical Board.

Fifteen years ago, I founded a physical rehabilitation therapy center for animals in Menlo Park, California. Scout's House was among the first facilities in the nation to offer this veterinary service and, as such, my veterinarian business partners and I agreed to base our operations on the best possible practices for care. Since there weren't any guidelines issued by the DCA or VMB at that time, we created our own. Specifically, to ensure the highest quality of care for our patients, we decided to:

1) hire a licensed Physical Therapist as our Director of Rehabilitation Therapy

My business partners, Jan Lowery, DVM, and Janet Dunn, DVM, felt strongly that veterinarians were not sufficiently knowledgeable about or experienced with the therapies in which a rehab therapist must be proficient, such as biomechanics, joint mobilization, therapeutic exercise, neuromuscular electrical stimulation, and goniometry, to effectively treat a small animal patient. This is a belief they continue to hold today;

2) require our Physical Therapist to operate under the indirect supervision of a veterinarian

Every patient at Scout's House was then and is still today required to be evaluated by one of our veterinarians AND by Krista Niebaum, our Director of Rehab Therapy and a licensed Physical Therapist, before beginning rehab therapy. Together, our vet and our PT perform an Initial Examination, where each professional brings her unique skills and training to bear for the patient. The veterinarian performs a general examination with a specific emphasis on the patient's underlying health conditions, particularly any issues that may contraindicate rehab

therapy, as well as on whatever issue necessitated the need for rehab; the Physical Therapist performs an evaluation of the animal's current functional abilities and assesses her/his rehab potential. Following the Initial Exam, our vet and PT discuss the patient's case from both of their professional perspectives and our PT creates a comprehensive treatment plan tailored to that patient's unique functional and medical needs. It is a process that has worked very well for more than 4,000 companion animals for almost 15 years;

3) locate our practice within immediate proximity of a veterinary hospital and to only operate when a licensed veterinarian is onsite at said veterinary hospital;

4) hire only Registered Veterinary Technicians to perform rehab therapy under the indirect supervision of our Supervising Veterinarian AND our Director of Rehab Therapy, a licensed Physical Therapist.

Having seen this model work—and work well—for almost 15 years, I am strongly opposed to the Veterinary Medical Board's approach to pursue regulatory language **without including an exemption for licensed physical therapists who have undergone the necessary training on animals**. Our PT has not only been performing this service with exemplary results since 2005, she is also:

- recognized as one of the preeminent experts in this field, both locally and nationwide, by her veterinary and physical therapy colleagues;
- a faculty member at the Canine Rehabilitation Institute in Florida, where she oversees the Internship Program and, at Scout's House, personally supervises and evaluates LICENSED VETERINARIANS in their Internship modules;
- the author of the chapter on canine rehabilitation modalities in *Canine Sports Medicine and Rehabilitation* by Chris Zink, DVM, and Janet Van Dyke, DVM (Wiley Blackwell, First and Second Editions).

By relegating PTs like Krista Niebaum, a licensed physical therapist who has been specifically trained to work on animals, to being merely an “unlicensed veterinary assistant” and subjecting them to work ONLY under direct supervision of a veterinarian and ONLY in a veterinarian's hospital/clinic is ridiculous. As our model has shown for the last 15 years, a veterinarian does NOT need to be present if the Physical Therapist is appropriately trained and certified by an organization like the Canine Rehabilitation Institute.

I wholeheartedly support—and encourage—regulations that allow qualified and licensed PTs to work under the indirect supervision of a veterinarian and to allow them to work on animals after a veterinarian has established a Veterinary Client-Patient-Relationship (VCPR), made a diagnosis, and determined that rehab would be safe and beneficial for their animal patients.

But I urge you to stop any regulatory effort that fails to include the licensed Physical Therapist as a legitimate provider of animal physical rehabilitation services.

Best regards,

Lisa Stahr
Founder
President, CEO

Scout's House, Inc.
251 North Amphlett Blvd.
San Mateo, CA 94401

CINDY CASTLE <cbrcastle@comcast.net>
Fri 4/24/2020 4:03 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

April 23, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Name Cindy Castle
Address 1731 Lexington Avenue
Phone 650 533 8913
Email address cbrcastle@comcast.net

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

luis diaz <luisrodc@hotmail.com>
Fri 4/24/2020 3:24 PM

- Sotelo, Justin@dca; Rodda, Timothy@dca; DCA Director's Office; PT@dca

April 10, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
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E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

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Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical

therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Name: Luis R. Diaz

Address: 811 E. Mason St. Santa Barbara, CA 93103

Phone: 9805)965-9801

Email address: luisrodc@hotmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs

Jessica Sieferman, Executive Officer, California Veterinary Medical Board

California Veterinary Medical Board Members

Jason Kaiser, Executive Officer, Physical Therapy Board of California

Physical Therapy Board of California Members

Cary Manoogian <cmanoog56@gmail.com>
Fri 4/24/2020 2:23 PM

- Sotelo, Justin@DCA

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

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So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

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I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Name

Address

Phone

Email address

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Cary Manoogian

Linda Morris <douglinmorris73@aol.com>
Fri 4/24/2020 1:05 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

April 23, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

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This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Doug and Linda Morris
2655 Chris Ave
South Lake Tahoe, CA 96150

5305448315

douglinmorris73@aol.com

Bonnie Brown <bbrownvmd@me.com>
Fri 4/24/2020 11:10 AM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

[CA Opposition to APR.pdf](#)
786 KB

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April 23, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: VETERINARY OPPOSITION TO CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

My name is Bonnie Brown and I am a practicing veterinarian and a certified canine rehabilitation practitioner (CCRP, CCRT) working in New York City. I graduated from the University of Pennsylvania, completed an internship and residency in internal medicine at the Animal Medical Center and earned my canine rehabilitation certification through both the University of Tennessee and the Canine Rehabilitation Institute (CRI).

When I first graduated from the Tennessee program, I understood how basic my rehab knowledge and skill level was, so I immediately sought further continuing education opportunities including CRI where most of the instructors are PTs. What I discovered was that our training, even after completing the rehab program at Tennessee's veterinary school, was lacking compared to what the physical therapists know about rehab. I have purposely sought out courses specifically taught by experienced physical therapists because they truly are the experts in rehab.

As this field grows, more veterinarians will be trained and hopefully become proficient at rehabilitation. At this time the number of veterinarians that are trained in rehabilitation is limited and most of us also practice other aspects of veterinary medicine. Veterinarians receive more extensive training in the medicine and surgery of veterinary patients, but physical therapists spend years being trained in the specifics of normal and pathological conditions associated with joints, bones, muscles, tendons, ligaments and nerves. They are taught how to recognize and treat neuromuscular and musculoskeletal pathologies. I would say they are significantly more skilled at this part of the practice. Their palpation and manual therapy skills are exceptional which is something we as veterinarians are never even taught. Surely it is an easier transition for physical therapists to go into animal rehab compared to a veterinarian making the switch to rehab (i.e. physical therapy).

If it is acceptable for a veterinarian to practice rehab without needing to have any additional training, why is it not acceptable for a qualified animal physical therapist to practice on our animal patients under our indirect supervision once we make a referral to them? While it may be ideal for a veterinarian and physical therapist to work on the same premise, it certainly is not necessary as long as the physical therapist has gone through the appropriate training on animals. Properly educated physical therapists should be able to work on their own premises under indirect supervision as long as a veterinary referral is made. I would question the motive if any more restrictive language was chosen.

I practice in a state where physical therapists are not allowed to work on veterinary patients. As a result of this unnecessary and overly restrictive regulation in New York, I am not afforded the opportunity to work collaboratively with PT's and without that collaboration, the animals are the ones who are hurt in the long run. Physical therapists not only improve the quality of care for our patients, but they have a depth of understanding of the animal patient that truly is unique. These are professionals who understand the importance of working with their patient's primary veterinarian and understand that a team approach always leads to better results.

They receive referrals and they confer with the veterinarians on a continuing basis. It is a synergistic relationship that provides for excellent care for our patients.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work only under direct supervision of a veterinarian and only in a veterinarian's hospital/clinic is absurd. Requiring a veterinary referral for treatment by a qualified physical therapist makes sense; insisting these practitioners can only work on a veterinary premise under the direct supervision of a veterinarian does not. If passed, the VMB's proposed mandate will decrease the availability of rehabilitation services for patients and drastically increase the cost. Remember that despite my having learned my skills in canine rehabilitation from excellent, experienced PTs; I have first-hand experience living in a state that does not allow PT's to work on animals. I have seen the negative effects our regulation causes for clients, vets, PT's and most importantly the animals we serve. I hope California learns from New York.

I understand you had a Stakeholder's Task Force study this issue in great depth and I remember sending in a letter to encourage you to pass those common-sense recommendations. I was appalled that you decided to reject your own Task Force recommendations as they related to PT's working on animals. I was perhaps even more taken aback when I read the reason *why* you rejected the recommendation made to authorize PT's to perform APR with indirect supervision. You indicated your reason for rejection of that provision was because "only licensed veterinarians and RVT's possess the knowledge and training to plan and supervise APR for animal patients and ensure proper animal handling, recognize pain and discomfort, and provide emergency care and assistance as needed in the particular field of APR." The original Task Force language *specifically included educational mandates that the PT would have needed to complete in order to practice under indirect supervision*. It appears you did not consider that PT's can and do learn these important aspects of animal care that you used as justification for rejection. Indirect supervision of a qualified animal physical therapist IS appropriate and safe provided there has been a vet exam and a referral has been made. Just look to the other progressive states that already have indirect supervision models in place.

A legislative remedy is clearly the solution (akin to AB 3013—the Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services.

Sincerely,

Bonnie Brown, VMD, CCRP, CCRT

Bonnie Brown, VMD, CCRP, CCRT
Owner/Founder Gotham Veterinary Center and Canine Rehab of New York

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Animal Rehabilitation and Fitness <aarf@verizon.net>
Fri 4/24/2020 6:35 AM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

[California rehab letter.pdf](#)
74 KB

Please find **attached** my letter regarding Animal Rehabilitation.

Amy Flannery

April 21, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for

services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Amy Flannery MS PT CCRP
Animal Rehabilitation and Fitness
316 3rd Ave
Alpha NJ 08865
908 454 2273
aarf@verizon.net
animalrehabilitationandfitness.com

Sheryl Goldman <shgoldman@gmail.com>
Thu 4/23/2020 11:07 PM

- Sotelo, Justin@DCA

Consumer oppose template letter 4.6.2020F.docx
16 KB

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

April 6, 2020

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

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So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Name

Address

Phone

Email address

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Rae Greulich <rae.greulich@gmail.com>
Thu 4/23/2020 10:34 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

[opposed Animal Rehab REGS 042320.docx](#)
20 KB

Please see [attached](#).

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

April 23, 2020

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It would appear that this pressure by the Veterinary Board to pass these very nonsensical regulations amounts to a money grab, because they certainly do not serve the best interests of animal patients.

Relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Veterinarians are not trained in rehab or physical therapy in vet school. Thus, the very professionals who are currently practicing animal rehab -- licensed physical therapists who must have a Masters degree to practice and have furthered their education extensively to practice on animals, *will be training* the very veterinarians who seek, by virtue of these pending regulations, to become their "supervisors". The veterinarians will profit nicely from that supervision, despite the fact that the vets' experience and education in animal rehab is far inferior to the professional physical therapists that they so desperately seek to supervise. *More important is the fact that this juxtaposition does not serve the best interests of animal patients.*

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. **I want access to a licensed PT for my animal, not a vet tech that has had a couple of classes. THESE REGULATIONS MAKE NO DISTINCTION.**

True provision of consumer protection would include mandatory educational standards for **all** who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to **mandate proper training** before being allowed to perform rehab on my pet. **The proposed regulation does nothing for me or my pet's, OR YOUR PET'S, safety or protection.**

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because *it does not ensure educational competency* of the practitioners who would be allowed to practice on **my animal OR YOURS**.

Consumers have spoken loud and clear on this issue for years. **We do not want to see this area of animal rehab monopolized by veterinarians who want to cash in on “animal rehab” without proper training.**

The appropriate solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need *by people who are properly trained*, where they need it in California.

Some day your own pet’s best interests may depend on it.

Sincerely,

Rae Greulich
30473 Mulholland Hwy #30
Cornell, CA 91301
805-206-1488
rae.greulich@gmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Deborah Merriman <dmerriman44@gmail.com>
Thu 4/23/2020 9:57 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

April 23, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Deborah J. Merriman

617 Inwood Dr, Santa Barbara, CA 93111
805 448-5602
dmerriman44@gmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Marla Miranian <marlanic@yahoo.com>
Thu 4/23/2020 5:50 PM

- Sotelo, Justin@dca.ca.gov; PT@dca.ca.gov; Rodda, Timothy@dca.ca.gov; DCA Director's Office

April 23, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
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E-Mail Addresses:

Justin.Sotelo@dca.ca.gov
Timothy.Rodda@dca.ca.gov
DCA.DirectorsOffice@dca.ca.gov
PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a licensed physical therapist, I have been monitoring this issue closely for years and have been repeatedly disappointed with the egregious attempts this Board has taken to monopolize this area of animal healthcare.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to practice my craft under reasonable guidelines.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, my job opportunities and ability to earn a living would be dramatically reduced. **This regulation would be a restraint of my trade.**

Other states have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am OPPOSED to

this regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before us on this matter.).

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists. Unfortunately, the CVMB opposed that bill largely based on the misrepresentations by members of the veterinary profession who successfully were able to sway Board opinion.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals *after* a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

Marla N. Wilkerson, PT, CHT, CCRT
344 Cottswold Place
Riva, MD 21140
marlanic@yahoo.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Jerri Miller <jamillerk9pt@gmail.com>
Thu 4/23/2020 4:40 PM

- Rodda, Timothy@DCA; Sotelo, Justin@DCA; DCA Director's Office; PT@DCA

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a licensed physical therapist in COLORADO, I have been monitoring this issue closely for years and have been repeatedly disappointed with the egregious attempts this Board has taken to monopolize this area of animal healthcare.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to practice my craft under reasonable guidelines.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, my job opportunities and ability to earn a living would be dramatically reduced. **This regulation would be a restraint of my trade.**

Other states have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am OPPOSED to this regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before us on this matter.).

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists. Unfortunately, the CVMB opposed that bill largely based on the misrepresentations by members of the veterinary profession who successfully were able to sway Board opinion.

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A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

Jerri A. Miller
3600 Silver Plume Lane
Boulder, CO 80305

Email address: jamillerk9PT@gmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Siefertman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Tina Linderoth <tmlinderoth@gmail.com>
Thu 4/23/2020 3:54 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

April 23, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

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True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Name Tina Linderoth

Address 2230 Valley View Pkwy #231 El Dorado Hills, CA 95762

Phone 530-306-0280

Email address tmlinderoth@gmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs

Jessica Sieferman, Executive Officer, California Veterinary Medical Board

California Veterinary Medical Board Members

Jason Kaiser, Executive Officer, Physical Therapy Board of California

Physical Therapy Board of California Members

Denise Roteman <aretegold@gmail.com>
Thu 4/23/2020 3:49 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a sporting dog owner, I engage in a lot of physical activity with my pet. That means my dogs are more prone to orthopedic and activity-related injuries. If my dog is injured, I would like to be afforded with the best options for his care. If my dog ever needed physical therapy, I would like to be able to see an actual licensed physical therapist who is certified in animal rehabilitation without having unnecessary regulatory barriers that would limit my access and choice. The California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

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Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Denise Roteman
489 Camino Talavera
Goleta, CA 93117
aretegold@gmail.com
(805) 680 631

Connie Schulte <connie@k9bodywork.com>
Thu 4/23/2020 3:13 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

[PT oppose Calif vetpt.docx](#)
24 KB

April 24, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a licensed physical therapist, I have been monitoring this issue closely for years and have been repeatedly disappointed with the egregious attempts this Board has taken to monopolize this area of animal healthcare.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to practice my craft under reasonable guidelines.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, my job opportunities and ability to earn a living would be dramatically reduced. **This regulation would be a restraint of my trade.**

Other states have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am OPPOSED to this regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before us on this matter.).

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly

included the physical therapists. Unfortunately, the CVMB opposed that bill largely based on the misrepresentations by members of the veterinary profession who successfully were able to sway Board opinion.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals *after* a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

Connie S Schulte, DPT, CCRP

13700 Flint Street,

Overland Park, KS 66221

connie@k9bodywork.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Kelley Carlson <kellcarls@gmail.com>
Thu 4/23/2020 2:58 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations. As a licensed physical therapist in New York City undergoing certification and licensure in animal rehab, I have been monitoring this issue closely, and I am disappointed with the egregious attempts this Board has taken to monopolize this area of animal healthcare.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to practice my craft under reasonable guidelines.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, my job opportunities and ability to earn a living would be dramatically reduced. **This regulation would be a restraint of my trade.**

Other states have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am OPPOSED to this regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before us on this matter.).

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists. Unfortunately, the CVMB opposed that bill largely based on the misrepresentations by members of the veterinary profession who successfully were able to sway Board opinion.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals *after* a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the

veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

Kelley Zupanek DPT, OMPT
400 W. 63rd St Apt 1705
New York, NY 10060
kellcarls@gmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Kathryn Symon <kathrynsymon05@yahoo.com>
Thu 4/23/2020 2:14 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Kathryn Morse

4763 Pinegate Road
Fleming Island, FL
32003

904-481-7178

kathrynsymon05@yahoo.com

Shari Sprague <sharik9pt@gmail.com>
Thu 4/23/2020 2:12 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

April 23, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Name Shari Sprague
Address 2116 Indian Shoals Dr, Loganville, GA 30052
Phone 954-913-4713
Email address ShariK9PT@gmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Siefertman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Shari Sprague MPT, CCRT, FP-MT, CCKTP
Masters in Physical Therapy
Certified Canine Rehabilitation Therapist
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Nancy Lee <nelee0523@att.net>
Thu 4/23/2020 2:01 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

[PT oppose CVMB letter 4.7.2020F .pdf](#)
77 KB

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

April 23, 2020

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a licensed physical therapist in California, I have been monitoring this issue closely for years and have been repeatedly disappointed with the egregious attempts this Board has taken to monopolize this area of animal healthcare.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists (PT's) who have completed the necessary training and certification to work on animals limits my ability to practice my craft under reasonable guidelines.

Relegating licensed PT's who have been specifically trained in the evaluation, treatment and handling of animals to being merely an 'unlicensed veterinary assistant' is absurd. Furthermore, requiring PT's to work ONLY under direct supervision of a veterinarian is ridiculous, since the Veterinary curriculum does not include rehabilitation techniques. Veterinarians are taught rehab techniques by physical therapists in continuing education courses. If anything, PT's should be the ones supervising the veterinarians when performing rehab techniques. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, my job opportunities and ability to earn a living would be dramatically reduced. **This regulation would be a restraint of my trade.**

Other states have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am OPPOSED to the CVMB's proposed regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before us on this matter.).

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated

CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists. Unfortunately, the CVMB opposed that bill largely based on the misrepresentations by members of the veterinary profession who successfully were able to sway Board opinion.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the referral of a veterinarian (level of supervision to be determined by the veterinarian) *after* a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. Leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises by referral of a licensed veterinarian, would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

Nancy E. Lee, PT, MA, CCRT

9808 Regent St., #3, Los Angeles, CA 90034

nelee0523@att.net

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Andy Miller <millerdvm@gmail.com>
Thu 4/23/2020 1:52 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

[Vet Rehab Letter.docx](#)
33 KB

Please see [attached](#) letter.

Thank You,
Andrew Miller, DVM

April 23, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: VETERINARY OPPOSITION to CVMB Animal Physical Rehabilitation Proposed Regulations

Dear Mr. Sotelo and Mr. Rodda,

I am a licensed veterinarian in California and a member of the CVMA. I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to inter-professionally collaborate and hinders the consumer's ability to access these professionals.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision of a veterinarian and ONLY in a veterinarian's hospital/clinic is unacceptable. As a veterinarian, I would like the choice to be able to refer my patients to a properly trained PT and determine for myself what level of supervision is appropriate.

Allowing the veterinarian to evaluate, diagnose, and determine the best course of treatment is appropriate. If the best course of treatment is to send my patients to an animal physical therapist, then I would like the choice to be able to do that for my patients and clients. It is unreasonable to believe that veterinarians have the same skillset as a PT, much less even want to offer specialty rehab services themselves, or have the space in their clinics for the "gym". It would be the highest standard of professional medical care for me to be able to refer my patients out to the professionals who are competent in this specialty.

I have personally seen the differences in outcomes from the services of a licensed physical therapist certified in canine rehabilitation and therefore recognize the important role these professionals play in the care and well-being of our companion animals. My personal dog had major hip reconstructive surgery and without the intensive rehab process, provided by a PT with special animal training, she would not have recovered near as well or completely.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals *after* a veterinarian has established a Veterinary-Client-Patient-Relationship (VCPR), made a diagnosis, and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (after the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us (like Colorado, Nevada and Nebraska). Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

The issue of animal physical rehabilitation has been going on for far too long. A legislative remedy is the clear solution (akin to AB 3013—the Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists.

Sincerely,

Andrew Miller, DVM

Mission Oaks Veterinary Clinic

5800 Santa Rosa Rd, suite 147

Camarillo, Ca 93012

millerdvm@gmail.com

Nonoguchi, Stacy <SNonoguchi@mednet.ucla.edu>
Thu 4/23/2020 1:46 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; dcc.directorsoffice@dca.ca.gov; PT@DCA

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov
Timothy.Rodda@dca.ca.gov
DCA.DirectorsOffice@dca.ca.gov
PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations. It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Stacy Nonoguchi
1000 Veteran Ave, Ste 11-62
Los Angeles, CA 90095-7147
3103519697
snoguchi@mednet.ucla.edu

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Stacy Nonoguchi, RTC, CTRS
Recreation Therapist
Marilyn Hilton MS Achievement Center
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1000 Veteran Ave, Ste 11-62
Los Angeles, CA 90095-7147

p - 310-267-4076
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Emily McKay <emily.mckay0510@gmail.com>
Thu 4/23/2020 1:45 PM

- DCA Director's Office; Sotelo, Justin@DCA; PT@DCA; timothy.rodso@dca.ca.gov

April 23, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a licensed physical therapist in California, I have been monitoring this issue closely for years and have been repeatedly disappointed with the egregious attempts this Board has taken to monopolize this area of animal healthcare.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to practice my craft under reasonable guidelines.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, my job opportunities and ability to earn a living would be dramatically reduced. This regulation would be a restraint of my trade.

Other states have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am OPPOSED to this regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before us on this matter.).

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists. Unfortunately, the CVMB

opposed that bill largely based on the misrepresentations by members of the veterinary profession who successfully were able to sway Board opinion.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals after a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

Emily McKay
1822 Itasca Ave, Sacramento, CA, 95835
Emily.mckay0510@gmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Beth Carlson <Beth@igsb.com>
Thu 4/23/2020 1:21 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a sporting dog owner, I engage in a lot of physical activity with my pet. That means my dogs are more prone to orthopedic and activity-related injuries. If my dog is injured, I would like to be afforded with the best options for his care. If my dog ever needed physical therapy, I would like to be able to see an actual licensed physical therapist who is certified in animal rehabilitation without having unnecessary regulatory barriers that would limit my access and choice. The California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Beth Carlson
760 Palermo Dr. #B, Santa Barbara, CA 93105
805-687-7285
beth@igsb.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

BARBARA LEE <ncccbarbara@cogeco.net>
Thu 4/23/2020 12:52 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA; Sieferman, Jessica@DCA; Dca@DCA; @cgocable.ca; ptbc.ca.gov@cgocable.ca

April 23, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a registered Physiotherapist in Ontario with my Diploma in Canine Rehab, I have been monitoring this issue closely for years and have been repeatedly disappointed with the egregious attempts this Board has taken to monopolize this area of animal healthcare.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits their ability to practice their craft under reasonable guidelines.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, their job opportunities and ability to earn a living would be dramatically reduced. **This regulation would be a restraint of their trade.**

Other States have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am OPPOSED to this regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before on this matter.).

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists. Unfortunately, the CVMB opposed that bill largely based on the misrepresentations by members of the veterinary profession who successfully were able to sway Board opinion.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals after a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

Barbara Lee PT MCPA Dip Canine Rehab

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188 Bunting Road, Unit 5A,
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L0S 1J0, Canada
289-362-5900
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www.canineconditioningcentre.ca

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

"A happy pet is an active pet!"

Barbara Lee, PT, MCPA, Dip.Canine Rehab
Niagara Canine Conditioning Centre, Inc.
Unit 5A, 188 Bunting Rd.
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Haley Agapiou <haagapiou@gmail.com>
Thu 4/23/2020 11:38 AM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

April 23, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

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By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

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True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Haley Agapiou

1360 Dumaine Avenue
Oak Park, CA 91377
818-635-1551

Haagapiou@gmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Siefertman, Executive Officer, California Veterinary Medical Board
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Jason Kaiser, Executive Officer, Physical Therapy Board of California
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Herman Guenther <heguenther805@gmail.com>
Thu 4/23/2020 11:09 AM

- Sotelo, Justin@dca

April 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
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Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

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I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Herman J Guenther
4540 Via Clarice
Santa Barbara, Ca 93111
805-680-9744
Heguenther805@gmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Lauren Fiedler <lfiedler623@gmail.com>
Wed 4/22/2020 8:47 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a licensed physical therapist in California, I have been monitoring this issue closely for years as a recently certified CCRT, and have been repeatedly disappointed with the egregious attempts this Board has taken to monopolize this area of animal healthcare.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to practice my craft under reasonable guidelines.

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A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

Lauren Fiedler
4601 Collwood Ln
San Diego, CA 92115
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dana.reid11@gmail.com
Wed 4/22/2020 10:53 AM

- Sotelo, Justin@dca; Rodda, Timothy@dca; DCA Director's Office; PT@dca

April 21, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
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E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a former licensed physical therapist in California and a current license holder in Washington and Oregon, I have been monitoring this issue closely for years and have been repeatedly disappointed with the egregious attempts this Board has taken to monopolize this area of animal healthcare.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to practice my craft under reasonable guidelines.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, my job opportunities and ability to earn a living would be dramatically reduced. **This regulation would be a restraint of my trade.**

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The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists. Unfortunately, the CVMB opposed that bill largely based on the misrepresentations by members of the veterinary profession who successfully were able to sway Board opinion.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals after a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

Name: Dana Reid, DPT
Address: 4040 Sherrard Rd, Hood River OR 97031
Email address: dana@thrivekinematics.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

rmheg@aol.com

Wed 4/22/2020 10:47 AM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

As a PT for 30 plus years and a canine PT for 15 I oppose these regulations. It is an insult to the intelligence of the Veterinarian field and the PT field. We are all highly educated professionals and t relegate a PT as a veterinary assistant is a joke. Colorado has a highly successful Canine PT license with a Veterinary clearance of health for PT. No problems. Clients want my PT expertise!

Rosemary Hegarty PT, APT, CCRT

303-499-4602 office

rmheg@aol.com

www.rosemaryhegarty.com

Judy Coates <jcoates@judycoates.com>
Wed 4/22/2020 10:02 AM

- Sotelo, Justin@dca; Rodda, Timothy@dca; DCA Director's Office; PT@dca

April 22, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
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E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a licensed physical therapist in New Hampshire, I have been monitoring this issue closely for years and have been repeatedly disappointed with the egregious attempts this Board has taken to monopolize this area of animal healthcare.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my colleagues' ability to practice their craft under reasonable guidelines.

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Sincerely,

Name Judy Coates M.Ed., MSPT, CCRT
Address 14 Low Road, Hanover, NH 03755
Email address jcoates@judycoates.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Laurie Edge-Hughes <physio@fourleg.com>
Wed 4/22/2020 8:47 AM

- Sotelo, Justin@dca; Rodda, Timothy@dca; DCA Director's Office; PT@dca

April 21, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
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E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

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Sincerely,

Laurie Edge-Hughes, BScPT, MAnimSt (Animal Physiotherapy), CAFCI, CCRT
PO Box 1581
Cochrane, AB T4C 1B5, Canada
Physio@FourLeg.com

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Owner,
Four Leg Rehab Inc.
Online Canine Rehab Educational Resources

www.fourleg.com

Owner,
Two Hands Physiotherapy
Calgary, AB
www.twohandsphysiotherapy.com

Past Chair & Advocacy Lead,
The Animal Rehab Division
The Canadian Physiotherapy Association
www.physiotherapy.ca/Divisions/Animal-Rehabilitation

Cc:
Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

AmericanDogRehab <americandogrehab@gmail.com>
Wed 4/22/2020 8:23 AM

- Sotelo, Justin@dca; Rodda, Timothy@dca; DCA Director's Office; PT@dca

April 22, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
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E-Mail Addresses:

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OPPOSED to this regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before us on this matter.).

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists. Unfortunately, the CVMB opposed that bill largely based on the misrepresentations by members of the veterinary profession who successfully were able to sway Veterinary Medical Board opinion.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals **after** a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

Danielle Robbins
11009 Viacha Dr
San Diego, CA. 92124
AmericanDogRehab@gmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Sheri RMVR <sherirmvr@gmail.com>
Wed 4/22/2020 7:58 AM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a licensed physical therapist, I have been monitoring this issue closely for years and have been repeatedly disappointed with the egregious attempts this Board has taken to monopolize this area of animal healthcare.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits our ability to practice our craft under reasonable guidelines.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, our job opportunities and ability to earn a living would be dramatically reduced. **This regulation would be a restraint of our trade.**

Other states have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am OPPOSED to this regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before us on this matter.).

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists. Unfortunately, the CVMB opposed that bill largely based on the misrepresentations by members of the veterinary profession who successfully were able to sway Board opinion.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals *after* a veterinarian has made a diagnosis and determined that rehab would be a safe

and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

Sheri Munteer, PT, CCRT
1221 Sth Pennsylvania St.
Denver, CO 80210
sherirmvr@gmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Sheri Munteer, MPT, CCRT
Rocky Mountain Vet Rehab

Dr. Allie Turner <allie@vetacupuncture.com>
Wed 4/22/2020 7:34 AM

- Sotelo, Justin@dca; Rodda, Timothy@dca; DCA Director's Office; PT@dca

April 22, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov
Timothy.Rodda@dca.ca.gov
DCA.DirectorsOffice@dca.ca.gov
PT@dca.ca.gov

RE: VETERINARY OPPOSITION TO CVMB ANIMAL PHYSICAL REHABILITATION
PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am a licensed veterinarian in California and a member of the CVMA. I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to inter-professionally collaborate and hinders the consumer's ability to access these professionals.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision of a veterinarian and ONLY in a veterinarian's hospital/clinic is absurd. As a veterinarian, I would like the choice to be able to refer my patients to a properly trained PT and determine for myself what level of supervision is appropriate.

Allowing the veterinarian to evaluate, diagnose, and determine the best course of treatment is appropriate. If the best course of treatment is to send my patients to an animal physical therapist, then I would like the choice to be able to do that for my patients and clients. It is unreasonable to believe that veterinarians have the same skillset as a PT, much less even want to offer specialty rehab services themselves. It would be the highest standard of professional medical care for me to be able to refer my patients out to the professionals who are competent in this specialty. I

have personally seen the differences in outcomes from the services of a licensed physical therapist certified in canine rehabilitation and therefore recognize the important role these professionals play in the care and well-being of our companion animals.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals *after* a veterinarian has established a Veterinary-Client-Patient-Relationship (VCPR), made a diagnosis, and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (after the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us (like Colorado, Nevada and Nebraska). Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

The issue of animal physical rehabilitation has been going on for far too long. A legislative remedy is the clear solution (akin to AB 3013—the Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists.

Sincerely,

Allie Turner DVM, CVA, CCRT
Veterinary Acupuncture and Rehabilitation Services
4370 La Honda Rd., San Gregorio, CA. 94074
(650) 479-6677
allie@vetacupuncture.com

Janet Van Dyke <janetvandyke@me.com>
Wed 4/22/2020 7:25 AM

- Sotelo, Justin@dca; Rodda, Timothy@dca; DCA Director's Office; PT@dca

April 22, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: VETERINARY OPPOSITION TO CVMB ANIMAL PHYSICAL REHABILITATION
PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am a licensed veterinarian in Florida. I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to inter-professionally collaborate and hinders the consumer's ability to access these professionals.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision of a veterinarian and ONLY in a veterinarian's hospital/clinic is absurd. As a veterinarian, I would like the choice to be able to refer my patients to a properly trained PT and determine for myself what level of supervision is appropriate.

Allowing the veterinarian to evaluate, diagnose, and determine the best course of treatment is appropriate. If the best course of treatment is to send my patients to an animal physical therapist, then I would like the choice to be able to do that for my patients and clients. It is unreasonable to believe that veterinarians have the same skillset as a PT, much less even want to offer specialty rehab services themselves. It would be the highest standard of professional medical care for me to be able to refer my patients out to the professionals who are competent in this specialty. I

have personally seen the differences in outcomes from the services of a licensed physical therapist certified in canine rehabilitation and therefore recognize the important role these professionals play in the care and well-being of our companion animals.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals after a veterinarian has established a Veterinary-Client-Patient-Relationship (VCPR), made a diagnosis, and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (after the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us (like Colorado, Nevada and Nebraska). Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

The issue of animal physical rehabilitation has been going on for far too long. A legislative remedy is the clear solution (akin to AB 3013—the Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists.

Sincerely,

Janet Van Dyke, DVM, DACVSMR

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Siefertman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Janet Van Dyke, DVM, Diplomate, American College of Veterinary Sports Medicine and Rehabilitation

American College of Veterinary Sports Medicine and Rehabilitation (ACVSMR) www.vsmr.org

Affiliate Faculty, Colorado State University, College of Veterinary Medicine and Biomedical Sciences

Immediate Past President, Veterinary Orthopedic Society (VOS) www.vosdvm.org

Past President, American Association of Rehabilitation Veterinarians (AARV)
www.rehabvets.org

CEO and Founder, Canine Rehabilitation Institute (CRI) www.caninerehabinstitute.com

Anne Howard (via Google Docs) <ahowardpt@gmail.com>
Wed 4/22/2020 7:22 AM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

Copy of PT oppose template letter 4.22.2020F .pdf
81 KB

April 22, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a licensed physical therapist in California, I have been monitoring this issue closely for years, have attended and spoken at meetings in Sacramento, and have been repeatedly disappointed with the egregious attempts this Board has taken to monopolize this area of animal healthcare.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to practice my craft under reasonable guidelines. Licensed and trained PROFESSIONALS hold themselves to a higher standard than unlicensed and untrained practitioners regardless of speciality.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, my job opportunities and ability to earn a living would be dramatically reduced. **This regulation would be a restraint of my trade.**

Other states have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am strongly OPPOSED to this regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before us on this matter.).

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists. Unfortunately, the CVMB opposed that bill largely based on the misrepresentations by members of the veterinary profession who successfully were able to sway Board opinion. I can assure you there are MANY practicing veterinarians who do not share the CVMA's position and want to work collaboratively with responsible physical therapists such as myself, both as a team and as individually practicing PROFESSIONALS.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals *after* a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

Anne Howard, MPT

1177 Buena Vista Drive
Watsonville, CA 95076

831-247-5584

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Siefertman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Andrew Groome <mcfc2@att.net>
Wed 4/22/2020 6:28 AM

- Sotelo, Justin@DCA

Dear Mr. Sotelo,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations. It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to practice my craft under reasonable guidelines.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, my job opportunities and ability to earn a living would be dramatically reduced. **This regulation would be a restraint of my physical therapy colleagues trade in CA.**

Other states have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am OPPOSED to this regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before us on this matter.).

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists. Unfortunately, the CVMB opposed that bill largely based on the misrepresentations by members of the veterinary profession who successfully were able to sway Board opinion.

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Sincerely,

Andrew Groome PT, CCRT

Well Paws K9 Rehabilitation
15225 Jefferson Hwy,
Baton Rouge,
LA 70817

Carrie Adrian <Carrie.Adrian@vca.com>
Wed 4/22/2020 4:34 AM

- Sotelo, Justin@dca; Rodda, Timothy@dca; DCA Director's Office; PT@dca

April 22, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov
Timothy.Rodda@dca.ca.gov
DCA.DirectorsOffice@dca.ca.gov
PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a licensed physical therapist in Colorado, I have been monitoring this issue closely for years and have been repeatedly disappointed with the egregious attempts this Board has taken to monopolize this area of animal healthcare.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to practice my craft under reasonable guidelines.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, my job opportunities and ability to earn a living would be dramatically reduced. **This regulation would be a restraint of my trade.**

Other states have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am OPPOSED

to this regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before us on this matter.).

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I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals *after* a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

Caroline Adrian, PT, PhD, FIAVRPT
Animal Physical Therapist
227 W. 67th Court
Loveland, CO 80538
Carrie.Adrian@vca.com • (303) 877-7485

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

terry todd <todd.terry@att.net>
Wed 4/22/2020 4:15 AM

- Sotelo, Justin@DCA

Justin Sotelo, Lead Administrative & Policy Analyst

April 22, 2020

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for

services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Jennifer Todd
4747 Valley Forge Drive
Jurupa Valley, CA 92509
951-681-6428
Todd.terry@att.net

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Amie Hesbach <amiehesbach@gmail.com>
Wed 4/22/2020 2:04 AM

- Sotelo, Justin@dca; Rodda, Timothy@dca; DCA Director's Office; PT@dca

April 21, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov
Timothy.Rodda@dca.ca.gov
DCA.DirectorsOffice@dca.ca.gov
PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a licensed physical therapist in California, I have been monitoring this issue closely for years and have been repeatedly disappointed with the egregious attempts this Board has taken to monopolize this area of animal healthcare.

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to this regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before us on this matter.).

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists. Unfortunately, the CVMB opposed that bill largely based on the misrepresentations by members of the veterinary profession who successfully were able to sway Board opinion.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals after a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

Amie Lamoreaux Hesbach, PT, MS, DPT, CCRP, CCRT
Maynard, Massachusetts
amiehesbach@gmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Amie Lamoreaux Hesbach, PT, DPT, MS, NCPT, CCRP, CCRT, CKTP

Follow me on Instagram and FaceBook @empowerphysiopt

Doctor of Physical Therapy
Nationally Certified Pilates Trainer
Certified Canine Rehabilitation Practitioner
Certified Canine Rehabilitation Therapist
Certified KinesioTaping Practitioner

EmpowerPhysio: Animal Rehabilitation Physical Therapy, & Pilates

https://urldefense.proofpoint.com/v2/url?u=http-3A__www.empowerphysiopet.com&d=DwIFaQ&c=LHIwbLRMLqgNuqr1uGLfTA&r=TxBNlbwgLI2YiSMIjSxoZihUwrJVdjVkkQ7kLGQaHm4&m=HOYYDekCBksEnr9dtdgmQh_0qSn6df5Ej8IrauCJzbQ&s=UyGS0SgNcGbzi9IFjCx2pUdxYt6MRchULCYYbdN4fj8&e=
https://urldefense.proofpoint.com/v2/url?u=http-3A__www.empowerphysiopt.com&d=DwIFaQ&c=LHIwbLRMLqgNuqr1uGLfTA&r=TxBNlbwgLI2YiSMIjSxoZihUwrJVdjVkkQ7kLGQaHm4&m=HOYYDekCBksEnr9dtdgmQh_0qSn6df5Ej8IrauCJzbQ&s=ylFnGI0GsyCiqSIJPYNKKdC_GKqe2Erip3hvhb-MmMA&e=

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Laura Parsley <dr.parsley@me.com>
Tue 4/21/2020 11:14 PM

- Sotelo, Justin@dca; Rodda, Timothy@dca; DCA Director's Office; PT@dca

April 21, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
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Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov
Timothy.Rodda@dca.ca.gov
DCA.DirectorsOffice@dca.ca.gov
PT@dca.ca.gov

RE: VETERINARY OPPOSITION TO CVMB ANIMAL PHYSICAL REHABILITATION
PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am a licensed veterinarian in California and a member of the CVMA. I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to inter-professionally collaborate and hinders the consumer's ability to access these professionals.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision of a veterinarian and ONLY in a veterinarian's hospital/clinic is absurd. As a veterinarian, I would like the choice to be able to refer my patients to a properly trained PT and determine for myself what level of supervision is appropriate.

Allowing the veterinarian to evaluate, diagnose, and determine the best course of treatment is appropriate. If the best course of treatment is to send my patients to an animal physical therapist, then I would like the choice to be able to do that for my patients and clients. It is unreasonable to believe that veterinarians have the same skillset as a PT, much less even want to offer specialty rehab services themselves. It would be the highest standard of professional medical care for me to be able to refer my patients out to the professionals who are competent in this specialty. I

have personally seen the differences in outcomes from the services of a licensed physical therapist certified in canine rehabilitation and therefore recognize the important role these professionals play in the care and well-being of our companion animals.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PTs to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals *after* a veterinarian has established a Veterinary-Client-Patient-Relationship (VCPR), made a diagnosis, and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (after the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us (like Colorado, Nevada and Nebraska). Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

The issue of animal physical rehabilitation has been going on for far too long. A legislative remedy is the clear solution (akin to AB 3013—the Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists.

Sincerely,

Laura Parsley, DVM, CCRT, cVMA
3353 Karen Avenue
Long Beach, CA 90808
dr.parsley@me.com
laura.parsley@vca.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Cary Harrison <caryharrison805@gmail.com>
Tue 4/21/2020 5:22 PM

- Sotelo, Justin@dca; Rodda, Timothy@dca; DCA Director's Office; PT@dca

April 21, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
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Timothy.Rodda@dca.ca.gov

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RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a sporting dog owner, I engage in a lot of physical activity with my pet. That means my dogs are more prone to orthopedic and activity-related injuries. If my dog is injured, I would like to be afforded with the best options for his care. If my dog ever needed physical therapy, I would like to be able to see an actual licensed physical therapist who is certified in animal rehabilitation without having unnecessary regulatory barriers that would limit my access and choice. The California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal

rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Cary Harrison
546 Beaumont Way, Goleta, Ca 93117
805-696-6496
caryharrison805@gmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Siefertman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Jill Kuhl <jillrkuhl@gmail.com>
Tue 4/21/2020 2:45 PM

April 7, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
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E-Mail Addresses:

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Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a licensed physical therapist in California, I have been monitoring this issue closely for years and have been repeatedly disappointed with the egregious attempts this Board has taken to monopolize this area of animal healthcare.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to practice my craft under reasonable guidelines.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, my job opportunities and ability to earn a living would be dramatically reduced. This regulation would be a restraint of my trade.

Other states have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am OPPOSED to this regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have

undergone the appropriate training specifically on animals (just as the other states have done that have gone before us on this matter.).

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists. Unfortunately, the CVMB opposed that bill largely based on the misrepresentations by members of the veterinary profession who successfully were able to sway Board opinion.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals after a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

Dr. Jill Kuhl, DPT, MSPT, CCRT, OCS
1242C Minnesota Ave
San Jose, CA 95125
jillrkuhl@gmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
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Physical Therapy Board of California Members

winepts@aol.com
Mon 4/20/2020 6:27 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

[Opposition to VMB animal rehabilitation regulations .pdf](#)

82 KB

[Opposition to VMB animal rehabilitation regulations .pages](#)

871 KB

2 attachments (953 KB)

[Download all](#)

To Whom it May Concern,

Please see my [attached](#) letter and enter it in the public comments regarding the proposed regulations by the VMB on animal rehabilitation. I have included my letter both in word document form and pdf to ensure it can be accessed.

Thank you

Sincerely,

Kellie Boiston, PT, OCS, RVT

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

April 20, 2020

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter in OPPOSITION to the proposed animal physical rehabilitation regulations.

As a licensed physical therapist in California, I have been monitoring and involved with this issue closely for years and have been repeatedly disappointed with the egregious attempts this Board has taken to disregard reasonable and collaborative solutions between Veterinarians and Animal Physical Therapists for the betterment of animals and their owners, and to consistently attempt to monopolize this area of animal healthcare.

As an animal physical therapist I agree that the growing specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach over a number of years to consistently pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to practice my craft under reasonable guidelines.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, my job opportunities and ability to earn a living would be dramatically and negatively impacted. **This regulation would be a restraint of my trade and in turn would enable monopoly of trade by veterinarians.**

Other states have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am requesting this type of model for California.

I am **OPPOSED** to this regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before us on this matter.).

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists. Unfortunately, the CVMB opposed that bill largely based on

the misrepresentations by members of the veterinary profession who successfully were able to sway Board opinion.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian with the level of supervision to be determined by the veterinarian, and allow them to work on animals *after* a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. Leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision, with the veterinarian's consent and order to treat, would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. **This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.**

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

Kellie Boiston PT, OCS, RVT

14073 Meadowlands Dr

Riverside, CA. 92503

Winepts@aol.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Susan Black <susanblack3@gmail.com>
Mon 4/20/2020 11:11 AM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

April 20, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a sporting dog owner, I engage in a lot of physical activity with my pet. That means my dogs are more prone to orthopedic and activity-related injuries. If my dog is injured, I would like to be afforded with the best options for his care. If my dog ever needed physical therapy, I would like to be able to see an actual licensed physical therapist who is certified in animal rehabilitation without having unnecessary regulatory barriers that would limit my access and choice. The California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers. By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure

educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Susan Black
1724 Mira Vista Ave.
Santa Barbara, CA 93103
805-729-4434
susanblack3@gmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Sharon McDonough <sharon_mcdonough@jUSD.k12.ca.us>
Mon 4/20/2020 10:59 AM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

Consumer OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED
REGULATIONS.docx

17 KB

Hello,

Please consider my **attached** letter and add it to the Public Comments for proposed regulations for animal rehabilitation.

The proposed language does not include Physical Therapists who have received advance training in animal rehabilitation and would essentially define animal rehabilitation as the practice of veterinary medicine and it would relegate all animal physical therapists to being merely "unlicensed veterinary assistants". This would be catastrophic. It would put all animal physical therapists under direct supervision of a veterinarian and only allow them to work for a veterinarian on their premise.

I feel as a consumer this would severely limit my choice.

So please add the attached letter as opposed to this regulation that would limit my choice as a California Consumer to the public comments.

Sincerely,

Sharon McDonough

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

April 20, 2020

E-Mail Addresses:

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Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Sharon R. McDonough
24312 Carman Lane, Moreno Valley, CA 92551
(951) 247-4960
stachrion@aol.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Siefertman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Stephanie Gendron <stephanie.e.gendron@gmail.com>
Mon 4/20/2020 7:59 AM

- Sotelo, Justin@DCA

April 20, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
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Sacramento, CA 95834

E-Mail Addresses:

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Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a licensed physical therapist in Illinois, I have been monitoring this issue closely for years and have been repeatedly disappointed with the egregious attempts this Board has taken to monopolize this area of animal healthcare.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits PT's ability to practice their craft under reasonable guidelines.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, my job opportunities and ability to earn a living would be dramatically reduced. This regulation would be a restraint of my trade.

Other states have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am OPPOSED to

this regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before us on this matter.).

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists. Unfortunately, the CVMB opposed that bill largely based on the misrepresentations by members of the veterinary profession who successfully were able to sway Board opinion.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals after a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

Stephanie Gendron, PT, DPT, Cert. MDT
5031 W Balmoral Ave, Chicago, IL 60630
stephanie.e.gendron@gmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Siefertman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Kenneth Bruecker <kbruecker@me.com>
Sun 4/19/2020 10:42 AM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

VET oppose letter 200419.pdf - attached
92 KB

kbruecker@me.com

April 7, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: VETERINARY OPPOSITION TO CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am a licensed veterinarian in California and a member of the CVMA. I am board certified in Veterinary Surgery and in Sports medicine/Rehabilitation. I am the founder of the Veterinary Medical and Surgical Groups in Ventura and San Juan Capistrano. I have served on the CVMA Ethics and Professional Conduct committee. I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to inter-professionally collaborate and hinders the consumer's ability to access these professionals.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision of a veterinarian and ONLY in a veterinarian's hospital/clinic is not always the best. As a veterinarian, I would like the choice to be able to refer my patients to a properly trained PT and determine for myself what level of supervision is appropriate.

Allowing the veterinarian to evaluate, diagnose, and determine the best course of treatment is appropriate. If the best course of treatment is to send my patients to an animal physical therapist, then I would like the choice to be able to do that for my patients and clients. Veterinarians do NOT have the same skillset as a PT. It would be the highest standard of professional medical care for me to be able to refer my patients out to the professionals who are competent in this field. I have employed and worked with Veterinary Technicians, Veterinarians and Physical therapists that have been trained and certified as Canine Rehabilitation Therapists or Practitioners (CCRT/CCRP). I have personally seen the differences in outcomes from the services of a licensed physical therapist certified in canine rehabilitation and therefore recognize the important role these professionals play in the care and well-being of our companion animals.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals *after* a veterinarian has established a Veterinary-Client-Patient-Relationship (VCPR), made a diagnosis, and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (after the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us (like Colorado, Nevada and Nebraska). Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the

pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

The issue of animal physical rehabilitation has been going on for far too long. A legislative remedy is the clear solution (akin to AB 3013—the Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists.

Sincerely,



Dr. Kenneth A Bruecker, DVM, MS, DACVS, DACVSMR

Board Certified Veterinary Surgery
Board Certified Veterinary Sports Medicine and Rehabilitation
Ventura County, California USA
kbruecker@me.com

Continuing Orthopedic Veterinary Education (COVE)

Founder 2015
Small Animal Orthopedic Education/Training/Mentoring/Surgical Coaching

Veterinary Medical and Surgical Group

Founder 1988

Veterinary Orthopedic Society

Past-President 2015

AOVet North America

Education Committee/Faculty Mentor 2016-2022
Co-Chair AOVet North America Sports Medicine Traumatology Course September 2019/2021
Co-Chair AOVet North America Advances in Spinal Surgery 2020

Western Veterinary Conference

Small Animal Orthopedics Topic Coordinator 2018-2021

Californian Veterinarian of the Year- 2004

"The greatness of a nation and its moral progress can be judged by the way its animals are treated." -Gandhi-

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Jackie Gruendyke <jgruendyke@hotmail.com>
Sat 4/18/2020 4:10 PM

- Sotelo, Justin@DCA

April 18, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a sporting dog owner, I engage in a lot of physical activity with my pet. That means my dogs are more prone to orthopedic and activity-related injuries. If my dog is injured, I would like to be afforded with the best options for his care. If my dog ever needed physical therapy, I would like to be able to see an actual licensed physical therapist who is certified in animal rehabilitation without having unnecessary regulatory barriers that would limit my access and choice. The California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Jackie Gruendyke
1514 Kronborg Dr.
Solvang, Ca 93463
805-350-0645
jgruendyke@hotmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Molly McKibben <mollymoreen@gmail.com>
Fri 4/17/2020 7:52 PM

Opposition of CVMB Animal Physical Rehab Proposed Regulations (1).pdf
75 KB

Please see the **attached!**

Molly McKibben

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

April 17, 2020

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is unfair.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want *more* choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I oppose these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Molly McKibben

12101 Idaho Ave., Apt 101

Los Angeles CA 90025

mollymoreen@gmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs

Jessica Sieferman, Executive Officer, California Veterinary Medical Board

California Veterinary Medical Board Members

Jason Kaiser, Executive Officer, Physical Therapy Board of California

Physical Therapy Board of California Members

Becky Kelber <bkelber@cox.net>
Fri 4/17/2020 1:44 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

April 17, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

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By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure

educational competency of the practitioners who would be allowed to practice on my animal.

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This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Becky Kelber
1132 Garcia Road
Santa Barbara CA. 93103
805.451.4660
bkelber@cox.net

Hillary Conant <drconant.sbvis@gmail.com>
Thu 4/16/2020 10:13 AM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

[Letter to oppose PT exclusion 4.16.2020.docx](#)
120 KB

Dear Mr. Sotelo and Mr. Rodda,

I am a licensed veterinarian in California and a member of the CVMA. I am submitting the **attached** letter to OPPOSE the proposed animal physical rehabilitation regulations. Please let me know if you have any trouble opening the attachment or if you have any questions that I can answer.

I hope you and your families are doing well and staying healthy during this difficult time.

Sincerely,

Hillary Conant

Dr. Hillary Conant
Santa Barbara Veterinary Integrative Services
drconant.sbvis@gmail.com
(805) 722-9811



Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

April 14, 2020

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: VETERINARY OPPOSITION TO CVMB ANIMAL PHYSICAL REHABILITATION
PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am a licensed veterinarian in California and a member of the CVMA. I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to inter-professionally collaborate and hinders the consumer's ability to access these professionals.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision of a veterinarian and ONLY in a veterinarian's hospital/clinic is absurd. As a veterinarian, I would like the choice to be able to refer my patients to a properly trained PT and determine for myself what level of supervision is appropriate.

Allowing the veterinarian to evaluate, diagnose, and determine the best course of treatment is appropriate. If the best course of treatment is to send my patients to an animal physical therapist, then I would like the option to be able to do that for my patients and clients. It is unreasonable to believe that veterinarians have the same skillset as a PT, much less even want to offer specialty rehab services themselves. Personally, I don't have the time or ability to offer these services. It's as if we asked a human surgeon to provide or directly supervise all of the post-operative therapy required by his or her patient. There is no doubt that the highest standard of professional medical care I can provide is to refer my patients out to the professionals who are competent in this specialty. I have personally seen the differences in outcomes from the services of a licensed physical therapist certified in canine rehabilitation and therefore recognize the important role these professionals play in the care and well-being of our companion animals.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals *after* a veterinarian has established a Veterinary-Client-Patient-Relationship (VCPR), made a diagnosis, and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (after the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us (like Colorado, Nevada and Nebraska). Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

The issue of animal physical rehabilitation has been going on for far too long. A legislative remedy is the clear solution (akin to AB 3013—the Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists.

Veterinarians have always been held in high regard by the public and I am proud to be part of this profession. These days, I find more and more clients are seeking alternative veterinary care for their pets, including physical therapy, and they are distrusting of veterinarians that don't support them in this pursuit. I feel fortunate to be able to refer to a physical therapist in my area that I know is highly skilled and extremely cautious in ensuring she is treating patients appropriately and in line with my diagnosis and recommendations. She does not require my supervision nor would my patients benefit from her being supervised by myself or any other veterinarian that was not specifically trained in rehab. If we aren't giving our clients the option to choose this level of care, I'm afraid we will erode the consumer's confidence in the veterinary profession as a whole. Please include qualified and appropriately licensed animal physical therapists as lawful providers of animal rehabilitation services.

Sincerely,

Dr. Hillary Conant, Owner, Santa Barbara Veterinary Integrative Services
PO Box 6187, Santa Barbara, CA 93160
DrConant.SBVIS@gmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Leigh Stevens <leigh@scoutshouse.com>
Thu 4/16/2020 8:57 AM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

VET oppose letter Leigh Stevens DVM 4.13.2020 .pdf
349 KB

Dear Mr. Sotelo and Mr. Rodda,

Attached you will find my letter in opposition to the CVMA's Proposed Regulations for Animal Physical Rehabilitation.

Thanks,

Dr. Leigh Stevens

Leigh Stevens, DVM
Supervising Veterinarian,
-FearFree Certified Practitioner
-Animal Hospice & Palliative Care Certificate

Scout's House, Inc.
A Rehab Center for Animals
650.328.1430
251 North Amphlett Blvd,
San Mateo, CA 94401
leigh@scoutshouse.com
scoutshouse.com

Leigh Stevens
leigh@scoutshouse.com



251 North Amphlett Boulevard San Mateo, CA 94401
650.328.1430 www.scoutshouse.com

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

April 13, 2020

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: VETERINARY OPPOSITION TO CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am a licensed veterinarian in California and a member of the CVMA. I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations. I have several concerns, including the fact that it seems like this regulation has been pushed through prematurely and inappropriately in light of the COVID-19 disaster. I received email notification from the Veterinary Medical Board regarding this action on March 16, 2020. That day, seven Bay Area counties declared the official shelter in place regulations. Right now, when many veterinary clinics are struggling to stay open and in business with the changes brought by the COVID-19 debacle, I feel it is an inopportune time for a discussion of this type. It is my personal opinion that this item be shelved or, at least, have the public commenting period pushed back by 3-6 months.

It is clear that the emerging specialty field of animal physical rehabilitation requires oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists (who have undergone the necessary training on animals) limits the ability to inter-professionally collaborate and hinders the consumer's ability to access these professionals.

By relegating licensed physical therapists (LPTs) who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision of a veterinarian and ONLY in a veterinarian's hospital/clinic is absurd. Full disclosure, this impacts me personally as a veterinarian who has been employed at Scout's House, Inc.-A Rehab Center for Animals for 12+ years, overseeing a licensed physical therapist. I have first-hand knowledge of what level of supervision is appropriate. We have a licensed PT who plans out the treatments and works with our RVT in performing the treatments. I am the medical supervisor at Scout's House and every new patient goes through an initial exam with both of myself and the LPT present to evaluate the animal's readiness and likelihood of responding to physical therapy/ rehab. After working with our LPT, I realize that she has skills that are very different than mine as a veterinarian. We complement each other and there is no way, without extensive continuing education or going to PT school, that I would ever be qualified to replace her knowledge/ skill base. The opposite is true as well. Our LPT knows she is not a veterinarian and leaves medical questions/ concerns to me. We know we are providing an essential service to those patients and pet parents who have exhausted their options, especially when their pet no longer responds to appropriate pain medications. Scout's House has improved the quality of life for many older patients where euthanasia has been openly discussed with clients and their veterinarians.

I understand that veterinarians have concerns about physical therapists working without oversight. I have that same concern (as does our PT) which is why the model we have at Scout's House is so powerful. Allowing

veterinarians to evaluate, diagnose, and determine the best course of treatment is appropriate. I do not need to be present while the RVT and PT, following a treatment plan designed by a professional PT, is followed, assuming that I, as a veterinarian, have cleared the patient for physical rehabilitation treatment. I have personally seen the differences in outcome from the services of a licensed physical therapist certified in Canine Rehabilitation and therefore recognize the important role these professionals play in the care and well-being of our companion animals. I do NOT need to be present. For the safety of our patients, we specifically made sure that our business was located in very close proximity to several veterinary entities (we share space with a veterinary surgical practice and there is a vet clinic 2 doors down and an emergency clinic 3 doors down). Anyone can put a dog in an underwater treadmill, but I have seen cases where dogs who had a very poor prognosis for any mobility EVER were able to walk again.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals *after* a veterinarian has established a Veterinary-Client-Patient-Relationship (VCPR), made a diagnosis, and determined that rehab would be a safe and beneficial intervention for their animal patients. Point of fact, human doctors never set foot in a physical therapist's office. As of 2016, all physical therapists receive a Doctorate of Physical Therapy as a reflection of the special skills and education that they possess. Many behaviorists and animal researchers at the university level are not veterinarians so the argument that you need to have a veterinary license to work with animals is moot.

By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own premises for animal physical rehabilitation under INDIRECT supervision (after the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us (like Colorado, Nevada, and Nebraska). Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

The issue of animal physical rehabilitation has been going on for far too long. A legislative remedy is the clear solution (akin to AB 3013—the Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included physical therapists.

Sincerely,



Leigh Stevens, DVM

10460 Serra Street, Cupertino, CA 95014

leigh@scoutshouse.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Juanita Smith <outlook_F3622320F69E94FA@outlook.com>
Wed 4/15/2020 5:34 PM

- Sotelo, Justin@DCA

Consumer oppose template letter 4.6.2020F.docx
17 KB

Sent from [Mail](#) for Windows 10

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

April 6, 2020

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Juanita Smith

Juanita Smith
3105 Cimarron Drive, Santa Ynez, CA 93460
805-688-3977
jssmith15@verizon.net

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

debrakayduncan@gmail.com
Wed 4/15/2020 4:59 PM

- Sotelo, Justin@DCA

Consumer oppose template letter 4.6.2020F.docx
16 KB

Please see [attached](#) letter.

Thank you, Debra Kay Duncan

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

April 6, 2020

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

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PT@dca.ca.gov

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Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Debra Kay Duncan

569 27th St.

Manhattan Beach, CA 90266

310-600-7336

debrakayduncan@gmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs

Jessica Siefertman, Executive Officer, California Veterinary Medical Board

California Veterinary Medical Board Members

Jason Kaiser, Executive Officer, Physical Therapy Board of California

Physical Therapy Board of California Members

Ashley Smith <amanoogi@gmail.com>
Wed 4/15/2020 3:41 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

[Opposition Letter .docx](#)
17 KB

Dear Mr. Sotelo and Mr. Rodda,

Please see the [attached](#) letter representing my stance OPPOSING the proposed animal physical rehabilitation regulations. This is a field near and dear to my heart. I love animals just like you! I am grateful that you are willing to take time out to hear the thoughts of the people and providers directly impacted by the decisions you will make. Thank you in advance for considering my opinions and hearing my voice.

- Ashley Smith

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

April 7, 2020

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a licensed physical therapist in California, I have been monitoring this issue closely for years and have been repeatedly disappointed with the egregious attempts this Board has taken to monopolize this area of animal healthcare.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to practice my craft under reasonable guidelines.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, my job opportunities and ability to earn a living would be dramatically reduced. **This regulation would be a restraint of my trade.**

Other states have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am OPPOSED to this regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before us on this matter.).

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists. Unfortunately, the CVMB opposed that bill largely based on the

misrepresentations by members of the veterinary profession who successfully were able to sway Board opinion.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals *after* a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

Ashley Smith

2017 Ava Ave. Hermosa Beach, CA 90254

amanoogi@gmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Siefertman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Trish <k9searcher366@gmail.com>
Wed 4/15/2020 6:09 AM

- Sotelo, Justin@dca; Rodda, Timothy@dca; DCA Director's Office; PT@dca

April 15, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

I am a member of the California Rescue Dog Association (CARDA). Our mission is to train, certify, and deploy highly-qualified search dog teams to assist law enforcement and other public safety agencies in the search for lost and missing persons.

I have personally experienced the services of a licensed physical therapist certified in canine rehabilitation. Our canine search and rescue (SAR) teams were deployed to help the injured and find the missing after the Montecito, California Debris Flow on January 9, 2018. After long search days by the canine team, an animal physical therapist would work on the dogs to prepare them for the following day so they could continue to assist in the recovery efforts. I am an RVT with 20+ years of clinical experience and, as a SAR dog handler as well, really feel like I know my dog and would have been able to tell where he was having physical issues more than most other handlers. I will say that this animal physical therapist, with her training and expertise, was able to tell where my dog was the sorest and in need of targeted care – and I was impressed by her skill to recognize his pain points that I wasn't seeing. I watched her work on my own and my teammates' dogs and utilizing the different modalities of treatment available to her to best help them and prepare them for return to duty. I noticed that the canine teams were fresher and better able to do their work the next day after they received the skilled treatments from the animal physical therapist.

I recognize the important role these professionals play in the care and well-being of both our companion animals as well as for our working dogs. The California Veterinary Medical Board's

approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers. By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and ONLY in a veterinary hospital is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the qualified, licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my working dog. The proposed regulation does nothing for me or my working dog's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Trish Moutard, RVT
6104 Everest Way
Sacramento CA 95842
530-228-3953
K9searcher366@gmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs

Jessica Siefertman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Amber Fruchey <afruchey29@gmail.com>
Tue 4/14/2020 11:46 PM

- DCA Director's Office; Sotelo, Justin@DCA; PT@DCA; Rodda, Timothy@DCA

April 14,2020

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a sporting dog owner, I engage in a lot of physical activity with my pet. That means my dogs are more prone to orthopedic and activity-related injuries. If my dog is injured, I would like to be afforded with the best options for his care. If my dog ever needed physical therapy, I would like to be able to see an actual licensed physical therapist who is certified in animal rehabilitation without having unnecessary regulatory barriers that would limit my access and choice. The California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely

AMBER M FRUCHEY
2145 N Ventura Rd,
Oxnard, CA 93036
(805)604-4350
afruchey29@gmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Siefertman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Suzanne Knox <suzanneknox47@gmail.com>
Tue 4/14/2020 10:48 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

April 12, 2020

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a sporting dog owner, I engage in a lot of physical activity with my pet. That means my dogs are more prone to orthopedic and activity-related injuries. If my dog is injured, I would like to be afforded with the best options for his care. If my dog ever needed physical therapy, I would like to be able to see an actual licensed physical therapist who is certified in animal rehabilitation without having unnecessary regulatory barriers that would limit my access and choice. The California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

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So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Suzanne Knox
1624 Branch ave
Simi Valley Ca 93065
Suzanneknox47@gmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Jeffyne Telson <jeffyne@resqcats.org>
Tue 4/14/2020 10:59 AM

- Sotelo, Justin@dca; Rodda, Timothy@dca; DCA Director's Office; PT@dca; Karen Atlas <karen.atlas@yahoo.com>

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

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So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Name: Jeffyne Telson
Address: 3263 Cliff Drive; Santa Barbara, CA 93109
Phone: (805)563-9424
Email address: jeffyne@resqcats.org

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Cynthia Guenther <csguenther50@gmail.com>
Mon 4/13/2020 7:53 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations. It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

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So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

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I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Cynthia Guenther
5234 Vista Miguel Drive
La Canada, CA 91011
csguenther50@gmail.com

heguenther@aol.com
Mon 4/13/2020 6:52 PM

- Sotelo, Justin@DCA

April 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
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Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

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therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

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I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Herta Guenther
4540 Via Clarice
Santa Barbara, Ca 93111
805-964-4924
Heguenther@AOL.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Jane Brown <harperswoods@sprintmail.com>
Mon 4/13/2020 6:23 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

April 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

My pets have GREATLY benefitted from physical therapy from a licensed PT specifically trained on animals. My pets' orthopedic DVM referred me to a specially-licensed animal PT, and both my veterinarian and I have been thrilled with the results. Unfortunately, many of my friends across our state have no close geographical access to such a specialist PT.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

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True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Thank you.

Sincerely,

Jane Brown
704 Calle Palo Colorado
Santa Barbara, CA 93105
Ph: [805-963-0407](tel:805-963-0407)
Email: harperswoods@sprintmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Natalie Kalustian <natkalu@yahoo.com>
Mon 4/13/2020 9:04 AM

- Sotelo, Justin@dca; Rodda, Timothy@dca; DCA Director's Office; PT@dca

April 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a pet owner and a licensed massage therapist for over 20 years (for humans), I have a personal and professional perspective on the importance of this matter.

Licensed physical therapists who have been specifically trained to work with animals should be recognized for their training and expertise, and should be able to offer their services in a way that is most ethical and beneficial to the public. Relegating them to the title of 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is not only absurd, it is unfair to them AND to the animals and pet owners that rely on them.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist. I OPPOSE it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Natalie Kalustian
16835 Klee Street, Northridge CA 91343
805-217-2512
natkalu@yahoo.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Kristin Massey <masseyk369@gmail.com>
Sat 4/11/2020 4:45 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; PT@DCA; DCA Director's Office

April 11, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a licensed physical therapist in California, I have been monitoring this issue closely for years and have been repeatedly disappointed with the egregious attempts this Board has taken to monopolize this area of animal healthcare.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to practice my craft under reasonable guidelines.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, my job opportunities and ability to earn a living would be dramatically reduced. This regulation would be a restraint of my trade.

Other states have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am OPPOSED to this regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before us on this matter.).

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists. Unfortunately, the CVMB

opposed that bill largely based on the misrepresentations by members of the veterinary profession who successfully were able to sway Board opinion.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals after a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

Dr. Kristin Massey, PT, DPT
masseyk369@gmail.com

Abby Eunyoo Noh <abbynoh@gmail.com>
Fri 4/10/2020 7:17 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a 2020 physical therapy licensing applicant in California with a strong desire to pursue animal rehabilitation, I have been monitoring this issue closely for years and have been repeatedly disappointed with the egregious attempts this Board has taken to monopolize this area of animal healthcare.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to practice my craft under reasonable guidelines.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, my job opportunities and ability to earn a living would be dramatically reduced. This regulation would be a restraint of my trade.

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The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists. Unfortunately, the CVMB opposed that bill largely based on the misrepresentations by members of the veterinary profession who successfully were able to sway Board opinion.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals

after a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

Abigail Noh
975 E Orange Grove Blvd Pasadena CA 91104
abbynoh@gmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Nicole Heighes <nheighes@widener.edu>
Fri 4/10/2020 1:03 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a Doctor of Physical Therapy Student, I have been monitoring this issue closely for years and have been repeatedly disappointed with the egregious attempts this Board has taken to monopolize this area of animal healthcare.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to practice my craft under reasonable guidelines.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, my job opportunities and ability to earn a living would be dramatically reduced. This regulation would be a restraint of my trade.

Other states have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am OPPOSED to this regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before us on this matter.).

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists. Unfortunately, the CVMB opposed that bill largely based on the misrepresentations by members of the veterinary profession who successfully were able to sway Board opinion.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals after a veterinarian has made a diagnosis and determined that rehab would be a safe and

beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

Nicole Heighes
6516 Dashwood St. Lakewood CA 90713
Nheighes@widener.edu

G. V. Ayers <gv@gentlerivers.com>

Mon 4/27/2020 5:00 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA; Karen Atlas <karen.atlas@yahoo.com>

APTC Regulation Comment, GVA.pdf

122 KB

G. V. Ayers

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April 27, 2020

VIA EMAIL

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

**Re: Proposed Regulatory Action Concerning: Animal Physical Rehabilitation
§ 2038.5 (Division 20, Title 16, California Code of Regulations)**

Dear Mr. Sotelo and Mr. Rodda:

On behalf of the Animal Physical Therapy Coalition (APTC), I am submitting this comment on the Veterinary Medical Board's (VMB's) proposed regulation regarding Animal Physical Rehabilitation, adding § 2038.5 to Division 20, Title 16, of the California Code of Regulations.

The APTC is a coalition representing Veterinarians, Physical Therapists, RVT's and consumers. The APTC has been working diligently with the VMB to establish common sense animal rehabilitation regulations and legislation in California.

The APTC OPPOSES the proposed regulation, and urges that it not be adopted by the VMB or approved by the Office of Administrative Law for a number of policy reasons, including the following:

1. Animal Physical Rehabilitation is not established within the scope of practice of veterinary medicine. The practice of veterinary medicine is described in Business and Professions Code (BPC) § 4826 which states:

§ 4826. A person practices veterinary medicine, surgery, and dentistry, and the various branches thereof, when he or she does any one of the following:
(a) Represents himself or herself as engaged in the practice of veterinary medicine, veterinary surgery, or veterinary dentistry in any of its branches.
(b) Diagnoses or prescribes a drug, medicine, appliance, application, or treatment of whatever nature for the prevention, cure, or relief of a wound, fracture, bodily injury, or disease of animals.

(c) Administers a drug, medicine, appliance, application, or treatment of whatever nature for the prevention, cure, or relief of a wound, fracture, bodily injury, or disease of animals, except where the medicine, appliance, application, or treatment is administered by a registered veterinary technician or a veterinary assistant at the direction of and under the direct supervision of a licensed veterinarian subject to Article 2.5 (commencing with Section 4832) or where the drug, including, but not limited to, a drug that is a controlled substance, is administered by a registered veterinary technician or a veterinary assistant pursuant to Section 4836.1. However, no person, other than a licensed veterinarian, may induce anesthesia unless authorized by regulation of the board.

(d) Performs a surgical or dental operation upon an animal.

(e) Performs any manual procedure for the diagnosis of pregnancy, sterility, or infertility upon livestock or Equidae.

(f) Uses any words, letters, or titles in such connection or under such circumstances as to induce the belief that the person using them is engaged in the practice of veterinary medicine, veterinary surgery, or veterinary dentistry. This use shall be prima facie evidence of the intention to represent himself or herself as engaged in the practice of veterinary medicine, veterinary surgery, or veterinary dentistry.

In the *Initial Statement of Reasons*, the VMB states:

The [Veterinary Medicine Practice] Act defines the practice of veterinary medicine to include the administration of a drug, medicine, application, or treatment of whatever nature for the prevention, cure, or relief of a wound, fracture, bodily injury, or disease of animals, except where the medicine, appliance, application, or treatment is administered by an RVT or VA at the direction of and under the direct supervision of a licensed veterinarian (BPC § 4826).

While the VMB makes the assumption that APR is defined within the scope of practice of veterinary medicine, it simply is not the case. By promulgating the proposed regulations, the VMB is attempting to define and establish a practice within the scope of veterinary medicine when the Legislature has not defined it within that scope in statute.

Scope of practice of the licensed professions has always been held within the purview of the Legislature. While the Legislature has seen fit to statutorily authorize the Board of Registered Nursing the sole authority to define and interpret the practice which it regulates (BPC § 2725 (e)), it has not done so with the other professional licensing boards under the Department of Consumer Affairs.

For the Board to establish a definition of Animal Physical Rehabilitation in regulation, it would do so without Legislative authorization, input or oversight. Simply put – the scope of practice for Animal Physical Rehabilitation should be established by legislative action, not by board regulation.

2. The proposed regulation will have significant adverse economic impact on businesses and jobs. The *Initial Statement of Reasons* states in the Business Impact that the proposed regulatory action will not have a significant adverse economic impact on businesses:

This initial determination is based on the fact that APR treatment is currently regulated and enforced by the Board pursuant to the Act, and businesses that provide APR treatment on animals are currently subject to the requirements of that Act.

This is a misleading statement since APR is not currently defined as the practice of veterinary medicine. It is clear that a primary reason that an adequate definition of APR has not been established is because the practice of animal physical therapy crosses over into two professions with separate licensing and regulatory structures (Veterinary Medicine and Physical Therapy). Therefore, if this regulation is adopted to only allow animal physical rehabilitation solely within the veterinary practitioner paradigm, and there are successful, legitimate rehabilitation practices that will certainly be negatively affected, resulting in jobs lost and businesses being lost.

3. The dangers cited by the Board are not based upon fact. The *Initial Statement of Reasons* states in the Economic Impact Analysis:

This regulatory proposal benefits the health, safety, and welfare of California residents and their animals by ensuring that only individuals with the requisite skill sets are authorized to practice APR. The Board has received consumer complaints that individuals not licensed by the Board or supervised by a veterinarian as required by existing law, are practicing APR. This poses a danger to California residents and their animals. The regulatory proposal attempts to lessen this danger and better protect California consumers and their animals.

This is an unwarranted assumption not based upon fact since there were no mandatory educational competency standards added for DVM's or RVT's who practice in the specialty field of animal rehabilitation. True provision of consumer protection would include mandatory educational standards for **all** who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) would be to mandate proper training before being allowed to perform rehab on animals. The proposed regulation does nothing for the protection of the consumer if educational competency standards are not included.

4. Legitimate alternatives are not considered. The *Notice of Proposed Regulatory Action*, and the *Initial Statement of Reasons* for the current regulatory proposal both list in the statement of Consideration of Alternatives:

No reasonable alternative which was considered or that has otherwise been identified and brought to the attention of the Board would be more effective in carrying out the purpose for which the regulation has been

proposed. No reasonable alternative which was considered would be as effective and less burdensome to affected private persons than the proposed regulation, or would be more cost-effective to affected private persons, or would be equally effective in implementing the statutory policy or other provision of law.

In enumerating the alternatives considered by the Board and the reasons each were rejected, the alternative recommended by the California Veterinary Medical Board's Animal Physical Rehabilitation Stakeholder's Task Force was not listed or considered.

5. The expertise of physical therapists qualified in animal rehabilitation is ignored. The Consideration of Alternatives contains the following inaccurate statement:

5. Authorizing physical therapists to perform APR with indirect veterinarian supervision; this was rejected because only licensed veterinarians and RVTs possess the knowledge and training to plan and supervise APR for animal patients and ensure proper animal handling, recognize pain and discomfort, and provide emergency care and assistance as needed in the particular field of APR.

This statement is inaccurate because it does not consider the additional training that physical therapists receive specifically during their animal rehabilitation certification coursework. The original Stakeholder's Task Force language was specific to include educational standards to achieve competency so PT's can render safe rehabilitation services on animals while working under indirect veterinary supervision. It appears this Board did not consider that PT's can and do learn these important aspects of animal care. The APTC believes it is inappropriate to reject a legitimate alternative based upon ill-reasoning.

6. The regulations do not place the protection of the public as the VMB's highest priority. As with all regulatory boards under the Department of Consumer Affairs, the VMB is required to place the protection of the public as its highest priority: BPC § 4800.1 states:

§ 4800.1. Protection of the public shall be the highest priority for the Veterinary Medical Board in exercising its licensing, regulatory, and disciplinary functions. Whenever the protection of the public is inconsistent with other interests sought to be promoted, the protection of the public shall be paramount.

There are no documented examples of consumer harm by licensed physical therapists trained in animal physical rehabilitation practicing physical therapy upon animals. There are no examples of consumer harm in California or in any other state that regulates APR. The question then remains, if the VMB is seeking to occupy a scope of practice solely by licensed veterinarians where there are already qualified professionals safely practicing within that space, and there are no examples of consumer harm by those practitioners, what is the purpose behind the proposed regulation? It surely is not the protection of the public.

The APTC urges the Board to withdraw the current regulatory proposal and to seek an alternative solution which will specifically allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals *after* a veterinarian has made a diagnosis and determined that physical rehabilitation would be a safe and beneficial intervention for their animal patients.

There is a huge shortage of animal physical therapists in California. The shortage is not because PT's don't want to practice, but because of the difficulty of getting hired by a veterinarian who is willing to pay a commensurate wage for their expertise.

If the current regulatory language is adopted, the unnecessary and restrictive regulatory burdens placed upon physical therapists to practice animal physical rehabilitation would fall once again into the crosshairs of restraint of trade. Physical Therapy is a profession that is well-equipped and accustomed to inter-professional collaboration. That is how physical therapists are trained to practice. Working collaboratively with doctors is second nature to those trained as physical therapists.

The APTC urges the Board to give more flexibility to allow the veterinarian to decide the level of supervision to improve inter-professional collaboration, allow consumers to have more choice of and access to qualified physical therapists for their pet, and allow properly qualified physical therapists to practice their expertise under more reasonable laws. California must catch up to our more progressive neighboring states who have already realized the solution to this ongoing problem.

If you have any questions about the Animal Physical Therapy Coalition, or about sensible workable solutions to these issues, please don't hesitate to contact me at gv@gentlerrivers.com or 916.316.7459.

Kindest regards,



G. V. Ayers, Lobbyist
On behalf of the Animal Physical Therapy Coalition

cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members
Karen Atlas, President, Animal Physical Therapy Coalition

karen.atlas@yahoo.com
Mon 4/27/2020 4:48 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA; G. V. Ayers <gv@gentlerrivers.com>

[CAAPTAPTC opposition to VMB APR regs.pdf](#)
154 KB

Dear Mr. Sotelo and Mr. Rodda,

Attached you will find an opposition letter to the VMB's proposed APR regulations on behalf of the Animal Physical Therapy Coalition/California Association of Animal Physical Therapists.

If you have any questions or wish to discuss anything further relating to animal rehabilitation, I am available to discuss. Feel free to email or call at any time.

Please respond to ensure timely receipt of this email.

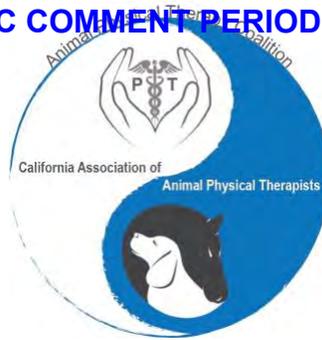
Thank you in advance for your careful consideration and it is my hope you are all staying healthy and well during this time of COVID-19 uncertainty.

Karen

Karen Atlas, PT, MPT, CCRT
President: California Association of Animal Physical Therapists
Animal Physical Therapy Coalition

Past-Member: California Veterinary Medical Board's Animal Physical Rehabilitation Stakeholder's Task Force

Karen Atlas cell: 805-680-6285



April 26, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

Re: Comment expressing Opposition to VMB's Proposed Regulatory Action Concerning:
Animal Physical Rehabilitation § 2038.5 (Division 20, Title 16, California Code of Regulations)

Dear Mr. Sotelo and Mr. Rodda,

As a California licensed physical therapist (since 1996) also certified in canine rehabilitation (since 2008), this issue is very near and dear to my heart. I have devoted my career to the physical wellbeing of animals. I was appointed to the legislatively-mandated California Veterinary Medical Board's (CVMB) Animal Rehabilitation Stakeholder's Task Force in 2017 where we studied the best approaches to regulate animal rehabilitation over the course of nearly a year in Sacramento. I know the ins and outs of this subject matter and understand the politics behind it as well. I am the President of the California Association of Animal Physical Therapists (CAAPT) and Animal Physical Therapy Coalition (APTC).

The Animal Physical Therapy Coalition is a grassroots coalition representing Veterinarians, Physical Therapists, RVTs and consumers. We have been trying to work diligently with this Board to take a leading role to further common sense animal rehabilitation regulations and legislation in California.

I have had the unique opportunity to be intimately involved with and actively participate in many of the stages in this regulatory/legislative process over the last 12 years as the CVMB has pondered how to regulate this specialty area of animal healthcare. Through the years, I have a documented history of interactions with this Board and I have experienced repeated occasions whereby they appeared to give more credence to the *opinions* of their own licensees rather than relying on evidence-based facts to reach their decisions.

Background and History of the Issue:

To provide some background, in 2015, the CVMB attempted to pass regulations that would have *only* allowed veterinarians to practice animal rehabilitation regardless of whether they were qualified or not to do so. After almost universal opposition by the public to this regulatory attempt, and potentially with the CVMB finding themselves in the crosshairs of the N. Carolina Dental Board vs. Federal Trade Commission for anti-trust, the Board withdrew their language. In effect, the VMB's current proposed

language will have the same negative effects as those we all objected to back in 2015. This current language once again fails to exempt the licensed and qualified physical therapist (who has undergone the additional training specifically on animals) as a legitimate provider of animal rehabilitation services.

Subsequent to withdrawing the animal rehab regulatory language in 2015, the CVMB's Sunset Review in 2016 included an action item by the Senate Committee on Business, Professions, and Economic Development and the Assembly Business and Professions Committee which recommended that the Board create a task force comprised of stakeholders including veterinarians, RVT's, animal rehabilitation and related animal industry professionals, consumers, and representatives from the legislature to further examine the issue and present a recommendation to the Board by January 1, 2017.

After studying the issue in great depth and meeting with the VMB's Stakeholder's Task Force for nearly a year, some common-sense language was indeed developed and set forth the following recommendations to solve the issue, namely:

CA licensed PT's with advanced certification in Animal Physical Rehabilitation (with such certification to be defined by the CVMB and PTBC working cooperatively) may provide APR under the degree of supervision to be determined by the veterinarian who has established the veterinary-client-patient-relationship on a veterinary premise or APR premises (as defined in regulation by the CVMB and the PTBC working cooperatively, or a range setting).

This language would have empowered the veterinarian to decide whether an animal is appropriate to receive animal rehabilitation and would allow them to refer (provide medical clearance) to a qualified physical therapist trained specifically on animals. Furthermore, the physical therapist could work in an indirect supervision model and on their own premises that is overseen by the CVMB to ensure consumer protection.

The language was then brought before the CVMB, and, largely based on misinformation, they **rejected** their own Stakeholder's Task Force language as it related to physical therapists practicing on animals. They egregiously voted to re-work the language to mandate direct supervision of a physical therapist and only *after* that PT received an advanced certification in animal rehab. Interestingly, however, the CVMB thought it made sense to allow any unlicensed assistant with no training at all to work under the same provision of direct supervision, (but if you are a licensed PT, they voted to mandate additional training for just those practitioners.). It is difficult to make any sense out of these decisions made by the Board.

In 2018, the Animal Physical Therapy Coalition sponsored AB 3013 (The Animal Physical Rehabilitation Bill) to codify the CVMB's Stakeholder's Task Force language to resolve this debate that the VMB was charged to address by the legislative oversight committees. Unfortunately, the CVMB and CVMA heavily opposed the bill, once again, based on misinformation and propaganda that was rampantly spread throughout social media and in CVMA newsletters and meetings. AB 3013 passed with zero 'no' votes through the Assembly Committee on Business and Professions after significant amendments were accepted by the author and sponsor to address the CVMB's concerns. The CVMB continued to oppose the bill and it was subsequently held in Assembly Appropriations.

Statement of Opposition:

On behalf of the California Association of Animal Physical Therapists and the Animal Physical Therapy Coalition, **we strongly oppose any regulatory effort that fails to include the advanced trained and licensed physical therapist as a legitimate provider of animal physical rehabilitation services.**

The Initial Statement of Reasons noted that the Board determined that this regulatory action will not have a significant adverse economic impact on businesses. It stated:

This initial determination is based on the fact that APR treatment is currently regulated and enforced by the Board pursuant to the Act, and businesses that provide APR treatment on animals are currently subject to the requirements of that Act.

This is a misleading statement since APR has yet to be defined as the practice of veterinary medicine. The CVMB's own legislative oversight committee tasked this Board to examine this issue in depth and develop definitions. It is well known that definitions have not yet been established and this regulation spans two professions (Veterinary Medicine and Physical Therapy). Therefore, there are successful, legitimate rehabilitation practices that absolutely will be negatively affected by this regulation and jobs and businesses will be lost.

Furthermore, the Board indicated that:

This regulatory proposal benefits the health, safety, and welfare of California residents and their animals by ensuring that only individuals with the requisite skill sets are authorized to practice APR. The Board has received consumer complaints that individuals not licensed by the Board or supervised by a veterinarian as required by existing law, are practicing APR. This poses a danger to California residents and their animals. The regulatory proposal attempts to lessen this danger and better protect California consumers and their animals.

This is patently false since there were no mandatory educational competency standards added for DVM's or RVT's who practice in the specialty field of animal rehabilitation. True provision of consumer protection would include mandatory educational standards for **all** who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on animals. The proposed regulation does nothing for the protection of the consumer if educational competency standards are not included.

The Notice of Proposed Regulatory Action, and the Initial Statement of Reasons for the current regulatory proposal both give a statement of a Consideration of Alternatives and state in part:

No reasonable alternative which was considered or that has otherwise been identified and brought to the attention of the Board would be more effective in carrying out the purpose for which the regulation has been proposed. No reasonable alternative which was considered would be as effective and less burdensome to affected private persons than the proposed regulation, or would be more cost-effective to affected private persons, or would be equally effective in implementing the statutory policy or other provision of law.

In enumerating the alternatives considered by the Board and the reasons each were rejected, the alternative recommended by the California Veterinary Medical Board's Animal Physical Rehabilitation Stakeholder's Task Force was not listed or considered. In addition, the Consideration of Alternatives contains the following inaccurate statement:

5. Authorizing physical therapists to perform APR with indirect veterinarian supervision; this was rejected because only licensed veterinarians and RVTs possess the knowledge and training to plan and supervise APR for animal patients and ensure proper animal handling, recognize pain and discomfort, and provide emergency care and assistance as needed in the particular field of APR.

This statement is inaccurate because it does not consider the additional training that physical therapists receive specifically during their animal rehabilitation certification coursework. The original Stakeholder's Task Force language was specific to include educational standards to achieve competency so PT's can render safe rehab services on animals while working under indirect veterinary supervision. It appears this Board did not consider that PT's can and do learn these important aspects of animal care and we believe it is inappropriate to reject an alternative if it is based on ill-reasoning.

It is important to realize the serious negative impact this regulation would have on consumers. Consumers have been speaking loud and clear on this issue for years and they do not want to be restricted in their access to qualified professionals for their animals. Rural areas are dramatically underserved and we must provide ways for these areas to be serviced. APTC has already submitted a petition to the CVMB on April 13, 2020 that accumulated over 4000 signatures against this proposed language as well.

We urge the Board to seek an alternative solution which will specifically allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals *after* a veterinarian has made a diagnosis and determined that physical rehabilitation would be a safe and beneficial intervention for their animal patients.

Leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under **indirect** supervision (with the veterinarian's consent and order to treat) will provide the following benefits:

- It will allow increased safe access for consumers and safe rehabilitative care for their animals.
- Allow veterinarians to collaborate with other licensed professionals of their choice to give access to a full range of animal healthcare options.
- Allow for Board oversight to protect the consumer.

This alternative approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have already established animal physical rehabilitation statutes. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015 (at the very same meeting the AR regulatory efforts were withdrawn.). So it is well known by now that the specialty of animal rehabilitation cannot legally and properly be handled without a legislative remedy. We urge you to withdraw the current regulatory

proposal and instead pursue the proper legislative solution similar to AB 3013 to codify the original VMB Stakeholder's Task Force recommendations.

There is a huge shortage of animal physical therapists in California. The shortage is not because PT's don't want to practice, but because of the difficulty of getting hired by a veterinarian who is willing to pay a commensurate wage for their expertise. If the current regulatory language is adopted, the unnecessary and restrictive regulatory burdens placed upon physical therapists to practice animal physical rehabilitation would fall once again into the crosshairs of restraint of trade. Physical Therapy is a profession that is well-equipped and accustomed to inter-professional collaboration. That is how physical therapists are trained to practice. Working collaboratively with doctors is second nature to those trained as physical therapists.

The APTC urges the Board to give more flexibility to allow the veterinarian to decide the level of supervision to improve inter-professional collaboration, allow consumers to have more choice of and access to qualified physical therapists for their pet, and allow properly qualified physical therapists to practice their expertise under more reasonable laws. California must catch up to our more progressive neighboring states who have already realized the solution to this ongoing problem.

We are better together. Let's work together on legislation to get this done properly and expeditiously in the best interest of the consumer, animals and all professionals involved.

Sincerely,



Karen Atlas, PT, MPT, CCRT
3208 State Street
Santa Barbara, CA 93105

President: California Association of Animal Physical Therapists (CAAPT)
Animal Physical Therapy Coalition (APTC)

Past-Member: California Veterinary Medical Board's Animal Physical Rehabilitation Stakeholder's Task Force

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Siefertman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Ilana Strubel <drilana@awelladjustedpet.com>
Mon 4/27/2020 10:22 AM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

[CVMB Letter April 24, 2020.pdf](#)
133 KB

April 24, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Members: California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: VETERINARY OPPOSITION TO CVMB ANIMAL PHYSICAL REHABILITATION
PROPOSED REGULATIONS

Dear Mr. Sotelo and the Members of the California Veterinary Medical Board,

I am a 1995 University of Illinois College of Veterinary Medicine DVM graduate and I have been practicing in the state of California since 1996, Lic. # CA 12526. I currently own and operate a stand-alone animal physical rehabilitation center, A Well Adjusted Pet, in Pacifica, CA.

I currently hold the premise permit #: HSP7038.

I am also a San Francisco Veterinary Medical Association (SFVMA) member.

I am writing to express my strong opposition to the VMB's proposed animal physical rehabilitation regulatory language. I oppose it because it does not include licensed physical therapists who have been specifically trained on animals as legitimate providers of animal rehabilitation services. As a veterinarian, I would like the option to refer my animal patients to a qualified physical therapist (trained in animal rehabilitation) and decide for myself the level of supervision that would be appropriate on a case by case basis. By relegating these professionals to "unlicensed veterinary assistants", our profession would be negatively impacted by limiting my ability to collaborate with other experts in the field. Furthermore, it would also be a disservice to the consumers of California because it would unnecessarily limit access to an already limited service. Rural communities would especially be negatively impacted by this language because it would further restrict access to care.

I thought it would be constructive for you to read my letter to the legislature referencing my 2018 support for the Animal Physical Rehabilitation Bill (AB 3013). Perhaps you were unaware of some of these details which I would like to highlight again here.

“I am discouraged to see that my own association, the CVMA, has been spreading fear to the generally uninformed DVM population in California regarding the possibility of CA DVMs “losing their given rights and sole privileges as DVMs for practicing APR” in their article entitled *“Alert: VMB to Debate Allowing Physical Therapists to Open Animal Physical Rehabilitation Practices”* California Veterinarian March/April 2017 Issue, pg. 14.

AB 3013 serves to **increase** DVM privileges by allowing veterinarians to make a choice on whom they would like to refer their animal patients for animal rehabilitation. AB 3013 does not limit, it actually expands the DVM choices. If a DVM does not feel it is appropriate to refer a patient to a licensed physical therapist certified in animal rehabilitation who practices on their own ‘Animal Physical Rehabilitation’ facility, then they can simply not refer. **All the control remains with the veterinarian.**

I feel that the CVMA has spread misinformation to CA DVMs- both in their news magazines, in their “Action Alerts” and at my local San Francisco Veterinary Medical Association (SFVMA) meeting. When I attended an SFVMA meeting last year, it was stated that California is at risk of passing legislation to allow physical therapists who have NO training in Animal Physical Rehab to practice animal rehabilitation with NO supervision by a veterinarian. This is simply untrue. I had to stand up and correct the CVMA representative announcing this misinformation at our SFVMA meeting.

The CVMA further alleges that allowing any “non-DVMs” to work with animals is the practice of veterinary medicine and is an insult to trained veterinary professionals who paid a lot of money for their degrees- and that the VMB was in danger of *“.....opening the door for physical therapists to treat animals without veterinary supervision would jeopardize the health of animals and be highly disrespectful to veterinarians who have the unique skills to care for them. It would undermine the expensive education of the veterinary professionals who have attained the highest levels of education and experience in the treatment of animals and disregards the schools dedicated to their exceptional educations. ...”* California Veterinarian March/April 2017 Issue, pg. 14.

I am extremely disappointed that the propagation of misleading information and outright lies coming from the CVMA are bringing about opposition to AB 3013 from their membership. Their membership is not receiving the truth about the impact of AB 3013, so opposition is coming from misinformed veterinarians.

The California Veterinary Medical Association (CVMA) falsely claims:

1. AB 3013 will “allow physical therapists to operate independent practices by referral only”.

False: AB 3013 clearly states that PT’s would operate under INDIRECT supervision. They would not be practicing independently.

2. AB 3013 “would not include establishing a veterinary-patient-client-relationship (on the practice site).”

False: AB 3013 clearly states that a veterinary-client-patient-relationship would need to be established by a referring veterinarian who has conducted a medical exam prior to referring for AR.

3. AB 3013 would allow physical therapists to treat animals by referral and outside a veterinary practice setting.

False: AB 3013 clearly states that a new premise type is created, namely an “animal physical rehabilitation” facility that would need to be registered with the Veterinary Medical Board.

4. AB 3013 would allow animal rehabilitation to be performed in a facility that does not include a veterinary supervisor or require a veterinary licensee manager to hold a premise permit.

They neglect to mention that a premise permit, called an Animal Physical Rehabilitation premise permit, would be required by a qualified licensed physical therapist with a certification in animal rehabilitation to provide proper oversight and allow for inspections by the Veterinary Medical Board to ensure consumer protection and animal safety.

To make things more upsetting to the veterinary profession, some of the very people who are pushing for restricting animal physical rehabilitation to only veterinary premises with a veterinarian onsite are DVM's who own their own rehabilitation clinics and I suspect they have incentive to protect their income stream by disallowing competition.

The claims of animal harm that are being propagated by the few rehab vets pushing for restricting animal rehabilitation practice are simply unfounded. This has not been my experience at all. A licensed physical therapist certified in animal rehabilitation has the appropriate training to recognize red flags that would prompt the practitioner to refer the animal back to their primary veterinarian.”

I urge you to abandon all regulatory efforts that do not include the licensed physical therapist with additional training on animals to be legitimate providers of animal rehabilitation services. Instead, pursue legislative language that serves to codify your original APR Stakeholder's Task Force. The clear solution is a statute like the one that was offered in AB 3013 (the Animal Rehabilitation Bill of 2018).

Thank you for your consideration,

Ilana Strubel, MA, DVM, CVSMT, CCRT, CVAT
Founder/Owner/Medical Director: A Well Adjusted Pet
1040 Palmetto Avenue
Pacifica, CA 94044

CC: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Siefertman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California

Physical Therapy Board of California Members

A Well Adjusted Pet

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1040 Palmetto Avenue Pacifica, CA 94044

Athena Kepler <athena.keplerdvm@gmail.com>
Sun 4/26/2020 9:10 PM

- Sotelo, Justin@DCA

VMB APR Letter1.pdf
105 KB

Hello Justin,

Please See [attached](#) document for the letter for 2038.5.

Best,

Dr. Athena Kepler, DVM CCAS
Integrative K9 Sport Veterinarian
Equine Rehabilitation & Podiatry Consultant
Northeast K9 Conditioning Faculty
Instagram: @VentureCompeteHeal
Member: American Association of Equine Practitioners
Member: Veterinary Orthopedic Society
Member: Golden State Schutzhund Club
Member: South Metro Atlanta Schutzhund Club

Athena Kepler 4/25/2020
DVM, CCAS Justin Sotelo, Lead Administrative & Policy Analyst
Riverside, CA 92504 **Veterinary Medical Board**
1747 North Market Blvd., Suite 230 Sacramento, CA 95834

9513841733 Enclosure: Concerning "NOTICE OF PROPOSED REGULATORY ACTION
Athena.keplerDVM@gmail.com CONCERNING: Animal Physical Rehabilitation, § 2038.5"

To whom this may concern:

I am writing as a veterinarian professional that is in opposition to the proposed regulations §2038.5. Specifically, regarding the statements below from the notice:

"Requiring RVTs and VAs to receive specialized training and education in APR; this was rejected as unnecessary since the proposal requires RVTs and VAs providing APR to have direct veterinarian supervision. 5. Authorizing physical therapists to perform APR with indirect veterinarian supervision; this was rejected because only licensed veterinarians and RVTs possess the knowledge and training to plan and supervise APR for animal patients and ensure proper animal handling, recognize pain and discomfort, and provide emergency care and assistance as needed in the particular field of APR".

I find that this statement is not necessary in all cases, thus, more clarity to the regulation should be developed. I do agree that a veterinarian has the knowledge to know which cases have underlying health concerns that deem it necessary to have direct veterinarian supervision and which cases are safe for unsupervised APR. I believe that a veterinarian needs to give a written release for a VA or non-veterinarian licensed physical therapist to proceed, unsupervised, with care of appropriate cases. This release should include any specific directions or information on the case so that appropriate care and intervention is able to be done by the unsupervised individual. I believe that if appropriate certification or licenses for the practice of rehab or physical therapy are met by VA, RVT, or non-veterinarian PTs, the "Case Veterinarian" should be able to refer appropriate cases to such individuals for unsupervised APR.

I, as a general medicine veterinarian, do not have the time to practice APR on some of my cases. I also work with clinics (as a relief veterinarian) in which many have limited locations for APR at a veterinarian-supervised location. Bringing in a non-veterinarian physical therapist to the clinic is likely logistically not possible in busy general medicine hospitals. I find that this regulation will restrict the abilities for some pets to get needed APR due to limited locations of APR-trained Veterinarians/RVT facilities, especially, in more rural locations and those that great distances and boarding-APR is unfeasible. This regulation will only allow those pets with higher economic-class owners and/or close to metropolitan areas to be able to receive appropriate care. This only creates more disparity for patient care between economic classes that is already evident today.

Yes, I agree, that some cases should only be under the direct supervision of a veterinarian for APR, however, a veterinarian should have the right to assess the patient and refer a patient to appropriate non-veterinarian APR without direct supervision. Much like human medical field where referral to physical therapy is a norm. The proposed regulation will further limit the ability for the veterinarian professional to have a broader reach

at improving the health and wellbeing of pets. While the ever-growing pet population and request for APR increases, monopolizing noninvasive care, such as APR, for ALL cases with the current limited APR-trained Veterinarian facilities in CA is faulty.

If there are regulations needing veterinarian-direct supervision for physical therapists that have appropriate licensing for physical therapy (Board of Physical Therapy) and approved animal-APR certification, then the practice of APR for the non-APR certified Veterinarian must also be banned. Veterinarians, with no further APR certifications upon completion of their DVM, do not have the training to practice APR safely and effectively for pets. I myself sought additional certification for canine fitness and canine athletes due to the lack of information and knowledge from veterinary school. Yes, as a veterinarian I do understand general health standards and cardiovascular health for fitness, however, I have not been trained for how canine's health and body systems adapt to fitness training and what are the specialized diet and nutrition requirements for canine athletes or those seeking to increase canine fitness safely.

Sincerely,

Athena Kepler

Position

DVM, CCAS

Lee Heller <leehellerk9@gmail.com>
Sun 4/26/2020 6:10 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

[AR regs response April 2020-signed.pdf](#)
49 KB

TO WHOM IT MAY CONCERN:

Please find [attached](#) my public comment regarding proposed regulation of animal rehabilitation therapy by the California Veterinary Medical Board.

Thank you.

Lee E. Heller, Ph.D., J.D.
PO Box 1592
Summerland CA 93067
leehellerk9@gmail.com

April 26, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: Opposition to VMB's Animal Physical Rehabilitation Regulations

TO WHOM IT MAY CONCERN:

The intent of this letter is to voice my strong opposition to the California Veterinary Medical Board's (CVMB) proposed animal physical rehabilitation regulatory efforts.

It is clear that the emerging specialty field of animal physical rehabilitation requires oversight and regulation to protect the consumer and their animals. However, the CVMB's approach to pursue regulatory language that excludes licensed physical therapists (who have undergone the necessary training on animals) as legitimate providers of rehab services is a huge disservice to consumers, pets, and licensed professionals. Specifically, by relegating licensed physical therapists who have been specifically trained on animals to the role of 'unlicensed veterinary assistant,' requiring that they work ONLY under direct supervision and for a veterinarian (at whatever wage the veterinarian chose to offer), would limit consumer choice of and access to these qualified and licensed professionals. It would also be a disservice to this unique and emerging specialty, stifling growth in the field and collaborative efforts between the two professions.

I am writing as a former (public) member of the California Veterinary Medical Board (VMB), appointed by Senate President Pro Tem Kevin de Leon. I also served as a member of the Animal Rehabilitation Task Force, one of two VMB members appointed to serve as representatives of the Veterinary Medical Board. I served a partial term on the VMB, and came away troubled by the inability of its members to distance themselves from the special interests of the profession that the Board exists to regulate.

I have been a high volume consumer of veterinary medicine for decades, as both a pet owner and an animal welfare advocate. I have the highest respect for the profession and many of its practitioners. But I also recognize the need for objective and independent oversight of the profession, to ensure proper consumer protections for both owners and animals. My experience on the VMB led me to conclude that the members of the Board have a hard time setting aside the interests of veterinarians in order to best serve consumers.

This observation is not limited to my experience with the Animal Rehabilitation Task Force, although it was most evident there. The legislature charged the VMB with establishing the AR Task Force precisely because of repeated failures to address the growing demand for access to

qualified animal physical therapists in California, other than trying to restrict its practice only to veterinarians – requiring even highly trained and specialized physical therapists to work as unlicensed assistants to veterinarians. The AR Task Force met three times over several months, worked through a number of issues, and ultimately recommended an ‘indirect supervision’ model that would allow highly trained PT’s to practice under veterinary direction, but not to require that a veterinarian be on site or be their direct employer. Other states have successfully adopted this model in regulating a fast-growing area of practice.

When this recommendation returned to the full VMB, it was rejected by all members other than myself and Dr. Mark Nunez, the two who had also served on the Task Force. This was partly the result of an inappropriate delegation of responsibility in presenting the findings: instead of having them presented by the Task Force Chair, this role was given to a member of the Task Force who also sat on the Board’s Multidisciplinary Committee, and who had repeatedly obstructed efforts to promote ‘indirect supervision’ in the past. The report that was presented did not reflect the views of the Task Force. It did result in the VMB rejecting the Task Force recommendation.

Where the regulation of Animal Rehabilitation is concerned, the solution – as this body has said repeatedly in the past – is legislation, which takes the issue out of the hands of self-interested regulators. I encourage the Board to support such an approach. AB 3013 (the Animal Rehabilitation Act of 2018) would have worked well for California, had it not been stymied by an inflated cost estimate produced by the VMB’s staff. A bill with language similar to AB 3013 should codify the recommendations of the AR Task Force, and finally resolve a problem that the VMB has been unable to manage over more than a decade.

I urge you to abandon this regulatory proposal as inadequate and not in keeping with the recommendations of the Board’s own Task Force, and instead pursue the proper legislative remedy so more animals can get the care they need, consumers will have more choice and access to services, and licensed professionals can better work collaboratively for the best interest of the animal patients.

Sincerely,



Lee E. Heller, Ph.D., J.D.

PO Box 1592

Summerland CA 93067

Leehellerk9@gmail.com

cc: Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Lisa Woolf <vetwoolf@yahoo.com>
Sat 4/25/2020 9:22 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

[Animal Rehab Reg.pdf](#)
108 KB

Please see [attachment](#) below:

April 24, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Members: California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: VETERINARY OPPOSITION TO CVMB ANIMAL PHYSICAL REHABILITATION
PROPOSED REGULATIONS

Dear Mr. Sotelo and the Members of the California Veterinary Medical Board,

I am a California-licensed veterinarian, a Certified Canine Rehabilitation Therapist, and I also hold certification in veterinary acupuncture. I am writing to oppose the proposed animal physical rehabilitation regulation.

In a letter dated April 5, 2017, I encouraged this Board to support your Stakeholder's Task Force recommendations at the April 19, 2017 Board meeting. I was disappointed in your decision to reject your own Task Force recommendations and perplexed by your rejection of the common-sense approach of having veterinarians decide the level of supervision (whether direct or indirect). Veterinarians are well qualified to determine if it is appropriate to collaborate with a licensed PT who is certified to treat animals, and whether direct or indirect supervision is required. The human medical model does not require a primary care doctor on location at a physical therapist; I believe indirect supervision is a reasonable option for veterinary patients as well.

I respectfully request you to abandon the regulatory approach that prevents the inclusion of licensed physical therapist with additional training on animals to be legitimate providers of animal rehabilitation services. Alternatively, I urge you to pursue a legislative remedy to fully codify the recommendation as written by the VMB Animal Rehabilitation Taskforce as it relates to the ability of licensed physical therapists with certification in animal rehabilitation to practice on animals on their own Animal Rehabilitation Facility *under the direct **OR** indirect supervision of a veterinarian*. Since the 'APR facility' will be registered with the Board(s), they will be subject to premise inspections that provide another layer of consumer protection. The veterinarian remains the gatekeeper to all animal services, which should be an acceptable approach for this Board.

For your convenience, a portion of my letter from 2017 is included below. I hope my professional opinion and experience will be helpful in the resolution of this ongoing issue.

"I support the VMB's Animal Rehabilitation Taskforce recommendations as written* to allow veterinarians to refer pets to a licensed physical therapist certified in animal rehabilitation who is working at a premises that meets state health and safety standards, as determined by both the CVMB and the Physical Therapy Board of California (PTBC). It is my understanding that such referrals would be authorized only after a veterinarian has conducted a thorough medical examination and determined that physical rehabilitation would be a beneficial treatment option. Furthermore, to ensure the pets' safety, the veterinarian would determine the level of supervision needed for the practitioner rendering the rehabilitation services throughout the duration of the animal's treatment plan. To increase consumer access to these specialized services, licensed physical therapists trained and certified in animal rehabilitation should be allowed to practice on their own premises. I wouldn't expect my doctor to be on the same premises as my physical therapist, and

likewise, **it would not be necessary to require onsite veterinary supervision of these advanced trained professionals once the animal has already been examined and referred by their primary veterinarian. Requiring onsite veterinary supervision would cause unnecessary limitations to access these services and create additional burdens on the consumer pocketbook.**

As you know, physical therapy techniques are providing thousands of pets, including horses, relief from painful and debilitating injuries, surgeries, sore muscles, aging joints, and many more ailments. Growing public awareness about the positive benefits of animal physical rehabilitation treatments is increasing the demand for services. I believe that this recommendation would expand healthcare options for the thousands of Californians who love and cherish their pets, while also protecting the health and welfare of animals treated by qualified non-veterinarian rehabilitation therapists.”

VMB’s Animal Physical Rehabilitation Task Force recommended language:
*California licensed physical therapists with advanced certification in Animal Physical Rehabilitation (with such certification to be defined by the Veterinary Medical Board and Physical Therapy Board working cooperatively) may provide animal physical rehabilitation under the degree of supervision to be determined by the veterinarian who has established a veterinarian-patient-client relationship, on a veterinary premises or an Animal Physical Rehabilitation premises (as defined in regulation by the Veterinary Medical Board and the Physical Therapy Board working cooperatively), or a range setting.

I hope you had a chance to read my letter dated April 2, 2018, in support of AB 3013. I have included excerpts from that letter below:

“I have been following the animal rehabilitation conundrum for many years, and I am pleased that a common-sense bill is now in front of the legislature to address the issue of consumer access to qualified animal physical therapists in California. There is a profound shortage of qualified animal physical therapists in California and I would like to see more pets get the care they need by safely expanding animal rehabilitation choices for consumers.

My clients have been seeking out and expecting more alternative choices for their pets’ wellbeing. It is the consumers who are driving this demand for more choice and access to licensed physical therapists certified in animal rehabilitation. **As a licensed veterinarian, I would like the opportunity to refer my clients out to these experts in the field. AB 3013 would afford me that opportunity.**

Licensed physical therapists with additional training, education and certification in animal rehabilitation should be accepted providers of physical rehabilitation services for animals under indirect veterinary supervision and on their own premises or mobile setting, but only after a veterinary examination has been completed and referral has been made.

I have listened to those who have concerns for animal safety with this indirect supervision referral model. I do not share the same concern. I have not witnessed any animal harm done during the 10 years I have been collaborating with a qualified physical therapist. The

nationwide evidence reveals that there has been over 70 years of exposure to this model in other states and not one complaint of harm or negligence has been made.

I believe AB 3013 is a carefully thought out bill that puts forth the safety mechanisms designed to protect the consumer while simultaneously allowing for greater choice of and access to qualified animal physical therapists.

1. The veterinarian remains the ‘gatekeeper’ of services who provides the diagnosis and makes the referral to a qualified animal physical therapist. The veterinarian remains in control of referrals to ensure that pets are medically appropriate to receive such care.
2. As a veterinarian, I would like to see the liability shifted from the referring veterinarian to the animal PT. AB 3013 appropriately addresses liability and states that the animal physical therapist is liable for what is being done under their care. In the unlikely event recourse is necessary, there is a mechanism in place for disciplinary action and/or litigation.
3. There is Board oversight of these practitioners to ensure and certify they are properly educated.
4. There is Board oversight to ensure these practitioners are working on premises that meet health and safety guidelines. This allows the Board to inspect animal rehabilitation premises for better consumer protection.
5. AB 3013 would codify what was already passed by the legislatively-mandated California Veterinary Medical Board’s Animal Rehabilitation Stakeholders Task Force.

Licensed physical therapists with certification on animals are experts in this field and are my preferred practitioner for physical rehabilitation services. I would like the opportunity to refer my patients out to these practitioners.”

Today, April 24, 2020, I repeat my request for you to follow in the footsteps of Nevada, Utah, Colorado, and Oregon by instating a logical legislative approach like AB 3013. They have proven that the model works well. When there is safe access to specialized rehab services rendered by licensed PT’s who have been specially trained on animals, more animals get the care they need. Furthermore, inter-professional collaboration improves the quality of patient care and facilitates advancements in the field with treatment/technique development, and clinical research.

I implore you to pursue a legislative solution to this persistent regulatory conundrum.

Sincerely,

Lisa Woolf, DVM, CVA, CCRT
1884 Falling Star Ave,
Westlake Village, CA, 91362
818-395-0625
[vetwoolf@yahoo.com](mailto:vvetwoolf@yahoo.com)

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs

Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

mgreenbergdvm . <mgreenberg.dvm@gmail.com>

Wed 4/22/2020 3:26 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

Marissa Greenberg, DVM
1691 Mirasol Way
Atascadero, CA 93422

April 22, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

Re: Veterinary Opposition to Proposed Animal Rehabilitation Regulations

Dear Mr. Sotelo and Mr. Rodda,

I am writing in regards to the proposed regulatory action concerning Animal Physical Rehabilitation Section 2038.5. I am an active member of the CVMA, and a practicing associate small animal veterinarian at VCA South County Animal Hospital in Arroyo Grande, CA. I am in opposition of the proposed regulatory action regarding physical rehabilitation in our state, as it will severely limit the access that owners and their pets have to gain life changing physical rehabilitation care. This regulation would also negatively affect the way I wish to practice as a veterinarian; it will limit my ability to inter-professionally collaborate with qualified licensed animal physical therapists and it will restrict me from deciding the level of supervision I want to provide for these professionals. I don't believe direct supervision should be mandated for qualified animal PT's, and I would like to have the choice to decide what level of supervision (whether that be direct or indirect) is appropriate and safe. I have first hand experience with physical rehab from multiple sides, both as an owner of a dog needing this level of care, and as a veterinarian working alongside a licensed physical therapist with certification in canine rehabilitation.

The proposed regulations are asserting that a veterinarian is more knowledgeable and experienced in rehab than an appropriately certified licensed physical therapist. As a 2006 graduate of Washington State University, I personally received no training in rehab, and I know I am not alone in saying that I would not be qualified to provide this level of care. Instead, someone who's total educational focus has been on rehab and is licensed to work on people, and has the additional training in canines, should be allowed to do so-their knowledge of the subject far outweighs most veterinarians when they come out of school. Working alongside Karen Atlas, I have seen her depth and breadth of knowledge in the area that she is trained, as well as her attention to safety for every patient, and a thorough understanding of the case from the referring

DVM. Her communications with each and every DVM is thorough and intense, helping to assure the safety of the rehab plan for each and every patient.

As a pet owner, my own eyes were opened about the benefits of rehab therapy when my own dog needed it after spinal cord surgery. Because I was not exposed to it in my schooling, it was a field I knew very little about. I credit rehab therapy with helping my own dog make an amazing recovery and maintain a high quality of life. Having access to an expert like Karen Atlas made all the difference in the world to me as a pet owner, but also helped me to understand how my other patients could benefit from this sort of service. It made me much more likely to refer patients for care. As it is, I personally travelled 110 miles one way for my dog to benefit from these services because they are not available any closer to my home. The proposed regulations would limit these services even more, preventing dogs like my very own, and my patients, from receiving these life altering benefits. This would be a shame, when this is already a service that is very limited in many areas, like mine. Each week that I was there with my own dog, I was able to witness the benefits to many more patients with a variety of underlying medical conditions. The care taken to provide each one a customized rehab plan was exquisitely done by a highly trained staff. And getting to know some of the other pet owners, I realized they all felt the same way I did about the importance and the impact that this kind of care had on their pets lives. To take this away from caring pet owners and for putting unnecessary burdens and restraining the trade for professionals like Karen Atlas, who are exceptionally qualified, and more qualified than most DVMs, would be debilitating to so many pets and their owners.

I urge you to consider rejecting the proposed changes, and instead look to codify the VMB's Stakeholder's Task Force language as it relates to physical therapists working on animals. The solution is a legislative remedy akin to AB 3013 (the Animal Physical Rehabilitation Bill of 2018).. Allowing the veterinarian to decide the level of supervision (whether it be direct or indirect) for a properly qualified licensed animal PT , and requiring a referral from a pet's primary DVM, provides for a high level of very safe care and allows this service to reach more pets and their owners. There is no need to limit an already limited service even more. To add an additional layer of consumer protection, it would be logical to allow qualified animal PT's to carry their own animal rehabilitation premise permits so that the Veterinary Medical Board can have further oversight of these practices. I am happy to speak with you further on this topic and hope that you will reconsider.

Sincerely,

Marissa Greenberg, DVM

Cc:

Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

William Otto <bovinebill@hotmail.com>

Mon 4/20/2020 2:21 PM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA; DCA Director's Office; PT@DCA

Justin Sotelo, Lead Administrative and Policy Analyst
Timothy Rodda, Administration/Licensing manager
Veterinary Medical Board
1747 North Market Blvd. Suite 230
Sacramento, CA 95834

Dear Mr. Sotelo and Mr Rodda,

I am writing to you as a licensed CA veterinarian and member of the CVMA to express my strong opposition to the proposed animal rehabilitation regulations.

I think we all can agree that the field of animal rehabilitation needs oversight and regulation to protect both consumers and their pets. I do not understand how the CVMB can honestly think that it is in the best interest of veterinarians, licensed Physical therapists trained in animal rehabilitation, consumers, or most importantly their pets to hinder the availability of needed rehab services by restricting access. By restricting animal rehab specialists with a degree in physical therapy to work under the direct supervision of a veterinarian and in a veterinary clinic definitely will limit those services. It will also drive consumers to unregulated, back yard services provided by people with no training at all. Licensed human physical therapists have a breadth and depth of knowledge of the physical body (both structure and function) that makes them unique in the field of veterinary rehabilitation.

Your proposed regulations would make licensed physical therapists WITH CERTIFICATION IN ANIMALS the same as a person off the street, trained on the job as a veterinary assistant. Really?!! I just do not understand how that could be seriously proposed.

I realize that it would be easier for the VMB not to have to deal with setting up the rules, regulations and oversight for independent animal rehabilitation facilities. So is that a reason for CA to be in the last century with regard to promoting animal welfare? These rehabilitation services are literally life saving and life altering services for so many pets who might otherwise be euthanized. We as veterinarians should be able to refer to independent therapists after taking into account the physical condition of the pets we serve. The human model of referrals for physical therapy by physicians works well. We would never expect DIRECT supervision of physical therapists by physicians when we go to a PT office. No, our physician refers us to a licensed independent professional for our care. In our area, the specialty orthopedic and neurology veterinarians are the biggest referral source for animal rehabilitation. They know the importance of having licensed professional rehabilitation therapy available to the pets in our community.

General practitioners also send many patients for evaluation and therapy for a multitude of physical and neurologic problems. Please do not deny our patients the access to these services.

PLEASE, stop this regulatory proposal that fails to include a licensed physical therapist as a legitimate provider of independent animal rehab services. PLEASE allow qualified and licensed physical therapists to provide services under the indirect supervision of the patient's veterinarian. We as veterinarians have already established a VCPR, hopefully established a diagnosis and determined that rehab would be safe and beneficial. Allow us to do our job and decide what is best for our patients without the constraints you have proposed. We are not trained in physical therapy. How fortunate are we that there are physical therapists willing, trained and able to provide those services? Let's get on with the task of providing what is best for our beloved pets by providing reasonable access to rehabilitation services.

Sincerely,

William J Otto, DVM
CA #7059

3208 State St
Santa Barbara, CA 93105
drotto@atlasrehabforcanines.com

Amanda Fiser <amanda.fiser@gmail.com>

Wed 3/18/2020 2:31 PM

- Sotelo, Justin@DCA

Hello,

I am writing in response to the proposed regulatory change to who can perform Animal Physical Rehabilitation (APR). I saw that the proposal stated that only a licensed veterinarian or RVT may perform APR or a VA can do so only under direct supervision of a veterinarian. I also saw that authorizing licensed physical therapists to perform APR under indirect veterinarian supervision was rejected due to the assumption that a physical therapist would not understand the differences between human and animal patients.

I disagree with not allowing physical therapists to perform APR under indirect veterinary supervision. I know of two physical therapists who have gone through training at the Canine Rehabilitation Institute put on by the University of Tennessee College of Veterinary Medicine to become Certified Canine Rehabilitation Therapists. One of these therapists did the rehab for my own dog after he had TPLO surgery. The surgeon that performed the surgery recommended her to me. The other physical therapist I know that went through this certification training became a physical therapist with the intention of working with canines. I can speak from experience that these physical therapists know just as much, if not more, about physical therapy in animals as any veterinarian or RVT.

I do agree that an animal should be referred to a physical therapist by a veterinarian and a veterinarian should have indirect supervision due to concerns regarding underlying conditions. However, a physical therapist that has put in the time and resources to become certified to work on animals should be allowed to use their knowledge to its fullest extent.

Thank you,

Amanda Fiser, DVM

Janet Van Dyke <janetvandyke@me.com>
Tue 3/17/2020 7:07 AM

- Sotelo, Justin@DCA; Rodda, Timothy@DCA

Letter to VMB 20200317.pdf
666 KB

Dear Mr. Sotelo and Mr. Rodda,

Attached please find my letter regarding the proposed regulatory action concerning animal physical rehabilitation. The hard copy will follow via USPS.

Sincerely,

Janet Van Dyke, DVM, Diplomate, American College of Veterinary Sports Medicine and Rehabilitation

American College of Veterinary Sports Medicine and Rehabilitation (ACVSMR) www.vsmr.org

Affiliate Faculty, Colorado State University, College of Veterinary Medicine and Biomedical Sciences

Immediate Past President, Veterinary Orthopedic Society (VOS) www.vosdvm.org

Past President, American Association of Rehabilitation Veterinarians (AARV)
www.rehabvets.org

CEO and Founder, Canine Rehabilitation Institute (CRI) www.caninerehabinstitute.com

March 17, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager

Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: Veterinary Medical Board Sunset Review/Animal Rehabilitation

Dear Mr. Sotelo and Mr. Rodda:

I have been involved in the discussions in several states, including Colorado and California, regarding physical therapists working with veterinary patients, for well over 16 years. We were able in 2006, to bring the physical therapy and veterinary boards in Colorado to a working agreement which led to legislative change, providing for collaboration between these two license groups, to benefit the pet-owning public. In Colorado, we were able to accomplish this in a 2-year time frame.

I am currently the CEO of Canine Rehabilitation Institute, Immediate Past President of the Veterinary Orthopedic Society, and Past President of the American Association of Rehabilitation Veterinarians. I have given presentations to the CA VMA and VMB on the benefits of collaboration between veterinarians and physical therapists, and I was a member of the CA VMB Stakeholders' Task Force in 2016.

The Task Force was asked to provide information regarding the need for and practice of animal rehabilitation in California. It became quite clear throughout this process that the public demand for animal rehabilitation is strong and growing exponentially. That being said, it must be practiced in a way that is both safe and efficient for all concerned.

We have trained well over 1400 veterinary professionals through our certification program, many of whom now practice in California. What these graduates quickly learn is that the practice of physical therapy requires a great deal of skill and experience. As a result, many veterinarians will seek the assistance of a physical therapist, trained in animal rehabilitation, to carry out the skilled techniques for their patients. These veterinarians have the ability to recognize the skill set required of a trained physical therapist and should be empowered to refer to and collaborate with these skilled physical therapy professionals to benefit their patients.

Providing the veterinarian with the ability to determine the level of supervision for each case and requiring that they provide medical clearance before the PT can work with their case results in an efficient and safe system, one that has worked flawlessly in Colorado for over 12 years. The California-licensed PT, trained in animal rehabilitation, should carry a limited premise permit (APR premise permit), allowing their facilities to be inspected by the Board. This adds another layer of consumer protection. Direct supervision or having a veterinarian on premise is an unnecessary barrier, provided the animal has an established veterinary client patient relationship (VCPR).

My experience with the CA VMB over the past decade has been one of frustration and disappointment. I have witnessed clear evidence of board members ignoring the facts presented by the Task Force, essentially tossing aside the hard work of the Task Force and instead moving forward with pre-conceived notions and biases. There are some (very few, but very vocal) veterinarians who have voiced concerns about physical therapists working with animals. The case examples that they presented to the Task

Force were all cases that were managed (or mis-managed) by veterinarians, but they used the argument that had a physical therapist been in charge of the case, further complications might have occurred. This is illogical.

The Board elected to ignore the logic and reversed the language proposed by the Stakeholders' Task Force as it related to physical therapists working on animals. They accepted the aspects of the Stakeholder's Task Force language with which they agreed, and re-worked the language related to physical therapists. Their re-worked language was so egregious that their actions suggest a strong bias against PT's. The language they arrived at would have made it more difficult for a licensed PT to practice than someone off the street who has no education at all. They passed language to mandate additional training for licensed PT's to work under direct veterinary supervision, while allowing unlicensed veterinary assistants, with no training at all, to do the same work under the same direct supervision.

The current proposed regulation will definitely negatively impact the pet-owning public as they will now be given the option of

- 1) having an unlicensed, untrained vet assistant performing 'rehabilitation techniques' on their pets or
- 2) having to pay for a veterinarian's time to directly supervise a skilled, well-trained physical therapist performing the actual techniques indicated for their patient.

To suggest that this regulation is the best option for the pet-owning public is simply wrong. Veterinarians should be given the respect that they deserve by allowing them to determine the level of training and supervision that they require for anyone working with their patient.

Sincerely,



Janet Van Dyke, DVM, Diplomate American College of Veterinary Sports Medicine and Rehabilitation
2701 Twin Oaks Way
Wellington, FL 33414
561-202-5737
JanetVanDyke@me.com

cc: Senator Steven Glazer, Chair, Senate Business, Professions and Economic Development Committee
Assembly member Evan Low, Chair, Assembly Business and Professions Committee

Janet B. Van Dyke, DVM, Dipl. American College of Veterinary Sports Medicine and Rehabilitation
2701 Twin Oaks Way Wellington, FL 33414



Animal Physical Therapy in California 2019

<https://www.thepetitionsite.com/142/642/234/animal-physical-therapy-in-california-20182019/>

Author: Animal Physical Therapy Coalition/California Association of Animal Physical Therapists

Recipient: Animal lovers who want choice when it comes to the care of their pet.

Petition:

Goal:

Protect your rights as a consumer to choose which qualified provider you want to render physical therapy and rehabilitation for your animals.

Please show your support by signing this petition!

Our challenge:

We, the Animal Physical Therapy Coalition (a grass-roots coalition comprised of consumers, physical therapists, and veterinarians) are facing significant resistance from the California Veterinary Medical Board (CVMB) and the California Veterinary Medical Association (CVMA). Their objective is to write a law that would allow ONLY veterinarians to provide animal rehabilitation independently. Highly trained, certified, and qualified animal rehabilitation physical therapists (PTs) would be required to work in a veterinarian's office, only under direct supervision from an on-site veterinarian who may or may not be qualified to render physical rehab services themselves. If passed, this law would severely limit the number of specialist physical therapists willing to practice in California, and deny consumers access to some of the best trained professionals.

You deserve choices when it comes to care for your animals. And your animals deserve access to whom many consider the most highly qualified specialists in the field of physical rehabilitative therapy. Please encourage others to **read, sign, and personally comment** on this petition. **(California residents, please include your zip code so we can ensure that your specific Legislator hears from you.)**

In 2017, a specially appointed task force recommended that certified PTs (**i.e. licensed PT's with advanced training specifically on animals**) be allowed to practice under "indirect" veterinary supervision. This would allow a licensed PT certified in animal rehabilitation to provide rehab services to animals, but only AFTER being examined by a veterinarian who determines the diagnosis and decides that the animal is appropriate to receive rehab services. The animal would then need to be referred to the qualified PT by that veterinarian, who would then provide indirect supervision of therapy services and oversight of the animal's plan of care. This is a standard and customary approach in both human healthcare and has proven to be a successful model in

	Name	From	Comments
1.	Lee Heller	Summerland, CA	I have used the services of qualified animal physical rehabilitation therapists for years. I know firsthand how their practices can be limited if they are required to work directly in a veterinarian's offices. Also, the pay they receive in those conditions is vastly lower than it would be if they were operating as an independent qualified medical professional. And that will keep talented people from entering the profession, which will injure consumers and their pets
2.	Jasmine Kilani	Jacksonville, FL	
3.	Margeaux LeVan	Bethlehem, PA	
4.	Kelly Doria	SANTA BARBARA, CA	As a veterinarian, I see many patients that benefit (or would benefit) from the adjunct treatment of physical therapy. Sadly, a general practitioner veterinarian has not the time, training nor equipment to provide the many patients that would benefit from physical therapy. I have seen wonders performed by these skilled adjunct care providers. To not utilize them in an indirect supervisory role is a detriment to our patients and the quality of care we have vowed to provide. To allow human chiropractors (which occurs on a far too common basis without repercussions), without proper training, to treat veterinary patients (a resort many clients seek in desperation) is not only an affront to veterinary medicine but a potential danger to our patients. I wholeheartedly support the authorization of qualified, trained animal rehabilitation physical therapists to treat veterinary patients in an indirect supervisory role. I urge the Board to allow my veterinary patients (and others) to receive the care they need. Zip code: 93427
5.	Kristen Hehnke	Goleta, CA	As the owner of a special needs dog I understand the often desperate need to look into all possible avenues, and limiting the potential field of options even further with this measure is unnecessary and harmful to the growth and spread of knowledge.
6.	Joan Mayer	Santa Barbara, CA	Physical therapists who have additional training in animal rehab should be allowed to work under indirect supervision of a vet, as long as a referral is made. As both a Certified Professional Dog Trainer and dog owner who has taken her dog to an animal physical therapist, I want to be able to choose who I want to treat my own pet. I don't want the California Vet Board to restrict my access to qualified animal physical therapists.
7.	Martha Webber	Goleta, CA	My dog started canine physical therapy and relearned how to walk in a matter of weeks. Although well-intentioned, my dog's veterinarians didn't have the knowledge or skill-set to provide physical rehab. We spent a lot of time trying out <i>(continues on next page)</i>

Name	From	Comments
7. Martha Webber	Goleta, CA	<p><i>(continued from previous page)</i> different medications on him that failed before we found success through physical therapy.</p>
8. Karen Atlas	SANTA BARBARA, CA	<p>Zipcode 93111 As a California licensed physical therapist also certified in canine rehabilitation, this issue is very near and dear to my heart. I have devoted my career to the physical wellbeing of animals. I was appointed to the legislatively-mandated California Veterinary Medical Board's Animal Rehabilitation Task Force in 2017 where we studied this issue in depth over the course of a year in Sacramento. I know the ins and outs of this subject and the politics behind it. After close examination of this issue, some very common-sense language came out of the CVMB Stakeholder's Task Force and it was determined that the best way to regulate this field is to mandate animal-specific additional training for PT's who want to work in this field under INDIRECT veterinary supervision and require that a veterinarian first examines and diagnoses the animal patient. Additionally, the veterinarian would also need to determine if rehab would be safe and appropriate for the pet before seeing a PT. Therefore, the veterinarian essentially serves as the gatekeeper for rehab services. It is the veterinarian who would provide a medical clearance/referral if the pet were to be seen by a qualified PT on their own premises (i.e. without a veterinarian providing direct supervision). It seems quite logical...because it IS logical...and it works! We know it works because other states have done it successfully. This is not new! The opposition wants you to believe that PT's are too "dangerous" or somehow they put the consumer/pet 'at risk' for harm so the Vet Board needs to "protect the consumer" by limiting access to these professionals...but that is an old, tired misguided thought process to try to give merit to their desired monopoly outcome. The truth is, there are over 73+ years of evidence supporting the safety of this regulatory model. Over the course of 73+ years, there has not been a single complaint of harm or negligence made against a PT treating animals in states that already have this statute in place. Pet owners in those states (like Colorado, Nevada, Utah, Nebraska, Oregon, just to name a few...) have more access to qualified PT's, and as a result, more animals are able to get the care they need. Consumers also have more choice when it comes to the care of their own pet. Simply put, California doesn't need a veterinary monopoly. The California Vet Board in cooperation with the California Vet Medical Association is trying to solidify a veterinary monopoly by mandating that qualified PT's need to work <i>(continues on next page)</i></p>

	Name	From	Comments
8.	Karen Atlas	SANTA BARBARA, CA	<p><i>(continued from previous page)</i></p> <p>under direct supervision and only on a vet premise. This power grab by the Vet Board would do nothing to increase consumer safety...it would only serve the vet profession by monopolizing the practice and limiting competition. As a result, access to practitioners would go down, prices would go up, and arguably the most qualified rehab practitioner (i.e. a licensed PT certified in animal rehab) would not be able to practice their craft (unless hired by a veterinarian which is extremely rare).</p> <p>There is a huge shortage of animal physical therapists in California...not because PT's don't want to practice, but because they can't get hired by a veterinarian who is willing to pay a commensurate wage for their expertise.</p> <p>It is time to allow qualified PT's to practice under indirect supervision (on their own rehab premises) but only after a veterinary referral is made. It will safely open the market up so more qualified practitioners can work and more animals can get the care they need.</p> <p>I urge you to support legislative language that reflects that of the VMB's Stakeholder's Task Force as it relates to PT's working on animals (akin to AB 3013).</p> <p>A physical therapist's unique skill set and education is different than a veterinarian. You wouldn't see your primary doctor for physical therapy. Why would you take your pet to see a veterinarian for PT who may not have any rehab education?</p> <p>Let's give more animals the chance to live a better quality of life. Just say "no" to veterinary monopolies! It's not good for the animals. It's not good for Californians.</p>
9.	lucie berreby	Rancho Santa Fe, CA	
10.	Mimi Vickers	Los Olivos, CA	
11.	Robyn Polinsky	Claremont, CA	
12.	Michelle Urata	Garden Grove, CA	
13.	Jill Kuhl	San Jose, CA	Improve quality of care for animals
14.	Amy Johnson	Elk Grove, CA	
15.	Jamie Bartz	San Diego, CA	92111
16.	Ann Essner	GÄVLE, se	
17.	M Miller	Escondido, CA	All species need help
18.	N o	GRAND PRAIRIE, TX	
19.	jadranka vidovic	rijeka, hr	
20.	Kim Stephenson	South Lake Tahoe, CA	Free choice affordable care

	Name	From	Comments
21.	Leigh White	Carlsbad, CA	<p>Physical therapists who have additional training in animal rehab should be allowed to work under indirect supervision of a vet as long as a referral is made. Restricting access and forcing these practitioners to work only in a veterinarians office would raise prices for services, limit access, and less animals will get the care they need.</p> <p>Veterinary monopolies are not good for California. Please allow animal physical therapists to work on animals on their own premises after a referral by a veterinarian has been made.</p> <p>California needs common-sense legislation passed to increase access to properly trained animal physical therapists so more animals can get the care they need. Please pass language that is consistent with what AB 3013 represented. Such common-sense language has already been passed by the California Veterinary Medical Board Stakeholder's Taskforce. Why not pass what the CA Vet Board's Taskforce has already come up with?</p> <p>Most veterinarians don't have the knowledge or skillset to provide rehab. Allow PT's with training on animals to help those in need without unnecessary restrictions.</p>
22.	Adrienne Barker	El Granada, CA	<p>I would not expect to find specialists at my PCPs office, so I would t likely expect that the only animal specialists be ONLY at my veterinary office. Practices shouldn't HAVE to be housed onsite.</p>
23.	Ilana Strubel	SAN FRANCISCO, CA	<p>I strongly believe that a physical therapist with advanced training in animal physical rehabilitation should be allowed to work with animal patients and their veterinary primary care providers who can oversee their medical needs. Animal Physical Rehab requires highly skilled therapists. Trained PTs are the best possible providers of this highly specialized service and as a veterinarian trained in animal physical Rehabilitation- I have learned and benefited the most from training provided by Physical / Physio therapists ! We must not limo access for animal patients to these amazing providers. There are so few trained veterinary physical rehab therapists- that I have a 6-8 week wait list for new patients. There is a need and demand for the expertise that an animal rehab provider can offer. These individuals are certified through the Canine Rehab Institute and the University if Tennessee they are trained, skilled, and vetted individuals who wish to collaborate with referring veterinarians, surgeons, neurologists who need their patients to be treated by skilled rehab professionals. Please don't limit legitimate & responsible referral options!</p>
24.	Chris Reed	SAN JOSE, CA	
25.	Nedra Abramson	Carlsbad, CA	
26.	Nikki-Rae Alkema	Huntington Beach, CA	

	Name	From	Comments
27.	Jenny Moe	Zephyr Cove, NV	<p>South Lake Tahoe 96150-96154</p> <p>I am a licensed animal PT in Nevada. I practiced in the SF Bay Area for 9 years with animals at a specialty practice. I now have the freedom to see pets as I would people as a regular physical therapist, with medical clearance from their veterinarians. We deserve the right to choose who practices with our animals. I would not go to my general physician for physical therapy, and we should have the right to choose specialists for our pets as well. Physical therapists have extensive training that the veterinarian will not be able to replicate. PTs should be allowed to work alongside veterinarians as part of a team, not be restricted or banned from working with animals. Much of my caseload is from the California side of Lake Tahoe. I would like to be able to serve them as freely as I can the Nevada side. California should be more progressive than other states. Please set an example and allow qualified and certified physical therapists to help animals.</p>
28.	Catherine Wallace	Newman, CA	
29.	annie fernandez	marcillac, fr	
30.	Marissa Greenberg	Atascadero, CA	<p>As a small animal veterinarian and animal owner myself, I have seen first hand the amazing benefits of animal physical therapy for my own dog. I have seen the care in which animal rehabilitation physical therapists plan and carry out rehab for their patients, and have never seen them put a patient at risk. They are experts in their field, and truly have more training in this specialty than a veterinarian coming out of vet school. I have had to drive almost 4 hours round trip to find the therapy my own dog needs. As a veterinarian, I see clients wanting to do everything for their pets. But, physical therapy resources are limited in our area, and not everyone's schedule allows the travel to seek it out like mine does. This bill will allow pet owners (consumers) better access to the level of care they wish to provide their pets. As a veterinarian, I see no downside to allowing physical therapists with advanced animal training to practice under indirect veterinary supervision. This is good for the veterinary profession, the clients, and their beloved pets.</p>
31.	Shelah Barr	San Francisco, CA	<p>As a consumer of various types of services for my animals I'm shocked that the governmentally appointed consumer protection agency (CVMB) would condone such a lack of protections to and for consumers.</p> <p>It makes no practical sense to allow persons untrained in a particular field to practice freely in that field, while those who are experts in it cannot. This is the opposite of consumer and protection. This current model serves no one and nothing except the veterinary profession.</p> <p>The task force was formed to prevent the CVMB from <i>(continues on next page)</i></p>

Name	From	Comments
31. Shelah Barr	San Francisco, CA	<p><i>(continued from previous page)</i></p> <p>creating a monopoly in this field, and it accomplished that goal. However, through questionable methods the CVMB managed to push its agenda through, leaving consumers like myself with no protections, and no access to the most qualified practitioners in the critical field.</p> <p>The model of "indirect supervision" has been in successful practice in many other states for years. There are no practical, logical, or factual objections that can be made against the model and I would encourage anyone with any type of pet, or anyone who provides care for any type of animal, in California to support this petition. Please tell your friends and family as well, that we, as consumers, insist that the California Veterinary Medical Board do its job as a consumer protection agency and ensure that we, consumers, have access to the best practitioners in the field of Animal Physical Therapy, and allow the Indirect Supervision Model to be enacted in California.</p>
33. Christa King	Goleta, CA	<p>Because more animals can get help they need it treatment isn't hard to access or too expensive to afford</p>
34. Nikki White	Newport Beach, CA	
35. Dianne Armitage	Carpinteria, CA	<p>Pets are a valued member of our families and need to be treated as such. The cost and availability of treatment prohibits many of us from being able to care for them in meaningful ways as they age.</p>
36. Cindy Tokar	Ventura, CA	<p>It allows us to have the best options for care and skilled rehabilitation for our pets. These are skilled professionals who understand how to work in professional partnership with Veterinarians. The veterinarians need the help. It creates an excellent team approach to care</p>
37. Sheigh Crabtree	Los Angeles, CA	<p>As an active SAR K9 handler for CalOes in California and as a SAR K9 volunteer for Los Angeles Sheriff Department it is imperative for me to keep my dogs conditioned and fit. Unless there is a medical emergency there is no need for a vet to be involved beyond an initial wellness assessment in my K9s daily fitness regimen. Canine conditioning is best designed and overseen by knowledgeable and experienced certified canine fitness PT and rehab professionals.</p>
38. Jolene Duffalo	Reynoldsville, PA	
39. Laura Davidson	Idyllwild, CA	
40. Donna Sanford	Temecula, CA	<p>Our search and rescue dog was in need of therapy!</p>
41. Amber Banks	Los Angeles, CA	
42. Pilar ocampo	Sylmar, CA	
43. George (Eric) Sheets	Castro Valley, CA	<p>My Search and Reacue dogs need regular physical therapy to recover from working injuries so as to get back out saving lives and reducing suffering for public safety officials across</p> <p><i>(continues on next page)</i></p>

	Name	From	Comments
43.	George (Eric) Sheets	Castro Valley, CA	<i>(continued from previous page)</i> the state of California and beyond. Please don't make Animal PT more difficult and expensive to get to animals like mine that need it.
44.	Leanne Quinn	Archer, FL	
45.	Emily Rand	Cartersville, GA	Physical Therapist training and mindset can bring so much value to rehabilitation for animals. It would be a disservice to both pets and pet parents to limit their autonomy in the field.
46.	Cassandra Ochoa	Lompoc, CA	I have a special needs puppy who will need physical therapy and rehab in his lifetime.
47.	Ochie Dominguez	West palm beach, FL	
48.	Jacy Meanor	Midlothian, VA	I am a student PT interested in canine rehabilitation. I would love to have more opportunities when I graduate and also am interested in the best care possible for all canines.
49.	Tracy Morel	Columbia, SC	Our animals are not JUST pets, they are family and deserve the best quality of life, which rehabilitation provides.
50.	Tracee Walker	Santa Barbara, CA	
51.	Ann Kent	Murrieta, CA	
52.	Jo Lyn	Santa Barbara, CA	
53.	Teresa Anderson	SEATTLE, WA	Physical therapists are uniquely trained and qualified in all aspects musculoskeletal neurologic, pain, mobility, edema treatment and rehabilitation. This is what we do. This is where our skillset lies. Vets are no more qualified than a human doctor to perform rehabilitation on their patients. We are the experts and rehabilitation that is what we do. Working under a vet is a barrier that stops me from taking the next step toward canine rehab.
54.	Audria Herrera	Toponas, CO	
56.	Sheri Mounteer	Denver, CO	Dogs need better access be able to see a PT w/o needing supervision from a vet. PT's are trained better than vets to provide rehab!
57.	Emily Symon	Brighton, CO	
58.	Kathy Bates-Lande	Palomar Mountain, CA	I have a senior dog and think we need legitimate Physical Therapist in the Veterinary field.
59.	Kelly Dettle	Mounds view, MN	
60.	Noah Gaines	Santa Barbara, CA	
61.	kristine black	Los Gatos, CA	
62.	samara love	berkeley, CA	
63.	Erin Bukofsky	Laguna Beach, CA	
64.	Candace Bramley	Redondo Beach, CA	I am committed to servicing canines in the safest and most efficient way possible, in collaboration with veterinarians.

	Name	From	Comments
65.	Helen Robartes	Auckland, nz	Physical therapy for animals by properly qualified physical therapists should be easily accessible by the public. Physical therapists are trained to be first contact practitioners and to operate autonomously. They are responsible and educated, and do not need to be supervised by vets, as they will work within their scope of practice and refer when needed. They can be trusted in their work. If they can only work under direct veterinary supervision, this limits how accessible they are to the public, and reduces their availability and ability to help animal patients.
66.	Ashley Smith	Redondo Beach, CA	I believe this petition will help to establish a legal precedence for the level of skill, knowledge and education required to perform animal rehabilitation as well as advance the field by increasing access to the advanced skill set and unique knowledge provided by licensed physical therapists in order to better protect and treat our four legged friends! Further, this petition can help to strengthen the veterinarian/physical therapist relationship by encouraging a multi-modal comprehensive medical team for animals.
67.	Eliza Wingate	Vallejo, CA	I want trained people to work on my dogs
68.	Lance Georgeson	Mammoth lakes, CA	Pets need our expertise from PT's
69.	Shay Cook	Concord, CA	
70.	Jean Greek	Goleta, CA	Qualified physical therapists bring knowledge to veterinary medicine that many veterinarians don't have.
71.	Katie Murphy	New York, NY	Certified physical therapists have the necessary knowledge and background to provide high quality care for pets. This change would allow for more options of better care for more animals.
72.	trish wamsat	San Martin, CA	As a former vet tech I know there are excellent rehab resources, most better than a veterinarian who would be unable to accomplish their goals if they have to be based in a veterinary clinic or under direct supervision. The cvma is out of control trying to regulate every aspect of pet care. Please stop this.
73.	tracy green	Santa Barbara, CA	I have had the benefit of working with animal physical therapists and am both appreciate and supportive of the work that they do.
74.	Josephine Heller	Chicago, IL	
75.	Christina Dehnke	Kennesaw, GA	
76.	Jeff Atlas	SANTA BARBARA, CA	Zip Code 93111 As an animal owner, I should have the right to choose who I want to treat my own pet. Please increase access to adequately trained PT's so more pets can get the care they need. It would be a disservice to the California animals and the people who love them if overly restrictive regulations are passed that would prevent us from seeking rehab services from a PT for our pets. <i>(continues on next page)</i>

Name	From	Comments
76. Jeff Atlas	SANTA BARBARA, CA	<p><i>(continued from previous page)</i></p> <p>Please expand healthcare options for animals! If there are more qualified professionals like licensed and trained animal PT's in California that offer rehab, then more animals can get the care they need. Let's work in the best interest of the animal and consumer, not what is in the best interest of the veterinary pocketbook. Californian's do not want or need a veterinary monopoly. We are asking for MORE access not less access. We want MORE choice, not have our choices taken away from us.</p>
77. Brittany Lough	Santa Barbara, CA	Our dachshund is still with us because of physical therapy.
78. Daryl Metzger	Santa Barbara, CA	Ventura, CA 93003
79. Susan Zamudio	Ventura, CA	
80. Denise Berry	Nipomo, CA	
81. Sonia Lucas	Midwest City, OK	Physical therapists are the most qualified professionals to provide rehabilitation services to the animal population and should not require direct supervision to do so.
82. audra katz	el sobrante, CA	Physical therapists who have additional training in animal rehab should be allowed to work under indirect supervision of a vet as long as a referral is made. Restricting access and forcing these practitioners to work only in a veterinarians office would raise prices for services, limit access, and less animals will get the care they need.
83. Peter Jenkins	Coeymans Hollow, NY	
84. PEGGY FOBELETS	HOLSBEEK, be	
85. Natalie Kalustian	Northridge, CA	My own dog and others I've known have greatly benefitted from animal PT. Most vets don't have the knowledge or skills to provide rehab. Physical therapists trained to work with animals are experts in their field, and I want to be able to choose who I'd like to treat my pet. I don't want the California Vet Board to restrict my access to qualified animal physical therapists.
86. corinne etancelin	les andelys, fr	
87. Elaine Sichel	Santa Barbara, CA	<p>I have a combined 7 years of first-hand experience with two pets benefitting from canine rehabilitation (CR). In fact, My dogs have lived better, more comfortable lives because of it. No one who is honest or familiar with CR thinks of it as a substitute for veterinary care, or a way to avoid proper medical care. It is an adjunct tool to veterinary medicine. Highly trained experts use their knowledge and a number of tools and techniques to improve quality of life for injured, post-surgical and hereditarily challenged animals. Our Great Dane lived longer and better because of hydrotherapy. Our current Frenchie has vastly improved quality of life due to core strengthening, coordination</p> <p><i>(continues on next page)</i></p>

Name	From	Comments
87. Elaine Sichel	Santa Barbara, CA	<p><i>(continued from previous page)</i></p> <p>exercises, and pain mitigation tools. He had successful medical care to eliminate an infection, but the day-after-day work to keep him strong and conditioned after months of muscle wasting can only be provided in rehab, and skeletal problems he was born with mean he needs more than medicine, surgery and clinical medical care. Most veterinarians won't have the interest or space to offer rehab services directly. If they do "host" them, the price becomes prohibitively high due to overhead. All rehab practitioners agree a veterinarian is the manager of care, but rehab folks are the fitness and therapy coaches. Let them practice their craft without overreach by veterinarians seeking to monopolize and commodify rehabilitation. A veterinarian can regularly examine their clients' pets to insure that trained, licensed practitioners are indeed augmenting pets' care. We are in the 21st century. No human medicine regulatory body would require a physical therapist to practice ONLY in a physician's office! Indeed, ancillary care modalities are being made more available to improve patient comfort and care and reduce medical costs. Why should we as owners, and our pets, have to settle for anything less, or be "protected" from stand-alone rehabilitationists operating under the law? California always blazes the trail on progressive policy that gives consumers maximum choice, freedom and opportunity to live as healthy a life as possible. Our pets should not enjoy anything less.</p>
88. William Otto	Santa Ynez, CA	<p>The human model of independently operating physical therapists with referral from the patient's doctor works well. I do not expect my Dr. to be in the same building as my therapist much less under their direct supervision. Physical therapists, certified in animal PT and rehabilitation provide an amazing resource that is currently less available due to restrictions in California. As a veterinarian, I understand the unmet need for rehabilitation services in our communities statewide. Few of us have the knowledge, time or space requirements to offer these much needed resources for our patients. This should not be a turf war. It is time to increase access for all of our beloved pets' sake.</p>
89. Anita Gram	DAYTON, OH	
90. Katie Reinhardt	San diego, CA	
91. Paula Sichel	Santa Barbara, CA	<p>Please give animal physical therapists access to treat our animals. It helps them live better lives. 93105</p>
92. Sima Lisman	Arcadia, CA	<p>pet owners should have a choice on where to receive PT for their animals, just as it is with humans</p>

	Name	From	Comments
93.	Angela Geiger	sausalito, CA	I should have the right to choose who I have treat my own pet, just as I do for myself. There is no valid reason the California Vet Board should be allowed to restrict access to qualified animal physical therapists.
94.	Gabriela Flores	Santa Barbara, CA	The CVMB and CMVA should not be allowed to limit quality access to care. A properly trained PT in animal rehab would provide appropriate knowledge and expertise that a veterinarian alone cannot supply. I have seen the outstanding inter-professional work that veterinarians and trained PTs can provide when working in conjunction.
95.	Elizabeth Brownson	Porterville, CA	Physical therapists who have training in animal rehab should be allowed to work under indirect supervision of a vet as long as a referral is made. This would allow more pets to recieve the care they needs as it would be made more affordable.
96.	Jessica Kirksey, DVM	Ventura, CA	Physical therapist that have received training in animal rehabilitation should be permitted to work in conjunction with veterinarians when an appropriate referral has been made. This allows animals to receive physical rehabilitation from trained professionals on a scale that would not be possible due to the lack of training, time, or resources when supplied through veterinarians alone.
97.	Dane Mehl	Santa Barbara, CA	These animals are part of our family and deserve proper care by qualified professionals.
98.	Robert Medina	Santa Barbara, CA	
99.	Brittany Maguire	Simi valley, CA	
100.	Nicole Gutierrez	Norwalk, CA	Because all animals matter and so does there health care
101.	Julie Bechtel	Sacramento, CA	
102.	Michelle Peralta	Santa Barbara, CA	
103.	TAMMY Hedden	Tuckasegee, NC	
104.	Sarah Muccia	Calabasas, CA	No two animals are the same, meaning that the care needed to help an animal can not be universal. The owners and vets needs to have the freedom to figure out what care is correct for their animal. The animals will directly be the ones to hurt from this action. Don't let the animals suffer.
105.	Bette Davis	Malibu, CA	Just like affordable health care is important to humans, the same can be said for our fur children. Limiting non invasive treatment to a vet clinic will certainly guarantee those services will not be affordable nor accessible.
106.	Patricia Bellairs	Port Charlotte, FL	
107.	Cary Harrison	Goleta, CA	
108.	Lindsay Wermers	Santa Barbara, CA	
109.	Helga Blackthorne	Wedel, de	
110.	Jerome ross	arroyo grande, CA	

	Name	From	Comments
111.	Arlene Ramirez	Santa Barbara, CA	
112.	Sonjia Polanco	Santa Barbara, CA	
113.	Beth Carlson	Santa Barbara, CA	There are many small towns and cities in California and the chances that local veterinarians will provide a full service physical therapy facility at their vet clinic is small. That would mean people would have to travel to bigger cities in order to receive physical therapy which can be very inconvenient. Also, I would like to choose what rehab facility I go to and it may not be associated with the vet practice where I prefer to take my dogs. Thank you.
114.	Allyson Condie	Williston, VT	
115.	Mark Cubillas	Sonoma, CA	
116.	Gerrie Shapiro	Santa Barbara, CA	
117.	John Beldham	Ponthirwaun, Cardigan, gb	
118.	Dorothy Honer	Goleta, CA	Choice!
119.	g p	minehead, gb	
120.	Christa King	Goleta, CA	Animals need more access to cheaper care, not limited access and more expensive care. More animals would suffer as a result
121.	marilyn schinkel	WILMINGTON, NC	Animals are worth everything we can do for them. They give us love, loyalty, true care. We must return this blessing.
122.	Panagiotis Rigopoulos	Patra, gr	
123.	Tram Nguyen	Goleta, CA	We love the option of seeing a rehab vet for joint issues. Seeing a regular vet never treats our dog in the correct way while seeing a rehab vet makes him stronger for life.
124.	Antoinette Wade	Buellton, CA	
125.	Felicia Garcia	Santa Barbara, CA	
126.	Marion Wright	Encinitas, CA	
127.	Whitney Covert	Ava, MO	
128.	Gail Grobbelaar	Alberton, za	
129.	Janet McNeil	Oak View, CA	
130.	Jamie Kaner	Santa Barbara, CA	Our dog Buster was able to walk again after back leg paralysis due to animal physical therapy. Our Therapist was amazing! Kind, patient, loving and EXTREMELY proficient. Please don't take this option away from our fur babies.
131.	Ira Keefer	Carlsbad, CA	Animals are important members of our families and need help in their path to rehabilitation following injury or disease. California is a state that prides itself in including pets within almost every aspect of our lives, give these pets the chance to get rehabilitation care from the experts in movement!
132.	Katherine Dutcher	El Dorado Hills, CA	

	Name	From	Comments
133.	Neili Vassey	Holly Springs, NC	I'm a vet tech and see how important rehab is to animals recovering from surgery or injury.
134.	Jenny Lee	San Mateo, CA	The PT greatly helped my dog when he injured his neck and back and without them he would not be able to live a full life that increased his independence and happiness! We wouldn't have been able to do it without them!
135.	Jeana Carvelli	Oakley, CA	
136.	Doreen Werthmann	Campbell, CA	We had an amazing animal physical therapist, who helped my dog to walk again after an injury to his leg, she made all the difference in his recovery .
137.	Nerissa Tanjuatco	Foster City, CA	Our dog benefits from this after two alone surgeries. He bounced back quicker with proper rehab
138.	Tiffany Cherney	San Jose, CA	
139.	Betty Lim	San Francisco, CA	
140.	Kerri Kinoshita	San Mateo, CA	Our dog had two back surgeries and we do not believe he would have regained his mobility as well as he had without the expertise of his physical therapists.
141.	Kathleen Jettlund	Santa Clara, CA	
142.	Cat Catano	Concord, CA	I work in the rehab field (with humans) and understand the importance of having qualified therapists to address injuries and physical limitations. These animals need you!!
143.	Corinne Chapman	Placerville, CA	
144.	Ronnie Rogerd	Campbell, CA	
145.	Ellyn Gaich	Morgan Hill, CA	Our pets have and will need them.
146.	Kathryn Yee	Cupertino, CA	
147.	Douglas Ford	Belmont, CA	Access to a qualified animal physical therapist was instrumental in 1) helping improve our dogs quality of life (suffering from CDM) from a death sentence to one that was manageable and allowed a longer than expected life. 2) Gave is the tools to assist care for our dog in the interims, learn to adjust to her disease process, and to recognize times when Veteranarian assistance was needed (eg she had chronic bladder infections that requires management.). We could not have done this without available APT.
148.	Alice Pyers	Sacramento, CA	My Granddaughter is a physical therapist
149.	Amy Clevenger	Valencia, CA	Animals [?][?]
150.	Terry Rifenburg	MORGAN HILL, CA	
151.	Sarah Hantz	San Jose, CA	I have worked in an animal rehab facility and physical therapist have a much greater understanding and knowledge of rehabilitation than veterinarians. Shutting them out of this profession will be a huge detriment to the care of animals.
152.	Toni Snyder	San jose, CA	Animals are just as important as humans

	Name	From	Comments
153.	Alice Lizardo	San jose, CA	
154.	Marlene Grobbelaar	Alberton, za	
155.	Amy Tran	San jose, CA	
156.	Myke Olson	San Jose, CA	
157.	Cindy Hon	San jose, CA	
158.	Megan Gross	San Jose, CA	
159.	Rosemary Anderson	Adlington, gb	
160.	Samina Bari	Driftwood, TX	Jenny was invaluable in the ongoing mobility and care of my Lola who had significant issues post surgery. She lived years longer because of Jenny's care.
161.	Tracey Ireland	Menlo Park, CA	
162.	Angela Cecchi	Plainfield, IL	
163.	Becky Rosenberger	Bondurant, IA	
164.	Monica Stampfl	Moss Beach, CA	My dog has needed extensive physical therapy and rehab after orthopedic surgeries, The costs of his surgeries alone were astronomical. His rehab was also pricey but would have been moreso if his therapist had to be a vet or working under a vet. His therapists had the knowledge and skill to perform therapy on him. The vet was not needed.
165.	Cara Samelson	Roseville, CA	
166.	Debbie Kuhl	San Jose, CA	
167.	Sarah Serrano	San jose, CA	
168.	Karyna Blake	La honda, CA	PT are best working with animals to achieve their rehab goals. I am a certified rehab vet nurse and have worked under DVMs and PTs. PTs are without a doubt best educated for the role.
169.	Nicole Gaich	Truckee, CA	Because I am a Certified Canine Registered Veterinary Nurse and Registered Veterinary Nurse and I know first hand how important Canine physical rehabilitation is to our animal community and my patients. I hope we can continue this path of being able to confusing giving them the best quality of life possible.
170.	Kari Kellenberger	Los Gatos, CA	
171.	Liza Muhl	Tahoma, CA	Every pet deserves the best care and facilities that provide it. I know my pets do!
172.	Diana Miller	Granite Bay, CA	Animals are huge for therapy. They can be comforting, motivating, and supportive.
173.	Cathy Olsen	Fremont, CA	My dog needed physical therapy for his ankles. Without current access to PT, he wouldn't have been able to keep running, playing, and just having a good life.

	Name	From	Comments
174.	Lena Cheya	Millbrae, CA	The work of my dog's PT is as important as my OB GYN or dentist. I want to be able to go where she goes.
175.	Joan Renne	Roseville, CA	Any thing that will make animal care more available and and still be professional is a plus for animals and their owners
176.	Sarah Jackett	Sunnyvale, CA	
177.	Tara Christison	Golconda, NV	I have had many animals in my 67 years. Dogs, horses, cat, cattle. I am a retired cattle rancher. Owners need all the help possible from vet care providers to care for their animals and give them the best quality of life!
178.	Esther Ouellette	San Jose, CA	
179.	Nova Lance-Seghi	Truckee, CA	
180.	Renee Drumm	San jose, CA	Having to be in a physical vet's office puts too much of a constraint on the therapists and clients.
181.	Zane Brown	Atherton, CA	It's important because people should be able to choose their animal care provider based on who meshes with their dog the best.
182.	Gisela Torres	SAN JOSE, CA	My adopted senior shepherds received PT from wonderful certified PTs and I would like to see as many animals receiving this type of therapy as possible.
183.	Glennis Whitney	Nth Rockhampton, Queensland, au	
184.	Suzzy Landeros	Menlo Park, CA	Veterinary rehabilitation is so important for post op care and for geriatric patients, it can mean being able to walk without discomfort for some and being able to walk period for others. It's important to keep this available to clients and patients
185.	ELBERT ATLAS	LA VERNE, CA	
186.	Raleighway koritz	PLYMOUTH, MN	
187.	Susan Zamzow	Sacramento, CA	Because it's the right thing!
188.	Elizabeth Loving	West Sacramento, CA	
189.	Victor Johnson	Ventura, CA	Because it is so.
190.	Lindsay Hogan	Truckee, CA	
191.	Rebecca Mckinney	Forney, TX	
192.	Leah Burns	Lincoln, CA	
193.	Vivian OConnell	San Jose, CA	
194.	Olga Ros Celis	L'Hospitalet de Llobregat, es	
195.	linda detels	SAN FRANCISCO, CA	
196.	William Floyd	Nipomo, CA	
197.	Heather Comer	Macon, GA	

	Name	From	Comments
198.	Lora Frost	Richmond, VA	
199.	Francisco Maia	Chicago, IL	It is important for pet owners to have access to the providers of their choice!
200.	Holly Bolesky	Idaho springs, CO	Animal physical therapy is amazing!!! Trying to cripple their work through excessive regulations is inhumane
201.	Lainie Cohen	Eureka, CA	I should be able to choose the medical professional for my dog.
202.	Gianna Puccinelli	Modesto, CA	This would limit access to pet rehab professionals, which I strongly disagree with.
203.	Traci Medrano	Stanley, NM	Qualified professionals are frequently MORE qualified than general practitioner veterinarians. It should be the right of the client to decide on the appropriate professional for their pet
204.	Shari Sprague	Snellville, GA	
205.	Kimberly Haecker	Hemet, CA	
206.	Katie Wacek	Sandia Park, NM	
207.	cory collier	Haltom City, TX	
208.	Maggie Boyd	Coquitlam, ca	
209.	Antoinette Gonzales	VICTORVILLE, CA	
210.	Jessy Kadmaer	hoogwoud the Netherlands, nl	
211.	Guillermo Romero	Satelite, mx	
212.	Aud nordby	Eidsvoll, no	
213.	Patricia B	Brisbane, au	
214.	Danny van Huizen	Geldrop, nl	
215.	Mari Dominguez	LINDEN, CA	
216.	Antonella Bini	Milano, it	
217.	Desiree Ramirez	State College, PA	
218.	Carol Bischoff	kerkrade, nl	
219.	Linda Drabova	Encinitas, CA	
220.	Tashauna Medrano	Stanley, NM	
221.	Gretchen Stone	Truckee, CA	My animals have recovered injuries with physical therapy. I would want the best care, and be able to make the decision myself regarding who helps my animals.
222.	Diana Moore	Belton, TX	
223.	Tina Behla	Berlin, de	
224.	Ashlie Mason	Wheatland, CA	We don't need a monopoly on something that should be easily accessed because the vet board wants more money.

	Name	From	Comments
225.	Katheleen Childers	Hollister, CA	This sounds like a power and money grab. This is an unnecessary oversight and will reduce much needed rehabilitation options for dogs.
226.	Tari Long	Cumberland, MD	
227.	Sue Newhouse	Louisville, KY	This would not only severely restrict access to licensed physical therapists certified in animal rehabilitation, but create a veterinary monopoly. As owners we deserve right to choose who we want to treat your pets. There are so few providers of animal physical therapy as it is. We must encourage the expansion of veterinary physical therapists, not restrict this access.
228.	Julia Hayes	SANTA BARBARA, CA	
229.	Kristina Porenta	Ljubljana, si	
230.	Jan Murphy	San Ramon, CA	There is no reason for a Vet to oversee PT on an animal. Animal Physical Therapists are needed in my community and this will just make it harder to get one when needed
231.	Shannon Janson	North Tonawanda, NY	
232.	Laurie Edge-Hughes	Cochrane, ca	
233.	Laura Grahalic-See	Calgary, ca	Choice is our right you can not take it away ever!
234.	Alyshia Skurdal	Okotoks, ca	
235.	Sherry Etifier	Calgary, ca	
236.	Carol Clark	Waverly, MO	
237.	Tanya Miller	Calgary, ca	
238.	Keri Daun	Calgary, ca	
239.	Steven Pye	Calgary, ca	
240.	Karen Hunt	Calgary, ca	
241.	Lydia Carter	London, ca	
242.	Kim Barrett	Edmonton, ca	
243.	Stacey Brown	Astoria, OR	As a physical therapist for 40 years trained first in human and then animal rehabilitation, there is no substitute for the experience, knowledge base, respect for outcomes and compassion, that comes with this profession. Having rehabilitation and physical medicine expertise is a gift the phtsical therpist can give her clients as well as veterinarian cohorts.
244.	Nick Gaich	Morgan hill, CA	Because pets matter !!!!
245.	Lynne Armistead	Calgary, ca	Animal physiotherapists are highly trained and skilled at their profession. Let them do their jobs without the veterinarian watching over their shoulder!

	Name	From	Comments
246.	Lorna Langman	Red Deer, ca	My dogs got physiotherapy from an independent therapist. I had to educate my vet.
247.	Carrie Kent	Calgary, ca	I should have the freedom and final say in my pet/family members care.
248.	Robin Gowen	Danville, CA	I don't want to be forced into a specific animal PT simply because that is the one that works with my vet. I want the choice to remain with the owner.
249.	Janet Phelps	Surprise, AZ	
250.	Deborah Garceau	Calgary, ca	
251.	Linda Mudie	Calgary, ca	
252.	Shanta Banerjee	Durgapur, in	
253.	Jacqueline Matticks	Cochrane, ca	Right to choose; benefits the animals!!
254.	Peter Hughes	Cochrane, ca	
255.	Margaret Kraeling	Calgary, ca	
256.	Mary Ann Wurst	Lebanon, NJ	So I have a choice
257.	Debbie Sawyer	Mercerville, NJ	I am not fond of only dealing with those associated with a vet. Been down that road and it was a failure. Independent is best
258.	Cindy Schmitt	Wasington, NJ	I want to make my own choices for my animals. I don't want someone else deciding who treats my dogs.
259.	Lena Madsen	Burnaby, ca	
260.	jill bruno	shelton, CT	I am a rehab practitioner
261.	Verna Dentrey	Cranbrook, ca	
262.	Lisa Perri	Coatesville, PA	Physical as well as occupational therapists bring a wonderful background of rehab specific skills to the field.
263.	Allyson McKnight	Niagara Falls, ca	
264.	Lourens Grobbelaar	Alberton, za	
265.	Mary Ann Dalton	Calgary, ca	I know from past experience that trained pet physiotherapists can help an animal have a better pain free life. The pet therapists I have had work on my dog have been able to identify and work on the problem where the veterinarians only suggestion was drugs. Both can work together to help an animal and that is why I think private pet therapy clinics can work and should be allowed to operate independently.
266.	Katherine Roberts-Zimmer	Regina, ca	
267.	Geoff Matticks	Cochrane, ca	
268.	Chris Diron	Sayward, ca	
269.	Linn Jägare	Vänge, se	

	Name	From	Comments
270.	Lena Weber	Halmstad, se	
271.	Nadja Solera	Edmonton, ca	
272.	Lynn D	Calgary, ca	
273.	Tom Edwards	Calgary, ca	
274.	Rhian Luscombe	Calgary, ca	
275.	Carole Gagne	Nanaimo, ca	
276.	Jenny Moe	Zephyr Cove, NV	We need the right to choose who works with our pets, for their best interests.
277.	Althea Rivers	Sacramento, CA	
278.	Sharon Casey	San Jose, CA	
279.	Claudia Rosas	Santa Clara, CA	
280.	Teresa Cameron	Irricana, ca	
281.	Gottfried Messmer	Karlsfeld, de	
282.	Eva Elfverson Wedin	Karlstad, se	
283.	Kathy Armes	Calgary, ca	
284.	Jéssica Orlandin	São Paulo, br	
285.	Janet Van Dyke	Wellington, FL	Veterinarians working in collaboration with PT's provide optimal care for animal patients. PT's bring skills that veterinarians do not have.
286.	Sue Yuen	Perth, au	Because this restricts physio from being able to do their job in the animal field and allows vets to encroach on our profession
287.	Kate Krochk	Truckee, CA	
288.	Deborah Knotts	Novato, CA	
289.	Arlana Taylor	Coldstream, ca	
290.	Susan Reynolds	Medicine Hat, ca	
291.	Leah Hope	Trail, ca	This is vital to animal health care that those with specialized, specific education, experience in one modality be a choice for animal owners in the independant care of their animals.
292.	Whitney Rainero	Charleston, SC	I am a canine rehab therapist.
293.	Silvia Cappi	Barzago, it	
294.	Adele Meroni	Barzago, it	
295.	Tara Monahan	Thunder Bay, ca	
296.	Breeann Perez	Ventura, CA	
297.	Tracy Marlborough	Tahoe City, CA	
298.	Nina Derpmann	Dinslaken, de	
299.	Sarah Brumbaugh	Burlingame, CA	

	Name	From	Comments
300.	Cynthia Guenther	La Canada, CA	Thoughtful regulation in the best interest of animals and their owners has been proposed and rejected by our legislature due to machination of powerful, self-serving vet board. This must be stopped.
301.	Victoria Henderson	Canterbury, gb	I'm a UK Chartered Physiotherapist holding a masters degree in veterinary physiotherapy.
302.	Tiffany Biggs	South Lake Tahoe, CA	
303.	Telma Grant	Bowmanville, ca	Give the people the choice
304.	Charmaine Buhler	Calgary, ca	
305.	Sue V.	Canmore, ca	Physical Therapists are rehabilitation experts. Many of the rehabilitation principles and concepts in human physical therapy were developed and based on studies done using animal specimens because of their very similar anatomy, physiology, and stages of healing- particularly Canine. physical therapists are in no way trying to practice veterinary medicine but are complimentary to veterinary medicine. Veterinarians who take postgraduate education in animal rehabilitation learn FROM physical therapists. Why, then, would it make sense for a physical therapist to have to practice under direct supervision of a veterinarian vs. collaborating?
306.	Janine Vinton	Hastings, au	
307.	DM Meyer	Fair Oaks, CA	
308.	Pam Traylor	Mesa, AZ	
309.	Virginia Pabst	Sisters, OR	
310.	Deborah Hammond	Cape Elizabeth, ME	I had an older dog treated by a animal physical therapist that was help tremendously by that individual. All the traditional vets did was try and push prescription medicines
311.	Laura Falcon	Washington, DC	
312.	Angela Adan	Glen Ellen, CA	
313.	Stephanie Richardson	Downey, ID	
314.	Tambre Dreiling	Monrovia, CA	
315.	Crystal Martin	Mooresville, IN	Animals need support and if there disabled they need extra help. We had to put my moms dog down b/c we didn't know of options like this.
316.	Heather Murdock	Carmichael, CA	
317.	Mary Tibbetts	Bakersfield, CA	
318.	Joan Ledford	Meadville, PA	
319.	Kala Perez	Santa Ynez, CA	
320.	Debbie Kronsburg	Oceanside, CA	
321.	Constance Rocke	Tehachapi, CA	

	Name	From	Comments
322.	Jessica McCoy	Bakersfield, CA	
323.	Amanda Raymond	Lake Villa, IL	
324.	Rosana Penalozza	Oxnard, CA	
325.	Melissa Keller	Seattle, WA	
326.	Gale Smith-Camp	Sacramento, CA	This will take away the choice of who and how my pet is taken care of, should the need arise. Vets are important, but some may not be trained, just the same as in human medicine. Let the PTs do their job!
327.	Charlotte Ward	Lincolnshire, gb	This can help ease an animals pain,help then to walk better
328.	Allison Kuehn	Carlsbad, CA	It is important because animals should be give the same treatment options as people. They are living creatures and not beneath humans.
329.	Nataile Swart	Halifax, ca	I have a dog and he and all fury friends are important.
330.	Patti German	Roanoke, VA	
331.	Valerie Gagne	Santa Barbara, CA	
332.	Julie Warren	Pollock Pines, CA	
333.	Tina Ruth	Littleton, CO	I have seen first hand how rehabilitation works and time and time again the inital vet will say nothing can be done.
334.	Tanya Renee Will	Ventura, CA	
335.	laura bridgford	Mojave, CA	
336.	Cynthia Haugen	Erskine, MN	
337.	Angelique Fleischer	Paso Robles, CA	
338.	AnnMarie La Flower	Palmdale, CA	
339.	Tammy Bragg	Sonoma, CA	Animals have rights just as people do to have the best possible care....
340.	Rachel Allen	Los Angeles, CA	Consumers should have the right to an open market of choices when it comes to the care of their animals.
341.	Heea Crownfield	Greensboro, NC	
342.	Cheryl Studer	Orange, CA	
343.	Adrienne Grover	Goleta, CA	
344.	Peggy Hauck	Solvang, CA	
345.	Jacqueline Robinson	Powder Springs, GA	
346.	Dena Hammang	Temecula, CA	
347.	Alison Moreno	Beaverton, OR	
348.	Caroline Khoury	Knoxville, TN	Nothing should stand in the way of a qualified and experienced therapist.
349.	Kristi Slager	LA, CA	Animals deserve our very best- they give their best to us.

Name	From	Comments
350. june bullied	Toronto, ca	
351. Terri Prince	Santa rosa, CA	
352. Carina Bäckström	Tågarp, se	
353. Dawn McGuire	Indianapolis, IN	
354. Paula Sule	Brighton, MI	
355. Jessica Araujo	Oxnard, CA	Animals have a purpose and this is part of it
356. Millie Snyder	Newport News, VA	
357. Charity Young	Oak View, CA	
358. Kathleen Keller	Walnut Creek, CA	Freedom of choice
359. Jen Nebgen DPT,CCRT.	Boulder, CO	
360. Andrea Perera	San Jose, cr	The importance of setting the right precedents for us in developing countries is huge.
361. Daniela Ruiz	San jose, cr	
362. Gloriana Ferlini	Heredia, cr	
363. Elisa Moreno	san jose, cr	Soy fisioterapeuta con 3 postgrados, más de 30 certificaciones internacionales entre ellas rehabilitación canina, trabajo bajo referencia de médicos veterinarios. Y si hay algo que tengo claro es que mis tratamientos sin superiores a los de cualquier veterinario.
364. Joann Henderson	PALM COAST, FL	
365. Mary DeCraemer	Clarkston, MI	
366. Elsa Saldana	Sierra Madre, CA	
367. Beata Rejman	Tychy, pl	
368. Sarah Mackeifan	Mineville, ca	Because dogs deserve the best care. We know from the people world that collaborative practises improve patient outcomes. Why can't we just work together to improve the health and well-being of our four legged friends???
369. Janella Leano	Vacaville, CA	
370. Rebecca Sydow	San Francisco, CA	As a dog lover and new puppy parent, I think it is essential for our four-legged friends to have access to high-quality rehabilitation by trained professionals. Restricting access means increased costs due to fewer providers supplying services for the same level of demand. With growing pet ownership, it is essential that we provide widespread and affordable care to animals and their caregivers.
371. twila roth	poway, CA	
372. Laura Greene	Hercules, CA	
373. Paige Lucus	San Francisco, CA	
374. Dagmar Vyhlasova	Praha 5, cz	

	Name	From	Comments
375.	Frédéric Villepontoux	Nice, fr	
377.	Alexandra Bondarchuk	Santa Barbara, CA	My dog has a neuromuscular disorder, declined quickly, and is now not able to walk because we were wasting precious time jumping through the hoops of getting a veterinary referral for a reputable and successful PT facility. I ended up paying thousands out of pocket toward inconclusive medical diagnostics, am not going through insurance, and should have the right to spend my money how I please in an effort to do whatever I can as expediently as I can for our ailing dog/family member.
378.	Wynn Stone	Santa Barbara, CA	I have the right to pick any doctor, physical therapist, chiropractor, pharmacy, hospital for myself and family. Why don't I have that right form my pets. Why do I have to spend more time and money to attain the best health care for my pets. Don't restrict my access to qualified physical therapists. I refuse to spend my money on health care monopolies or support governing boards that do. We need common-sense legislation instead of non-bipartisan, monopoly driven, and restricting legislation. Get common sense and pass language that is consistent with what AB3013 represented. Fostering unwanted is hard and expensive. Do not pile on more expensive those who open thier hearts and wallets to the unwanted who need care.
379.	Susan Henderson	Houston, TX	
380.	Jamie Tyler	Oak Harbor, WA	Having been a mom to more than one special needs pet requiring physical therapy and rehab, I fully support the need for more Canine rehab specialists and accessibility to clinics throughout the USA. In my opinion there are not enough and needs to be more!!!
381.	Jad Habib	Mar Roukoz, lb	
382.	divergent revolution	red hook, vi	
383.	Hilary Register	San Jose, CA	
384.	Ivan Barnes	San Jose, CA	
385.	Travis Register	San jose, CA	Direct access for my dog
386.	Alexandra Augustin	Santa Barbara, CA	I have had dogs my whole life and have two dogs now with injuries. they are family and should have access to physical therapy just like humans!
387.	anthony augustin	santa barbara, CA	current law protects vet's interest, not the dogs.
388.	Amelia Hobbs	San francisco, CA	Because animals heal and thats what it is all about!
389.	Sharon Hughes	Santa Barbara, CA	This is an unnecessary "hoop" and expense that seems unneeded to me.

	Name	From	Comments
390.	Lucy Bochynski	Santa clara, CA	My dream was always to help horses through Physical therapy to return to prior level of function or optimize their performance. The current laws significantly restricts my scope of practice and make it difficult to allow owners to benefit from physical therapy services.
391.	Laurine Zolghadri	Ostwald, fr	
392.	Sebastien Seguy	Santa clara, CA	
393.	Pierre Thouzeau	Ostwald, fr	
394.	Jonathan Bioni	Monrovia, CA	
395.	Sandra Beckett	Fergus, ca	
396.	Sophie Emlek	Sarcelles, fr	
397.	Dana Johnson	Toronto, ca	
398.	Luc Fecteau	Hercules, CA	
399.	Kamila Simonova	Stochov, cz	... because dogs do deserve to have the chance to walk again [?]
400.	Marilyn Graziano	trofarello torino italy, it	
401.	claire daggy	coronado, CA	
402.	Haley Agapiou	Oak Park, CA	
403.	Cynthia Butler	Long Beach, CA	T is critical that we have both more and direct access Animal physical therapists. Veg care is extremely expensive as it is, and forcing animal PTs o work under direct supervision would provide no benefits, drive up costs further and would limit access further. What if every human physical therapist had to work out of a medical doctor's office? And thing would happen. Nuts!
404.	Jennifer Bradley	Glendale, CA	
405.	Matthew M	Los Angeles, CA	
406.	Todd Brock	Bend, OR	
407.	Diane Morton	Dana point, CA	More government overreach just to make money with no concern for animal welfare
408.	Christine Biddick	Philadelphia, PA	
409.	Victoria Munz	Lancaster, CA	Physical therapists are the movement experts. If a therapist becomes highly trained and certified to rehabilitate animals then why not allow it. This allows for more qualified individuals to be accessible to pet owners. When working with companion animals we as physical therapists will be best at seeing how the animal interacts with their human and what function they need to get back to. I agree with the 2017 task force that the best practice is after a veterinarian clears the animal for physical therapy then a certified physical therapist should be allowed to treat the animal.
410.	Nick Ritter	San Diego, CA	

	Name	From	Comments
411.	Edriana Bougrat	Kissimmee, FL	Because I am a PT, CCRT and I am an advocate for the best treatments available for dogs as well as the growth and betterment of our profession
412.	Caitlyn OSullivan	Coachella, CA	
413.	Andrea Anderson	San Francisco, CA	Physical therapists are THE specialists in movement and rehabilitation. Access to animal PT should be increased, not decreased. Don't let professional turf wars impact the movement health of animals in California.
414.	Whitney Mitchell	Sayre, PA	I'm a PT who is passionate about rehabbing dogs. Almost completed my CCRT.
415.	Danielle Dion	Riverside, CA	
416.	Matthew Haehn	Dallas, TX	
417.	Nyssa Midden	Carbondale, IL	
418.	Julie Sias	Newport Beach, CA	
419.	Holly Klemme	Woodland, CA	
420.	Jean Gill	South Sioux City, NE	I want the best care for my dogs & if they need rehab i want to be able to utilize a PT who has gone to school specifically for therapy & has fine tuned skills that will help my dogs. Canine therapy should work by vet referral like human outpatient therapy does.
421.	Gaby Barrera	Los Angeles, CA	
422.	Ariel LaRocca	Lawrenceville, GA	
423.	Kelsey Jonas	Portland, OR	Physical therapists are highly trained professionals that understand the canine body and rehabilitation much better than many other health professionals. Allowing PTs the independence to practice without supervision of a vet would allow the canine rehab world to expand so that many more dogs can be taken care of.
424.	Lauren Fiedler	San Diego, CA	
425.	Dsnielle Hughes	DeKalb, IL	
426.	Marla Goodfellow	Winnetka, CA	
427.	megan craig	san francisco, CA	I am a physical therapist and dog lover!
428.	Katie Baker	Chicago, IL	
429.	Liliana Castaño	Medellin, co	Me gusta mucho. Y soy feliz cuando veo. Estas personas q les gusta los animales. Sin importar su condición
430.	Janet Aylward	Beaverton, OR	
431.	Jack Handy	Lockhart, FL	
432.	Lidia Ruiz	Santa rosa, CA	Animals can suffer and feel pain just as humans, therefore they deserve the same respect and caring
433.	Christina Murphy	Long Beach, CA	Dogs should have physical therapy to recover from injuries or to help with any problems they may have. They are like family!

	Name	From	Comments
434.	Jane Foreyt	San Diego, CA	
435.	Airianna Martinez	Long beach, CA	Dogs need just as good care as humans
436.	Leslie Ashley	Costa Mesa, CA	
437.	Jatinder Hicks	Edmonton, ca	
438.	Angus Halliburton	Templestowe, au	Because this is a animal physical therapy petition and I think all animals should have a chance at life
439.	Christina Madera	Ventura, CA	
440.	Aden Whitfield	Canton, GA	Animals are equal to humans
441.	Jessica Solley	Ardmore, OK	
442.	Emily Schick	Pilot Butte, ca	So many animals need physical therapy and it shouldnt be hard for them to get and expensive
443.	Kimberly Starck	Tucson, AZ	
444.	Daisey Ortega	El Paso, TX	
445.	Beatriz Ribeiro	Palo Alto, CA	
446.	Kenna Powell	Phoenix, AZ	
447.	Sophie Moles	Sydney, au	Animal care is already too often sidelined and in order to effectively manage movement issues with animals including pain management, physical therapy is necessary as part of that treatment plan. As veterinarians we should always aim to provide the best care for the patient and whilst veterinary input is essential sometimes that care is not necessarily directly a part of a veterinary practice.
448.	Helene Sundius	Köping, se	
449.	Alexandra Calvillo	Glendora, CA	I love Freddie. She needs it. All living beings should be able to get the necessary help they need to fell better.
450.	Annabelle Brooks	Bridgend, gb	
451.	Jamie Willman	Dunno, CA	
452.	K. Meyer	Porta Westfalica, de	
453.	Hannali Kastanek	North Las Vegas, NV	
454.	Susannah Evans	Concord, CA	
455.	Marlee Mayo	Chanhassen, MN	
456.	Natalia Bleecker	Downers grove, IL	
457.	I Fei Chang	Irvine, CA	Protect animal right and secure rescue force
458.	Andrea Sanchez	Coyoacan, mx	
459.	Ariel Aragon	Santa Fe, NM	
460.	Gabriella Lieber	Manchester, gb	I love animals especially dogs have 4 myself. I would like to have 100. Lots of people just get a dog then when they get bored of it they just leave them in a shelter or on street. Those animals then left without care and they get health problems. Vet is very expensive but all animals deserve to live a painful happy life! Help them!

	Name	From	Comments
461.	Krysta Hall	College Station, TX	Because animals need just as much love and care as humans and they cannot help themselves
462.	Dana Mayfield	Frankfort, IL	
463.	Harry Potter	Melbourne, au	Dogs need to be treated he same
464.	Robin Imus	San Diego, CA	
466.	Cinthya Rodriguez	Los mochis, mx	
467.	Patricia Rivera	Las Vegas, NV	
468.	Owen Erquiaga	Denver, CO	
469.	Cynthia Hernandez	Riverside, CA	
470.	Marie Marquez	San Gabriel, CA	
471.	Luz Silva	Glendale, CA	
472.	Helen Creaney	Newcastle upon Tyne, gb	Animals have a right for our help
473.	Hanna Hancock	Los Angeles, CA	
474.	Holly Murray	Redding, CA	
475.	Talia Williams	Scranton, PA	Animal health care is a rising topic as more individuals are becoming aware of different issues that can happen with ownership. As a pet owner, it is our responsibility to provide our animals with the best care. And same as our family doctor may point us to a specialist when needed for extensive and long term care for a chronic problem, the same option should be available for those willing to seek that route for their pet.
476.	Linnea R	Anacortes, WA	
477.	Emma Watson	London, tr	
478.	Kuulei Rabara	Kahului, HI	
479.	Esly Herrera	Monterrey, mx	Helping animals get better
480.	Victoria Zacher	Zwickau, de	
481.	Caroline Luft	New Orleans, LA	
482.	Samantha Newman	Bournemouth, gb	
483.	Alex T	Toronto, ca	
484.	Ruby Gilbert	Chichester, gb	
485.	Romily Estell	Oklahoma City, OK	
486.	Vanessa Jorgensen	Albany, OR	
487.	Tiffany Gough	Glendale, CA	
488.	Kelly Prusak	Bella vista, AR	Cause it important to animals
489.	Adam Stanczyk	Gelsenkirchen, de	

	Name	From	Comments
490.	Bridget Plummer	Knoxville, TN	To help with the animals.
491.	Deanna Hullings	Irvine, CA	
492.	Michael Soulek	Corrales, NM	
493.	Anthony Soto	Georgetown, TX	
494.	Kristen Heck	Hoxie, KS	
495.	Laree Harris	Las vegas, NV	
496.	Nancy Maragioglio	Sumter, SC	
497.	Mario Koppatz	Hannover, de	
498.	Gabriel Oliveira da Silveira	São Paulo, br	
499.	Kathryn Grant	Newry, gb	
500.	Patrick Batey	Pelham, AL	
501.	Amy Liffen	Nottinghamshire, gb	Because all animals should have the right to go to physical therapy and not have to pay outrageous amounts
502.	Drake Long	Saint Louis, MO	
503.	Beate Wolfe	Solvang, CA	The spirit of healing should not be fenced in
504.	Donna Serl	Akron, CO	I've know so many animals that have benefitted from therapy. Because of this their lives have been enriched. There by enhancing their quality of life!
505.	Susan King	Toluca Lake, CA	
506.	Leonard Borrelli	Ho chi Minh city, vn	They have every right to live a peaceful and loving life
507.	Mariana Rios	Leiria, pt	
508.	Margie Robatto	Beachwood, NJ	
509.	Natalie Keagle	Chester, gb	
510.	Marina Prozorova	Auckland, nz	The same as humans, pet parents have the right to choose the best care for their peys!
511.	Lisa Kay Alsgard	Farwell, MI	
512.	Camilia Abouzeid	Alexandria, eg	Cause animals deserve better
513.	lucy fletcher	North perth, au	I think it is extremely important that as many animals can get the physical therapy they need and the needs of those animals should not be limited because of an unjust, unnecessary law!
514.	Sophie Schulman	Los Angeles, CA	ANIMALS
515.	Claire Battison	Crewe, gb	
516.	Terri Urquhart	Citrus Heights, CA	
517.	Evo Gomez	Peoria, AZ	Animals already have a hard time getting adequate care without this going into effect. Please, take into consideration that these beings need us to be an advocate for them and that they've shown us time and time again why they deserve nothing but the best from us.

	Name	From	Comments
518.	Bára Labudíková	Česká Rybná, cz	
519.	Elizabeth Cohn	Alpharetta, GA	
520.	Joe Buxton	Wakefield, gb	
521.	Natalia M	Slane, ie	
522.	Giulia Inangeri	Chiswick, au	
523.	Theresa Asperti	Staten Island, NY	
524.	MiShelle Rice	Owings Mills, MD	Just like people need physical therapy after suffering some type of trauma, so it is with animals. Animals are human's #1 stress reliever and humans are relaxed around them. So much to the point that nursing homes request not people but animals to visit to help and entertain the elderly
525.	Brian Nicholson	Van Nuys, CA	
526.	Catherine Sharp	Apartment 436, CA	
527.	Nina Hakkarainen	Jyvaskyla, fi	I want to see only the best care for all animals.
528.	Elicia Hasl	Gothenburg, se	
529.	Mariano Cozza	Amantea, it	
530.	Theresa Kenworthy	Auburn, IN	
531.	Marsel Reyhani	Santa Ana, CA	
532.	Nadine Näbrich	Werdau, de	
533.	diana f	San Jacinto, CA	I love animals n i love skot n bri
534.	Kelly Berke	San Clemente, CA	Believe it's important for dogs to get
535.	Dionne Senders	Amsterdam, nl	
536.	Norbert Gusztafik	Budapest, hu	I love animals and they must get the best care, they are like humans, they need help, therapy and care after something really bad. Animals are really good to people as a relieve and humans (sadly not all of them) feel better around these cute creatures. So thats why this is important to me. It should be important for everybody in this planet.
537.	Dan Rodriguez	Las Vegas, NV	
538.	Deb hancock	Auckland, nz	
539.	Kimberley KERLEN	Liverdun, fr	
540.	Iva Vujicic	Jagodina, rs	Because every animal deserves to be treated right
541.	Doroti Čanak	Kastav, hr	
542.	Josie Garcia	Seaside, CA	They save lives.
543.	Kaden BT	Toronto, ca	To give all animals a fair chance
544.	Lucas Tames	Floriianópolis, br	
545.	Polly Biffin	Poole, gb	I care about the health and well-being of animals and believe help should be more accessible to them!

	Name	From	Comments
546.	Dalton Waller	Winston-Salem, NC	Because animals need to be able to get help without money being such a big problem.
547.	Lenita Behncke	Hennigsdorf, de	
548.	Felizitas Gramsamer	Ansbach, de	
549.	Sarah Obryon	Pasadena, MD	
550.	Kaden Richards	Lake Worth, FL	
551.	Kelly Mendoza	Oceanside, CA	
552.	Anna Davel	Pretoria, za	
553.	Shannon Webb	Kettering, OH	
554.	Denise Healy	Summerfield, FL	
555.	Pamela Breska	Ballston Spa, NY	I believe all furbabies should be able to have it.
556.	Aida Carrasco	Igualada, es	
557.	Melissa Leakey	Tonganoxie, KS	
558.	Leonor Duran	Rosemead, CA	
559.	Annika Westermayer	Neustadt, de	
560.	Lisa Mayne	St. Paul, MN	
561.	Nohemi Vazquez	Chicago, IL	
562.	Melissa Lara	Manchester, NH	
563.	Tim Ruffner	Covington, KY	It restricts access and mirrors the bureaucratic institutionalization and profiteering of the American healthcare system for humans.
564.	Leico Nagata	São Paulo, br	
565.	Evee Garcia	Whittier, CA	
566.	Kiesha Tee	Bull Creek, au	
567.	Hunta Gray	Wellington, nz	Because all animals deserve a chance in life and people that are willing to help them live there best life means the world to me
568.	Giorgio Colla	Cairo monyenotte, it	
569.	L M	Charlotte, NC	
570.	Mitchell Dollimore	Missasga, ca	Because animals are cute and all animals mean everything to me if you are going to help the animals i will help too
571.	Angela Dubler	Westerville, OH	
572.	Sheryl Kiser	Mashpee, MA	I have seen the good physical therapists have done. Why should vets have to do it? It's not a requirement for humans. Maybe license them if the fear is fraud.
573.	Rose Madigan	Canoga park, CA	
574.	Christine Cutler	Abington, MA	
575.	Lara Pantojas	Grand island, FL	

	Name	From	Comments
576.	Olivia Wright	Grand Island, NY	
577.	Carol Popely	Gillingham, gb	
578.	Jay Gans	Livingston, NJ	
579.	Emma Marie Klausen	Gilleleje, dk	Cause, not only does humans have it, but lot off dogs get hurt in kinda the same way and need help to get back up [?][?]
580.	T F	Lisboa, pt	
581.	Justin Sudol	Morris Plains, NJ	Special needs animals should not have to suffer due to rising cost of physical therapy.
582.	Jaime Edmonds	Pensacola, FL	
583.	Tyler Smith	Port orange, FL	I love animals
584.	Sierra Munoz	Greenwood, DE	This is important because animals like Freddy need all the help they can get and I want be part of that help and signing this petition to me feels like I'm helping them
585.	Hannah Smith	Port orange, FL	I love animalz.
586.	keira gunn	thurso, gb	
587.	Sanita Gill	London, gb	Because us humans need to be a voice for our beautiful animals!
588.	Laura Dworman	Dudley, MA	They need help, they love and feel loved.
589.	Erianna Williams	Cumming, GA	
590.	Christina Grindstaff	Lubbock, TX	
591.	Lauren Mayo	Mora, MN	To allow more qualified professionals to assist with animal rehab
592.	Tara Kruck	Harvest, AL	
593.	Ana O.	Hillsdale, NJ	
594.	Ashot Hambardzumyan	Marseille, fr	Just animals are like humans i love them so much and we have to do anything for protect them in this unfair world
595.	Stephanie Shay	Wauseon, OH	
596.	Ajda Kafol	Ljubljana, si	
597.	Chris Egan	Reisterstown, MD	
598.	Wyatt Campbell	Kingston, OK	I love animals
599.	Erin McGuire	Huntington, VT	
600.	Olivia Wella	Omaha, NE	Because animals deserve to be treated just as well and as taken care of as humans
601.	Aïcha Van Driessche	Erpe-Mere, be	Because all dogs deserve a chance at being happy and all dogs deserve someone or something to make them happy
602.	Saskia Frömmer	Schloß Holte, de	
603.	Anna Karina Antunes De Souza	Curitiba, br	
604.	Anthony Montague	Norwood, MA	

	Name	From	Comments
605.	Aloo Khachaloo	Toronto, ca	
606.	Mercedes Alcalá	Valley village, CA	
607.	Sophie Cruz	Tegucigalpa, hn	
608.	Steve Verloy	Merksdm, be	We need this for our animals !
609.	Bianca Ayala	La mirada, CA	I have a disabled animal and would love to see them play to their full extent. Animals are living breathing and deserve the best too.
610.	Valerie Pioch	Toledo, OH	
611.	Ashley Bethke	Orlando, FL	
612.	Narelle Marie	Guaynabo, pr	
613.	Nancy Ives	Clinton, NY	There should be the least amount of limits to accessing these service as possible.
614.	Gloria Febrizio	Long Beach, NY	Because I am an animal lover
615.	Artem Fischbach	Moscow, ru	Because we need to help each other. And appreciate supporting each other!
616.	Suzanne Reussner	Newburgh, NY	
617.	Lexie Woodard	Clarksville, AR	It important to me because dogs need home and I feel really bad for all the the dogs that are left out in the streets and also dogs needs help
618.	Alvaro Cestti	Alexandria, VA	
619.	Danica Barnes	Montoursville, PA	
620.	Justin Davis	Adair, IA	Freddie murkery
621.	Lauren Laicu	Clawson, MI	
622.	Jill Jerauld	Spring lake, NJ	
623.	Esteban Soster	Strasbourg, fr	I want to pet to have physical therapy in California
624.	Judie Wilbanks	Milton, FL	Should be my choice
625.	daisy fernandez	new york, NY	
626.	Kristin Cowles	Bakersfield, CA	
627.	Jakub Zielinski	Wroclaw, pl	
628.	Giulia Ruggiero	Castelletto Sopra ticino, it	
629.	Jillian Cernok	Chicago, IL	
630.	Rebecca Miller	Columbus, GA	
631.	darina boneva	sofia, bg	
632.	Tomika Pratt	Oak park, MI	
633.	Sue Borja	Citrus Heights, CA	
634.	Jack Sorenson	Kerrville, TX	I love dogs and I believe that this is needed
635.	Emily C	Ok, OK	

	Name	From	Comments
636.	Joseph Gloria	Independence, MO	
637.	Jill Williams	Columbia, MO	
638.	Karter Craig	Saskatoon, ca	
639.	Sheila Lee	Dalton, GA	
640.	Giulia Serio	Cefalù, it	
641.	Zoe Caran	Celebration, FL	My dog had a displaced disc in his back and pt helped him go from can't standing up to running and playing
642.	Judy Aubrey	Farmington Hills, MI	
643.	Ruben Haro-Villa	Lawrence, KS	
644.	Michaelia Torres	Riverside, CA	Because I have dogs and I understand that animals need affordable medical help just like humans.
645.	Patty Tabacchi	Astoria, NY	
646.	Lilith Bolger	Lorain, OH	To help dogs in need.
647.	Maddie Sin	Brampton, ca	
648.	Madison Gaunt	Yucca valley, CA	
649.	Marilyn Drake	Greenville, MS	
650.	Jessica Esguerra	Northridge, CA	
651.	Theresa Smith	Oceanside, CA	If my dog needed PT, I wouldn't want to be forced to deal with a vet first. Not only does it waste my time and money, it delays treatment for her.
652.	Debbie Larmonie	San Nicolas, aw	Because I love dogs(animals) and as God created creatures they deserve a good quality of life by good(special care if needed) much love by Us humans, Period!!,
653.	Alexx S	Stoddard, WI	All animals deserve to get affordable care
654.	Rachel Majewski	Glendale, AZ	
655.	unknown [?]	gaushs, kr	???? ???? ????
656.	Diana Rivera	Charlotte, NC	
657.	Andrea Finfrock	Springville, IA	
658.	Francisco Pagan	Mayaguez, pr	
659.	Jennie Haynes	N. Las vegas, NV	
660.	Ashley Earl	Tualatin, OR	
661.	Jennifer Klinger	Jacksonville, FL	
662.	Marie Bryan	West Covina, CA	If a doctor has prescribed and indirectly supervises treatment then that should be sufficient- owners should be able to decide who/where is best for their pet after that
663.	Luisa Von Gostomski	München, de	
664.	Regina Wegryn	Broadview Heights, OH	Not everything needs to be regulated. We should be able to choose where we want our animals to get therapy.
665.	Ann Mackl	Damwald, nl	

	Name	From	Comments
666.	Zakya Wilson	Hampton, VA	Because I love animals and people shouldn't have to pay a lot of money to take care of their pets that they love so much. It should be affordable so that they can take care of their pets instead of paying for treatment that is expensive.
667.	Christine Frank	Akron, OH	
668.	Katie Gallagher	Northwich, gb	
669.	Ann Perigo	Stoystown, PA	
670.	Della Foster	Moreno Valley, CA	
671.	Vegette Prutas	Quezon City, ph	All lives matter
672.	James Wallace	Chicago, IL	
673.	Terri Warden	Santa Cruz, CA	
674.	Rachel Snyder	Zimmerman, MN	
675.	Amie Durrman	covington, VA	
676.	Lucy Carroll	West Sacramento, CA	
677.	Michelle Wills	Arden, NC	
678.	Jessica Rodriguez	Chino, CA	
679.	tracy lutz	Scranton, PA	I love animals!!
680.	Rochelle Albee	Newbedford, MA	
681.	Amanda Blantona	Hazelwood, MO	As a future canine PT I want this to pass in every state!
682.	Julie Ferron	Torrance, CA	I have a rescuedog who currently uses a dog physical therapist. When I rescued him, he had been hit by a car and the therapy has allowed him to regain mobility and quality of life. Do not pass this bull that would increase costs of such an important tool for animals everywhere.
683.	Isabel De La Cruz	San marcos, CA	This topic is very important to me because I believe that other trained people can give physical therapy to animals. Also I had a dog that got ran over but we had to put her down because it was too expensive and we could not afford the hospital or therapy bills. It seems like the people who are trained would charge a bit cheaper and would do the same or better job with our pets.
684.	Diane MILLER	Tooele, UT	I love animals and want them to have every opportunity to live a good life and get treatments they need.
685.	Rob Hartman	Oswego, IL	You're taking away small businesses! Now the CVMB and the CVMA are creating a monlopoly?! Really?!!
686.	Vanessa Lopez	Orlando, FL	
687.	Loren Buss	Chandler, AZ	
688.	Noora ..	doha, qa	making them happy and helping them is something that means a lot. Since there are trained people and people who could help like why not help them and train them.. Animals are the most precious thing and they should be treated <i>(continues on next page)</i>

Name	From	Comments
688. Noora ..	doha, qa	<i>(continued from previous page)</i> kindly because they are the most loving creatures in this world. They deserve the love and the care. If we didn't help them and they are not able to do something would make them feel bad but making them able to walk or do something again will be so special to them and will also make the person who helped them happy.. then why not help them when we can?
689. abbie ryan	rochester, NY	Animals help me personally with anxiety and i think other people should definitely benefit from them
690. Shaheem Evans	Bronx, NY	
691. Jennifer Mininger	Highland Springs, VA	
692. Leticia Negrón	Bronx, NY	
693. Paige Nickell	Stockton, CA	
694. Jessica Kaplan	Gaining, FL	
695. Melissa Aldana	Pompano beach, FL	Animals need this device too
696. melissa Coyle	Winnipeg, ca	
697. Adrienne Newman	Bakersfield, CA	Animals have always been lifted my spirit when I needed it. I will always be there them.
698. ella Hassan	melbourne, au	i live and breathe for the welfare and happiness of animals :)
699. S DeWyer	Buffalo, NY	Freedom of choice!
700. Donna Entrican	Paris, IL	I'm a dog lover
701. Veltette Medina	Villa Rica, GA	
702. Joseph Mackay	Placerville, CA	Because government regulation of things is rarely a productive solution to an issue. Babying every decision everyone makes is ridiculous and should stop.
703. Anna Westein	Maassluis, nl	
704. Daniel Tapia	Denver, CO	
705. Carol Barlow	Shelby Township, MI	
706. Barry Garland	Cameron, NC	Because I don't want this stupid stuff coming to my state.
707. Jesse Renee	Fort Worth, TX	Its important in general because we have animals that need our care. But sometimes theres some animals that need more help than others but its up to us to help.
708. Sylvia Gutierrez	San Antonio, TX	
709. Aubrey Feser	Zeeland, MI	
710. Cheryl Senese	Bolingbrook, IL	
711. Marcene Weiler	Carson City, NV	
712. Cassie Prom	Wauwatosa, WI	
713. Stephanie Lanphear	Masury, OH	Animal rights
714. Karina Solano	Daly City, CA	

	Name	From	Comments
715.	Elena Díaz	San Pedro Garza García, mx	Because animals only give us support, loyalty and mainly love, so it's only fair for us to take good care of them and it shouldn't have to be hard to get access to that care.
716.	Gail Klein	Gaithersburg, MD	
717.	Mary Sek	Sonoma, CA	
718.	Shawn Hilburn	Downingtown, PA	
719.	Amy Ford	hooks, TX	
720.	Jenna Lamica	Reseda, CA	
721.	Mca Heuvelman	Enkhuizen, nl	
722.	Staye Nonya	Nonyatown, NJ	
723.	Nicole Hardin	Everett, WA	One person can make a difference
724.	Tracy Glays	Winnipeg, ca	
725.	Virginia Murphy	Carmel, NY	
726.	Vanessa Leon	Kennewick, tri cities, WA	I love dogs there are so loving and I feel like we should have physical rehabilitation everywhere
727.	Mats T	KÅGERÖD, se	
728.	Carmen Davis	Vancouver, WA	They deserve a better life
729.	Rochelle Lesnak	Campbell, OH	
730.	Sabrins Arnold	Livermore, CA	Animals need this kind of therapy too.
731.	Jennifer Giddings	Jonesboro, AR	I have watched animals go through treatment at this facility and being to walk better, play better, and even eat better!!! It is an amazing place!
732.	Kathy Szostak	Palos Hills, IL	
733.	Brandi Fuss	Riverside, NJ	
734.	sarah noll	kansas city, MO	
735.	Adrian Hunsucker	Marietta, GA	
736.	C.K. Nuetzie Jasiorkowski	Goleta, CA	
737.	Janella Leano	San Francisco, CA	
738.	Michele Glucroft	Simi Valley, CA	
739.	Bonnie Vargas	Bloomington, IN	
740.	Brenda Cooper	Cleveland, OH	
741.	Ky Diehl	Mansfield, OH	
742.	Katie Dow	Erie, CO	
743.	Nicole Duenes	Elmwood Park, IL	
744.	Cristal Renteria	SIERRA VISTA, AZ	
745.	Kathleen Morin	Vacaville, CA	
746.	Angela Bigbie	Birmingham, AL	

	Name	From	Comments
747.	Janet Turner	Mineral Wells, WV	As a physical therapist I feel that a bed Marion is not qualified to Supervise a physical therapist. Physical therapist do have their doctor degree And that should be sufficient.. Having Veterinarians supervisephysical therapist is like sending the mechanic in to supervise the doctor. They have absolutely no knowledge base to draw from. Shame on the veterinarians. It
748.	Heather Dunn	Truro, ca	I think it's very important to be able to outsource our pets physical therapy in private facilities, vs having vets monopolize treatment bc it brings them more income..
749.	A Crawford	Santa barbara, CA	Freedom of choice and cost
750.	Jenny Street	Tomball, TX	
751.	Laura Milburn	Scottsdale, AZ	These animals deserve what is available to give them a productive life.
752.	Di Tims	Axminster, gb	
753.	Kathleen DUNCANSON	Toluca Lake, CA	
754.	Natalie Guter	Dallas, TX	
755.	Sandra Matthews	Coventry, CT	Animals suffer with pain in silence
756.	Florencia Stefani	San Fernando, ar	Por favor firmen
757.	Debbie Whittaker	Hurricane, UT	
758.	Brittany McCune	Fairmont, WV	Animal parents should have the right to choose where their animal receives care.
759.	Sarin Shimshirian	somewheres, lb	
760.	kathy Miller	el mirage, AZ	
761.	Meghan Padilla	Hollister, CA	
762.	Bethany Brabner	London, gb	
763.	Andrea Lagow	Bloomington, IN	
764.	Melissa Zimmerman	Canandaigua, NY	
765.	Ginger Winn	Glendora, CA	
766.	Christine Quesada	Pasadena, CA	
767.	Barbara Kozlowski	Phoenix, AZ	
768.	Celeste Soltesz	Chandler, AZ	
769.	Stephanie Allen	Methuen, MA	Pets are part of my family. They spend every day with me and are part of my day to day happiness. They deserve round the clock care
770.	Tamzin Harrison	Clydebank, gb	To help animals in need
771.	Chris Campbell	Palmerston North, nz	
772.	Braydon Thurston	Olathe, KS	
773.	Karen Harris	Minnnetonka, MN	

	Name	From	Comments
774.	Angela Kleinschuster	Menifee, CA	
775.	Kathy Benskin	Pittsburg, KS	Dogs as well as people need physical therapy to recover from surgeries or just as an adjunct therapy
776.	Holly Berdan	Las Vegas, NV	PT has changed my dogs life
777.	Alyssa Banks	Sneads Ferry, NC	I love animals and they deserve help too
778.	Solaye Curtis	Fair oaks, CA	
779.	Leigh Dean	Albuquerque, NM	All dogs deserve the chance to live.
780.	Jed Simsuangco	Fairfield, CA	
781.	Kristina Pifari	Long beach, CA	
782.	Jesus Munoz	Downey, CA	
783.	Seana-Marie Sesma	Ventura, CA	We need to respect and care for all beings
784.	Marie Powell	Bluffdale, UT	The owner should be able to choose the provider
785.	Jacqueline Rupprecht	Augsburg, de	Jedes Tier sollte die Chance haben!
786.	Wen Casti	Jersey Cutu, NJ	Improve Quality of life
787.	Zach Woods	Bristol, gb	All animals deserve help
788.	Stephanie Alvarado	Gilroy, CA	
789.	Shayna McMinn	Rostraver Twp., PA	
790.	Penélope Gantus	Balneário Camboriú, br	
791.	Robert Santoro	Sherman Oaks, CA	Keeping options for treatment of my animals is important to me.
792.	Jesse Cohen	Emeryville, CA	I have pets that if they were injured or required PT I would want to have the option to put my money and effort toward whichever service I believed would best serve my family member. It feels a bit like a money grab from these veterinary groups, and I'm not down with that.
793.	Fernanda Lara	Cuautitlán, mx	Love u Brian , for the dogs
794.	Florangel Parraga	Marysville, OH	
795.	Priscilla Villanueva	Arvin, CA	
796.	Lily Stewart	Chilliwack, ca	I want to help pets in need, because its so sad to see them hurt and if no one cared then no one would help and it would be bad.
797.	Ivette Greenwood	San Antonio, TX	
798.	Ann Wells	San Antonio, TX	
799.	Eden Olivier	Hartbeespoort, za	
800.	Ozzlynn Noyes	Burns flat, OK	

	Name	From	Comments
801.	Griselda Galindo	San Nicolás, mx	
802.	Brown Brooke	Fullerton, CA	
803.	Zack Hanna	Sunset beach, CA	We need more options for care. Not fewer and more expensive options.
804.	Giorgia Aliprandi	Arcore, it	
805.	Vicki True	Valrico, FL	This service needs to readily available to many. There can be laws in place to protect consumers that doesn't require the veterinarian. The price needs to stay affordable.
806.	jamie lusk	woodbury, TN	
807.	Scott Nicholson	Van Nuys, CA	
808.	Cristina Denbaugh	Los Angeles, CA	
809.	Cathy Ruffus	Lakewood, OH	
810.	Melissa Retana	Anaheim, CA	PT should be affordable to everyone. No matter your income, You should have affordable access to PT to care for your animals.
811.	Xena Sieminski	Tyrone, PA	Why not? It's a good cause for the puppies and then people
812.	Kristian Thwing	Lansing, MI	Animals are always there for us, so why not be there for them.
813.	Jessica Peltcher	Thornton, CO	Every pet deserves the chance and right to have physical therapy if it wasn't for physical therapy my little girl wouldn't be waking right now
814.	Kieran Mackintosh	Hale, gb	Animals are really important and they deserve only the best help
815.	Madison Gard	San Carlos, CA	Because dogs need it
816.	Alex C	New York City, NY	
817.	Janessa Arellano	Santa Clara, CA	
818.	Matthew Stevens	Greenwood, IN	More needless legislation that financially benefits the submitter, but diminishes care of the recipient.
819.	Shelby Jordal	Pulaski, NY	
820.	Marie-Elodie Fallourd	Paris, fr	
821.	Cheryl Davenport	Omaha, NE	We need to appreciate that we humans have some of the same health conditions as dogs and need the same therapies. We need to support the animals we love!!
822.	Sara Herman	Pasadena, CA	
823.	Hanna Huenemann	Logan, UT	
824.	Jennifer Nuzzolo	Fort myers, FL	
825.	Lilia Salinas	Atwater, CA	Animals deserve there medical needs met just like people do.
826.	Kathleen Reber	Courtenay, ca	

	Name	From	Comments
827.	Sabrina Hall	Grove port, OH	
828.	Sue Kahl	SPRINGFIELD, IL	
829.	Nicole Fowler	Antelope, CA	
830.	Kirstin Davy	Port huneme, CA	
831.	Dana Savage	Blue Bell, PA	
832.	Hannah Carey	San Jose, CA	
833.	Kristin Lubniewski	Smyrna, GA	
834.	Carolyn Mazzola	San Francisco, CA	Animals deserve to be healed by humans, needless suffering is unacceptable and PT can help prevent needless suffering
835.	Daniela Arweiler	Saarlouis, de	
836.	Kobe Ramirez	Upland, CA	
837.	Jorja Culbreth	Sonoma, CA	
838.	Sadie Bradley	Oneonta, AL	Because they need help too and if we get help so should they.
839.	Rosemary Hubbard	Birmingham, gb	Because all dogs deserve a chance
840.	Valerie Stapleton	Gaffney, SC	We need to bring awareness to how much of a symbiotic relationship we have with pets and animals in general. We need each other for our health and well being and we are destroying that resource through negligence and willfull ignorance.
841.	Jame Castor	Denver, CO	This can help animals recover from very intense surgery that are goi g to take time to heal an with out the said animal may not recover as well. It might help a once paralyzed dog walk again eirher before surgery if needed or from some kind of illness that can interrupt there Nervous system for what ever reson. The bottom line is that help out in do may ways sith oud pets an other animils
842.	lilian lin	Garden Grove, CA	
843.	Linnea Kuusisto	Kangasala, fi	
844.	Michael Castor	Denver, CO	
845.	Angelina Velarde	Marikina City, ph	Dogs can provide unconditional care and love that money cant get
846.	Katrina Neber	Corvssllis, OR	
847.	Kate Lustig	Carmel, IN	
848.	Veronica Rosa Pérez	Granada, es	
849.	Liz Wasick	Murfreesboro, TN	
850.	Chloe Dollar	Bakersfield, CA	
851.	Michael Blase	Peoria, IL	All animals deserve fair treatment

	Name	From	Comments
852.	karen martinez	north canton, OH	
853.	Tania Nieves	Raleigh, NC	
854.	Colette Pickering	Wolverhampton UK, gb	
855.	Jennifer Williams	Tacoma, WA	
856.	Kaja Jankowska	Ballymena, gb	
857.	debbie kahlberg	thousand oaks, CA	
858.	jana Hollmann	München, de	
859.	Keira Kennedy	Surrey, ca	Animals desecrate the best, and helping them out shouldn't be too expensive.
860.	Sofia Flores	Westbury, NY	
861.	Diane Dahlstrom	Somerset, MA	
862.	Ashley Martin	Snta clrta, CA	
863.	Nadia B	Sf, CA	
864.	Shannon Lance	Bradenton, FL	Because all animals deserve to have the best quality of life possible
865.	Genie DeLacoudray	Westminster, CA	
866.	Victoria Veaudry	Montague, MA	All families and their animals should have access to get this sort of help if they need it. All animals who may have physical limitations, and their families, should be able to access the help of therapy no matter what. Therapy for animals has drastically changed so many animals lives for the better, and it should be able to for generations to come. It shouldnt be taken away from those who are already struggling to afford it, so they can help their pets and see them grow stronger with each therapy session.
867.	Charlotte Bridger	Chippenham, gb	
868.	Susan Quick	West Decatur, PA	
869.	Angelica Morgan	Sonoma, CA	
870.	Lisa Stepnick	Tarentum, PA	
871.	Janeen Anderson	Fullerton, CA	
872.	Faith Wright	Oregon City, OR	
873.	Monika Ligas	Chicago, IL	
874.	Wayne English	Indianapolis, IN	
875.	Anne Lansdon	Sylmar, CA	
876.	Cari Sauter	Wausau, WI	
877.	Cherilyn Haber	South dennis, MA	Please animals need this so very much don't be cruel by taking it away from them
878.	Lindsey Valentine	San Marcos, CA	

	Name	From	Comments
879.	Marie-Laure Rosseel	Sint-Martens-Latem, be	
880.	Marine Bouketir	Lyon, fr	
881.	Jane Pyle	Burlingame, CA	I feel strongly that I should have the right to choose a physical therapist that is right for me and my pet. I don't need veterinarians interfering in this process.
882.	Lynelle White	Joshua Tree, CA	
883.	Libby Reed	Manlius, NY	
884.	Bev Schmidt	North East, MD	
885.	Zeynep Turk	Portland, ME	
886.	Cheryl Holt	Modesto, CA	Animals can live a much better quality of life with Physical Therapy
887.	Lisa Shwartz	Lihue, HI	This is important to me because it can be
888.	Kaci Slone	Dearborn heights, MI	Animals aren't just pets, they're family. They mean so much to so many people. They help people through the hard times without even knowing it. They're precious
889.	Wendy Sue Hawkins	San Diego, CA	
890.	Kara Aasterud	Lake Worth, FL	
891.	Shalila Lewis	Jerome, ID	
892.	Tasha Cookman	Grand forks, ND	
893.	Caitlyn Williams	Norman, OK	
894.	nathan moore	Chandler, AZ	This is America we get to choose things here, and in general humans should have the right to choose who they allow around them or their loved ones.
895.	Margarita Rincon	San Jose, CA	I am a mother to three fur babies
896.	Monica Vaz	Maidenhead, gb	
897.	Debbie Tymura	Guelph, ca	
898.	Jonie Nguyen	San Francisco, CA	
899.	Amanda Menard	New Iberia, LA	They get a chance to live their life as they would have if they wasn't hurt or born that way
900.	Cecilia Rodriguez	Stockton, CA	
901.	Carol Daneluk	Edmonton, ca	
902.	Arielle Libertore	North hollywood, CA	
903.	sandrine hamang	FOURMIES, fr	
904.	Sandy Adan-Lundgren	Modesto, CA	
905.	Stefania Mani	Carpenedolo, it	
906.	Cindy LEPAGE	CONCORD, NC	
907.	Sydney Clifton	Portage, MI	

	Name	From	Comments
908.	Wendy Coultry	Dayton, TN	Tired of the government over regulating everything.
909.	Cotton Wilson	St. Paul, MN	Freedom of choice
910.	Christine Schneiderman	Wilsonville, OR	
911.	Sequoia Pringle	New Hamburg, ca	Animals
912.	Pamela Montano	Bakersfield, CA	I love special needs animals
913.	Nichole Maloney	Ashland city, TN	
914.	vanessa grande	california, CA	because animals mean so much to me and they deserve happiness
915.	Murvin Curry	Anoka, MN	Because I love animals especially Freddy
916.	Laura Shuell	Fallon, NV	If i have the right to choose between the care of myself i feel i have that same right in the choices for my children both 2 legged and 4.
917.	Lynda Lovett	Alameda, CA	Freedom of choice.
918.	Patricia Garcia	Commerce, CO	
919.	Andrea Sonntag	Bremen, de	
920.	Cathrine Olsen	Bergen, no	
921.	Steve Caballero	Roseville, CA	We as humans have a duty to give our dogs the unconditional love they give us.
922.	Katie Montford	Philadelphia, PA	
923.	Eric Eric	Windsor Mill, MD	
924.	Katie Ryan	Everety, WA	
925.	Jennifer Walsh	Oxnard, CA	
926.	Richard Coreno	BEREA, OH	
927.	Emily Riekert	Brits, za	
928.	Leslie Conover	Dacula, GA	
929.	Michelle Wingerter	Laplace, LA	Because dogs need therapy just like humans in order to thrive.
930.	Danielle Kosak	Pearl River, NY	My and my family's animals deserve the best care possible.
931.	Diane Rapkiewicz	New Carlisle, OH	
932.	Victoria Craig	Leander, TX	PT can be critical to the rehabilitation of our pets and I wouldn't want this bill to limit the quality and availability of these services to deserving animals and owners
933.	Brenda Evans	Sapulpa, OK	
934.	Daniel Blizel	Fremont, CA	
935.	Rita Dominguez	San Jose, CA	It is very important to me that we take care of all animals
936.	Valarie Ochoa	Lompoc, CA	I have a special needs dog and he needs his physical therapy.
937.	Evelyn Rickert	Westernville, NY	

	Name	From	Comments
938.	Alissa Hakim	dearborn heights, MI	
939.	Shaley Davis	New Castle, IN	
940.	Lynn Gergen	Lido Beach, NY	
941.	Jennifer Guzman	Killeen, TX	
942.	Abby F	Granby, CT	
943.	Elizabeth Rogers	Jackson, MI	I have four(4) special needs dogs that were all about to be put down as they were considered unadoptable. One was tossed in a garbage can in a plastic meijer bag during 0° weather. He needs surgery and PT. The other three (3) have had surgery and it us crazy expensive to pay for their PT which they NEED!!! They are all viable great dogs even though they are disabled. They are loving sweet dogs who deserve a second chance at life! They deserve to be healthy!
944.	John Halsall	Middletown, NJ	
945.	Brianna Nanan	San Fernando, tt	Animals are an important source of joy and wellness to humans especially children
946.	vivian felan	culver city, CA	
947.	Elena Stanova	Ekaterinburg, ru	
948.	Trista Grissom	Murfreesboro, TN	
949.	Jess Abdou	Huntington Beach, CA	
950.	David Green	Liberty center, OH	Because it is
951.	Jesus Aguirre	Overland Park, KS	Love animals
952.	Melissa Larson	Saint Paul, MN	
953.	Lise Kirby	Solvang, CA	
954.	Carol Jones	Rosanky, TX	
955.	Velvet Holz	Acton, CA	This is life changing treatment for people and animals. Please keep it affordable so we can help the animals we love.
956.	Robert Garcia	El Monte, CA	
957.	Elizabeth Ambrosii	Montreal, ca	
958.	Nancy van den Honert	Waterford, PA	Please don't hurt the animals.
959.	Wendy Moore	Bakersfield, CA	You do things others cant do for animals. Love what you do for marlets mutts
960.	Emmalee Swales	Springfield, MA	I care about the lives and well being of all animals. Especially dogs. Let's make this possible for these sweet creatures. They deserve as much care as humans get.
961.	Marzia Elgani	Dolzago (LC), it	
962.	Lucia Butler	Las Vegas, NV	
963.	Victor Buri	Patchogue, NY	

	Name	From	Comments
964.	Corinna May	London, ca	I believe that physical therapy for animals should be easily accessed by all and relatively affordable. Physical therapy has helped many animals and increased their quality of life.
965.	Ruben Maesfranckx	Beervelde, be	
966.	Noah Seiter	Collierville, TN	I saw it in my Instagram feed and I love dogs so I was like screw it
967.	Lynn Nelson	Conway, AR	
968.	Dennis Donovan	Danbury, CT	
969.	Sim Alur	Naperville, IL	
970.	Hammy Prinsen	Almelo, nl	
971.	Lily Yangco	Summerville, SC	My dog has physical impairments.
972.	Janet England	Spring Hill, TN	
973.	lisa Hamberger	Goleta, CA	We are so connected to our animals who give us love and support.
974.	Tammy Crawford	Fairfax, VA	
975.	Emily Kropog	Lebanon, VA	
976.	Sherry Cushman	SAN ANTONIO, TX	
977.	Jose Santillan	Pembroke Pines, FL	
978.	Matthew Hemmatijou	Sacramento, CA	
979.	Helen Snell	Tallahassee, FL	
980.	Saddles Baggett	Aberdeen, SD	Right to free choice for our pets
981.	Jesse Taylor	Victorville, CA	
982.	Abigail Carpenter	Kannapolis, NC	Physical is so important to a lot of animals. It doesnt just help the animal but also the owner who cares about their little four legged family!
983.	Rebecca Reiland	Whitmore lake, MI	
984.	Jan van Est	Waddinxveen, nl	
985.	Rebecca Sack	Utica, NY	
986.	Brenda Ayala	Mansfield, TX	
987.	Andrea Huerta	Mexico, mx	Because I wanna help them they don't need to be minus just to be an animal
988.	kim smith	Hudson, OH	
989.	Kimberly W	Dallas, PA	
990.	Nancy Jennings	Silverton, OR	Nobody should be able to dictate who we want to treat our pets.
991.	Nayeli Galindo	Montevallo, AL	
992.	Jackson Forest	Owings, MD	
993.	Sarah Adams	Camarillo, CA	

	Name	From	Comments
994.	Shane Murphy	Willenhall, gb	
995.	Ann Mclaughlin	Lake Balboa, CA	
996.	Stacey Simmons	Alta Loma, CA	
997.	Haley Peters	Liverpool, NY	Animals deserve a chance to be rehabilitated. They should be treated with the same rights as humans.
998.	VITORIA Nascimento	Ceará, br	
999.	Pearl Woolley	Tremonton, UT	
1,000.	Grace Rojas	Giddings, TX	Animals deserve to be treated equally as well no matter their disability or condition:
1,001.	Fallon Weinman	Jamestown, NY	Every living thing has the right to a full happy healthy life and physical therapy is important for that to happen sometimes. Being able to choose our Dr.'s is an important part of getting better everyone should be able to choose.
1,002.	anna davidson	cleveland, NC	all animals are special
1,003.	Susie Magged	Cathedral City, CA	
1,004.	Kinsey Nguyen	Tustin, CA	
1,005.	Addison Loeser	Louisville, KY	
1,006.	Meadoh Sanchez	Lafayette, CO	This is important to me because animals may need physical therapy to be able to do simple tasks such as walking
1,007.	Amy Downs	Grand Junction, CO	
1,008.	Sharon Saldana	Austin, TX	
1,009.	JoAnne Klein	Bakersfield, CA	This is a ridiculous law supporting exclusivity and it is unreasonable. I personally know of animal physical therapists who are not only certified, but are far more effective than vets, and also know of vets recognizing their lack of both knowledge ant time, will actively hire an animal physical therapist to help the animal. AND THIS IS HOW IT SHOULD BE!!! (93312)
1,010.	Sue Perreault	St. Adolphe, ca	
1,011.	Pedro Magana	Provo, UT	Because dogs desrve to be helped
1,012.	Emily Doran	Somerville, MA	This is a career I would like to get into
1,013.	Susan Sander	Clearwater, FL	
1,014.	Alison Valentine	Columbia, SC	
1,015.	Ryenn Roy	Chula Vista, CA	
1,016.	Mary Hager	nicholasville, KY	
1,017.	Manuela Arioli	Milano, it	
1,018.	Peggy Sheldon	Curtis, WA	
1,019.	Alex Smith	Warrenton, VA	
1,020.	Nancy Bright	Van Nuys, CA	Helping animals is my 1st love.

Name	From	Comments
1,021. Mirley Felix	Las Vegas, NV	
1,022. Anny Garay	Rialto, CA	Because LOVE
1,023. Monica Sambrano	San Antonio, TX	
1,024. Madelyn Roel	Hacienda Heights, CA	
1,025. Olivia Bartram	Ironton, OH	Pets are everyday parts of our lives, they are like humans, we get physical therapy why shouldn't they??
1,026. Maya Almeida	Riverside, CA	
1,027. Gloria Schmirler	Sunrise, FL	Because I love animals and want them to have great care!
1,028. Ricky Loop	Oxnard, CA	
1,029. Tammy Davidson	Carrollton, TX	
1,030. Nicky Robbins	Haenertsburg, za	
1,031. Sherri hudson	MOUNT JACKSON, VA	
1,032. Mindy Yap	Rossford, OH	
1,033. Oscar Dutch	nope, AK	many will not be able to afford for their dogs. And its very important that they should get the treatment they need to walk as best as they can just like any dog. And I want to help Freddie!
1,034. Felicia Day	Salt Lake City, UT	Pets deserve therapy just as much as people. As far as I'm concerned I think pets are more worthy. Stop treating them as if they don't matter. They are important and deserve everything we can give them. My dog is my family and shall be treated as such.
1,035. Vicky Santos	Chino hills, CA	
1,036. Olivia Mann	San Carlos, CA	Because I went to therapy and I hated it with people maybe this is a better way to do it taht can actually help kids and I love animals[?][?]
1,037. Jembralyn Jones	Lexington, SC	Dogs are so precious to the human heart
1,038. Roo Matias	Helen, GA	[?][?]
1,039. Jessica Koscialkowski	Rocky Point, NY	Why would I want to limit the quality of care that my pet could receive? Let's stop acting like animals are less important than humans, and stop creating barriers for them to get the treatment they need and deserve to thrive in this world.
1,040. Sharon Tripp	Ball Ground, GA	
1,041. Mary O'Toole	Bakersfield, CA	
1,042. Sadie Garcia	Colusa, CA	
1,043. Priscilla Snyder	Lafayette, CA	
1,044. Arletta Lent	Portland, OR	The fact that highly qualified professionals are being persecuted for the simple Love of animals is horrendous.
1,045. Stephanie Pullen	Columbia, TN	

Name	From	Comments
1,046. Jessica Smith	Silverthorne, CO	
1,047. Jessica Manley	Las Vegas, NV	
1,048. Kelsey Starr	Terre Haute, IN	
1,049. Kaileigh Powell	Tucson, AZ	
1,050. Elizabeth Glynn	Anchorage, AK	
1,051. peighton Allred	arlington, TX	i love animals that's why
1,052. Betty Adkins	Richmond, VA	
1,053. Debbie Hannon	amherst, NY	
1,054. Danny Turner	Owatonna, MN	Save the dogs
1,055. Rene Dasher	Appleton city, MO	We wouldn't put a human down for disabilities we shouldn't put animals down with disabilities!!
1,056. Nicaivan Charles Bayaras	Long beach, CA	I have dogs too and i that if they needed pT it would be affordable
1,057. Peggy Mason	Lompoc, CA	Special needs dogs need a place to go for therapy that is closer to their homes.
1,058. Eileen Holinski	Mahopac, NY	I want dogs to be able to get the help they need.
1,059. Malinda Livings	Rancho Cucamonga, CA	
1,060. Cora Cleveland	Baldwinville, MA	
1,061. Jackie Gruendyke	Solvang, CA	
1,062. Cayden Parker	Spring, TX	I can't resist puppers
1,063. Kelsey long	arroyo grande, CA	Physical therapy for disabled dogs is vital to there health, recovery and over all well being
1,064. Haley Garroni	Winnipeg, ca	🐶🐶 I love pups 🐶🐶
1,065. Brittany Romero	Winnekta, CA	
1,066. Sena Sumpter	Blue Springs, MO	
1,067. Amy Filiano	Langhorne, PA	
1,068. Judi Balisciano	Camarillo, CA	
1,069. Kalyani Roldán	Santa Barbara, CA	
1,070. Julie Robinson	Walla Walla, WA	
1,071. Karol Vargas	Grandy, NC	
1,072. Kirby Slager	sherman oaks, CA	
1,073. Sasha Strohl	Auburn Hills, MI	
1,074. Amber Lorance	Jeffersonville, IN	
1,075. Dakota Harriman	Carthage, NC	
1,076. Debbie Bradshaw	Falcon Lake, ca	
1,077. Jess MacPherson	Knox, PA	
1,078. Catherine Howell	Lawton, OK	

Name	From	Comments
1,079. Camryn Bliss	Hudson, MA	
1,080. Mary Anderson	Fallon, NV	
1,081. Katey Morgan	Whitewater, WI	
1,082. Destini Pearson	Alameda, CA	
1,083. Diana Del Valle	Tampa, FL	
1,084. Jeremy Battista	Fruitland, MD	I love Angela Adan and I support everything she does. Also animals deserve all the help they can get!
1,085. Sandy Gruber	Crossville, TN	Because I currently have a small breed dog in therapy following surgery to repair a torn ACL
1,086. Becky Hernandez	Riverside, CA	
1,087. Chelsea B	Marlborough, CT	
1,088. Denedan Owen	Kenaston, ca	
1,089. Mayra Barragan	Sonoma, CA	AnimalS are the best therapists in the world. My baby has saved me from my deep depression that I was in and getting over.
1,090. Rocio Flores	Hemet, CA	
1,091. Jennifer Romriell	Poteau, OK	
1,092. Melodee Bippus	Carmel, IN	For my love for animals
1,093. Margit Urich	Wachenheim, de	
1,094. Mickey Babcock	Wilson, WY	
1,095. Kathy Rojas	Caracas, ve	To make life better, if animals are fine people Is fine. You have to have empathy towards another living being
1,096. Caitlyn Simmons	Caseyville, IL	
1,097. Jimmy Graham	Molino, FL	
1,098. Michelle Morris	West Point, UT	
1,099. Laurie Felker	Escondido, CA	
1,100. Michelle De la Cruz	Fontana, CA	
1,101. Justinian Rivas	Austin, TX	I Have dogs And i love them
1,102. Susan Parker	Shelby, NC	
1,103. Johanna Gutierrez	Hallandale, FL	
1,104. Sophia Rappe	Santa Monica, CA	
1,105. Erika Yrigoyen	La Grange, CA	
1,106. Susan Hale	South Haven, MI	
1,107. Jenny Gonzalez	Panorama city, CA	
1,108. Wendy Zindars	Champaign, IL	
1,109. Suzanne Price	Arlington, VA	People shouldn't have to sacrifice care for their pets because of lack of affordability!
1,110. ANN SMITH	Montecito, CA	

Name	From	Comments
1,133. Scarlett Berger	Northeim, de	
1,134. Cheryl Tichon	La canada, CA	
1,135. Flora Correa	Los Angeles, CA	
1,136. Michael Garcia	Wealaco, TX	I love dogs they warm my hearts especially mentally challenged dogs
1,137. Carita Karlsson	Lahti, fi	
1,138. Sara Williams	Missoula, MT	
1,139. Cristina Iordache	Los Angeles, CA	
1,140. Eddie Caballero	San Diego, CA	
1,141. Cillian Cray	Burlingame, CA	
1,142. Elisabeth Jochum	Lech, at	
1,143. Helen Olsen	moreno valley, CA	
1,144. Beth Carlson	Santa Barbara, CA	
1,145. Vicki Allen	Santa Barbara, CA	My elderly dog was treated by a skilled and compassionate physical therapist and it helped give her a better quality of life for her last year.
1,146. Faith Irwin	Clearfield, PA	
1,147. SARAH SILVA	SAN JACINTO, CA	
1,148. Ani C	Panorama City, CA	
1,149. Donna Pruitt	Braselton, GA	
1,150. Nethan Smith	Aurora, CO	Animals are the most innocent creatures of all. They deserve to be protected.
1,151. sharon bental	los angeles, CA	We cannot afford to limit animal physical therapy in this way - animals need care at reasonable cost and quality that is available from independent physical therapy. This should not be monetized by any Association, or limited to a veterinary office.
1,152. Melanie Anderson	Leiden, nl	
1,153. Barbara Marshall	Northwood, gb	
1,154. Amy Gloeckner	Westerville, OH	There are thousands of people who do only this. They will be out of a job. Veterinarians will not have the time to do more. And I don't believe their hearts would be in it. Don't get me wrong. Love all Vets...they have so much on their plates already.
1,155. Angelika Schui-Lindthaler	Höxter, de	
1,156. Fleur Roux	Paris, fr	
1,157. Мария Виталье Дежнева	P	
1,158. Katie Robbins	Nipomo, CA	

Name	From	Comments
1,159. Dora Luz Reyes	Sugar Land, TX	Our animal depend on us and deserve to have a good life. Give him the opportunity for a life he deserves, please.
1,160. kazuyo daikoku	itami, jp	
1,161. Pamela Harrington-Alwell	Ida Grove, IA	
1,162. tommy newell	greenbrier, TN	
1,163. Karen Distefano	Manahawkin, NJ	
1,164. Ella Duarte	San Carlos, CA	
1,165. Karmen Katz	ASTORIA, NY	
1,166. Leslie Brackman	Santa Barbara, CA	
1,167. Michele Kunde	San Diego, CA	
1,168. Kristina Cetrulo	Santa barbara, CA	
1,169. Brianna Adamski	Perrysburg, OH	All animal owners and lovers should be able to choose the care they think their animal deserves.
1,170. Mariana Weller	SEATTLE, WA	
1,171. Patricia Escalera	Santa Barbara, CA	I want to be able to continue with physical therapy for my pup at my choice of a Rehabilitation Center.
1,172. M. DiMichele	Oceanside, CA	FREEDOM OF CHOICE
1,173. Lory Garrett	PORT ANGELES, WA	
1,174. Yvette Busby	Woodland hills, CA	
1,175. Kim Bergin	Cardiff, gb	This is an important issue to everyone!
1,176. Kaitlin Bogart	Saint james, NY	
1,177. Sarah-Sue Wadell	Santa Barbara, CA	
1,178. Luigi Francis Shorty Rossi	San Ysidro, CA	
1,179. Lyndsey Taylor	Bognor Regis, gb	Let these people continue with their amazing work.
1,180. Shari Zygadlo	Zephyr Cove, NV	Physical Therapy saved my dog
1,181. viola chung	santa clara, CA	
1,182. Ian Hajiro	Pearl city, HI	
1,183. Carrie Williams	South Lake Tahoe, CA	I live one mile from a Stateline and should have all services in my community available to us, even if we crossed a Stateline to get there.
1,184. Mary McGone	Indian Harbour Beach, FL	Dogs need to be cared for in many different ways . Canine therapy can help injured dogs , age related illnesses like arthritis and after surgery or illness . PTs and PTA's are trading in my kinda of Rehabilitation. The animals deserve the same care and treatment . How do you want your dog to be treated ?
1,185. Beth Ogasian	SOUTH LAKE TAHOE, CA	

Name	From	Comments
1,186. Amber Verner	Deltona, FL	I am a DPT that will be pursuing a career in canine rehabilitation and believe we can be experts in this area with our extensive knowledge of musculoskeletal dysfunctions.
1,187. Sommer Hall	Jacksonville, FL	I am a PT in FL certified in canine rehab, but not actively practicing at this time. PTs are Rehab experts and need to be valued more in this field. We have so much knowledge that we bring to the table.
1,188. Sofia Bardalez	Orlando, FL	
1,189. Mari Bukofsky	Laguna Beach, CA	
1,190. Tabitha Navarro	McAllen TX, TX	
1,191. Carrie Turner	Stateline, NV	PTs are the experts here and should be three ones directing therapy in partnership with vets. The human model makes the most sense.
1,192. Debbie Johnson	Matewan, WV	
1,193. Annela Erceg	South Lake Tahoe, CA	
1,194. Sandra Holland	Lakeside, AZ	
1,195. Jessica Gadayan	Berkeley, CA	
1,196. Seamus Decker	NEW YORK, NY	
1,197. Deb Gardo	Catasauqua, PA	
1,198. Diane Urata	Garden Grove, CA	
1,199. May Kesler	Chevy chase, MD	Animals need pt and Pts are equipped to treat them
1,200. Deborah Russell	Thousand oks, CA	I am a PT.
1,201. Maryanne Murray	Tehachapi, CA	
1,202. Danielle Tilley	Seal Beach, CA	My friend is a PT in California and she would love to be an animal PT but there aren't any schools here.
1,203. Erin Shaffer	Santa Barbara, CA	I love my dog and would want all the options if she were injured. This country is about choice!
1,204. Carlo Baes	Rizal, ph	
1,205. Linh Nguyen	Garden grove, CA	
1,206. Kim LaMonica	Camarillo, CA	Animal owners should be entitled to a choice of rehabilitation expert's. Most veterinarians are way too overworked to also be able to supply proper physical therapy. Taking guidance from the human model of separate physical therapists is the best way to go!
1,207. Casey Wetherbee	Parker, CO	
1,208. Renee Fini	San Jose, CA	I am a PT and an animal lover.
1,209. Ruth Lopez	San Jose, CA	
1,210. Karen Lamberton	Sunland, CA	All animals therapy needs to be that of the pet owner. As a human, my primary doctor doesn't have a say if I want to get acupuncture or see a chiropractor. Same should apply to pets.

Name	From	Comments
1,211. Tani Perinoni	Morgan Hill, CA	An animal physical therapist improved my dogs disability beyond what our Vet could provide. We should have the ability to have direct access.
1,212. Svetlana Timoshenkov	Plymouth, gb	
1,213. Rhonda Johnson	Santa Barbara, CA	Just like with humans, physical therapy helps recover from injuries. Why can't mans best friend receive the same care?
1,214. CAROLYN HAMMACK	Ocala, FL	
1,215. Ward Bukofsky	Laguna Beach, CA	
1,216. Sandy Giordano	ATCo, NJ	
1,217. Tammy Bayes	Sloan, NY	Pet parents have the right to CHOOSE who they want to treat their pet.
1,218. Madison Burke	Altadena, CA	
1,219. Philip Kushner	Westmont, IL	
1,220. Sylvia King	Lompoc, CA	
1,221. Amber Chavez	Houston, TX	
1,222. Erin Tierney	Monroe, OH	
1,223. Terry Keene	baltimore, MD	
1,224. Vanessa Douglass	Collingswood, NJ	
1,225. Cecilia Colon	Eastampton, NJ	
1,226. Kelly Smock	Henderson, NV	
1,227. Brandon Rosi	Indio, CA	
1,228. Sheylinn Gano	Scappoose, OR	
1,229. Katie Leventhal	Albany, OR	Because qualified animal therapists shouldn't have to work under veterinarians that may not have any specialized training in certain therapies or rehab techniques. Also, the animal owners should be able to choose where to take their pets for treatment.
1,230. Cadence Elizabeth	Lansing, NC	
1,231. Sallie Miller	Booneville, KY	
1,232. Rhonda Hunt	Picayune, MS	
1,233. Jackie chau	Medford, MA	I believe that animals should also given the chance to try alternative treatments for their conditions and given the chance to see other care providers outside of the regular referral group.
1,234. Sarah Colombo	salvador, br	The little ones are much better than us, they deserve the greatest treatment of the world, we owe this to then.
1,235. Chrystal sims	Pipe Creek, TX	I'm an animal lover. We have two cat colonies living on our 5 acres. We have pup's who are part of the group. We are disabled and live meagerly, but scrape for our animals.

Name	From	Comments
1,236. syd greer	lom poc, CA	
1,237. Kim Thompson	Westport, CT	I love animals totally. When my father was dying the our dog got heart problems just like him and he died shortly after him. It makes you realize how much dogs really are just as important as we are and don't all lives matter?
1,238. Angelique Prevost	Valencia, CA	
1,239. Sara Abello	Barranquilla, co	Because all dogs everywhere in the world deserve a chance to get healthy, to be provided and taken care of, to be loved and ensure their health with the proper provider chosen by their owners and family, the people who really love them and keep vigil of their best interest and well being.
1,240. Charles Andrews	Toronto, pl	
1,241. Lilia Franco	Saint Cloud, FL	Every single animals always looks to us for help , so we do everything possible to help our little fur friends .
1,242. Amanda Whalen	San diego, CA	Animals deserve proper treatment too!
1,243. Leelah Speer	San Antonio, TX	
1,244. Jim Shoopack	East Stroudsburg, PA	
1,245. Al Hall	Baton rouge, LA	I'm an animal lover!!!
1,246. Eve OBrien	Cuyahoga Falls, OH	We should all help animals be better versions of themselves whenever possible ... if one person could save 1 more animal.. what could 100 or 1000 people do?! [?][?][?]
1,247. Jared Morrison	Longview, WA	I am a K9 handler and see the value in having consumer driven choices, rather than being limited by politicians
1,248. Beate Bernedine Konstanta	Riga, lv	Dogs deaerve it
1,249. Tereza Filoušová	Trmice, cz	
1,250. Marion Vose	VENTURA, CA	
1,251. Cija MI	Copenhagen, dk	
1,252. Erin Winslow	San Diego, CA	
1,253. Denise Smith	St. Helens, OR	
1,254. Amber Carini	Portland, OR	
1,255. Rita Garvey	Edinburgh, IN	
1,256. Emily Cohen	Woodbridge, NJ	
1,257. jordan lee	sevierville, TN	
1,258. Diannis Puello Moreno	Houston, TX	I love dogs all shapes and sizes no matter how they look and would love to help them more.
1,259. Stacy M Shields Stacy M Shields	Cape Coral, FL	
1,260. Kennedy Sims	Stone Mountain, GA	This will help others in need be happy and healthy with their trained animals.
1,261. Banafshé Alavi	Germantown, MD	

Name	From	Comments
1,262. Deanna Britton	Sault Ste Marie, ca	
1,263. Sara Reese	Gresham, OR	
1,264. Tamara Ilharreguy	Whittier, CA	
1,265. Alyssa Kaopio-Lopez	Fayetteville, NC	
1,266. Nancy Rafalaf	San Leandro, CA	94579
1,267. Char Marney	Tecumseh, KS	We should all take good care our little friends and companions
1,268. Mary lynn Hobby	Cos cob, CT	I suffer from fibromyalgia.They have the same illnesses as we do.They get Cancer arthritis.etc why should they suffer if they don't have to.
1,269. Patricia Phay	Valley center, CA	
1,270. Natalie Garcia	Lawrence, MA	
1,271. Amber McNeill	Sale, gb	
1,272. Debra Wallace	Midland, TX	I love animals and they need all the help that they can get. Thank you.
1,273. Cherie Books	Elkhart, IN	
1,274. Heidi Marti	La verne, CA	
1,275. Lynette Lopez	San Lorenzo, pr	
1,276. Marion Taber	Ventura, CA	IT TAKES AWAY MY RIGHTS TO CHOOSE.
1,277. Kristen Reel	East Haven, CT	
1,278. Shontal Parker	Balmoral, au	Because, animals deserve all the love and attention. We as humans, do not understand or fully comprehend the importance of animals and the happiness they bring. We are not deserving, BUT THIS ANIMAL IS. What a sweet sweet little girl xx
1,279. Rebecca Cheek	Moorpark, CA	
1,280. Cathy White	Everett, WA	
1,281. Paula Garcia	Chía, co	
1,282. L CUMMINGS	PHOENIX, AZ	
1,283. Rachel Van Allen	West Bend, WI	I want to help in any way shape or form
1,284. Sophie Whiting	Wirral, gb	
1,285. Sheila Lee	Atlanta, GA	Animals are unconditional love and anything to ease their lives
1,286. Derya Tombakoglu	Arlington, VA	Dogs who have special needs deserve to have all the options available for them. Even if it doesn't help with every situation, it helps improved the quality of life.
1,287. Tia Saine	Detroit, MI	Im an animal lover!
1,288. Rory Muldoon	Boca raton, FL	
1,289. Morgan Krystle	Portland, OR	

Name	From	Comments
1,290. Debbie Blietz	Lewiston, ID	
1,291. Gabriela Andrada Marinuzzi	CABA, ar	
1,292. Guadalupe Romero	Los Angeles, CA	All animals deserve the same love & care.
1,293. Kimberly Wade-Wear	Booragoon, au	Dogs are apart of family and should be given equal health availabilities
1,294. cindy please	fresno, CA	
1,295. Rachel Martin	Denver, CO	
1,296. Angelina Velasquez	Hawthorne, CA	Because dogs are humans, and all deserve to get healthy and healed and adopted
1,297. Kamila Akhmetova	Tuymazy, ru	
1,298. Jessica Keath	Los Angeles, CA	
1,299. Yara Dasha	Köln, de	
1,300. Ava Bearie	Yucaipa, CA	I struggle with anxiety and animals can help physical too
1,301. Naomi Preciado	Darien, IL	
1,302. Carrie Gleason	Sedalia, CO	
1,303. Alex Trevino	San Antonio, TX	Dogs need rights just as humans
1,304. Suzie Pasman	San Francisco, CA	More govt regulation!? For pet care too now!? Let us see independent PTs to take necessary good care of our pets!!
1,305. Logan Adams	Winter park, FL	AWWWW this is the sweetest this
1,306. Jenny Wong	Pasadena, CA	Needs to be accessible and affordable for everyone.
1,307. Sherry Chabolla	Corona, CA	I want the best care for my pets.
1,308. Oliwia Otulak	King's Lynn, gb	
1,309. Alba Rodriguez	Salem, OR	I love animals!
1,310. Sarah Certeza	Joppa, MD	Vets dont always know whats best for your dog and some are more in it for the money.
1,311. Deanna Mitchell	Woodstock, GA	
1,312. Luis Lopez	Sylmar, CA	
1,313. Jennifer Wahl	Mobile, AL	If people are trained in the area of rehabilitation they should be allowed to do there job without having to be "babysat" from a vet. Veterinarians already have so much to do while only working on what they were trained to do. You would be putting more stress on them and the number of rehabilitation centers that are available for animals will decess significantly. A lot of PT workers will end up being out of jobs. There are only so many vet offices and only so many people can fit, which will mostly likely be vets, vet tech, kennel assistants. The people you would normally find in a veterinarian office. So there woiod be no room. Also, this is very degrading to the men and women who have trained for <i>(continues on next page)</i>

Name	From	Comments
1,313. Jennifer Wahl	Mobile, AL	<i>(continued from previous page)</i> this area only to be treating like they dont know what they are doing. Overall, this is not a good idea.
1,314. Jackson Harr	Searcy, AR	
1,315. Mallory De Lauro	Castro Valley, CA	Keeping care accessible and affordable is a necessity. I've seen how poorly a veterinary office can be run. Making providers function under their supervision does not ensure proper care for animals.
1,316. Lori Clapcich	Swedesboro, NJ	
1,317. Susan Fotd	Beverly Hills, CA	Dogs should have this service
1,318. Tree Gallagher	MERRITT ISLAND, FL	
1,319. Wiremu Foster	Melbourne, au	
1,320. Steven Becker	Petaluma, CA	
1,321. Kennedy Sell	Albany, OR	
1,322. Mary Patocchi	Tiburon, CA	
1,323. Mitchell Wishart	Monterey, CA	California over reaches with arrogant, ignorant laws. Keep the government out of our pets care.
1,324. Maria Lo Tempio	Signal Hill, CA	Children - People open up to animals. Animals comfort us.
1,325. Sharon Elmensdorp	Simi Valley, CA	
1,326. Crystal Josephson	Goleta, CA	Dogs help us! We should do everything to help them!
1,327. Colleen Grimm	Loveland, OH	Dogs (and animals in general) are way better than humans could ever deserve. The least we can do, for all of their love and loyalty, is to take care of them and provide for their needs
1,328. Samantha Negrini	Starrkirch-Wil, ch	
1,329. Francine Perez	Monterey Park, CA	
1,330. Damein Conklin	Visalia, CA	I beleive therapy dogs are helpful for some people in our world
1,331. Sandi Moravec	Fontana, CA	
1,332. Will Gordon	Morristown, TN	Animals deserve the same treatment as humans
1,333. Angel Amaya	Watsonville, CA	
1,334. Carol Duffy	March, gb	
1,335. Emma Reynolds	Boston, gb	Every dog deserves treatment, to be loved and to feel cared for.
1,336. Nayara Mendonça Alao	Araguari, br	
1,337. Sylvie Bertrand	Thetford Mines, ca	
1,338. nick robley	manchester, gb	

Name	From	Comments
1,339. Camilla Bailey	Ocala, FL	All living things deserve a chance at a healthy and happy life!
1,340. Kaylan Harris	Tyler, TX	Because every dog deserves a chance and should never be given up on!
1,341. Connie Taliaferro	San Diego, CA	
1,342. Rosa Calderon	Gardena, CA	
1,343. Christy Gidney	Plano, TX	Dogs need help also. They are abused everyday and need all the help they can get.
1,344. John Demboski	Santa Barbara, CA	Consumers should have as much freedom as possible to care for their loved pets. Free market forces alone with existing regulatory oversight is more than sufficient to ensure the competent and professional care of their furry patients.
1,345. Adrienne Demboski	Santa Barbara, CA	
1,346. Paula DiSipio	Manahawkin, NJ	I believe regulation for animal care gives them better opportunities.
1,347. Julia Thomas	Portola Valley, CA	
1,348. Michelle Rudnick	Encino, CA	
1,349. Samantha Morris	Staten Island, NY	Animals deserve a second chance at life if they didn't get it the first time around
1,350. Kendall Cherry	Charlotte, NC	
1,351. Carlene NANCE	Glen Burnie, MD	
1,352. Shelcee Graves	Raytown, MO	
1,353. Nicole Clark	Kodiak, AK	Because all dogs deserve a chance. [?][?]
1,354. Iana Ishchuk	FOSTER CITY, CA	
1,355. Vanessa W	Santa Monica, CA	
1,356. Julie Stanton	Bay of Plenty, nz	
1,357. Sarah P	Queens, NY	Animals bring peace and happiness
1,358. Elise Pizarro	Alexandria, VA	As an owner of rescue dogs who have required physical therapy, I understand how important this is to their well being and quality of life.
1,359. Karla Vorel	Caddo Mills, TX	
1,360. Carmen Reyes	Kenner, LA	
1,361. Liz Shumbo	Clinton, CT	
1,362. Emilee Fowler	Hutchinson, KS	
1,363. Fiona Tomyon	Saskatoon, ca	
1,364. Fabiola Hernandez	Fairview, OR	
1,365. Andrea Willett	San Diego, CA	

Name	From	Comments
1,366. Madison Vanness	Muncie, IN	Because I love animals a lot and have adopted or found many hurt animals and helped them
1,367. Caroline Swartz	Seaford, VA	Every animal deserves a good life
1,368. D'Ann Seddinger	Myrtle Beach, SC	
1,369. Valeria Kudriashova	Saint-petersburg, ru	
1,370. Kristen Stevenson	Coalinga, CA	Every living thing deserves a fighting chance and my heart is full of love and want to help as much as I can to make it possible.
1,371. Sierra Mullins	Adrian, MI	
1,372. P Pucher	Janesville, WI	
1,373. micah guzman	san angelo, TX	
1,374. Maurice Jones	Boston, MA	I love all kinds of fur babies and they need a fighting chance just like the rest of us. They deserve so much more than what has been handed to them. A forever supporter [?][?][?]
1,375. Chrysa Jonas	Crestwood, IL	
1,376. Patricia Teachey	Sandusky, OH	
1,377. Margaret Garcia	Deer park, NY	
1,378. Zachary Heefner	Oak Harbor, WA	
1,379. Meghan Goolsby	Seattle, WA	
1,380. Kara ORTIZ	Norwalk, CT	
1,381. Alison Pratt	Warwick, RI	
1,382. Janina Campos	Lima, pe	
1,383. Christine Hoy	San Marcos, CA	
1,384. Rosaisela Rios	Fort worth, TX	Dogs are happiness
1,385. Iva Bunjevac	Belgrade, rs	
1,386. skylar Rollings	rock hill, SC	i know that if this was my dog i would do everything possible to help her so i can a least do this
1,387. Carol Rodriguez	Hemet, CA	
1,388. Isobel Scarlett	Lincoln, gb	Dogs are living beings
1,389. Cameron Dresselhaus	Lake Havasu City, AZ	
1,390. Laura Luciano	Hampton bays, NY	
1,391. Bethany Koehler	Vineyard, UT	
1,392. Sarah Filiaggi	Papillion, NE	
1,393. Josie Michalk	Mound, MN	
1,394. Sandy Korkki	Plymouth, MN	
1,395. Estrellita Rodríguez Félix	Guanica, pr	Because all of the dogs deserve a better life and all the love

Name	From	Comments
1,396. Ceara Gray-Shannon	Ardglass, gb	
1,397. Helida Cruz	Lakeside, CA	Because dogs are people too and they should get therapy if they need it like us!
1,398. Chera Coursey	Yukon, OK	
1,399. Ally Parker	Petersfield, gb	
1,400. Jack Loughland	Bournemouth, gb	
1,401. Jessica Zaruba	Palm city, FL	
1,402. Sami Imamovic	Sarajevo, ba	I saw Freddie on a video and iy made me cry and when I heard her story it broke my heart and i would love to see her fine and good again
1,403. Pilar Garrido	Roda de Bara, es	Because I love animals and because I am also US citizen and California resident
1,404. Julianne Watson Galla	San Jose, CA	It's the right thing to do.
1,405. Christine Sylvester	Boston, gb	
1,406. lida Sturgeon	Alcester, gb	
1,407. Jayden Neff	Phoenix, AZ	Cause dogs are cool and some dogs need help with stuff.
1,408. Megan Wolf	Jacksonville, FL	I love all animals!
1,409. Chuck Densmore	Clarkston, MI	
1,410. Daurice Verga	TEHACHAPI, CA	
1,411. Karla Pool	Westmisnter, MD	
1,412. Lyn Kyle	Carpinteria, CA	Because I love Karen Atlas!
1,413. Larna O'Connor	Wangaratta, au	
1,414. Krystin Misci	Revere, MA	
1,415. Amy Hall	San Francisco, CA	
1,416. Michelle Bergstedt	New Orleans, LA	I am a member of schnauzer rescue New Orleans and we get many senior and injured dogs that require PT especially water treadmill and the results are astonishing. This vital therapy transforms and gives dogs new life through mobility, who otherwise would have pain and discomfort and little quality of life.
1,417. Amanda Painter	Denver, CO	Vets don't often refer because they dont know what is best. I kept my dog from surgery by doing PT. When I asked the vert if PT would help, she said no. She was wrong!
1,418. Kevin DeGroot	Denver, CO	turf wars get in the way of people and their pets having a choice in regards to the care that they need and deserve!
1,419. Glenn Urata	Garden Grove, CA	
1,420. Fallon Heddings	Media, PA	
1,421. Kelli Josephsen	South orange, NJ	

Name	From	Comments
1,422. DAWN CHIMENTO	whitesontee, NY	animals deserve to have help, they need our help to speak out for them. They need PT
1,423. Kristine Sweezy	Alexandria, VA	Vets don't get rehab training like PTs do!
1,424. katie hohman	Orlando, FL	
1,425. Molly Pleasants	Washington, NC	
1,426. Esther Adler	hasbrouck Heights, NJ	I believe physical therapists are the most appropriate clinicians to be treating animals who are in need of rehab.
1,427. Jessica Pierce	Kimberton, PA	I am a canine PT.
1,428. Leticia Jacquet	West Hartford, CT	When we limit the things that can prevent the longevity of all mammals, we limit our future existence on this plant.
1,429. Sarah Mackeigan	Mineville, ca	Physical therapists are trained in movement and how it helps promote healing. In the human field, doctors are the medical experts and physiotherapists are the mobility experts and they work collaboratively in the best interest of the patient. A similar model in the animal world is needed so that everyone can be experts in their own area and work together with the pet parent, for the betterment of the animal involved.
1,430. Meghan Wieser	Catonsville, MD	
1,431. Jennifer Stoner	Columbus, OH	Physical therapists are more educated and trained to rehabilitate the musculoskeletal system, whether it be human or animal. Vets are medical doctors, not rehabilitation specialists.
1,432. Manu Chacko	Elmont, NY	
1,433. Lesa Dilorio	Buckeye, AZ	
1,434. Sarah Jamieson	South Bend, IN	
1,435. Jazmin Krumrie	Chicago, IL	
1,436. Juan Martin	Lawrenceville, GA	
1,437. Katie Budz	Orland park, IL	
1,438. William Mills	Lafayette, LA	Because physical therapy needs are important across all species.
1,439. Erin Guinan	Flagstaff, AZ	Canine therapy is an amazing tool to improve health and happiness of the dogs who give so much unconditional love and support to their humans
1,440. Erik Vranesh	Moravian Falls, NC	Because animal rehab should not be monopolized by certain providers, but allow for significant contributions among the medical field in the market place for advancing care for those animals.
1,441. Carlie Turman	Charlotte, NC	Physical therapists are extremely valuable and important in this matter.
1,442. Brenton Stewart	San Jose, CA	
1,443. Jessica Imholz	Palm beach gardens, FL	

Name	From	Comments
1,444. Kristen Schulz	Grand Forks, ND	
1,445. Harold Pan	Brea, CA	Physical therapy is so important and empowering. Everyone who needs it deserves it. To limit it would be a tragedy and travesty.
1,446. Jenna Kantor	Rego Park, NY	
1,447. Nyasha Abrams	Alhambra, CA	
1,448. Terrie Jorgenson	Coon rapids mn, MN	
1,449. Patricia Young	Northfield, MA	Animals will highly benefit from skilled physical therapist to address movement patterns, strengthening and pain. PTs are exercise experts who can improve an animals quality of life.
1,450. Shannon Parks	Clearwater, FL	
1,451. Paula Accomando	Durham, CT	Physical therapists are trained professionals who have the expertise and the right to work with and alongside veterinarians for the benefit of their clients and their animals. The expertise of the PT should be recognized as such. It is not a competition but a collaboration.
1,452. Ana Colina	Stuart, FL	I love pets, they enhance our lives and health in so many ways; the least that we can do it is to take care of their lives and health and YES they also need Physical Therapists to help them to be well and helped with any musculoskeletal difficulties that Veterinarian can diagnose but not treat effectively.
1,453. Amy Wieser	Hamilton, NJ	
1,454. Kyler Emery	BAKERSFIELD, CA	
1,455. Maisie Craig	Yeppoon, au	
1,456. Patrick O'Brien	Visalia, CA	
1,457. Judith Lévesque	St-Basile-Le-Grand, ca	
1,458. Rachel Brechbuhl	Avondale Estates, GA	
1,459. Silpa Pallapothu	Jacksonville, IL	
1,460. Cindy Berner	LaMirada, CA	Our airedale is in need of physical therapy.
1,461. Roza Rozina Batinou	Athens, gr	
1,462. Hypatia Moncada Zeneno	Lima - Peru, pe	
1,463. Rebeca Dawson	Rancho Cucamonga, CA	
1,464. Dmitry Ershov	Moscow, ru	
1,465. Dmitry Evgrafov	Moscow, ru	
1,466. Jennifer B	Berkeley, CA	
1,467. Alyssa Montejo	Tustin, CA	

Name	From	Comments
1,468. Megan Rheeder	Peoria, AZ	
1,469. Linda Hisa	Huntington Beach, CA	
1,470. Francesca Cirri	London, gb	
1,471. Sue Maddox	Apple Valley, CA	I have Performance dogs requiring physical therapy and am aware of the need to have more qualified PT's available.
1,473. Shelah Barr	San Francisco, CA	I believe that I and other consumers have the right to access the most qualified practitioner for the treatment required. I also believe that just because a DVM is allowed to practice a modality does in no way mean they should, especially if they have no training in that field. That alone should raise ethical alarms all over the state and for everyone who cares for animals.
1,474. Kristin Massey	Newport, TN	I want to be able to choose a Physical Therapist for Canine Rehab if I believe they are the best option for my dog. I also want to be able to be a provider as a Doctor in Physical Therapy and future Canine Rehab Practitioner
1,475. Lisa Bedenbaugh	Monroe, GA	Physical Therapists certified in canine rehabilitation are well educated and trained to provide safe and effective treatment for the canine client.
1,476. Kelly Straub	Las Vegas, NV	Because people have a right to a choice in the provider of rehab for their pets.
1,477. Rebecca Dao	Bend, OR	Physical therapists are experts in rehabilitation and spent 7 years in school to achieve this. Taking an intensive certification course (CCRT/CVRP) in order to transfer this expertise to canines is something that should allow PTs to continue to have autonomy in providing canine rehabilitation.
1,478. Tara Pandiscia	Ssnfird, NC	I am a licensed PT in CA and I support direct access for all patients, human and animal.
1,479. Taylor Rose	Palm bay, FL	Every animal deserves to be relieved of pain or discomfort just like humans. They do not have a voice so I am being a voice for them. Physical therapists go to school to specialize in rehabilitation and after getting an extra certification to help animals, they also deserve to practice what they are trained and certified to do anywhere they please not only at a veterinarian office.
1,480. Ronald Moe	Pleasanton, CA	i AM A PET OWNER i AN WANT A CHOICE FOR MY ANIMALS JUST AS i WOULD WANT IT FOR ME.
1,481. Eldridge guzman	AmericAn canyon, CA	
1,482. Tiffany Bedolla	Sacramento, CA	
1,483. Sophia Fuller	Spotsylvania, VA	
1,484. Bridget Gioiello	Santa Barbara, CA	Pets and their owners deserve access to the best help they can get. Less restriction on treatment providers would increase quality of care and quality of pet life.
1,485. Alisha Polido	Woodland, CA	

Name	From	Comments
1,486. Alexis Eslava	San diego, CA	
1,487. Deanna Gallo	Whittier, CA	
1,488. Andrew Groome	Baton Rouge, LA	I am a CRRT and feel that as PT and Vets we should be a collaboration not a monopoly.
1,489. Taylor Meyer	Springfield, MO	
1,490. Kelly Inabnett	Dixon, CA	
1,491. Carolyn Ferez	San Francisco, CA	
1,492. Aaron Snyder	San Francisco, CA	I believe that PTs should be able to provide rehab services to animals as well as humans. We are the moment experts based on biomechanics which can be applied to humans or animals alike.
1,493. Cristina Aguilar	Port Hueneme, CA	
1,494. Robin Edwards	San Leandro, CA	As a physical therapist and a dog owner, this profession deserves the autonomy other professions get.
1,495. Emily Blaker	Redwood city, CA	Veterinarians are amazing and know so much about animal medicine, surgeries, etc. But they are not rehabilitation experts. One person cannot know and be an expert at it all. This is why the human health industry has so many different kinds of health care professionals. We need to expand the animal health industry to provide our animals with experts and specialists. For movement restoration and rehabilitation, they need physical therapists.
1,496. Alexandra Salch	Livermore, CA	
1,497. Fou Saelee	Sunnyvale, CA	
1,498. Betty Tran	San francisco, CA	
1,499. Silvia Park	San Francisco, CA	
1,500. Lisa Wong	San Francisco, CA	
1,501. Louise Jacob	Vacaville, CA	
1,502. David Curtis	Southport, CT	
1,503. Eileen Kurtz	Somerset, NJ	PT's are highly qualified to assess movement disorders and signs and symptoms of pain/weakness. This is extremely beneficial in the diagnosis and treatment of canine pain and dysfunction.
1,504. Jessica Rodriguez	West Point, NY	
1,505. Cassie Swafford	Bremerton, WA	
1,506. Amanda Nguyen	SAN FRANCISCO, CA	
1,507. Tiffany Lucus	Escondido, CA	Everyone/thing should have an equal opportunity! Animals are so warm and loving, how can you not treat them the same.
1,508. Shawn Baisley	San Diego, CA	
1,509. Jacqueline Peipert	BRIGHTON, IL	

Name	From	Comments
1,510. Lori Leano	Vacaville, CA	
1,512. Karyna Blake	La Honda, CA	
1,513. Kristin Carralejo	Goleta, CA	
1,514. David Barlow	Leeds, AL	
1,515. Sarah Weir	Richmond, CA	
1,516. Athena Pierce	West Hollywood, CA	This is horrible. A PT doesn't need to work in a vet's office or underneath one in order to perform physical therapy. It's what they went to school for, and we're trained to do!!
1,517. Glenn Alamilla	Newark, NJ	Free choice based on needs and merit
1,518. Bryan Wong	San Francisco, CA	
1,519. Matthew Lee	Pinole, CA	
1,520. Tammy Wolfe	Denver, CO	
1,521. Kristie L	Modesto, CA	
1,522. Stephanie Breon	Athens, GA	
1,523. Claire Lahaie	Savannah, GA	I'm a licensed physical therapist who has also worked with animal rehabilitation (performed by physical therapists) and I've seen just how beneficial this can be! Physical therapists are very well qualified to work with animals for their physical needs - just as our job title states. We do take animal anatomy and temperament courses, too, to better prepare us for working with animals vs humans.
1,524. Cherie C	Lawrenceville, GA	Highly trained physical therapists with certification in animal therapy should have the right to practice their knowledge wherever they want to, whether it be at a pet owner's home, a specialized pet rehabilitation practice or at a veterinary office, either full time or part time. They should not be limited to working at a vet's office. Because of their expertise in their field I would definitely take my pet to a PT outside of a vet's office where there is a full rehabilitation setup already in place.
1,525. Kristi Sutherland	Charlotte, NC	
1,526. Chelsea Wells	Denver, CO	
1,527. Patricia Burton	Loganville, GA	I love animals and they all need TLC!
1,528. Ria Acciani, MPT, CCRP	Warren, NJ	I am a PT who wants owners to have a choice. Monopolies restrict owners from having access to whom they choose to be the best match for their dogs rehab.
1,529. Heather Roloff	Santa Monica, CA	
1,530. Manu S-M	Hamilton, ca	
1,531. Jennifer Bragg	Fontana, CA	
1,532. Jordana Zurita	Cottonwood, AZ	
1,533. Grace Rei	Medway, MA	I love animals and just like himans some need rehab, so give them the chance[?]

Name	From	Comments
1,534. Maria Stolo	Stephens City, VA	
1,535. Adrianette Feliciano	Bronx, NY	
1,536. LC Sanders	Pacific Grove, CA	
1,537. Patrice Widhalm	Cut Bank, MT	
1,538. Gregg Reza	Montclair, CA	
1,539. Janice Hume	Joshua tree, CA	
1,540. Sylvia Reapor	San Jose, CA	
1,541. Julie Nolan	Concord, CA	
1,542. Priscilla Martinez	Sunnyvale, CA	
1,543. Anna Gonzalez	San jose, CA	
1,544. Rosemary Mills	Atlanta, GA	
1,545. Ivan Tamayo	El cajon, CA	
1,546. Mark Nienas	Wauwatosa, WI	
1,547. Lisa Soto	Sicklerville, NJ	
1,548. Natalee Garay-espinal	Belmont, CA	All animals deserve just as much care as humans! [?][?]
1,549. MARGIE SORLIE	Seattle, WA	
1,550. Alejandra Tapia	Smyrna, GA	
1,551. M Sorbo	woodcliff lake, NJ	
1,552. Phyllis Stone	Shreveport,, LA	
1,553. Josie Peraza	Norwalk, CA	
1,554. Ann Cameron	Cardiff, CA	
1,555. Micele Ott	Eugene, OR	
1,556. Melanie Osegueda	Spring, TX	Because animals don't have a voice and we need to speak for them.
1,557. Cristina Puente	Houston, TX	Animals deserve the right to be taken care and loved for
1,558. Robi Gutierrez	Tupelo, MS	To help the animals
1,559. Toni Essman	North hills, CA	
1,560. Jennifer Mansfield	Concord, CA	Because animals are better than people
1,561. Rachel Cionger	Temple City, CA	
1,562. Rebecca Farmer	Citrus Heights, CA	
1,563. Melissa Manaloto	Lompoc, CA	I have two fur babies. If they would need this service, I want to get it for them.
1,564. Vicki Jones	SHORNCLIFFE, au	
1,565. Anna Ferrannini	Fair Oaks, CA	Love animals
1,566. J C Kovacik	Malta, NY	Because all animals deserve a life to the best we can provide especially the ones that need therapy thank you [?][?]

Name	From	Comments
1,567. Lyn Paulos	Lompoc, CA	my dogs my choice. Most vets are not schooled completely on physical therapy. much like doctors are not. I want the CHOICE for my pets like I have for me to get the quality i want for my pets
1,568. Raevyn Vincent	Anchorage, AK	Animals mean so much, why not treat them like we treat ourselves.
1,569. Marie Weber	Mount Holly, NC	
1,570. Rosa Lopez	Suisun City, CA	
1,571. Maureen Chisholm	Newbury Park, CA	Animal welfare
1,572. Penny Webb	Spring hill, FL	Animal welfare
1,573. vanessa lewis	los angeles, CA	
1,574. Alejandra Saavedra	San José, cr	Because all dogs deserve to be helped
1,575. Jodie Fulton	Cuyahoga Falls, OH	
1,576. Zoe Arthur	Costa Mesa, CA	
1,577. Kassie Frazier	Buena park, CA	
1,578. Rick Montoya	Lake Havasu City, AZ	
1,579. Brandy Boozer	Kingsport, TN	
1,580. Lindsay Benedict	San Bernardino, CA	
1,581. Sheila Fox	Modesto, CA	
1,582. Mitzi Brackett	Killeen, TX	I believe in having the freedom to make my own choices!
1,583. Summer James	Fresno, CA	All animals deserve the best care or physical therapy that a specialized person can give whether it's a veterinarian or not. Shouldn't be limited to veterinarian clinic. We as humans get to have care outside our primary care provider, we get specialize care so should our pets.
1,584. Emily Harrison	Springfield, MA	
1,585. Shirley Harman	San Jacinto, CA	Animals that are hurt or "disabled" should definitely be able to get physical therapy. They are family to some and caregivers to others...
1,586. Kim Baker	Los Angeles, CA	Animal welfare and care access is most important.
1,587. Kimberly Mulvihill	Pater5, NJ	
1,588. Donna Steck	Clarksville, TN	Because every animal has a right to live a fulfilling live and deserve a chance.
1,589. Kathy Rivera	Huntington Beach, CA	
1,590. Keri Richardson	Victorville, CA	
1,591. Mary Solmonson	Oroville, CA	
1,592. brenna Stockwell	Marshfield, WI	
1,593. Melissa Edwards	San Juan Capistrano, CA	

Name	From	Comments
1,594. Barbi Madrid	Santa Ana, CA	
1,595. Kristine Jackson	Edmond, OK	
1,596. Teresa Larson	Lincoln, NE	
1,597. Terrye Hubel	Happy Valley, OR	
1,598. Silvia Aviles	Bellflower, CA	There's so many animals that need continued physical therapy.
1,599. Daisey Streets	Fontana, CA	
1,600. Claudia Grandez	Los Angeles, CA	
1,601. Sarah Birdwell	Walnut Creek, CA	
1,602. Nancy Avila	Whittier, CA	
1,603. Jackie Tierrablanca	Austin, TX	
1,604. Kathleen Marie	TEHACHAPI, CA	
1,605. Linda Yang	Fresno, CA	
1,606. Kerri Bauer	Bradenton, FL	
1,607. Erin McCarthy	Bakersfield, CA	
1,608. dawn shellem	Victorville, CA	Animals desrve the highest quality of care.
1,609. Sandra Cap	Santa Clarita, CA	
1,610. Maureen Doughy	Los Angeles, CA	There are thousands of physical therapists who are amazing and not veterinarians
1,611. Katie Lineburg	Suffolk, VA	Dog are amazing
1,612. Julia Ovington	Canberra, au	
1,613. Jess Esguerra	Los Angeles, CA	
1,614. Rebecca Taylor	Rio Rancho, NM	
1,615. Gay Mcclurg	Redding, CA	
1,616. Nicola Achenbach	Newport Beach, CA	
1,617. Kyla Hall	Camarillo, CA	They need our help!!!!
1,618. Pam D	Granada Hills, CA	Dogs deserve the best care possible! We should be able to have choices in where they get the care.
1,619. Laura Melman	Sebastopol, CA	
1,620. Favio Montes	Camarillo, CA	
1,621. Amber Ventrillo	Methuen, MA	Physical therapy should be easily accessible and affordable. Forcing PT's to work under a vet (who probably doesn't even understand the meaning of physical therapy) would deny owners and their disabled pets a fair shot at recovery.
1,622. Monika M.	Trier, de	
1,623. Phyllis Ryan	Winder, GA	Animals are very important to me and are a huge part of my life. I believe that they deserve the best care that they can receive

Name	From	Comments
1,624. Cindy Laabs	Santa Barbara, CA	I want to be able to decide where I take my pet for physical therapy.
1,625. Kathy Stankiewicz	Los angeles, CA	I live dogs. They should be entitked to ohtsical therapy just as us humans are. They are family
1,626. Tina Willard	Camarillo, CA	I'm an advocate for dogs [?][?]
1,627. Jaye Tucker	Jacksonville, AR	
1,628. Breeanna Poulin	Sacramento, CA	Because dogs are important to
1,629. Candace Campbell	Fountain valley, CA	
1,630. Alyciah Barcelon	Co springs, CO	
1,631. Cynthia Lynn	Sergeant bluff, IA	
1,632. Kim Meyer	Rowland Heights, CA	
1,633. Kathleen San Miguel	Santa Cruz, CA	
1,634. Angie Neeley	Colorado Springs, CO	
1,635. matt Levinger	Rio grande, NJ	
1,636. Diana McKissick	summerville, SC	
1,637. Kathleen Phalen	Ojai, CA	Because animals are sentient beings that need our help
1,638. Amber Goodman	Boyertown, PA	
1,639. Amy Mayes	Culver City, CA	
1,640. Michael Allen	Vancouve, WA	
1,641. Taylor Romano	San marino, CA	
1,642. Bobbie Butler	Cerritos, CA	With animal physical therapy, it gives the opportunity for "special needs & Wheelie animals. Its provide them with a specialized training therapist for them receive a full chance to live their a life to best of abilities!
1,643. Debby Smith	Tuscumbia, AL	
1,644. Alex Bobbitt	Austin, TX	Because I was able to choose the right and best pt for my pup when she needed it and now she lives a happy healthy carefree life
1,645. Rosario Toyoda	Los Angeles, CA	PT helps everyone.
1,646. Kim Garcia	Whittier, CA	
1,647. Stephanie Bolton	Loma linda, CA	
1,648. Heather Worth	Temecula, CA	
1,649. Tracy Simmons	Lakewood, CA	In this day and age, pets are treated more like family. Additionally, many humans, such as myself, depend on our pets for emotional and mental support. We love our pets like family and feel that Physical therapy can help the pets live a longer quality life rather than euthanizing them prematurely. We don't give up on people when they become physically <i>(continues on next page)</i>

Name	From	Comments
1,649. Tracy Simmons	Lakewood, CA	<i>(continued from previous page)</i> infirm and we shouldn't have to give up on our fur friends when they become infirm.
1,650. Jenn Zieska	Palmdale, CA	
1,651. Nanette Damian	South San Francisco, CA	
1,652. Donna Percival	Upland, CA	
1,653. Nicole Gutierrez	Norwalk, CA	Because all dogs matter
1,654. Olena Nikolenko	Los Angeles, CA	We have to help and provide support to those animals who need it, there always should be hope for any creature to get better, heal, live a good happy life!
1,655. Diane Ortega	Northridge, CA	
1,656. Crystal Fedor	Hartsville, TN	
1,657. elena weare	santa rosa, CA	
1,658. Ray Rivera-Salinas	Fresno, CA	
1,659. Jane Sellman	Joppa, MD	
1,660. Renee Doo Young	Pos, tt	
1,661. Kimberly Buen	Palmdale, CA	
1,662. Barbara Lay	Bakersfield, CA	
1,663. Cathy Cunha	Woodside, CA	
1,664. Roberta Pierman	Oakland, CA	
1,665. Kathy C	Pahrump, NV	
1,666. Nancy Neill	Albuquerque, NM	Because all living beings deserve a chance. This is invaluable for the disabled pets needing rehab.
1,667. Stacy Herbert	Norwalk, CA	
1,668. Olivia Peralta	Winter Springs, FL	
1,669. Angela Todd	San Diego, CA	
1,670. Barbara Stillwell	Salinas, CA	I want the right to choose
1,671. Alexander Acosta	Las Vegas, NV	
1,672. Ann Taube	North St Paul, MN	
1,673. katherine davis	san diego, CA	
1,674. Bryan McCullough	Santa Barbara, CA	
1,675. Emma Zamora	Clovis, CA	My dog is paralyzed and goes through physical therapy. It's been crucial to his recovery.
1,676. Michelle Hopkins	Omaha, NE	
1,677. Annie Wang	Hillsborough, CA	
1,678. Margie Robatto	San Diego, CA	
1,679. Andrea Mehrer	Fallon, NV	

Name	From	Comments
1,680. Erin McGuire	Sacramento, CA	
1,681. Cami Kalman	Phx, AZ	
1,682. Sue Dumas	Norco, CA	
1,683. Sai Teja	San mateo, CA	
1,684. Diana BEARD	Luton, gb	
1,685. Dawn Bennett	Irvine, CA	The owners deserve the right to decide what is best for their pet's rehab.
1,686. Veronica McDaniel	Torrance, CA	
1,687. Michelle Ayala	Los angeles, CA	
1,688. Amber Love	Oroville, CA	
1,689. Carol Stelling	San Diego, CA	
1,690. Lena De Faveri	Berlin, de	
1,691. Sue Colley	San rafael, CA	
1,692. Sofia Lacerda	Pleasanton, CA	
1,693. Marie Cornwell	Las Vegas, NV	Everyone should have The right to choose who they want to be physical therapy to their dogs. Or animals for that matter if they're qualified they should be able to perform it
1,694. Melissa Melendez	Los Angeles, CA	
1,695. Ashley Sanchez	Odessa, TX	
1,696. Lindsay MacDonald	SONOMA, CA	
1,697. Angela Dombrowski	Oak Lawn, IL	
1,698. Geisha Garcia	La Coruña, es	
1,699. Jacqui Best	Bensville, au	
1,701. Charlan Stillwell	Boonville, IN	
1,702. Donna Mackay	Wichita, KS	All our dear b wobderful animals need good n loving homes know what
1,703. Brandy Gillette	Albany, OR	
1,704. ruby caballero	port macquarie, au	
1,705. Vincent Scarcella	Willis, TX	Because I am human and God put us in charge, so let's not mess this up. Everything that's alive deserves to live, and without any pains.
1,706. Brenda Kormandy	Phillipsburg, NJ	Because there is documented proof that therapy Animals help the sick tremendously to heal and get thru whatever it is they are fighting !
1,707. Nancy Tylicki	Lake Worth, FL	
1,708. Jean Kim	Ridgewood, NJ	
1,709. Kevin Wehmann	Virginia Beach, VA	

Name	From	Comments
1,710. Shannon Reynaldo	Santa monica, CA	
1,711. Renee Vecchio	Ocala, FL	All animals are worth giving a second chance and deserve treatment and therapy to have quality of life.
1,712. John Farver	Berwick, PA	
1,713. Susan Thomas	WALNUT, CA	
1,714. LeAnn Slough	Hawthorne, CA	
1,715. Catherine Nagorski	Castle Rock, WA	I have a special needs dog. It's important that I am able to choose whom & where I take him for his PT. I believe California's deserve the same right.
1,716. Jack Mciver	Liverpool, gb	
1,717. Fatima Guzman	Lemoore, CA	
1,718. Stella Gambardella	Roma, it	
1,719. Vaneca Mushrush	Auburndale, FL	
1,720. lauren shaver	Tustin, CA	
1,721. Tanya Rubalcaba	Bonita, CA	I love animals
1,722. Tara Willis	Virginia Beach, VA	
1,723. barbara funkhouser	boyce, VA	
1,724. Danielle Munoz	West covina, CA	
1,725. Milagro Rauda	Long beach, CA	Many animals would go without much needed therapy if this law were to pass, as there aren't enough vets as it is.
1,726. Pamela McBee	Huntington Beach, CA	
1,727. Maria Cabrera	Las palmas, es	VEry important
1,728. Stephanie Alder	Fullerton, CA	
1,729. Trudy Royster	Kansas City, MO	Because animal need special help and facilities just like humans do!
1,730. Mike Tavares	Brampton, ca	
1,731. Kristina Laakso	Espoo, fi	Animals especially dogs are my life. Cause I have allergies and astma, I really can't be in touch with dogs, so this is my way to help as much as I can!
1,732. Calvin Millan	Studio City, CA	
1,733. John Venegas	Goleta, CA	For the ANIMALS!!!
1,734. barbara middleton	pierrefonds, ca	
1,735. Michael Jones	San jose, CA	
1,736. Jennifer Hall	BERKELEY, CA	
1,737. Donna Balmat-Jantz	Chula Vista, CA	Because if people are certified and trained properly, I see no reason that they should not be able to work independently.

Name	From	Comments
1,738. Amira Rantanen	Hyvinkää, fi	I love and care for every animal, they deserve all the help they need!
1,739. Caroline Higson	Bolton, gb	You are denying access to specialists and delaying recovery. Whilst increasing the cost
1,740. Gail Belardes	Mariposa, CA	
1,741. Allie Fox	Valencia, CA	
1,742. Susan Bragg	Los Angeles, CA	
1,743. Jessica Reimann	Kerpen, de	Because i love dogs and i want that they all can live the life they deserve. With all the grace and luck in it.
1,744. Jennifer Raus	Arlington hts, IL	
1,745. Kashmir Salas	Upland, CA	
1,746. Lori Wylde	Westville, IL	I believe rvery animal should get the chance to live life to there fullest. It doesn't mattet if there normal or handicapped. We should respect every living being we are children of God no matter if we have 2,4 or legs that don't move. We are all living breathing beings.
1,747. Cheryl King	Chandler, AZ	Would want an option to choose an only rehab center to specialize not just an added option at a vets office
1,748. Lindsey Oddy	Leeds, gb	
1,749. Dewi Roodenburg	Zuidoostbeemster, nl	
1,750. Sherry Cushman	San Antonio, TX	
1,751. Michele Burnett	San Leandro, CA	
1,752. Rachel Hemmer	Hayward, CA	
1,753. Eric Bonzell	Folsom, CA	
1,754. Heidi watkins	Sacramento, CA	This would be ridiculous and totally unfair. I would rather a trained PT work on my babies than a licensed veterinarian. Theres no reason for them to be under a vet 'directly'. Theyre already working in conjunction with their vet, so they dont need to be in their office! Let the PT professionals do their job!
1,755. Madi Shin	Twentynine Palms, CA	Because I also have a disabled dog
1,756. Dixie Yoder	Bakersfield, CA	Safety of animals , rx quality, professionalism, cosistency of treatment
1,757. Veronica Flores	San Antonio, TX	
1,758. Sara Steele	Bakersfield, CA	
1,759. Michaela Roberts	san jose, CA	This is important to me because if there was a human with special needs, they would be help. So why can't animals get help too?
1,760. Dorianny Campbell	Miami, FL	
1,761. Alexa Fuentes	Modesto, CA	

Name	From	Comments
1,762. Nicole Zach	Toronto, ca	This is very important to me because as an animal lover, I believe that animals deserve the healthcare that humans can. I believe that animals should all get a chance at living a happy comfortable life
1,763. Victoria Lopez	Chula vista, CA	Animals deserve to be loved and cared for♥️🐾
1,764. Nicola Mitchell	Gunnedah, au	It's important because we need to help animals as much as possible x
1,765. Stacy Klinker	Denver, CO	
1,766. Chris Jones	Chula Vista, CA	
1,767. Meg Broussard	Gurnee, IL	Pets shouldn't be treated cruelty they are like human . All they want is to love them and care for them . Unconditional 🐾🐾🐾🐾
1,768. Alexander Stefan	Terrassa, es	Animals deserve to have open access to the best care available to them, without obligation to adhere to a proposed law which appears to be a scheme for generating profits instead of advancing the process.
1,769. Nathalia Gomez	Terrassa, es	
1,770. Jennifer Young	SAN JOSE, CA	
1,771. Penny Moffat	Lincoln, CA	
1,772. Michelle Brower	Westminster, CA	
1,773. Lynn Logan	Mobile, AL	This is important to me because Special needs dogs need every opportunity afforded them to live a happy life!!
1,774. Wendy Bloom	Brooklyn, NY	
1,775. Sharon Gurevitch-Loredo	Burbank, CA	It important to me because special needs dogs lives matter. They deserve to live a better life.
1,776. Aloysius MacNeil	Scarborough, ca	
1,777. Andie Brewer	Sharon, PA	Pets receiving physical therapy is so important because it helps them with balance, learning how to walk again & strengthen their muscles, much like humans.
1,778. Beverly Speirs	Luton, gb	
1,779. Laura Austin	Atwater, CA	
1,780. Magdalena Szydłowska	Torun, pl	
1,781. Claire Kelly	El Cajon, CA	To be able to provide a wider range of care and bring more competitive pricing
1,782. Joëlle Cuerq	Marck, fr	
1,783. Suzanne Alexandra	Santa Ynez, CA	
1,784. Emily Havens	Charlevoix, MI	
1,785. Mandy Ellington	Rescue, CA	
1,786. Monica Peterson	Renton, WA	

Name	From	Comments
1,787. Trudy Pricop	Townsville, au	All animals deserve the chance too heal and benefit
1,788. Sandra Hernandez	Hayward, CA	Because just like human they physical therapy is important to be able to go back to their regular life and to have a happy life.
1,789. Kim Touton	Paradise Valley, AZ	
1,790. Curtis Peterson	phoenix, AZ	i love dogs and think they deserve the world
1,791. Sam Rose	Anchorage, AK	
1,792. Michele Brandt	Baltimore, MD	All lives matter. Animals are the purest souls ... they deserve protection.
1,793. Anika Erickson	Fairbanks, AK	
1,794. Alena Alkins	Claymont, DE	It is important to help animals heal, and to let them live a normal life. They deserve as much love as they give.
1,795. Vanessa Fuchs	Gratwein, at	
1,796. Lars Janssens	Aarschot, be	
1,797. Valerie Cosson	Paris, fr	
1,798. Betty Ronson	Milford, CT	
1,799. Zori Mendel	Anchorage, AK	
1,800. Eva Lindman	Nykroppa, se	
1,801. Mya Gonzalez	Anchorage, AK	
1,802. Elisa Sgobbo	Torrance, CA	
1,803. Natasha Bridger	Durban, za	
1,804. Ginny Shutt	Monrovia, CA	Animals have no Voice. We are there Voice. They need better care and more affordable!!
1,805. Philippa Bushell	New Plymouth, nz	Because my dog has a leg injury
1,806. Denis Lutsyshyn	Kiev, ua	This is good doing
1,807. Azizza elsa vinicia Baldoni	Milano, it	
1,808. Dimitria Papadatos	Toronto, ca	
1,809. Alicia Paliza	Palmdale, CA	
1,810. Julie DiPiazza	Madison, WI	
1,811. Donna Mendoza	Waukegan, IL	I love animals the deserve every chance
1,812. Anne Mix	Hudson, MA	
1,813. Paige McDaniel	New york, NY	
1,814. Armineh F	Glendale, CA	They can't speak for themselves. No matter what they give us unconditional love. They deserve to live their best life however we can help
1,815. Candice Thurman	Sandy, UT	
1,816. Laurie Sparrow	Syracuse, UT	

Name	From	Comments
1,817. Tatum Wilson	Rogers, AR	Animals need help too
1,818. Abby Richardson	Palm harbor, FL	Every dog deserves the chance to get to their full potential
1,819. Tara Strange	Hattiesburg, MS	I love animals and it brakes my heart when I see an animal in need so I would really like to help more animals get physical therapy!
1,820. Cian Farrell	Dublin, ie	
1,821. Lisa Lovell	Indianapolis, IN	
1,822. Abbie Hudgins	Knoxville, TN	
1,823. Bonnie Yamahiro	Glendale, CA	
1,824. JoAnn Miller	Conshohocken, PA	Because animals need to feel good to just like humans do and if there hurting bad and there people can't afford the outrageous prices veterinarians charge they have other options available to them.
1,825. Georgia Williams	Houston, TX	
1,826. Naomi Jones	Durham, CA	
1,827. Diego Raya	Oxnard, CA	
1,828. Alyssa Kelnhofer	Weston, WI	
1,829. Danny Brown	Amarillo, TX	
1,830. Maria Garcia	Norwalk, CA	Dogs gets a second chance to live
1,831. Michelle Harris	Jupiter, FL	
1,832. Chance VanMeter	Bedford, IN	Because i love animals amd they deserve tp be able to get better
1,833. Heidi Brooks	Fairmont, MN	
1,834. Olivia Leonard	Savannah, GA	
1,835. Roxanne Ruben	Mims, FL	
1,836. Khaiya Godin	Kamloops, ca	I love dogs and want to help
1,837. Pica Icasiano	Los Angeles, CA	I love animals and would do anything to help them.
1,838. Connie McGovern	San Diego, CA	
1,839. Rhys Sauvage	New York, NY	
1,840. Gia Gibson	Jax, FL	
1,841. chloe milstead	e cajon, CA	
1,842. Camille Carlington	Norman, OK	
1,843. Daniela Oliveira	Luxembourg, lu	
1,844. Lola Rodjanapreecha	Nakhon Pathom, th	
1,845. Heather Rivera	Chatsworth, CA	
1,846. Amanda Baird	Mounds View, MN	
1,847. Riemen Sanders	Waynesboro, PA	
1,848. Susan Cover	Aurora, CO	

Name	From	Comments
1,849. Ony Avajah	Nottingham, gb	
1,850. Ayesha Anthony	DrippingSprings, TX	
1,851. Trina Corsello	Santa cruz, CA	
1,852. Constance Roberts	Mobile, AL	
1,853. Amara Harkness	Smyrna, TN	
1,854. Linda Maddison	Palm Springs, CA	
1,855. Carly Taylor	Yarm, gb	
1,856. Stephanie Souza	Cranston, RI	
1,857. Luanne Garcia	Santa Maria, CA	
1,858. Kris Mattus	El Cajon, CA	Need to stop making things difficult for people trying to help
1,859. Sara La Placa	Fresno, CA	Because our fur baby's deserve a chance at getting any and all help they can when needed!
1,860. Kimberly Sloan	Greer, SC	
1,861. Diana Orr	Blackwood, NJ	
1,862. Kimberly Crowson	Gastonia, NC	
1,863. Leila Cavazos	Fresno, CA	So that animals have a better life
1,864. Mary Dias	Kenner, LA	For Freddie.
1,865. Robert Williams	Ellenwood, GA	All God's creatures deserve love and care!!!
1,866. T Ogle	Carrollton, TX	These precious animals need HELP! Please don't make it more difficult for them. Have compassion, please.
1,867. Cheryl Pientka	Brooklyn, NY	
1,868. April S.	San Diego, CA	
1,869. Rebecca Miske	Capitola, CA	
1,870. Valerie Quintanilla	Columbia, MD	It's important to show love to animals everywhere. They know the good that is humans are capable of.
1,871. Andrew Wood	Little Rock, AR	
1,872. Ande Minton	Santee, CA	
1,873. Stephanie Quinones	Colton, CA	
1,874. Sofia Smith	Thousand oaks, CA	
1,875. Terry Dill	Visalia, CA	All pets/animals have the right to the best of care. They are NOT just mindless things that can be treated as useless throw aways.
1,876. Maddy Clarke	Columbus, OH	
1,877. Chris Gregory	Oyster bay, NY	
1,878. Caren Alvarez	Manor, TX	It's important to me because I want dogs to get the help they need, and they have to be happy, these therapies are nessasery. Please Let The Therapies Be Good And Easy.

Name	From	Comments
1,879. Jason Stewart	Plano, TX	Why the hell is the government dipping their noses into animal health Care? Are you all not getting enough tax dollars/kick backs? F'ing hell man. You overreaching, pocket picking, no good, corrupt ass thieves. Leave these beautiful animals alone. Don't you have junkies and people pooping all over the place in San Francisco to worry about?
1,880. Donna Ferrara	Franklin, NC	These sweet animals deserve the best care we can give them.
1,881. Abby Portillo	Miami, FL	Doggies are better than humans so I signed this petition.
1,882. Claire Este McDonald	Lexington, MA	
1,883. Susan Woods	Alta Loma, CA	
1,884. Gillian Clarke	Hamilton, gb	
1,885. Jon Nielsen	Los Angeles, CA	
1,886. Kelli Wolfe	Oak Ridge, TN	
1,887. Kelli Patrick	Lenexa, KS	
1,888. Ursula Brinkley	Annandale, VA	
1,889. Vanessa Hayward	Eastleigh, gb	
1,890. Nola Kelsey	Alsonot, th	
1,891. Stefanov Clara	Pantelimon, ro	
1,892. Stacey Manasco	Delray Beach, FL	
1,893. Leanne Wood	Los Angeles, CA	
1,894. Krystal Briggs	Mississauga, ca	
1,895. Paula Bates	St helier, gb	It doesn't need to be so complicated
1,896. Laurie Suquet	Parkland, FL	I'm an animal advocate.
1,897. Christian Hernandez	chula vista, CA	All pets are family and should recieve the best possible care.
1,898. Marni Sugar	Rockaway park, NY	
1,899. amber susan	hutto, TX	
1,900. Amie Price	Oakland, CA	Dogs need us to fight for them
1,901. Dawn Albanese	ELK GROVE VILLAGE, IL	
1,902. J.T. Doyle	Carmel, IN	
1,903. Elena Pizano	North Aurora, IL	This is so important for the health and well being of challenged animals.
1,904. Terrie Stapley	Cedar, UT	
1,905. D P	Boston, MA	
1,906. Laura Harris	Irvine, CA	Because we should have a choice!
1,907. Dana WILLIAMS	Brooklyn, NY	
1,908. Diane Glem	Maplewood, MN	

Name	From	Comments
1,909. Wanda Tomooka	Bakersfield, CA	Animals are not disposable! They deserve rehab when in need. I've seen first hand through Deserving Dogs (Angela Adan), it works! Thank you
1,910. Tanya Todd	N. Myrtle Bch, SC	
1,911. Cathie Czernecki	Canonsburg, PA	
1,912. Zane Cochran	Thornton, CO	
1,913. Sean Mottershead	Chino, CA	I like doggos
1,914. Maryethel Bradley	Deltona, FL	Pet owners should have the ability to make a choice for their animals care, period.
1,915. Alex Mora	Richmond, CA	Physical therapy is massively beneficial to those who need it and no law should be put in place to make it harder to receive.
1,916. Amanda Werny	East Williston, NY	I am a huge animal lover!!!
1,917. Ronda Bailey	Fountain valley, CA	
1,918. Anja Henderson	Aldie, VA	It doesn't make sense to force highly trained PT specialists to give services only under the supervision of veterinarians. Not all veterinarians are even qualified themselves in PT.
1,919. Tes kurtz	Huntington Beach, CA	Because our beloved animals deserve THE best in specialized care.
1,920. Zornitza Koteva	Kissimmee, FL	
1,921. Crystal Cruz	Chicago, IL	
1,922. Tom Florio	Milford pa, PA	That all dogs need a fair chance at life to get better and have a fun and loving life
1,923. Nicole Conaway	Madison, AL	
1,924. Cristina McBeath	Jacksonville, FL	
1,925. Sierra Mason	Los Angeles, CA	
1,926. Tina Machynia	North Hills, CA	Physical therapy should be available to all...No matter what species. Pets are family too!
1,927. Angeline Barrile	Marlton, NJ	
1,928. Marci Zied	Philadelphia, PA	
1,929. Christina Sotiropoyloy	Athens, gr	
1,930. Joan Larson	Seattle, WA	Because PT can help some animals get stronger, heal and have a full and healthy life
1,931. Lauren Kelley	Los Angeles, CA	
1,932. Ava Mckee	Mansfield, TX	I have pets at home and I feel like they shouldn't do this.
1,933. Carrie Radford	Seattle, WA	
1,934. Kellin Esquivel	Culver City, CA	
1,935. Andrea Sandberg	Monument, CO	

Name	From	Comments
1,936. Beth Luck	Eau Claire, WI	Care for challenged animals should be readily available so that people considering adoption of a special needs animal will know where they can get quality care and support for their pet. If these services go away, adoption rates for challenged animals may go down.
1,937. Makayla Rodriguez	Minneapolis, MN	Another way to control and over price. Many animals will not be able to get the help they need. Rescue groups won't be able to pay the high prices.
1,938. Rick Jackson	Glasgow, gb	
1,939. Heidi Keller	Sacramento, CA	
1,940. P K	Bideford, gb	
1,941. Robyn Willis	Atlanta, GA	Animals very important part of life.
1,942. Lacey Ramos	Fresno, CA	Animals do so much for us, it's time we return the favor
1,943. June Gangi	M.V, NY	We need to be their voice.
1,944. Emily Berriman	Taunton, gb	
1,945. Tania Fertig	Heidelberg, de	Because american friends of me own dogs in need for physical care.
1,946. Jill Payne	Charlotte, NC	We should be able to choose care for our pets
1,947. Leah Masterson	Mill Valley, CA	
1,948. Robin Hallstrom	Carmichael, CA	
1,949. Leah Perkins	Littleton, CO	
1,950. Hans Greenawalt	Sacramento, CA	
1,951. Deborah Wilkinson	Petaluma, CA	
1,952. Margarita Shircel	Glendale, AZ	
1,953. Jennifer Wren	Fishers, IN	
1,954. Rose Anne Corbin	Visalia, CA	Animal health and animals are important
1,955. Tiffany Bellan	San Diego, CA	
1,956. Olivia Allen	Hertford, gb	Dogs are a gift to the world and we should do everything we can to support them and let them live the greatest life they can in the safest possible environments with people who know what they're doing. Keeping it independent would mean more time focused on rehabilitation for animals and lower prices for the owners of the dogs. Better care all around should be the aim, not to stop them getting the treatment they need. Would they do this to humans? Probably not. So why do his to dogs in their time of need when they're always here for us? X
1,957. Flavia Gabrioti	Curitiba, br	
1,958. Victoria Fredericksen	Sierra Blanca, TX	This law is an intrusion into small businesses, who know how to physical therapy. Greedy veterinarians are just wanting more money. Let people chose who they want!

Name	From	Comments
1,959. Barbara Clippinger	Fort Mill, SC	
1,960. Maurisa Dalonges	Union, NJ	Because I know a lot of people with disable dogs, they are need and I hope this will help them.
1,961. Lucille Albertelli	Massapequa, NY	
1,962. BARBARA A JOHNSON	Plymouth, MI	People with special needs animals and those that need extra help to better function need to have options and someone trained in the field. With humans, general practitioners are NOT experts on physical rehab and most vets are the same.
1,963. Lisa Gann	Las Vegas, NV	
1,964. Alyssa Rios	Howell, NJ	
1,965. Tina Andrews	Ellesmere Port, gb	Dogs can't speak for themselves so we have to stand up for them. It's important they receive all the medical attention they need. Physical Therapy is very important.
1,966. Mareike Drewes	Lotte, de	
1,967. Randi Strunk	Pittsburgh, PA	Animal care options should become broader, not more restricted. This sounds like people missed out on an opportunity to cash in and want to prevent others from having options. #friendsnotfood #govegan #freedomforallwholive
1,968. Kylynn Smith	Wanatah, IN	
1,969. Jess T-E	Sydney, au	We can't take away something that majorly helps injured dogs getting the help they need.
1,970. Shelly Desouza	Falls church, VA	
1,971. Jack Sell	Sherwood, OR	
1,972. Donna Parks	Elma, NY	
1,973. Stacy Eddings	Lexington, SC	To quote Ghandi, "The greatness of a nation can be judged by how it treats its weakest member." We are in trouble. Start a new trend!
1,974. Tiffany Hernandez	Baldwin Park, CA	
1,975. Camille Sanders	Millington, TN	
1,976. Jennifer Rosson	San Diego, CA	
1,977. Cindy Matthews	Marietta, GA	My dad took PT from an off site therapist that was life changing for him. I think it's completely unnecessary for any physical therapist to be under the direct supervision of a vet.
1,978. Lilliana Preops	Los Angeles, CA	
1,979. Lee-Oscar Kremer	Maastricht, nl	
1,980. Elena Robaina	Miami, FL	
1,981. Gaylene Gibson	Encino, CA	I believe that animals are at times more important than humans because of their loyalty. We should be able to get them the medical care that they need!

Name	From	Comments
1,982. Christa Keran	Mesa, AZ	Animal physical therapy is as important as human physical therapy. ANIMALS have rights too
1,983. Mari Givens	Memphis, TN	
1,984. Kim Davis	Fredericksburg, VA	
1,985. Cindy Barkho	Anaheim, CA	
1,986. Karol Kohner	Oxnard, CA	To help th animals out that need it
1,987. Elizabeth Collado	Coronado, CA	
1,988. Zach Fisher	Columbus, OH	
1,989. Payton Douglass	Lakewood, CO	
1,990. destinie mireles	citrus heights, CA	
1,991. Eva Avalos	Forest Grove, OR	
1,992. Kishore Sawh	Dania, FL	
1,993. Jen Wood	Round Rock, TX	We need to be able to choose.
1,994. Rey Leal	Chicago, IL	Because I'm pro-choice
1,995. Gabby M	Readington, NJ	
1,996. Marisa Arviso	Lakewood, CA	Care should NEVER be withheld
1,997. Jessika Gerondale	McMinnville, OR	
1,998. Elyna Ortega	Carlsbad, CA	I love animals!!! Pet owners should have the freedom to decide what treatment, from who, and where.
1,999. Mason Carlisle	Miami, OK	
2,000. Gloria Perez	Pomona, CA	
2,001. Joanna Mather	Boone, IA	
2,002. Lynn Smith	Jacksonville, FL	Animals that need rehab shouldn't have a hard time getting it! They need rehab just like humans
2,003. Jennifer Fleischman	ALISO VIEJO, CA	I adopt senior dogs and sometimes need physical therapy for them. Let's not make it more complicated and costly for people to help take good care of their pets in need.
2,004. Alexia Moreno	Tucson, AZ	
2,005. Dawn Mcloughlin	Middle village, NY	
2,006. Leslie Meadows	Port Orange, FL	
2,007. Judy Twombly	Old Orchard Beach, ME	
2,008. Ani Garibian	Tujunga, CA	
2,009. Celeste Blair	Redmond, WA	It is our job as humans to provide all animals the care that is required for them to have a quality life, including therapy
2,010. Caroline Wood-Loeble	Newark, DE	
2,011. Erika Benitez	Edinburg, TX	
2,012. Suzanne Mays	Cottonwood, CA	

Name	From	Comments
2,013. Marie Papas	Box Hill North, au	
2,014. Lynn Brooks	Monroe, WI	
2,015. sandra skolnik	sunnyvale, CA	don't make it harder for animals to get help. The AVA is just interested in making more money, not in the welfare of animals.
2,016. Rebecca Boyle	Columbus, OH	
2,017. Kim Kelly	Elko, NV	I'm an animal lover!!!
2,018. Casey M	New York, NY	
2,019. Rachel Langsam	Snowmass Village, CO	
2,020. Tristen Storie	Watauga, TN	
2,021. Aliyah Wallingford	Taberg, NY	
2,022. Jeremiah McCarty	Littleton, CO	
2,023. Lynn Runy	Brunswick, OH	
2,024. Sarah Hook	Fort wayne, IN	Animals are just as important as humans
2,025. Claudia Ramos	North Las Vegas, NV	
2,026. Ivy Hein	Damascus, OR	
2,027. David Woolley	Bishop auckland, gb	The welfare health and care if all animals is important.
2,028. Susan Nunn	Halifax, ca	Because animals deserve a healthy happy life too. Pets are not only pets they are family and we humans need to advocate for them.
2,029. Julia Kelly	Oakville, ca	Pets are important to all of us .. they need to be healthy happy and not in pain . Same as humans
2,030. Alex Aparicio	Fullerton, CA	
2,031. Ally Medina	Roanoke, VA	Because Freddy is so adorable!
2,032. Terri grandbois	Perris, CA	These beautiful babies deserve a chance . And physical therapy gives them a chance to rehabilitate.
2,033. Carolyn Bockmon	Whitehouse, TX	
2,034. Holly Hansen	Lincoln, NE	Every animal deserves the best quality of life possible for them.
2,035. Christina Godwin	Sacramento, CA	
2,036. Jennifer Mills	Palmyra, PA	For the love of animals everywhere
2,037. Natalee London	Madera, CA	
2,038. Lisa Asay	Cody, WY	
2,039. Sherry Schillaci	Sicklerville, NJ	Injured and special needs animals deserve the right to be treated as their Dr's and therapists recommend, and not due to cost cutting by greedy insurance companies and politicians
2,040. Rose Herrera	Inglewood, CA	
2,041. Angie Brownawell	Coatesville, PA	

Name	From	Comments
2,042. Lizbeth Lara	Beaverton, OR	This world needs more compassion. And these fur babies need more support.
2,043. Melissa Schapiro	Rutherford, NJ	This is important to me because it's hard enough to find able dogs into good homes let alone ones that need physical therapy. We need to give these animals a fighting chance to a good life!
2,044. Tamala Hall	Lakeland, FL	
2,045. Jennifer Kemper	Bidwell, OH	
2,046. Rhiana Martinez	American Canyon, CA	These are innocent animals with feelings who need help
2,047. Jennifer Baker	Pittsburgh, PA	
2,048. Alyssa Anastasio	Huntsville, AL	I believe animals deserve just as many rights as humans do. If we can have easy therapy access, so should the animals!
2,049. Ambrosia Heather	Firebaugh, CA	
2,050. Kim Sears	Lowell, MA	
2,051. Ashley Cordell	Grovetown, GA	
2,052. D Padilla	Huntington beach, CA	
2,053. Laverne Woode	DesMoines, IA	
2,054. Thomas Gehringer	Fort Lee, NJ	Because animals are just as deserving of care as humans
2,055. Jeffrey Ceja	Antioch, CA	
2,056. Donna Horne	Moultrie, GA	
2,057. Esperanza Zaragoza	Novato, CA	I am an animal lover and I don't like to see those little ones suffer.
2,058. Isabel Gradilla	Los Angeles, CA	Because all animals deserve just as much care as us humans, they feel and can be in pain as well. We humans aren't the only ones who need help with our body's and such, they need the help as well and animals are very precious to many people and the owners can't access the help they need for the companions when we don't have the right care for them available. That is why it is important to me.
2,059. Heather Backo	Cypress, TX	
2,060. Ashley Headrick	Indianapolis, IN	
2,061. Dana Justice	Las Vegas, NV	Because animals deserve to have the quality of life that physical therapy can bring!
2,062. Nancy Ernst	Highland Mills, NY	Everything about animals is important to me.
2,063. Nicky Jacobson	San Francisco, CA	
2,064. N Lewis	Lennox, CA	
2,066. Tuesday Gomillion	Austin, TX	
2,067. Lisa Fumia	Tulsa, OK	Because animals need humans to help them.
2,068. Eve Rio	Corona, NY	
2,069. Becky Darwazeh	Yuba City, CA	

Name	From	Comments
2,070. Cara Nagy	Columbia, NJ	
2,071. Anselmo Olivas	El Paso, TX	All dogs deserve care and love
2,072. Shana Chin	Grand Cayman, ky	
2,073. Journey Singh	Hull, GA	My dog is disabled
2,074. COREY HILL	Brantford, ca	Every one include dogs are entitled to help.
2,075. Nora Porter	Montclair, CA	Because all animal should be right to physical therapy when need it without all the red tape!!
2,076. Ana Maria Medina Cano	San Vicente del Raspeig, es	A imals feel pain as we do and can feel better with phisicaly therapy. They deserve a better quality of life
2,077. Jocelyn Sims	Hixson, TN	
2,078. Mary Thibodeaux	Lafayette, LA	
2,079. Belinda Chapman	Cessnock, au	
2,080. Suzanne Clements	Hopewell, VA	Animals are living beings and need to be respected too [?][?]
2,081. Brittney Dilles	Moses Lake, WA	
2,082. Destiny Martinez	Denver, CO	
2,083. Evelyn Langdon	Carson City, NV	Without this oppportunity these animals have NO chance to regain a life they deserve and should have.
2,084. Peita Sims	South Melbourne, au	
2,085. Rochelle Wilder	Silver spring, MD	
2,086. Letitia Ford	Riverdale, GA	I love animals and want them to have what they need to live their best lives.
2,087. Jean O'Neill	San Diego, CA	
2,088. leila cheshire	Kingston, TN	My pups are the most important thing next to my family. They deserve the best.
2,089. Gwendolyne Echenagucia	Dallas, TX	
2,090. Chris Martinez	San Antonio, TX	I am a dog person and will always be a dog person. I also work with the special needs and handicap, and if they ever took away rehab for them I would be so upset.
2,091. Suzan Ward	Clayton, GA	
2,092. Kaylan Harden	Meridian, MS	Because every animal deserves a chance to live a better life.
2,093. Sue Lauer	Howards Grove, WI	
2,094. Brenda Magaña	Corona, CA	
2,095. Katie Gared	Northridge, CA	
2,096. Lydia Crepon	Watertown, CT	I want to make sure dogs who need therapy, like Freddie, get helped!
2,097. Allison Teetzel-Butler	DEL Mar, CA	
2,098. Helen Faithfull	Santa Maria, CA	

Name	From	Comments
2,099. Jocelyn Olivo	Pembroke Pines, FL	Because Animal Physical Therapists should be treated in the same manner that human P.T's are treated. They should work in conjunction with the animals primary Dr. They are not taking work away from them but assisting in their patients recovery.
2,100. Christina Pammer	Oslo, no	
2,101. Lisa Labozetta	Medford, NY	
2,102. Aumai Wills	Portland, OR	
2,103. Karina A	New York, NY	Animals should have access to PT. The process should not be made difficult for the animals, the owners and the trained and qualified physical therapist. It seems like the board and association are not willing to compromise. More like being selfish/greedy
2,104. Sheida Samayoa	Fontana, CA	It is important that all animals deserve the care that humans would receive as well
2,105. Heather Jones	Lakewood, CA	
2,106. Martha-Ann Miller	Belgrave, au	
2,107. Taylor Holland	Edmonton, ca	They just deserve a better quality life. Animals are amazing creatures that make life better for everyone. My dogs save my life every day signing something like this is the least i could do to give back. Without things like this being more accessible, more and more amazing animals will end up losing their lives prematurely.
2,108. Amanda Glaesel	Hackettstown, NJ	I know a dog in CAwho needs physical therapy.
2,109. Nina Dante	Staten Island, NY	PT is very important to these animals and limiting options would not help them
2,110. Donna Lockwood	Wasaga Beach, ca	
2,111. Alessia Babboni	La Spezia (SP), it	
2,112. Michael Bassett	Brooklyn, NY	
2,113. Stacy Bobadilla	Corona, CA	
2,114. Cindy Segura	Delano, CA	
2,115. Jennifer Mechling	Hertford, NC	
2,116. Mary Ann Maier	Sea Cliff, NY	The protocol passed by the California Veterinary Medical Board Stakeholder's Task Force in 2017 makes sense for all— vets, PT's, consumers and patients. No vets I know want the additional burden of having to provide their own physical therapy services for their patients. If they do, they are free to create such a service on their own. Legislating compliance would be costly, time consuming, space-restricting, and quality of care would suffer. The new rules being proposed sound like a shady money grab.
2,117. Chastidy Hubbard	Roanoke, VA	
2,118. Donna Cleary	Middletown, NJ	

Name	From	Comments
2,119. Joan Wisbeski	Felton, DE	If this law was to go into effect, a) you're taking my right away as to where I feel I want my animal worked on; b) don't vets have enough on their plates? and c) I'm pretty sure that the rehab centers have people who are trained to take care of any physical therapy that needs to be done.
2,120. Jo Cortez	London, gb	
2,121. Aimee Sanders	Campbell, CA	
2,122. Laurie Dydo	Bow, NH	
2,123. Deena McKinney	Bakersfield, CA	
2,124. Lee Cado	Bala Cynwyd, PA	
2,125. Marilyn Sheppard	Grass Valley, CA	I have three dogs, I would want the best for them.
2,126. Heather Hulseley	Middle River, MD	
2,127. Amanda Harris	Fayetteville, GA	
2,128. Kaitlin Aguirre	San Diego, CA	
2,129. Keri Przebienda	Northville, MI	
2,130. Claudia Lopez	Toa Alta, pr	Dogs are a priority for me because I adore them and will do whatever it takes for them to be happy and healthy.
2,131. C Sokol	Los Alamitos, CA	
2,132. Susan Wells	Syracuse, NY	Dogs and other pets deserve easy access and choices in their medical care, and the pet parents for their beloved pets .
2,133. Jessica Kim	Anaheim, CA	
2,134. Lisa Williams	Roanoke, VA	
2,135. Rachel Colwitz	De Pere, WI	Animals always need a voice!!!!!!
2,136. Maryann Hathaway	San Diego, CA	Animal is a part of family!! Help them as we can!!
2,137. Joseph Colacitti	Elizabeth, NJ	
2,138. Darci Castanon	Lemoore, CA	
2,139. Aleks Brady	Silvers spring, MD	It is important to me because I love all animals yes even cats and I believe that if a child with a disability needs that extra support and care from a animal physical therapy dog then by gods good hands they should have it if it truely helps them thru the day then give them that chance don't we all deserve that chance? I believe so no matter how many dissabilities that you have you deserve that helping hand in any way shape or form that is possible to help you succeed and progress through life
2,140. Holli Lienau	Rancho Santa fe, CA	
2,141. Melanie Thomas	Winchester, KY	

Name	From	Comments
2,142. Linda Colon	Wallingford, CT	Animal physical therapy is critical to the quality of life for animals either born with disabilities or inflicted upon them by humans who abuse them while those who rescue try to give them a new leash on life.
2,143. Elsie Paramo	Lemoore, CA	
2,144. Claire Duffy	Torbay, ca	
2,145. Will Simms	Lemoore, CA	
2,146. Morgan Medina	Reseda, CA	
2,147. Darci Simms	Lemoore, CA	
2,148. Annette Shapiro	Gurnee, IL	I have a pup that is blind with numerous back problems. To be able to help her live her life to the fullest is very important, as is with each and every animal out there. Let's keep things as they are, so Freddie and her family can live happily and healthy.
2,149. Ashley Burdo	Saint Albans, VT	
2,150. Simon M Castanon	Hanford, CA	
2,151. Bernadette Pauley	Studio City, CA	
2,152. Katie Long	Morgantown, WV	
2,153. Emily Couch	Chicago, IL	
2,154. Carolyn Mayta	Sonoma, CA	
2,155. Laci Wilson	North Hills, CA	
2,156. Debbie Leon	Redding, CA	I don't have "human" children. My animals are my children. These fur babies have had a hard,rough life. We need to help these babies.
2,157. Francisco Diaz	San Antonio, TX	We all need some help specially the ones that can't speak.
2,158. Jacqueline Johnston	Camarillo, CA	This is very important for animals who need this! Animals are our family members and we would do everything for them as I would any other members of my family!
2,159. Carol Smith	Eliot, ME	All animals deserve to have what ever is needed to help them Live quality nlubes. Animals live is unconditional
2,160. Joyce Colman	Alexandria, VA	This helps so many animals and should continue.
2,161. Sausha Wright	Steger, IL	ALL animals deserve a chance feel good every day! And therapy is an important part of that and the special humans that take care of them!!!
2,162. Sandra Fuller	Claremont, CA	I feel as thought the physical therapist are being denied independence in their practice with this act
2,163. Jennifer Espinoza	Campbell, CA	
2,164. Lisa Anderson	Berea, KY	

Name	From	Comments
2,165. Shelly Watkins	Metamora, IN	I love dogs and value the importance of their ability to be rehabilitated.
2,166. Julie Andersen	Roseville, CA	The more PTs, the more healthy and happy animals. Please don't limit their ability to provide services.
2,167. Kreeanna Mahl	Livonia, MI	Dogs just really deserve the world. They're the best friend that's never going to leave you, no matter what kind of person you are because they only see the good in the world. Making much needed care more difficult for them to receive is just plain wrong.
2,168. Tanya Sonna	Knoxville, TN	
2,169. Dawn Christie	Weston, PA	
2,170. Amy Elepano	RICHMOND, TX	
2,171. Charine Phang	Singapore, sg	
2,172. Kate Ramirez	Moorpark, CA	
2,173. Michele Plante	Coventry, RI	
2,174. Anna Eshelman	Rosamond, CA	Because they deserve all the loving care and physical therapy they need.??????
2,175. Jaleana Wells	Portland, OR	
2,176. Barbra Marquez	San Bernardino, CA	
2,177. Ida Leo	Clay, NY	
2,178. Laura Peterson	Elkton, MD	Animal PT shouldn't be controlled by vets. More therapists available makes it better for animals.
2,179. Carla Fulgham	Oxford, MS	
2,180. Brittany Lacy	Conneaut, OH	
2,181. Lucy Gomez	Ontario, CA	I have dogs
2,182. Lisa Randall	Augusta, GA	
2,183. Dawn Richard	Saint-Antoine, ca	
2,184. Julie Velez	Vacaville, CA	
2,185. Dana Farrell	San Diego, CA	These treatments give dog owners options to care for their pups in a different way and in addition to their regular vet. I have friends to take their dogs to physical therapy and it has greatly improved the health of their older dogs. O feel like this should be an easy option for pet owners. Also, it provides jobs for many people who are interested in the field.
2,186. Mary Garwood	Asheville, NC	
2,187. Michael Mandeville	Swanton, VT	@ready_freddie_
2,188. Ivette Guerrero	Pomona, CA	
2,189. Nicole Heckman	Long Beach, CA	
2,190. Callen Logan	St Augustine, FL	For Freddie and Juniper
2,191. Ryne Sorensen	Helena, MT	

Name	From	Comments
2,192. Dhwani Malhotra	New Delhi, in	
2,193. Michelle Jones	Vero Beach, FL	
2,194. Beth Tomte	Oakdale, CA	I love special needs animals
2,195. Tani DAloia	Trenah, au	
2,196. Kate Semyonova	Port Coquitlam, ca	
2,197. Linda Phelan	Green Valley Lake, CA	
2,198. Jill Franklin	Austin, TX	
2,199. Tammy Wypy	Terryville, CT	I believe the physical therapists have the right to remain independent.
2,200. Bernadette Cope	Kenosha, WI	
2,201. Terri DesLaurier	Minnnetonka, MN	What happens first in CA usually moves inward to other states. I think pets are entitled to the same treatment team approach humans have. Physical therapists aren't doctors but work with doctors for the good of the patient. If humans were limited to one dr there would not be enough time for everything needed. PT is not an MD specialty; it is its own degree. For reasons that are just as true for pets.
2,202. Maria Medlarz	Houston, TX	
2,203. Kim Perez	San Jose, CA	Animals need physical therapy too, without us having jumping through a bunch of hoops in order to receive it.
2,204. Andree Guest	Stockton, CA	Dog lover!♥🐶
2,205. Parry Pardun	Sacramento, CA	The corporate and political lobbyists representing medical and veterinary associations exploit legislators to sequester power and authority and to create bureaucratic and legal barriers to other trained medical and veterinary professionals.
2,206. Vince Bindo	Croydon, PA	I love dogs and care about them very much. They deserve all the love and care needed.
2,207. Caitlyn Reinhold-Lee	Winchester, VA	I believe all animals, like Freddie, deserve the help they need.
2,208. Neta Prine	Claremore, OK	
2,209. Laraina Domanchich	Los Alamitos, CA	
2,210. Jo Anna Evans	San Martin, CA	
2,211. Lori Cognetti	Scranton, PA	
2,212. Colleen Calvert	Ajax, ca	
2,213. Mirta Graciela Escobar	San Miguel de Tucumán, ar	Animals need physical therapy !
2,214. Evelyn Luna	Woodland, CA	
2,215. Alice Roberts	Salem, NJ	
2,216. Gloria Cueto	Jersey city, NJ	

Name	From	Comments
2,217. Kayla Needham	Glenwood springs, CO	Dogs are important.
2,218. LeeAnn Ford	Orange, CA	Animals are our family members. Thry deserve thr rights to physical therapy kust like any family member. Many animals have revovered and or had major improvements with physical therapy and went on to live long quality lives.
2,219. Kathy Keller	Appleton, WI	
2,220. Richard Blydenburgh	Gonzales, LA	Because it saves a dog life
2,221. Cassidy Deaver	Dahlonoga, GA	
2,222. Michelle Caruso	Goodyear, AZ	
2,223. Toni Hoy	Waynesboro, VA	
2,224. Sharon Elis	S F, CA	
2,225. Jessica Quinn	Fresno, CA	
2,226. Samantha Rojas	Phoenix, AZ	
2,227. Samantha Kuras	Pompano beach, FL	
2,228. Kenneth Vaughn	Phoenix, AZ	
2,229. Elaine Newmans	Middleburg, FL	
2,230. Nyssa Estremera	Loxahatchee, FL	
2,231. Rachael Espinoza	Whittier, CA	
2,232. Lynn Manning	Waynesville, NC	Because it's the right thing to do. I dearly love animals and feel for as much as they give us, we need to pay it back to them.
2,233. Benjaline Ashmore	Bakersfield, CA	
2,234. Shsun Speck	Edmond, OK	
2,235. Ron Patterson	Ormond beach, FL	Animals deserve same amount of care and respect.
2,236. Melanie S	Kailua, HI	I love animals
2,237. Janet Taylor	Rochester, NY	
2,238. Maria Miller	Los Angeles, CA	Free Choice!
2,239. Michael Spann	Lutz, FL	Every beating heart deserves a chance.
2,240. Heather Workman	Powell, OH	
2,241. Lisa Davis	Douglassville, PA	Animals have rights and deserve care. Pets are family members.
2,242. Elisha Armstrong	Stainton, gb	
2,243. Michele Culver	Albuquerque, NM	
2,244. Ellen Jensen	Cedar Park, TX	
2,245. Larri Cochran	Northampton, MA	
2,246. Ivette Fernandez	Yabucoa, PR	

Name	From	Comments
2,247. Marlene Brown	East Haven, CT	
2,248. Natalie Shasi	Santa clara, CA	
2,249. giusy pulzone	san miniato, it	
2,250. Diane Barrett	Cary, NC	
2,251. Sherrill Edwards	Porter, IN	To help all the animals get necessary service easily
2,252. Indira McPherson	Norman, OK	Every life is important and every dog deserves get treatments including physical therapy
2,253. Helena Stark	Foster City, CA	
2,254. Michael MacDade	Dallas, TX	There are so many talented specialists that are not veterinarians. It simply doesn't make sense. It would do tremendous damage to animal welfare.
2,255. Pamela Hougum	Moorpark, CA	
2,256. Jodi Rodar	Pelham, MA	
2,257. Sharon Tigner	Modesto, CA	I have 4 Dachshunds, and they are susceptible to ivdd.
2,258. Louise Schneider Louise Schneider	Danbury, CT	Animals have rights.
2,259. Elizabeth Stansberry	Beaverdam, WI	
2,260. Jolene Jones	Alliance, NE	Because California needs to mind their business and stay out of peoples lives. You've hurt as many people as you can and now you're going after animals. California is the home of monsters and socialist devils.
2,261. Brenda Wells	port colborne, ca	
2,262. Peaches Allen	Phenix city, AL	I love animals and anything they can do to help people is important!
2,263. Geena Duran	Monrovia, CA	
2,264. Jacqueline Nieves	Clearwater, FL	
2,265. Aikea Isom	Vallejo, CA	
2,266. Aniel Peski	Chicago, IL	For access to physical therapy for those with limited resources (ie. Money).
2,267. Megan Ballard	Lockport, IL	
2,268. Lynn Wood	Torrance, CA	
2,269. Lori Corradino	Brewster, NY	
2,270. Renee Parmelee	Campbell, CA	
2,271. Tammy Manrique	Kent, WA	Dogs need to be able to get the best treatment available to them!
2,272. Jaismeen Malhari	Acton, MA	
2,273. Kimberly Martin	Walton, KY	
2,274. Madeline Mendes	Wahiawa, HI	

Name	From	Comments
2,275. Matthew Roiz	Los Angeles, CA	Animals that need help can't receive it anywhere else but through humans. To become, to the Christian, is to help them.
2,276. Leslee Nicholas	Virginia Beach, VA	
2,277. Roxannie Razo	91304, CA	
2,278. Kayleigh O'Connor	Pittsburgh, PA	I have 3 rescues
2,279. Diana Serrano	Los angeles, CA	I believe that this law would potentially increase the cost of animal physical therapy, as well as limit ones options or access to these resources.
2,280. Marcella Alvear	Cypress, CA	Because I love animals all animals especially those who need help.
2,281. Kelli Drum	Garden Grove, CA	
2,282. Amy Morgan	Rice, VA	Limiting therapy to vet offices alone will prevent many pets receiving the care they need. Veterinarian offices are typically much more expensive which can be prohibitive to many people with tight budgets. Why change what has been working for years unless there is an underlying "kickback" going on to certain parties. This is ridiculous!!!
2,283. Lisa Levine	Palmetto Bay, FL	
2,284. Lisa Kulp	Hellertown, PA	Special needs animals should be allowed to get special care.
2,285. Susan Singleton	Salt Lake City, UT	
2,286. Vana Antonopoulou	Athens, gr	
2,287. Paula White	Jacksonville, FL	All handicapped people AND animals need help
2,288. Carol Davis	Flagstaff, AZ	
2,289. Malin Mertens	Travelers Rest, SC	
2,290. Casandra McCants	Turlock, CA	Please don't pass this law. With animal rights and advocacy on the forefront now, more people are making it their life work and mission to help animals and become qualified to do these types of services for animals in need. Thank you.
2,291. M Cancelli	Mississauga, ca	
2,292. Ashley Brazfield	Albuquerque, NM	
2,293. Lauren Boccia	Memphis, TN	
2,294. Jessica Franco	Woodbourne, NY	
2,295. Alisha Sylvester	Riverside, CA	
2,296. Neysa Smith	Mayport, PA	Animals are
2,297. Lisa Selca	Fairfield, CA	
2,298. Melanie Elmore	Hixson, TN	
2,299. Marie W	Tinley, IL	

Name	From	Comments
2,300. Kris Schinke	Edmonton, ca	
2,301. NINA DELUCCHI	Hercules, CA	
2,302. Megan Cunningham	Saint Paul, MN	
2,303. Morgan Robinson	Baltimore, MD	
2,304. Rosalind Hicks-Bowles	Austin, TX	
2,305. Renee Morehouse	Shingle Springs, CA	
2,306. Desiree Mingear	Centre hall, PA	Why would you ever do something that would make it MORE difficult for people to help their pets? Boggles the mind.
2,307. Candice James-Benjamin	Trincity Tacarigua, tt	
2,308. Nisa Bernal	Midland, TX	It is important because physical therapy is something we need for animals like Freddie.
2,309. Donica Tongel	LEXINGTON, NC	
2,310. Zoyla Molina Risher	San Bernardino, CA	Because i have fur babies and i rescue all fur babies need love and help they dont have a voice we are their voice
2,311. Julie Balin	Black diamond, WA	Our pups are part of our family and deserve the care we can get.
2,312. Rebecca Dutcher	Cave Creek, AZ	Humans don't do PT in doctor's offices. Why should animals/pets?
2,313. Heidi Chapman	Fremont, CA	????????
2,314. Nick Klaue	Brandon, FL	Animals are no different yhan humans they should be helped too!
2,315. Michelle Weiss	Sammamish, WA	
2,316. Felicia Levine	Boca Raton, um	
2,317. Ana Bienek	Spring, TX	It's the owners right to choose and the therapists right to work independent.
2,318. Lisa Rountree	Norris City, IL	I am a physical therapist interested in pursuing the education required to practice animal rehab. Living in a rural area it is not possible to meet the stringent requirements of this proposal. As well as placing more financial burdens on clients seeking services for the animals in their care.
2,319. Missy Thompson	Mobile, AL	This is a good program and it needs to stay!!
2,320. Hannah Dahdouh	Campbell, CA	
2,321. Rachel Baker	Huntingtown, MD	
2,322. Doreen Smith	Waland, TN	
2,323. Laney Gillum	Bonsall, CA	All animals should have access & no issues for their own health care
2,324. Regina Riedner	San Marcos, CA	
2,325. Leigh Ann Dial	Winston, GA	Animals deserve a chance. All life is important.

Name	From	Comments
2,326. Amber Carter	Dayton, OH	
2,327. Lisa Flaherty	Hollister, CA	
2,328. Kristine Schultz	Davie, FL	I love furry babies and they need all the help they can get. They can't help themselves and need you . Please help these wonderful creatures of God. Dog backwards .
2,329. Susan Devoe	Mentone, CA	
2,330. Erin Grennan	Brooklyn, NY	I've seen the positive, life changing effects first hand. It would be tragic to not be made available to all in need.
2,331. Christina Diggs	Cottonwood, CA	
2,332. Alicia Vandergriff	Whitwell, TN	
2,333. Edith Waters	Plantation, FL	We need to be able to provide an animal the therapy they need. If it can be provided by someone other than a vet why not? There Start worrying about what these animals need & not whose pockets it's going in to.
2,334. Lisa Brown	Hickory, NC	Pet owners know which providers they trust also the pines closet to them.
2,335. viola souza	pearl city, HI	
2,336. Samantha Barbere	East Meadow, NY	
2,337. andrea overton	austin, TX	
2,338. Sharon Matchett	San Juan Capistrano, CA	
2,339. Gracie Adams	Burns, TN	
2,340. Marisa Williams	Petaluma, CA	Animals don't have a voice, is humans help advocate what's best for them.
2,341. Ashley Wilson	Englewood, CO	Making it harder for animals to have improved lives is irresponsible, it appears making money is a large factor not the wellbeing of the animals that need to be treated!
2,342. Susan Trimmer	Westerville, OH	So many qualified professionals that have so much to offer our pets.. please don't limit the amount of care our animals are so deserving of to a veterinarian!
2,343. Ashley Rivas	Albuquerque, NM	
2,344. Madalina Neagu	Ploiesti, ro	
2,345. Sally Koons	Galand, TX	
2,346. Michele Mele	North Hollywood, CA	
2,347. Vinca Minor	Morsbach, de	Want to help ready freddy and her sisters an brothers,.... why shouldn't get dogs the same chance for therapies like humans?? Often dogs are the better ones ;)

Name	From	Comments
2,348. Candice Craig	Hagerstown, MD	Because this will greatly impact the quality of care that many animals rely on.
2,349. Joy Gross	Goodyear, AZ	Because every dog deserves to get help .. and do where they want.
2,350. Morgan Loftus	Park Ridge, IL	
2,351. Judith Zuhlke	Nashville, TN	Every being deserves a chance for a life and for some animals rehab could save them. We must advocate for them.
2,352. Alanna Patterson	Perth, gb	Because the gorgeous animals don't need their life to be more complicated and they need physical therapy!
2,353. Vanessa Guzman	South Gate, CA	
2,354. Stacy Handler	Red Bank, NJ	It seems like an unnecessary government intrusion that will limit rehabilitative care for animals. If a veterinarian has seen the animal and recommended a course of treatment, a licensed physical therapist is fully qualified to carry out the therapy.
2,355. Misty Smith	Lubbock, TX	because it's cruel & intentionally making it extremely difficult to get help for those creatures who need it. additionally most of the sweet critters are in need of these services because of a human.
2,356. Michael Macgrory	Worcester, MA	Firm animal lover believe all animals should be giving a fair shot
2,357. April Ledford	Woodstock, GA	
2,358. Alecia McInerney	Smithtown, NY	
2,359. Shawna Waller	Ridgeway, VA	Because animals are important to me. I've been passionate about animals since I've know what they were. It's important that animals get the care that they need just like people. Please don't make things any harder for those animals who need help.
2,360. Vanessa Sambrano	san diego, CA	Affordable therapy for our beloved pets
2,361. Lauren Scheich	Tucson, AZ	
2,362. Jeannette Ball	Rancho Cucamonga, CA	Dogs deserve to have physical therapy and be supported by the government.
2,363. Amy Munoz	Burleson, TX	
2,364. Arden Chaucer	Chapel hill, NC	We do not deserve the love and kindness and joy that dogs bring to our lives. The least we can do to repay them is help them when they are in need.
2,365. Allison Edwards	Clayton, NC	
2,366. Victoria Albright	Napa, CA	
2,367. Callie Smith	berkeley, CA	
2,368. Gabriela Schargorosdky	CABA, ar	
2,369. DJ Hooghkirk	Patchogue, NY	

Name	From	Comments
2,370. Amy Thorstenson	Glendale, CA	
2,371. Sonya Keefe	Bella Vista, CA	
2,372. Angela Mondarte	Bacoor, ph	Because animals deserve to be protected, loved and take care of.
2,373. Kaitlyn Ankrom-Hadden	Phoenix, AZ	
2,374. Michelle FARRUGIA	Oakville, ca	
2,375. Aldea Boaz	Atlanta, GA	The wait at vet offices for an appt is already too long. To add PT in a very office will only create more crowding, longer wait times, will make your animal upset instead of cooperative going to a place where pain occurs. Plus, as these are my children, I should have the choice on where and who to take them to, just like my Human child and myself.
2,376. Alice Gibson	Raeford, NC	
2,377. Dianne Underhill	Tor, ca	These animals are at a disadvantage and deserve a better life, and therapy helps that.
2,378. PATRICIA CACCAVALE-QUINN	Englewood, FL	
2,379. Diana Maltseva	Round Lake Beach, IL	I have a special place in my heart for all animals, have a rescue senior dog myself
2,380. Pam Ames	St. Catharines, ca	The work they do for injured animals whether it's an injury from say a vehicle impact as well as making a difference in animals born with physical limitations. They have already proved their value to animals and the pet parents
2,381. Charles Pippin	Surprise, AZ	
2,382. Eiko Cardiel Eiko Cardiel	Rancho Cucamonga, CA	
2,383. Michelle Fargo	Londonderry, NH	
2,384. Tamara Dulaney	Rancho Cucamonga, CA	
2,385. Shelley Peyron	Porterville, CA	Because I love animals and they deserve the best care they can possibly get!
2,386. Annette Gross	canterbury, au	
2,387. Michelle Scott	Cary, NC	We (pet owners, rescues) need MORE affordable and accessible services for our beloved animals, not fewer. Requiring that veterinarian level practitioners must render or oversee rehabilitative therapies will no doubt increase costs and decrease availability of services! Please do the right thing for the consumers and the animals without a voice who need access to this care.
2,388. Kasey Silverberg	Munford, AL	I love dogs

Name	From	Comments
2,389. Jackie Scarnici	San Juan capistrano, CA	
2,390. Erin MATTHEWS	Valencia, CA	
2,391. Zoë Fazio	Plantation, FL	
2,392. Victoria Hart	Sydney, au	
2,393. Lisa Machin	Temecula, CA	
2,394. Devyn Duneheew	Longmont, CO	This is important to me because animals that have something wrong with them they should be able to get all the treatment they need. Like we had to put down my dog because he got poisoned and wasn't able to walk and had seizures all the time and we didn't have enough money to help him so we had to put him down. It's not fair to someone if they have to put down there pet or if they loose their pet because they can't pay for the treatment.
2,395. Victoria Turner	Blair's, VA	All animals should be able to get the care that they need no matter what. It should not matter how. Just as long as the animals are helped the right way.
2,396. Christina Agnello	Las Vegas, NV	These beautiful and generous creatures deserve to have the best quality of life possible.
2,397. Joanne Schultz	Chicago, IL	
2,398. Lisa Chadwick	Arroyo Grande, CA	I should make decisions about my pet with the help of my vet, but not have to go only to their office for help. Makes no sense to me.
2,399. Stephany Hurtt	San Diego, CA	
2,400. MaryRose Lovgren	Chico, CA	
2,401. Michelle Osborne	Alamogordo, NM	
2,402. Savannah Trahan	El paso, TX	Physical therapy was everything my dog needed to walk again. It's not fair to deny it to these helpless animals that don't know any better.
2,403. Keendra Flores	Los Angeles, CA	
2,404. Jennifer Pollock	Thousand Oaks, CA	
2,405. Sarah Charchan	Standish, MI	I have a Lab who has diabetes, bladder problems, large mass on his side, he's blind and bad back legs. He needs to have this to move daily, it's an amazing thing to give out babies.
2,406. Heidi Parody	Olympia, WA	I have friends in California with animals who require PT to sustain any quality of life. They deserve to be able to choose the most qualified professionals to administer these treatments.
2,407. Vickie Lopez	Martinez, CA	
2,408. Rylie Klingaman	Rohnert Park, CA	
2,409. Veronica Perez	San Antonio, TX	

Name	From	Comments
2,410. Jose Villalobos	El Paso, TX	We need to be stewards for animal welfare.
2,411. maritza dominguez	vallejo, CA	
2,412. Javier Castillo	Chino, CA	
2,413. Maggie R	Monterey, CA	Having options is important for those who need to get care for their animals, it's already limited as it is.
2,414. Kimberly Raymond	Fenton, MO	This is important because every animal that need PT to make their life better should be able to get treated. We should help to make things easy and availbe not harder.
2,415. Gerda Veskus	Tallinn, ee	
2,416. Claire Scheele	Oakland, CA	
2,417. Meghan Eppinette	Diamond Bar, CA	
2,418. Tina Scarborough	Savannah, GA	I have five dogs and would like to ensure their ability to have whatever is necessary for their health.
2,419. Kate Hanus	Berkeley, CA	
2,420. Tanya Ascencio	Inglewood, CA	Every animal needs the opportunity to have a second chance.
2,421. Patricia Kamienski	Hermosa beach, CA	I'm an animal lover, I've seen animal who suffer from disabilities. They feel pain too and need our help. Since they can't advocate for themselves, here I am!
2,422. Kathleen Duncanson	Huntington Beach, CA	
2,423. Linda Bianchi	Redwood City, CA	
2,424. Carol Armstrong	Penrith, gb	
2,425. Gini Dawes	Sacramento, CA	
2,426. Chicky Burton	Prescott, AZ	
2,427. Nicole Hill	Bothell, WA	
2,428. Carolin Drake	Los Angeles, CA	
2,429. Gabriela Deleo	Buenos Aires, ar	
2,430. Kelly Espinosa	Watsonville, CA	It's important we have choice when caring for our dogs.
2,431. Matteo Curtoni	Milano, it	
2,432. Annie Steinberg-Behrman	Berkeley, CA	Because all lives are equally valuable and deserve to be treated that way
2,433. Linda Pester	Taylorsville, UT	because i want all the animals all the help they need without having to jump over a lot of obstacles we have to be their voice !
2,434. Filiza S	Норильск, ru	
2,435. Faith Wilkinson	Lake Forest, CA	It's important to me because I am the owner of 2 dogs
2,436. Hannah Perreault	Beale afb, CA	

Name	From	Comments
2,437. Katherine Vieiramendes	Oakland, CA	
2,438. Amanda Chamberlin	San Antonio, TX	
2,439. Melissa Kittley	Abilene, TX	I love animals and think they should be able to receive the proper care they need, and should be able to choose who they desire to treat them.
2,440. Tarra Cokor	Reno, NV	
2,441. Katherine Stewart	Belmont, CA	
2,442. Melissa Garrett	Ogden, UT	Everyone including animals deserve affordable help
2,443. Cherr Lenz	Paulden, AZ	People & animals deserve the best treatments by the practitioner of their choice.
2,444. Gabriela Lopez	Pico Rivera, CA	
2,445. Anna Torres	Pasadena, CA	Because it's not fair for these sweethearts to have to struggle more than they already are. Don't do this to them.
2,446. Priscilla Wallace	Roseville, CA	
2,447. Zoë Hunt	Cholsey wallingford, gb	
2,448. Elaine Armstrong	Sligo Ireland, ie	
2,449. Ashley Powell	Sacramento, CA	
2,450. Kinsey Salyers	La Mesa, CA	
2,451. Adrian Potts	Durham, gb	It is essential that animals ste afforded the opportunity to receive this vital treatment, and not to put limitations or constructions in th way.
2,452. Chloe Dunham	Cary, IL	
2,453. Stacy Strutz	Portland, OR	Dogs need healthcare too.
2,454. Nicole Alaverdian	Valley glen, CA	
2,455. Linda Keydeniers	Ontario, CA	
2,456. e. wood	greer, SC	
2,457. Kaitlyn Paras	Campbell, CA	It's important that every animal is able to get the help they deserve. Animals should have as much right as humans do.
2,458. Laura Martinez	Orangevale, CA	All living beings deserve help
2,459. Sheena Jones	Tauranga, nz	Help the animals.
2,460. Hayden Watson	Greenville, SC	Animals are just like kids and are a part of the family. They should have benefits and resources available to them at all times.
2,461. Alina Palomino	Houston, TX	
2,462. Paul Brannen	Austin, TX	
2,463. Jamie Hollway	Napa, CA	
2,464. Elise Ohara	Doncaster, gb	

Name	From	Comments
2,465. Misty Russell	Carpinteria, CA	
2,466. Ludovica Lai	Cagliari, it	
2,467. Megan Regan	Port Huron, MI	Because so many dogs need physical therapy to keep them healthy
2,468. Roger Skidmore	Vallejo, CA	
2,469. Pamela Fogleman	Clemmons, NC	It is NOT in the best interest of our pets.
2,470. Nicola Hocking	East kilbride, gb	
2,471. Nicole Luna	Sacramento, CA	Because I love Freddie Mercury!!!
2,472. Milli Martinez	San Diego, CA	every animal deserves the right to be able to learn to walk again, etc. they have lives that are just as important as ours.
2,473. Rachael Stimpson	Dubai, ae	Every animal has the right to quality of life, and if this can be improved through therapy then options should be available.
2,474. Alexandra Guellich	Stuttgart, de	
2,475. Elizabeth Rodríguez Medina	Hargarten-Aux-Mines, fr	
2,476. Romea Lohmann	Wilhelmshaven, de	
2,477. Jade Nixon	Redcar, gb	
2,478. Helbert Arias	North Hollywood, CA	
2,479. Patti Miele	Yonkers, NY	Every animal deserves a chance atva wonderful life!!!
2,480. María Alicia Sedlmair	Santo Domingo, do	
2,481. Miranda P	Hi, au	Dogs need to run amd to act lile a dog sorry idk
2,482. Lulu Guerrero	Sylmar, CA	Animals deserve all the care we as humans get. Especially dogs, they are innocent life changing deserving family members/ friends.
2,483. Stacy Shaw	Watford City, ND	
2,484. Tom Young	Ipswich, gb	
2,485. Ashelynn Osnato	Grahamsville, NY	
2,486. Laura Curry	Van nuys, CA	
2,487. Deevy Greitzer	Middletown, NY	It's important that qualified animal physical therapists be available outside of veterinary offices.
2,488. Sandra Plunk	Riverside, CA	It is ridiculous that if this is passed, highly qualified people would be out of work.
2,489. Maria Slough	Instow, gb	Because all sentient beings deserve the right to care for their lives
2,490. Robin Cahayla	Granite Bay, CA	
2,491. Kristen Valle	Long beach, CA	Animals that need therapy need therapy . PERIOD
2,492. Setenay Ishak	Los Angeles, CA	

Name	From	Comments
2,493. Jackie McClement	Menifee, CA	Far too many animals will lose their chance to be rehabbed because the cost of services done by Veterinarians will become too costly to afford and not enough Vets are trained to do this.
2,494. Janet Quixano	Iselin, NJ	Animals have a right to good health care
2,495. Marion Kraus	Heidenheim, de	
2,496. Carol Chargualaf	La Mirada, CA	
2,497. Kathy Anderson	Greensburg, PA	
2,498. Adrianette Feliciano	Bronx, NY	
2,499. Bobvi Dolan	Ostrander, OH	
2,500. Hailey Thomason	Boiling Springs, SC	Because dogs deserve to live life to the fullest just as humans do.
2,501. Shannon Gray	Belfast, gb	Dogs need someone to look after them, to care for them.
2,502. Kristin Oliva	Charlotte, NC	
2,503. Mindy Worrick	Boalsburg, PA	Stop over regulating health care for animals and humans. Terrible!
2,504. Katherine Fields	Indianapolis, IN	some animals need physical therapy and the animals who need it should get it.
2,505. Christine Romero	Chandler, AZ	Physical Therapy for our furry family is important to me. One of my older dogs developed a bulging discs. Too old for surgery. So alternative medicine therapy help him live longer without surgery.
2,506. María Teresa Oliver	Caniles, es	
2,507. William Dutcher	Pataskala, OH	My dog required physical therapy and if it wasnt for the wonderful physical therapist he had, he might not be the happy playful puppy he is now.
2,508. Elyse Branscum	Reno, NV	
2,509. Sue Goodman	North York, ca	
2,510. Toyia Bryant	Inglewood, CA	
2,511. Cynthia Borlinghaus	Selma, TX	All dogs deserve treatments especially recues
2,512. Courtney Dosch	Winter garden, FL	My dogs are my children and would do anything to keep them safe and happy and well.
2,513. Jennifer Kidd	allenhurst, GA	I believe every animal has the right to be able to get physical therapy because some of their problems are caused by humans
2,514. Sarah Reed	Tallahassee, FL	
2,515. ETELVINA Serrano Martinez	ourense, es	
2,516. Josy Canova	Sion, ch	

Name	From	Comments
2,517. Janice Elenbaas	Beaufort, SC	Dogs add such joy to our lives. Helping them recover from injuries is our responsibility.
2,518. Celena Lopez	Logansport, IN	
2,519. Maria Stepanova	Saint-Petersburg, ru	
2,520. Beth Small	Scottsdale, AZ	
2,521. Elia Catalano	Staten Island, NY	
2,522. Bonnie Murdoch	Speers pt, au	
2,523. Matthew Hinojosa	Rio Grande City, TX	Because I want animals to live a happy normal life
2,524. Deanna Fletcher	Independence, MO	
2,525. Jenni Lewis	Midlothian, VA	
2,526. Jutta Vaytinen	Helsinki, fi	
2,527. Margaret Douglas-Johnson	Sun City, AZ	
2,528. Alexander Cox	Berryville, AR	
2,529. Ким Анна	Ташкент, uz	
2,530. Hollie Dean	Hilldale, au	Because I feel all animals should have the right to have access to health care and treatment no matter where they are
2,531. Celina Odeh	Greer, SC	
2,532. Tracy Johnson	El Dorado Hills, CA	We have a right to choose! They've already taken away so much of our choices for treatment as people we should put out foot down when it comes to our animals and friends. We should habe the right to choose what's best because we are the ones who spend all of our time with them, not someone who sees them for maybe 10 minutes every few months.
2,533. Nicole Lucas	Portland, ME	All innocent beings deserve care and should be allowed the opportunity to heal and get well.
2,534. Cathy Ledvina	New Berlin, WI	
2,535. Grace Salinas Chase	Camarillo, CA	I rescue dogs.
2,536. Amanda Kaylor	Las Vegas, NV	Animals deserve to be able to get physical therapy they need and limiting it to just veterinary clinics will significantly hinder that ability
2,537. Sarah Duplaga	Columbia Station., OH	
2,538. Andres Cerda	Chicago, IL	Animals are living creatures, too. They need proper physical therapy just as much as humans do.
2,539. Brandi Rothermel	Mechanicsburg, PA	
2,540. Donna Jordan	Santa Monica, CA	I want choices when it comes to choosing the best possible therapy for my pets.
2,541. Erin Frawley	Martinez, CA	All dogs, like humans, should be able to receive quality medical care.

Name	From	Comments
2,542. Misti Brewer	Galax, VA	
2,543. Mona Coetzee	Penhill, za	
2,544. Sarah G	Beaverdam, VA	
2,545. Jessie Caruso	MEDFORD, MA	
2,546. m kincer	shelby, MI	
2,547. Maggie Marlowe	Honolulu, HI	
2,548. Courtney Rico-Tinajero	Hayward, CA	Affordable animal health care should be on the 2020 platform
2,549. Mike Greve	Calverton, NY	
2,550. Patricia Branco	Dos Palos, CA	We must care for all living things
2,551. j kincer	shelby, MI	
2,552. Madelaine Reid	Portland, OR	
2,553. Tess Hoven	Phoenix, AZ	
2,554. Ada Migliorini	Vimercate, it	
2,555. Samantha Thorpe	Oxford, NC	
2,556. Myrna Kines	Winnipeg, ca	All life matters. ♥[?]
2,557. Candace Pederson	Redding, CA	We should be able to chose who cares for our family, our pets and their well being.
2,558. Tina Meeker	Rialto, CA	
2,559. Deborah Smith McGowan	Mesa, AZ	Because it is!!!
2,560. Lori Perlman	Long Beach, NY	I am a dog mom, I have friends and family in California and would never want them or myself not to get our babies the care the need!
2,561. Jennifer MAZZEI	Darien, IL	
2,562. Cecilia Aguilar	Detroit, MI	~ Animals have feelings, they can feel just like us, they aren't objects, and they deserve to be treated right
2,563. Morgan McKenzie	Wrightwood, CA	I've had many special needs dogs and know the importance of physical therapy. I feel limiting physical therapy options is a step backwards.
2,564. DAWN STEINWEG	Escondido, CA	I love animals. They should be able to get all the help possible.
2,565. Sylvia Ferro	Miami, FL	
2,566. Mallory Jordan	Memphis, IN	These animals deserve the care we can give them with ease. Its selfish to deny them that. We need to take care of these selfless creatures and making it harder to do that is a crime
2,567. Ali Porter	Smithfield, VA	All dogs deserve a chance to live a pain free happy life!
2,568. Kate Mannion	Brooklyn, NY	
2,570. Trisha Havens	Draper, VA	

Name	From	Comments
2,571. MaryAnn Lower	Pollock Pines, CA	
2,572. Cati Burlison	Huntsville, AL	So many dogs need the thereapy and it should not be hard for them to get Animals are as important as humans
2,573. Helene Lapointe	Keremeos, ca	
2,574. Laura Duran	Porterville, CA	Every animal should have a chance for a good life
2,575. Laura Montes	Modesto, CA	Because dogs are so important and people throw them away like trash
2,576. Lisa Shea	Pelham, MA	
2,577. Elsi Rivera	El monte, CA	
2,578. Corinne Etancelin	les andelys, fr	
2,579. Barbara Godfrey-Cass	London, gb	
2,580. Sheila Pinheiro	Murrieta, CA	
2,581. Susan Sutherland	Haleyville, AL	All animals deserve a chance at a better quality of life just as humans do.
2,582. abby tollett	dallas, TX	
2,583. Kara BELLAR	Phoenix, AZ	All animals need a chance and there is no reason why PT has to work in a vets office if there highly qualified, also a vet has less traning..
2,584. Christine Sharry	Orange, CA	All living things deserve a chance to live their best life possible.
2,585. Aleksandra Wala	Rzeszow, pl	
2,586. Carolyn Schaerer	Las Vegas, NV	
2,587. Amber Lau	Mission hills, CA	Poor babies deserve access to physical therapy and benefit so much from it!!
2,588. Holly Erickson	Moorpark, CA	All dogs are special, no matter their specific needs. We shouldnt charge extra for therapy.
2,589. Amy Danowitz	Mt Holly, NJ	Animals matter
2,590. Ginger Mullis	Morven, GA	Help
2,591. Teri Hanson	Stillwater, MN	
2,592. Danielle Stranger	Los Angeles, CA	
2,593. KimJ ManyIssues	Peterboro, gb	
2,594. Clare Vaught	Jacksonville, FL	Each living and breathing anima has rights to life and help in a quality life. Especially our pets, when caring for them any help that we can get for them is crucial!
2,595. Wendy Danno	Encino, CA	I do not want my dogs health care controlled by a vet office that already has never suggested anything but drugs. Most of the private Pt's are amazing & work to bring the whole body into the forefront. We want to have these highly trained specialist certified & NOT working in a 3rd party vets direct <i>(continues on next page)</i>

Name	From	Comments
2,595. Wendy Danno	Encino, CA	<i>(continued from previous page)</i> supervision. Most vets do not know the 1st thing about what it takes to rehabilitate a dogs physical body. I and many others want our PT separate & specialized just like human PT. Why do vets want to monopolize every facet of your dog? Food etc. What motivation\$\$\$\$?? One stop shopping & profit for our vet is not good enough for out dogs & our wallets.
2,596. Marianne Lazarus	Melbourne, FL	
2,597. Ashia Villegas	Duarte, CA	
2,598. Martha Castro	Evanstkn, IL	
2,599. david gray	paisley, gb	
2,600. Joel Gonzalez	La Quinta, CA	
2,601. Erin Rice	Turlock, CA	
2,602. Wendy Gibson	Indianapolis, IN	
2,603. Annette Koeckmann	Hamm, de	
2,604. Kelly Pierce	Paducah, KY	
2,605. Ana Gonzalez	Woodland, CA	
2,606. Janette Nieva	SSF, CA	
2,607. Debi Block	Bay city, MI	
2,608. Corrie Czubatiuk	Hoffman Estates, IL	Because these wonderful dogs need a chance.. they might have came from an abusive environment or born with something wrong.. both not their fault.. it's cruel to deny them
2,609. Airela Ayala	Las Vegas, NV	They deserve this as much as any human does. They have feelings, emotions and give so much love that they hide when they are suffering. The best we can do for them is have all the resources available for them to be able to help them and care for them just as they care for us and love us.
2,610. Amy McDevitt	San Antonio, TX	
2,611. Jennifer Asaro	Pacifica, CA	
2,612. Carlene Martinez	Venice, CA	
2,613. Hollie Patterson	Atlanta, GA	Dogs deserve whatever it takes to make them healthy and functioning!
2,614. Nancy Ritthamel	Northridge, CA	Human PT's don't have to work in a doctors' office, so why should animal Pt's?!
2,615. Cynthia Leech	Enfield, CT	
2,616. Grace Kasprzak	Mt Laurel, NJ	All living beings deserves this kind of help!
2,617. Sonia Tlatelpa	Bakersfield, CA	
2,618. Gu Viell	M, de	
2,619. Lia Solomou	Athens, gr	

Name	From	Comments
2,620. Cat Guzman	Glendora, CA	Rehab is important to all life
2,621. Emily Garrido	Atlanta, GA	
2,622. Kim Armstrong	Pittsfield, MA	
2,623. Rebrcca Summera	Doncaster, gb	
2,624. Becky Burns	Waterford, MI	This needs to BE!!
2,625. Marya Glowka	Jupiter, FL	Duh.
2,626. Michelle Ellis	Opelika, AL	
2,627. Robert Smith	Los Angeles, CA	
2,628. Julie Johnson	Rehoboth, MA	
2,629. Jasmine Powell	Hereford, gb):
2,630. Brenna Kuryk	Calgary, ca	This is so important to help unfortunate animals gain a second chance at living their best life! These animals did not ask to have disabilities, asked to be abused or asked to be neglected. We need to do our part to help these animals.
2,631. Angel Anglin	Godley, TX	
2,632. Bobbi jo Ulsh	Hanover, PA	
2,633. Virginia Wedemeyer	Spring, TX	
2,634. Sandra Martinez	Spring, TX	Because animals deserve any treatment that will help them feel and function better.
2,635. Carrie Connors	Los Alamitos, CA	
2,636. Sara Wotherspoon	Lovettsville, VA	
2,637. Ronja Mathiesen	Tinglev, dk	
2,638. Ross Babcock	Eagan, MN	
2,639. Samantha Miller	Windber, PA	All animals deserve a second chance, and if that's a second chance to walk then they deserve it! Dogs and animals are a mans best friend and I don't know where I would be some days without my dog, she's my best friend!
2,640. Juan Carlos Rodriguez Sanchez	Cartago, cr	Because whoever wants to help an animal should be able to do it.
2,641. Jay Vee	Toronto, ca	
2,642. Maureen Jacquot	Bay Harbor Islands, FL	
2,643. Lisa Tallent	Cleveland, TN	
2,644. Michelle Cox	Charleston, WV	All dogs deserve a chance
2,645. Kim Cunningham	Valdese, NC	I believe helping this sweet dog get back its feet again
2,646. Kelly McClanahan	Cleveland, TN	
2,647. Amy Podgorski	Queen Creek, AZ	
2,648. Karen Scarlet	Melbourne, au	

Name	From	Comments
2,649. Nicole McClintock	Levittown, PA	
2,650. Karin Carrie	Scappoose, OR	Animals should get all the help they need, since we as humans do us much to fail them. This is our way that we can give back positivity and most of all HOPE.
2,651. Linda Jung	Boyds, MD	
2,652. Bandjery Rivera	Chicago, IL	
2,653. Shelley Eisenberg	Tolovana park, OR	
2,654. Garrett Gunski	Manchester, NH	
2,655. edithlynn jackson	elkridge, MD	
2,656. Karen Marshall	Heysham, gb	
2,657. Ashley Kirby	Goulburn, au	
2,658. Elizabeth Jetton	Charlotte, NC	
2,659. Maegen DeGroff	San Diego, CA	Dogs deserve to be treated with the best care possible
2,660. Melissa Marquez	Hood River, OR	I love animals & they can't speak for themselves. They have feelings like we do & they try to help us in so many ways in life. They deserve the best care as do humans.
2,661. Guilherme Hiago Afonso	Santo André, br	Unfortunately the most i can do
2,662. Johana Rodriguez	Philadelphia, PA	
2,663. Patricia Walker	Albuquerque, NM	It is important for animals to have the best care possible
2,664. Rachael Cote	Reno, NV	
2,665. Christina Dmello	Borivali, in	
2,666. Rosy May	Sydney, th	Because animals are just as important as humans & they have rights
2,667. Jeanny Laurie	Yucaipa, CA	My pets are family. I make responsible decisions as to their care. I do not want government telling me who can do it.
2,668. Kerstin little	Woodland Hills, CA	
2,669. Tania Richter	Prior Lake, MN	
2,670. Cordielle Street	Kew Gardens, NY	
2,671. Jacki Bates	Hyannis, MA	Physical therapy for animals is so important for their rehab and shouldn't be difficult to access.
2,672. Theresa Dowd	Arcadia, CA	Because I love the work they are doing!
2,673. John Casas	Manvel, TX	
2,674. Crystal Josephson	Goleta, CA	
2,675. Kristy hawk	Conroe, TX	
2,676. Cynthia Hebert	Kinder, LA	Love dogs
2,677. Richard Livingstone	Newcastle upon Tyne, gb	
2,678. Elisa Sánchez	Córdoba, mx	Such a good way to help those who desperate need this kind of therapy

Name	From	Comments
2,679. Dagny Austin	Siler City, NC	
2,680. carrie west	muncie, IN	
2,681. Katie Whelan	Santa Rosa, CA	
2,682. Lynsey Martin	London, gb	
2,683. Diane Beavers	Toledo, OH	
2,684. Alice Almond	Waxhaw, NC	
2,685. Ashley Gwin	Kingwood, TX	I have animals, 1 of which needed therapy!
2,686. Lori Tayar	NEW YORK, NY	
2,687. Mary Petty	Bowling green, KY	
2,688. Pamela Basciano	Caserta, it	
2,689. Marsha Cooke	HEADLAND, AL	
2,690. Chrissy Casey	Chester Spring, PA	
2,691. Gerry Jacobs	Raleigh, NC	
2,692. Elizabeth Ritchie	Roseville, CA	
2,693. Cindy Steerman	Northglenn, CO	Having options to decide what is best for your dog and your family is what is best. Please do not limit access to PT to veterinarian. People can make their own informed decisions!
2,694. Lynn Gross	Olney, MD	
2,695. Tomislav Fundak	Bestovje, hr	
2,696. Carole FONTAINE	Mont saint aignan, fr	
2,697. Nova Ferguson	Coleville, ca	Animals are the goodness this world needs and we should treat them as the gift to the world they are!
2,698. Alicia Myers	Vienna, WV	
2,699. Julie Akin	Atlanta, GA	I believe this is not something that should be regulated by vets. It will on add more cost and most of the people who take their animals for therapy are doing it for the love of their pet and the pet's wellbeing...not bc a vet told them to. It's crazy. It's just a money making endeavor for vets
2,700. Jake Lewis	Lancaster, CA	Just as with humans you don't go to a doctor for psychical therapy, you go to individuals who are taught how to use psychical therapy to help you improve. No need to throw these two very different professions together.
2,701. Alison Fehl	Lumberton, NJ	I absolutely love animals in every at possible and believe from my heart that they deserve this level of care
2,702. Eva Sobieray	London, gb	I think that animals deserve a chance to have rehab. We can't just let them be in pain. It's our duty to help
2,703. Sherrie Mingle	Lompoc, CA	
2,704. Shay Ridley	Paraparaumu Beach, nz	
2,705. I. Hoogendijk	Woubrugge, nl	All lives matter, human and animal

Name	From	Comments
2,706. Tammy Dance	Apple Valley, CA	It's vital for abused and in general animals that would otherwise be put down. Our animal friends need our support since they are always here for us.
2,707. Patti Anthony	Harbor City, CA	
2,708. Heather Richwine	Mechanicsburg, PA	I have a friend who has several dogs who need physical therapy and its important for there healing and development to continue with this.
2,709. ines johansson	morjärv, se	
2,710. L Morgan	Phoenix, AZ	
2,711. Anika Secrease	Las Vegas, NV	
2,712. Marie Herrera	Oakland Park, FL	
2,713. Lauren Huet	Natrona Heights, PA	
2,714. Sherry Geils	Newberg, OR	
2,715. Emily Franklin	Los Angeles, CA	
2,716. Diane Taylor	American Fork, UT	So that dogs with difficulties will continue to be able to access the therapy they need and have been receiving.
2,717. Evandra Moran	New York, NY	
2,718. Kelly Canterbury DiMeo	Woodland Hills, CA	
2,719. Tonia Martin	Nashville, TN	All animals that need assistance physically need our help. They aren't just trash you throw in the street. They deserve love, passion, friendship and to just enjoy life like we do. God put animals on this earth for a reason it's our job to care for them.
2,720. Adriana Zuniga	Whittier, CA	
2,721. Jessica Jones	Rogers, AR	It is important for quality of life!
2,722. Lyn Davies	Maesteg, gb	Every living being should be given the same opportunity to thrive
2,723. Brittany Rubio	Philadelphia, PA	
2,724. Holly Berdan	Las vegas, NV	Physical therapy was crucial to my dog's recovery from pododermatitis. I think it can do wonders for dogs and change their lives and access to it should not be restricted.
2,725. Tom Rawlinson	Liverpool, gb	
2,726. Amy Keller	Quinter, KS	I was the transport coordinator for Juniper's trip from Tennessee to California. Her story and pictures filled my heart, so I want to see other dogs get a chance like hers!
2,727. Christy Young	Anderson, SC	Everyone should have a choice who they receive care from.
2,728. Elizabeth Nagle	Reading, PA	
2,729. Kirsten Upadek	Manahawkin, NJ	
2,730. Chase Holloway	Bedford, PA	I hate knowing that some dogs won't get the care they need even if it's not in my state.

Name	From	Comments
2,731. Jose Torres	Bronx, NY	
2,732. Emily Estrada	Garden Grove, CA	
2,733. Andrea V Talamantes	Chicago, IL	
2,734. Amy L.	Canaan, NH	Animals needs this service to help in healing and recovery. Vets are qualified to diagnose & treat. Physical therapist
2,735. Stacey Pfeffer	Spokane, WA	
2,736. Riley Nicole	Skiatook, OK	
2,737. Mimoun Benouda	N/A, fr	
2,738. Amy O'Keefe	Woodland, CA	
2,739. Lola Reeves	Redington shores, FL	
2,740. Tiffany Alfonseca	Clearwater, FL	
2,741. Saskia Delest	Châteaubourg, fr	
2,742. christine edwards	oxford, ME	
2,743. Ilse Verboven	Weert, nl	Because dogs care!
2,744. Paige Whited	Las Vegas, NV	Because owners should have the right to choose who treats their pets and where they are treated!
2,745. Amanda Graham	North Branch, MN	
2,746. Zoom Harb	Rancho Cordova, CA	
2,747. Michela Rebuli	London, ca	
2,748. Melanie Steers	London, ca	Personal experiences
2,749. Katie Batstone	St.Philip's, ca	Because animals > Humans
2,750. Deidre Dillon	Lexington, OH	
2,751. Pip Lane	Frome, gb	because i want to make sure animals can get as much help possible
2,752. Frances Vincen-Brown	Boise, ID	
2,753. Susanne Webb	Dunfermline, gb	Trained and experienced animal therapists should be allowed to continue what they're doing. Let vets do what they're doing.
2,754. Hannah Pruitt	Fountain Inn, SC	
2,755. Wiktoria Skowrońska	Wrocław, pl	
2,756. Heather Heath	Las Vegas, NV	
2,757. Michelle Gregory	Las Vegas, NV	
2,758. Diane Concannon	MOSS BEACH, CA	There is absolutely no reason this needs to be done in a vet's office. Quite self serving. The people who do physical therapy on animals are trained, compassionate and a lot more qualified to give this service at a reasonable (vets <i>(continues on next page)</i>)

Name	From	Comments
2,758. Diane Concannon	MOSS BEACH, CA	<i>(continued from previous page)</i> never charge reasonable prices nor do they pay decent wages) This is just another try by vets to make more money at the expense of our pets.
2,759. Megan Goodwin	West Boylston, MA	
2,760. Sara ann Rodriguez	Raymondville, TX	Because I love animals and if others do anything possible to help their fur baby's get special care and quick to save them that's why this is important to me. Animals can not fend for themselves it pretty much takes a village to care for all animals especially the ones that need extra care.
2,761. Patricia Vultaggio	Massapequa, NY	All animals should have a chance at a happy life if there are resources to help them.
2,762. Leslie Fleming	Spring hill, FL	
2,763. Elise Williams	Cary, IL	
2,764. Stephanie beetsch	Minneapolis, MN	
2,765. Kennedy Szabo	Boca Raton, FL	
2,766. Danielle Ziegler	Ann Arbor, MI	
2,767. Andrea Stewart	Waterford, MI	Dogs can't soeak for themselves. We must do right by them.
2,768. Jenna Harris	Congers, NY	Animals deserve health care and it shouldn't be made more difficult. Help these sweet innocent creatures, don't make it worse.
2,769. Iryna Striletska	Ruda Śląska, pl	
2,770. Carol Alberd	Burns, TN	Animals have feelings too they are just as important as people with disabilities
2,771. andrea fantin	tucson, AZ	
2,772. Keira JOHNSON	Ceres, CA	This is important to me since so many animals need therapy just like humans do, so not letting them get therapy is like us not getting it either.
2,773. Moriah Coleman	Cross plains, WI	
2,774. Sylvia Sotelo Sylvia Sotelo	Coachella, CA	Because our pets also need to be treated with the love and care they deserve. They are family too! [?][?]
2,775. Catherine Montgomery	Wainscott, NY	They ALL matter!!!
2,776. Nicole N	Torrance, CA	Animals that need this should have it made easily accessible and affordable to them and their owners, not harder. Animals can't speak for themselves so we must do it for them.
2,777. Jennifer Thyret	Fort Erie, ca	
2,778. Kelly Rodgers	Monmouth, ME	It's very important to continue allowing access to affordable animal physical therapy. We must continue to make these services accessible to all fur babies.
2,779. Diane Deguzman	Antioch, CA	There is a need for this, animals benefit from this to lead a better quality of life for their remaining years on earth. #help our furbabies!!

Name	From	Comments
2,780. Wendy Garner	gold coast, au	
2,781. Karen Ypelaar	South Amboy, NJ	
2,782. Robin Webster	Wadsworth, OH	Every animal deserves help and healing [?]
2,783. Melissa McDowell	DAYTON, OH	my friend in Ca. works with physical therapy dogs-the throw aways to some people. this would stop therapy for the animals
2,784. Jessica Yates	Bedford, IN	Why is an animals life worth any less? If it can help why wouldnt you?! If the therapist wants to who is anyone to say otherwise?! Please let this life changing work continue without interjection! I know it has to help people also, to loose an animal cause its demobilized would be awful to kill it because it cant physicly function is what would happen and these people fix that and change lives!!!
2,785. Nichole Sullivan	Santa Barbara, CA	
2,786. Brittany Ragan	Salina, KS	
2,787. Jasmine Ewert	Saskatoon, ca	
2,788. Linda Diaz	New York, NY	
2,789. Evelin Juhasz	Szeged, hu	
2,790. Elmer Workman	Middleburg, FL	
2,791. Krista Roof	Springfield, IL	
2,792. Kylie Gates	Palm Bay, FL	
2,793. Leah S	Maricopa, AZ	
2,794. Jennifer Schultz	Palmetto, GA	Dogs are so reliant on us to care for them. It's our work to care for them in ways that cannot.
2,795. Mary Avila	Lima, pe	
2,796. Shelby Geiser	Surprise, AZ	
2,797. James Raanes James Raanes	Scottsdale, AZ	I love dogs
2,798. Anita Rosinola	Haddon Township, NJ	
2,799. Patricia Cross	SAN JOSE, CA	
2,800. Jennifer Case	Hendersonville, NC	
2,801. Jafe Campbell	New York, NY	The ability to choose an independent PT rehab is just as important for my pets as it is for me.
2,802. Michelle Hartness	Beaumont, CA	I work with dogs. PT is so important for them. It's hard enough trying to keep care. Expenses don't need to go up.
2,803. April J	Saanichton, ca	This is extremely important because, as a future veterinarian, I would as a medical professional want to know that any patients I refer, or if my own pets required physical therapy, that they would get the help they needed from trained professionals. It is ridiculous to say that ONLY veterinarians can treat them, as most veterinarians have no <i>(continues on next page)</i>

Name	From	Comments
2,803. April J	Saanichton, ca	<i>(continued from previous page)</i> where near as solid a training on animal rehab as an actual animal physical therapist. Medicine is about saving and helping a life, so we should embrace ALL the many individuals and professions throughout the wide world of medicine.
2,804. Jeanine Mielke	Columbia, MO	
2,805. Connie Rimes	Plant City, FL	
2,806. Beth Yoder	Sylvania, OH	Because animals deserve help
2,807. Marsha DuBose	Jacksonville, FL	
2,808. Joan Broadhead	Bethlehem, PA	Love animals and they need our help so we have to step up and do whats right for them.
2,809. Anna Eberle	Boise, ID	
2,810. John Myers	Vassar, MI	
2,811. Emmitt Luther	Danielsville, GA	Helping animals live the fullest and best life they can by anyway is important to me.
2,812. Jo Ellison	Portsmouth, gb	
2,813. Stacie Welcome	Signal Hill, CA	
2,814. Cheryl Schrum	Wesley Chapel, FL	Rehab by caring therapist helps put our dog walking correctly. Please don't take away this valued grip of people
2,815. Barb Narong	Burlingame, CA	
2,816. Briana Mitcheson	New Kensington, PA	
2,817. Susie Magged	Cathedral City, CA	
2,818. Leslie Fuller	SONOMA, CA	
2,819. Marla Hilmer	El Cajon, CA	
2,820. Deb Keith	New Britain, CT	
2,821. Amanda Garcia	El paso, TX	
2,822. Elizabeth Okazaki	Honolulu, HI	
2,823. megan martins	west jordan, UT	
2,824. Andrea Henry	Kota kinabalu, my	
2,825. Susan Creighton	Vary, IL	
2,826. Julia Torrens	Uniontown, PA	
2,827. Mercedes Danforth	De Pere, WI	
2,828. steve mcneece	Stockton, CA	
2,829. Sharon Smith	Huntington, WV	I am concerned about the welfare of ALL animals.
2,830. Semra Triplett	Carbondale, IL	Animals need therapy just like humans do.
2,831. Zebadiah Backstrom	Red Bluff, CA	

Name	From	Comments
2,832. Bonnie McCrimmon	Verdun, ca	
2,833. Robyn Johnson	Yeovil, gb	
2,834. SUSAN NIEMI	Howell, MI	
2,835. Gabe Millet	Hammond, LA	I really care for animals and this would be very good for them
2,836. William Rosar	Bradenton, FL	
2,837. Jamie Valkovci	Madison, IN	
2,838. Karin Giles	Roseville, CA	
2,839. Julie Ridings	Richmond, TX	This is important to me because I think all living things deserve a chance at a healthy life!! Plus we just adopted our Bulldog Ozzie and believe he has PTSD due to his past. They all need a chance with a family that loves them!!
2,840. Mary Kobler	Palatine, IL	Mary Alice Ryan-Kobler, PhD.
2,841. Matthew Thurman	Pearland, TX	
2,842. Janie McNeil	Cardenden, gb	I follow dogs on Insta who would no longer recieve this kind of care if it were so restricted. I believe as long as a practitioner is well qualified and to a good standard, there is no need for a veterinarian to stand over them.
2,843. Sandra Fitzpatrick	Centennial, CO	
2,844. Kendra Roggio	El paso, TX	
2,845. Nicole Ramai	Queens Village, NY	
2,846. Cathy Cloonan	Birmingham, gb	
2,847. Linda Gill	Monroe, NY	Because i carefor animals
2,848. Anna Safarik	Memphis, TN	
2,849. SYLVIE BARAT	st maur, fr	
2,850. Constance Campbell	Ojai, CA	
2,851. janet hunter	Las Vegas, NV	
2,852. Rachele Bandy	San Diego, CA	
2,853. Veronica Medina	Greeley, CO	
2,854. Karen Lambert	North Syracuse, NY	
2,855. Theresia Donovan	Tacoma, WA	
2,856. Charlene Turpin	Edmonton, ca	Every animal deserves to have the necessary treatment to improve their overall health in any means necessary. I love all animals.
2,857. Carolyn Choban	Pasadena, TX	
2,858. Whitney Tegethoff	Wildwood, MO	I know dogs that have benefited from PT. The experts best to help a dog should be able to work independently of a vet.
2,859. Courtney Harris	Prestonsburg, KY	My dog is my family. I seek medical assistance for her before myself.

Name	From	Comments
2,860. Casey Trueman	london, ca	
2,861. animals Iniguez	Rochester, NY	animals should be healthy and happy
2,862. Arica Johnson	Oceanside, CA	I love animals and have followed Angela Adan and the work she does for years now. She is amazing and if I had the resources to do the same, I would in a heartbeat. For now, all I can do is help support her and help continue the work with not only her, but others.
2,863. Julie Martin	FREDERIC, WI	
2,864. Mark Schofield	Sheridan, MI	it will help give animals a better chance fr a quality life, and if california leads the way maybe more states will follow
2,865. Susie Straka	Lexington, SC	We need to save all animals
2,866. Ruth Percy	Crowley, TX	
2,867. Linda Edwards	anthem, AZ	Someone has to stand for the voiceless.
2,868. Dianna Febres	Riverview, FL	Because dogs are life and they deserve the help just as much as humans do
2,869. Louise Warren	Charlotte, NC	Dogs- Animals of all- teach us how to love and accept differences. They are vital to humans living and we should do whatever it takes for them to be healthy and safe and happy as we do humans.
2,870. Catherine Badgett	Westminster, MD	
2,871. Elizabeth Harris	Ormond Beach, FL	
2,872. Kimberly Garvie	Irvington, AL	They're beautiful
2,873. Lauren Snyder	Richmond, CA	It makes no sense to limit PT for pets. Too many good service providers would be unable to continue to practice and I think that's wrong.
2,874. Lisa Murphy	Dry Ridge, KY	
2,875. Russ Thayer	Bozeman, MT	
2,876. Rob Spellman	Lake Worth, FL	I am a dog owner and would certainly hope if he ever needed physical therapy that there would not be any restrictions on the availability to him in the state of Florida
2,877. Beatriz Areco	Bs. As, ar	
2,878. Jennifer Davis	Norwalk, CA	
2,879. Jodi Gross	SECAUCUS, NJ	
2,880. Tameca Hickerson	Van Nuys, CA	
2,881. Linda Martinez	Oxnard, CA	
2,882. Mayte Rodriguez	Santa Ana, CA	
2,883. Lacey Rucker	Madisonville, TN	
2,884. Kelly Czack	Athens, OH	
2,885. Emily Williams	Francesville, IN	

Name	From	Comments
2,886. Brenda Martinez	Orem, UT	This is important because animals deserve love, support, and all the help we humans can give them.
2,887. Toni Argento	Melrose park, IL	
2,888. Marietta Smith	Santa Monica, CA	
2,889. Vicki Bruno	North Smithfield, RI	
2,890. Cynthia Hawthorne	West Greenwich, RI	
2,891. John Spears	Budd Lake, NJ	I love animals and “ Animal Lives Matter”. Too many people can’t see beyond their own importance to realize animals and all living things feel, love think and fear. We can live without that development but the animals can’t !
2,892. Victoria Koeppen	Tucson, AZ	
2,893. Marilyn Baldwin	Aberdeen, MD	
2,894. Kelsey Reinhard	Brighton, CO	
2,895. Mary Valdez	Alta loma, CA	
2,896. Randi Allen	Acworth, GA	Because every animal deserves a fighting chance!
2,897. Angela Pickup	Blackburn, gb	
2,898. Camie Rodgers	RADCLIFF, KY	
2,899. Amy Cooper	Pembroke Pines, FL	
2,900. Lynne Ray	Racine, WI	It doesn't make sense. Plus it would make it so expensive, many animals wouldn't get the help they need.
2,901. Anita Minarik	Long Beach, CA	
2,902. Geri Weber	Henderson, NV	We care for our dogs like our children and they deserve our ability to research and choose the providers of their care. High Vet bill's is not the answer, quality caring providers is the answer.
2,903. Laurie Frake	Sarasota, FL	
2,904. Danielle Greene	Middle Village, NY	
2,905. Sandra Wiles	Inverness, FL	
2,907. Michelle Cheney	Saint Petersburg, FL	
2,908. Rosemary Bernier	Norfolk, MA	
2,909. Linda Spors	Boston, NY	
2,910. Lisa Mazzola	Tampa, FL	
2,911. Denise Lavish	South Plainfield, NJ	
2,912. Jordan Daniels	Manchester, CT	I love animals.
2,913. Jeff Strome	Cambridge, ca	
2,914. Lynn Howard	Lawrenceville, GA	
2,915. Jay Monroe	Elmira, NY	
2,916. Lis Anselmi	Caba, ar	

Name	From	Comments
2,917. Susan Volpicelli	Coconut Creek, FL	
2,918. Gayle Willis	Bedford Hts., OH	
2,919. Elizabeth Byrnes	Pittsburgh, PA	
2,920. David Smith	Cleveland, OH	
2,921. Cathleen Roster	Holtsville, NY	
2,922. M. Lynn	Mechanicsville, VA	
2,923. Ron Neuman	Santa ana, CA	
2,924. Tiffany Smith	Fort plain, NY	
2,925. Crystal Simon	Altoona, PA	Save these beautiful animals, for our children and for our earth that depends on the Eco system. If you kill off all the animals, we will die too. Please Help!
2,926. Kelly Wilcox	Walkertown, NC	These babies our part of our family and they need the best care that we can provide for them.
2,927. Amanda Hagan	MIMS, FL	animals
2,928. Sandy Crooms	Clarkesville, GA	
2,929. Jackie Parks	Tamarac, FL	
2,930. Tracy Lellie	Statesville, NC	
2,931. Lusi Perry	San Diego, CA	
2,932. Isabella Mueller	Los Angeles, CA	
2,933. Kaaren Ford	Charleston, WV	
2,934. Agnese Gandolfo	Swan Lake, NY	I personally had to go to 3 different Vets in 24 hrs before anyone realized my boy had a herniation & needed a hemilamectomy. My cousin contacted me to bring him to his vet that was equipped to do emergency surgery & get him back on the road to recovery. My boy loved going to this vet office. God forbid this law had existed & he had had surgery with another vet. I would have been locked into going to an Ill-equipped ignorant vet to care for my baby.
2,935. Mario Corrales	Phoenix, AZ	As a animal lover it is crucial that my animals have various rehab options from clinics to rehab technicians, and resources available. If this law passes it would hurt American families.
2,936. Kim Harmon	Asheville, NC	I love animals
2,937. anna parello	Cranston, RI	
2,938. Joanie Chaney	Campbellsville, KY	
2,939. Tara Smith	SANTA BARBARA, CA	We need to have all options when it comes to helping the voiceless.
2,940. Barbara Taylor	Washington DC, DC	They deserve good he as lth care too
2,941. Corinne Chapman	Stamford, CT	
2,942. Rachel Orsie-Coomer	Pasadena, MD	

Name	From	Comments
2,943. Michele Villeneuve	Kingsport, TN	
2,944. Vicki Herdt	Boise, ID	I have dealt with differently abled individuals most of my life, and it is very important that each individual be treated on their own best plan. This idea is behind the homeschooling laws across the country, for instance. I understand many people wanting to treat animals with respect and dignity, but just as a physician isn't a physical therapist, a teacher isn't a physical therapist, neither is a veterinarian. People specialize in areas that help special populations. Many therapeutic activities not only don't require a veterinarian, a veterinarian requirement could delay or eliminate access to vital care, harming the very animals your proposal aims to protect. I would expect nonsense like this from PETA, but not from a state that claims to care about its communities, including pets. Let these pet owners do their best to meet their animal's needs. Do not force them to go to a veterinarian for physical therapy; that trip could end in unneeded euthanasia because owners are limited to expensive and unnecessary oversight.
2,945. Helen Moore	Millsboro, DE	
2,946. Regina Buckler	Madison, IN	
2,947. cindy porter	hornell, NY	
2,948. Kellie Smith	South otselic, NY	
2,949. Yanula Pengenika	Pensacola, FL	
2,950. Abby Karjala	Beaverton, OR	Because I love Freddie!
2,951. Visare Lekic	Poughkeepsie, NY	
2,952. Kendra Pipkin	Wenatchee, WA	
2,953. Diane Olson	Andovet, MN	I want my grandchildren and all children to be able to enjoy the Florida Panthers.
2,954. Caylee Vanderploeg	Wyoming, MI	
2,955. Joannah Yu	Hyattsville, MD	
2,956. Jackie Vickery	Zephyrhills, FL	All animal deserve help.
2,957. Brenda Luberto	Paramus, NJ	Animals are Angels that need our help! They are pure and helpless[?][?]
2,958. Luz Zarate	Waukegan, IL	
2,959. Theresa aaron	Myrtle Beach, SC	
2,960. Amanda Fowler	Boone, NC	
2,961. Emily Lutz	Dayton, OH	
2,962. Marie-Camille Deneberger	Sete, fr	
2,963. Yésica Angulo	Miami, FL	
2,964. Tanvi Krishnan	Claremont, CA	

Name	From	Comments
2,965. Angela Ackroyd	Forest lodge, au	
2,966. Julie Brown	White Settlement, TX	
2,967. Michelle Louise	Bendigo, au	To help ALL creatures everywhere, get the care they need. And to not restrict people who don't have years of veterinary school, but still know exactly what they're doing with physical therapy.
2,968. Patricia Dayton	La Crosse, WI	
2,969. Danielle agresta	HAZLETON, PA	
2,970. Darlene McCarthy	Forestdale, MA	Dogs should have the opportunity to get better the same as humans
2,971. Cassandra Rogers	Poinciana, FL	
2,972. Janet Lewis	Columbia, MO	
2,973. Lea Trikur	Brooklyn, NY	
2,974. Ximena Hernandez	Chicago, IL	
2,975. Alison Petrolino	Riverside, CA	
2,976. Lillian Paolucci	Plymouth Meeting, PA	
2,977. Catherine Escobedo	Commerce, MI	
2,978. Samantha Marius	Madison, NJ	
2,979. Debbie Campbell	Fort worth, TX	
2,980. Catherine Surowiecki	Meriden, CT	
2,981. Lynne Huntley	Park Forest, IL	
2,982. Sharon Dake	Bakersfield, CA	Consumers should have a choice to pay for animal physical therapy where they wish
2,983. Maria Minney	Sacramento, CA	
2,984. Jeremy Kuronya	Murray, UT	
2,985. Teri Boots	Anderson, CA	
2,986. Lori Rockweiler	Youngsville, LA	
2,987. Niki driscoll	Sebastian, FL	
2,988. Kristie Johnson	Montgomery, TX	
2,989. Kim Orsini	Oakville, ca	
2,990. Mary Anne Watson	Windsor, ca	When animalee are injered they need therapy.
2,991. Lisa Aligata	Colchester, CT	pets are family!
2,992. De Do	Houston, TX	
2,993. Ruth Cooley	Hazelwood, MO	
2,994. Angie Chhabra	Katy, TX	

Name	From	Comments
2,995. Kris Dotson	Elmhurst, IL	
2,996. Leah Overbeck	Ocala, FL	
2,997. Perri Palermo	Houston, TX	
2,998. Linda Zern	Carrollton, TX	Trained PTs should be able to have their own practice to treat animals. The veterinarians make enough money without controlling PTs
2,999. Catherine Baca	Albuquerque, NM	Limiting access to proper medical care is wrong, this law would limit ability for many to practice in CA
3,000. Carla Farrell	McComb, MS	
3,001. Marilyn Stickler	Midlothian, VA	Don't want panthers to be extinct or loose their place to live
3,002. Rosa Astrada	Miami, FL	
3,003. Candy Quinn	Peotone, IL	
3,004. Jen Barker	Newbury park, CA	Because animals do not have a voice.
3,005. Lisa Lamb	Manchester, CT	Animals deserve all of the medical attention they need in order to live their best lives. Why take that away from them? It would be a cruel thing to do. Animals are so kind hearted and need our help to advocate for them.
3,006. Beverly Cooper	Pascagoula, MS	
3,007. Marvel Parish	Wichita, KS	
3,008. Beth M.	Roswell, GA	
3,009. William Camp	Salt lake city, UT	
3,010. Dolores Mick	Fond du Lac, WI	
3,011. Kim Fry	Myrtle creek, OR	Animals are so beautiful. I have 4 dog's that don't know their dogs. Every animal deserves love
3,012. Heather Taylor	NEWPORT NEWS, VA	I love all animals and we've taken enough of their land. Take old buildings and fix them up or build new ones on that property! Don't take more of what we DON'T need! Repurpose!
3,013. Patricia Retherford	Stillwater, OK	
3,015. Dawn Farr	Sidney, NE	
3,016. Brenda Hewitt	Pennsville, NJ	
3,017. Paulette worley	Osage Beach, MO	
3,018. Sheldon McCranie	Bastrop, TX	Mother Nature & wild animals are very important.
3,019. Gertrude Charette	Daytona Beach, FL	We ALL have a right to pick my own providers for our babies. After all, WE are the ones who have to pay the bills.
3,020. Melissa Gonzalez	Brownsville, TX	Because animals aren't able to defend themselves
3,021. Gina O'Donnell	New York City, NY	
3,022. Sara Sikes	Newcastle, WY	
3,023. Lisa Jones	Brackenridge, PA	

Name	From	Comments
3,024. John Hayes	St. Paul, MN	
3,025. Susan Collins	Eastman, GA	There are many qualified people out there that can provide this service. Trying to get a vet to do this along with regular veterinary duties will be expensive and wont provide the time to do a great job. Let the vets doctor and the therapists do therapy. Your you time tonpass legislation on all the animal cruelty that is occurring. Make a difference where its needed most!
3,026. Janet Ingle	Franklin, IN	Each animal occupies a special place in nature. All have something to contribute.
3,027. Tarei Pennington	Westerville, OH	
3,028. Gail Sethi	Singapore, sg	
3,029. Tracy Gustafson	Midlothian, IL	
3,030. Kathy Swanson	La Mesa, CA	
3,031. Jane Keahna	Tama, IA	
3,032. Mary Larrimore	Panama City, FL	All lives are important but especially those who can not speak for themselves.
3,033. Richard F. Doss II	Atlantic Highlands, NJ	
3,034. Seiko Tanaka	New York, NY	
3,035. Carly Smith	Roanoke, VA	Because dogs deserve physical therapy just like humans.
3,036. Diana Butler	Cascade, MT	
3,037. Martha Johnson	Corpus Christi, TX	Because animals,like humans, need therapy to get back to normal instead if being crippled!!!
3,038. Margaret Perry	Morgan City, LA	I love cats. They deserve the same consideration dogs rreceive
3,039. Jessica Cowell	Columbus, GA	
3,040. Cheri Coursey	Eugene, OR	
3,041. Karla Cotrim	Brasília, br	
3,042. Kimberley Pritchard	Brooklin, ca	Dogs are family members and deserving of all the help they can get in order to live their best lives. They cannot advocate for themselves.
3,043. Kc How	San Clemente, CA	
3,044. Nancy Collins	Tucson, AZ	
3,045. Erica Levine	Boca Raton, FL	
3,046. Gabrielle Menendez	Napa, CA	
3,047. Jessica Gallardo	San Dimas, CA	
3,048. Stephanie Frazier	PLEASANTON, CA	
3,049. Kellie Valentine	Sparks, NV	
3,050. Cecilia Macy	Long Beach, CA	

Name	From	Comments
3,051. Roxanne Alden	Sonoma, CA	
3,052. GAIL MUNDANIOHL	FT PIERCE, FL	
3,053. William Porter	Elgin, SC	
3,054. Patricia Matt	Tehachapi, CA	
3,055. Marilee Chipoletti	Pegram, TN	
3,056. Kim Brailey	Sheridan, MI	
3,057. Donna Walters	Tinton Falls, NJ	
3,058. wendy weiner	Great Neck, NY	
3,059. Jordan Schneider	Davenport, IA	
3,060. Hillary Muramoto	Denver, CO	
3,061. Matthew Froese	Bella Vista, AR	
3,062. Marilyn Silver	Metuchen, NJ	
3,063. Kelsey Amemiya	El Dorado hills, CA	
3,064. Reba Doughty	Edgewater, MD	
3,065. Noreen Trytek	Mesa, AZ	
3,066. Marsha Estefan	San Antonio, TX	
3,067. Denise Macias	Orland Park, IL	
3,068. Marcia Kuechle	Collinsville, IL	
3,069. Carol Kemmerer	Phoenix, AZ	
3,070. Wendy Ellis	Madison, MS	I have rescue dogs myself and each dog deserves the proper care we can give them in this type of rehab environment.
3,071. Sharlene Celeskey	Phoenix, AZ	
3,072. Lisa Elloyan	Las Vegas, NV	Animals are people too. Just 4 legged.
3,073. Yvonne Lewis	Vancouver, WA	
3,074. Lenore Black	MARKHAM, ca	
3,075. Kelly Green n	San Mateo, CA	
3,076. Liz Orellana	Phoenix, AZ	It's important to me because I want to be these innocent animals voice, because they too have the right to get well and be happy. Because they give us unconditional love. And because it is the right thing to do with another living life.
3,077. Janet Martindale	Springfield, OR	
3,078. Ron snizek	Yulee, FL	
3,079. Amanda Reid	Boynton Beach, FL	
3,080. Roxanne Bachoua	El Cajon, CA	
3,081. Fátima Tamayo	Uniondale, NY	
3,082. JosefinaAnne Gobreville	Los Angeles, CA	

Name	From	Comments
3,083. Toni Meeler	Indianapolis, IN	No animal should suffer
3,084. Robin Frye	Redondo Beach, CA	All animals deserve a chance to have a healthy, happy life.
3,085. Tracey Carlisle	Surrey, ca	
3,086. Janet Arthur	Suffolk, VA	
3,087. Elena Snezhkina	New York, NY	
3,088. Naaz Nasir	Stockton, CA	
3,089. Sara Lucia	Las Vegas, NV	Because all animals deserve a fighting chance!!!
3,090. daisy cruz	CALLAHAN, FL	
3,091. Shirley Spradlin	Muncie, IN	They are precious need to be saved.
3,092. Victoria Reust	Rancho Cucamonga, CA	
3,093. Melanie Holder	Tulsa, OK	
3,094. B Schlegel	Modesto, CA	
3,095. Cheryl Archuleta	Boise, ID	
3,096. Pamela Middleton	Tehachapi, CA	I'm a Physical Therapist & animal lover planning to get certified in the future to work with canine rehab
3,097. Penny Small	Cedar Rapids, IA	
3,098. Julie Clifton	Corte Madera, CA	
3,099. Laurie Harrison	Auburn, ME	dog lover
3,100. Karen Young	Lockbourne, OH	
3,101. Summer Chancey	Humble, TX	Without the specialized physical therapy, these animals would not have the chance to be rehabilitated.
3,102. Michelle Nacheman	Chicago, IL	
3,103. Dzulkifly Yusof	Petaling Jaya, my	
3,104. Kelly Holmstrom	Galesburg, IL	I would like every dog to have a chance at a good and happy life[?][?]
3,105. Kyle Bell	Alexandria, VA	
3,106. Lin Hine	East Meadow, NY	Shouldn't every breathing creature on earth be given the chance to live their best life?
3,107. Cindy Hemenway	Stoneham, MA	
3,108. Janice Crisp	Winder, GA	Animals don't have a voice. I will be that voice.?
3,109. Ana Mickle	Redondo Beach, CA	
3,110. Lisa David	New Port Richey, FL	because animals are family they should not be harmed
3,111. Amy Pearson	Long Beach, CA	
3,112. Brandi Tiemeyer	Ventura, CA	

Name	From	Comments
3,113. Karen Ziegler	Santa Barbara, CA	Veterinarians are NOT trained or specialize in any physical therapy issues, they are good at making sick animals better and doing regular routine checkups, diagnosing illness and surgery. What about water therapy? Would vets be required to have pools in their vet offices?
3,114. Gaye Carleton	New York, NY	
3,115. Theresa Woods	Tanner, AL	Animals need love and care just like us. I love all animals.
3,116. Kaili Cozine	Dallas, TX	I think any and every animal deserves the chance to heal
3,117. Liam Boyle	New York City, NY	
3,118. Nicole Dimick	Grants Pass, OR	
3,119. dion laurie	kennewick, WA	
3,120. Wanmai Pailin	SAN DIEGO, CA	
3,121. Aristana Firethorne	Langley, WA	
3,122. Susan Moore	Pinson, AL	
3,123. Minerva Hernandez	Madera, CA	
3,124. Jaclyn Rodrigues	Scituate, MA	All living souls matter
3,125. Gloria Ecie	Rockwood, MI	Too many of our beautiful animals are being put out of their habitat with no consideration to their wellbeing
3,126. pria orth	beaverton, OR	lets stop destroying the planet and killing every animal on it
3,127. Connie Miller	Levittown, PA	
3,128. Amy Revilla	Goleta, CA	Humans deserve options for their pets
3,129. Amanda Holmes	Butler, PA	
3,130. Jolina Chavez	Beaumont, CA	
3,131. Nancy Greenway	Marysville, GA	
3,132. Paola Perez	Piedras negras, coahuila, mx	Like humans, dogs deserve good treatment
3,133. Lori Smith	Monroe, MI	
3,134. Geri Kraft	Spokane Valley, WA	
3,135. Araceli Herrera	San Antonio, TX	Los animales tienen DERECHO Em PLANETA TIERRA también es de ellos.
3,136. Stacey OBRIEN	Plymouth, IN	
3,137. Connie Thomas	Venice, FL	
3,138. Guillermo Hernandez	Oakland, CA	
3,139. Carola Nugent	Beverly Hills, CA	
3,140. Cynthia Rose	Edison, NJ	
3,141. Binah Goldman	Portland, OR	

Name	From	Comments
3,142. W Cecie	Sandpoint, ID	Every living, breathing creature deserves the chance of specialized treatment. We, as providers of these animals, deserve to have and make the choices that we see fit for each individual animal.
3,143. Angel Roby	Honolulu, HI	
3,144. Mary Gomes	Edmonton, ca	
3,145. Melissa Wilson	COLUMBIA, SC	I hate being told who I can see. Its usually crappy places no one wants to go to.
3,146. K T	Malibu, CA	
3,147. David Shernov	Boynton Beach, FL	
3,148. Mayra Arguello	Walnut, CA	
3,149. Debra Small	Vancouver, WA	Trained people are important but not just in the busy vets office.
3,150. Luis Valenzuela	Chaparral, NM	
3,151. Jeannie Bishop	Bakersfield, CA	As long as the pet has a prescription and goes to a licensed physical therapist specializing in dogs then that is all that should be required. This is standard pricedure for humans, so why not for dogs??
3,152. Alex Harris	Lee's Summit, MO	
3,153. Kayla Nix	Grafton, ND	Helping animals get better and get the help they need is important
3,154. Nick Viola	Philadelphia, PA	
3,155. Juliet Barrable	Braintree, gb	
3,156. Nelya Warzocha	Toronto, ca	
3,157. Amy Holloway	Yreka, CA	
3,158. Barbara Bloethner	Barrington, IL	
3,159. Evelyn Alarcon	Barstow, um	
3,160. myra berario	castaic, CA	
3,161. Ann Ohme	Mechanicsburg, PA	
3,162. Alejandra Renteria	Del Rio, TX	
3,163. Carla Garcia	Glendale, CA	
3,164. Robert Ortiz	PHOENIX, AZ	
3,165. Justin Byrd	ROCK ISLAND, IL	
3,166. Wanda Foell	Hartfield, VA	
3,167. Christy payterson	Baytown, TX	I love animails.
3,168. Paulette Capperis	Cleveland, OH	
3,169. Amber Locke	Los Angeles, CA	
3,170. Evelyn Horton	Beaumont, TX	Because it's the right thing to do people stop abusing animals...????????????????
3,171. Olivia Keel	Garner, NC	

Name	From	Comments
3,172. Beverly Stumpf	Lakewood, CO	Animals are Amazing & Beautiful, NO One has the right to hurt an animal!!
3,173. Brian Stebbins	Salt Lake City, UT	I have always loved animals and when i see or hear if someone doing it it makes me mad
3,174. Pamala Casey	Kennewick, WA	I should have the right to pick who I think is the best for my pets and my service animals. Not some stranger who doesn't know them, let alone not have their best interest at heart like I do. I know that they won't like their choices taken away either. Please let the ones that know these animals, decide for them.
3,175. Donna Cristo	Northampton, PA	
3,176. Michele Shaw	Marion, NC	
3,177. Edwin Morales	Fonda, NY	Animals are amazing they deserve the best.
3,178. Frederick James	Bronx New York, NY	
3,179. carla belli	colle di val d'elsa, it	
3,180. Virginia Wasserman	Mt. Gilead, OH	
3,181. Dana Zupanovich	Rolling Hills Estates, CA	Its important for the animals to heal.
3,182. Cerian Sharkey	Casarabonela, es	Animals and their owners deserve the right to seek treatment where they choose and I don't believe vets, qualified or not have the ability to offer this in the same price bracket or time value window
3,183. Jennifer Calleya	Peymeinade, fr	
3,184. Sharon Gregory	Boulder City, NV	
3,185. Paul Low	Fresno, CA	
3,186. cheryl kathan	swanzey, NH	
3,187. Paolo Fogliato	grugliasco, it	
3,188. Steph Begas	Sydney, au	
3,189. Tonya Privott	Phenix City, AL	
3,190. Chris May	Windsor, MA	
3,191. Mitzi Deitch	Langhorne, PA	
3,192. Kristal Johnson	Perry, OK	
3,193. Debbie Gage	Cedar Park, TX	It is cruel to keep destroying animal's habitats for human housing.
3,194. Barbara Boulton	CEYLON, MN	
3,195. Ashley Lafferty	Herndon, VA	
3,196. Mona Osburn	Montgomery, AL	
3,197. Lisa Gurrera	Ny, NY	

Name	From	Comments
3,198. Karen Haywood	Belle Vernon, PA	Pets are family. Without the help they need, the quality of their lives and the families would suffer. Too many people would have to make a heartbreaking decision to euthanize their beloved pets
3,199. david ciaffaglione	new britain, CT	
3,200. Lin Farley	Vista, CA	
3,201. Jeniffer Flores	Miami, FL	
3,202. Kalie Montgomery	Benton, IL	Animals are living beings. They become such a huge part of our lives. They're family to us. They deserve a chance at life and we should help them as we would any human.
3,203. Hillary Waters	Houston, TX	
3,204. Jeanne Wade	Ft Myers, FL	
3,205. denise obeso denise obeso	hammond, LA	
3,206. Jean Cervi	New Hope, PA	
3,207. Tammi Wells	Troy, OH	
3,208. Rose Miras	Melbourne, au	
3,209. Stephen Twombly	Virginia Beach, VA	
3,210. Mary Vascik	Oregon, OH	
3,211. Phyllis Beard	West Berlin, NJ	
3,212. Liz Harris	Vineland, NJ	
3,213. bryan ersek	aston, PA	
3,214. Jenna DeFrancesco	La Jolla, CA	
3,215. Kelly Dailey	Muskogee, OK	Because animals are family to me and many others . I have 4 dogs and two cats.
3,216. Alana Hendrickson	Hopkins, MN	
3,217. Caroline Satterfield	West Union, OH	
3,218. Jodi Burley	East Wardell, au	
3,219. Tonia stiles	Ocala, FL	I love all animals.....and try my best to save all them I can.....
3,220. LINDA STOKES	St Petersburg, FL	
3,221. Tracey Weal	London, gb	Love Animals and want to help in any way I can
3,222. Leslie Hallford	Abilene, TX	I'm tired of people other than the ones most affected by this making all of the decisions. Let the pet owners decide where their animals get treatment.
3,223. Danielle Moreau	Westerville, OH	Animals deserve unrestricted access to healthcare services they need.

Name	From	Comments
3,224. Shelley Reilly	West Chester, PA	I believe all animals should be treated with respect and that is their home! If you lose one animal group you hurt the rest of us. We all need one another.
3,225. Carole Miller	Conway, SC	
3,226. Carolina Ulloa Robles	Avenue. Hts, MD	
3,227. Lori Canale	Danbury, CT	
3,228. Marcos Soto	Vista, CA	This should be a no-brainer!
3,229. Wende Meeks	Vermilion, OH	We need to protect beautiful mysterious animals for future generations instead of them only seen in books
3,230. Laurie Powell	New Braunfels, TX	
3,231. Casey Brown	Madison, WI	
3,232. Marti Mcmillen	overland park, KS	
3,233. Lisa Brown	Webster, MA	
3,234. Eric Butler	Rexburg, ID	Pets are more than just animals they are loved ones and deserve to be as healthy and happy
3,235. Steph Boehm	Lombard, IL	
3,236. Christaleneecs Godwin	Staten Island, NY	
3,237. Katrina Hunter	Miami, FL	
3,238. Karen Neely	Palmdale, CA	
3,239. Sarah Espinoza	OWOSSO, MI	
3,240. Laura Luisi	West Hartford, CT	
3,241. Linda Rhyne	Charlotte, NC	
3,242. Darlene Czesniewski	Paramus, NJ	
3,243. Cathleen Felice	Lords Valley, PA	
3,244. Kimberley Mynatt	San Jose, CA	
3,245. T Woodall	Buford, GA	To help all creatures is important.
3,246. Amelia Guzman	Thornton, CO	
3,247. Gary Cassar	Slinfold, gb	
3,248. Rolinda Ellenburg	Sweetwater, TX	
3,249. Kristine Thompson	Fall River, MA	
3,250. Heidi Grant	Sparks, NV	I believe in all therapies for all living things. I currently have 3 dogs and no kids and would do ANYTHING I could for them if anything were to happen to them. Physical Therapy for dogs has come a long way and we have so much more to give to physically challenged canines.
3,251. Gabrielle Rhodes	Bradenton, FL	
3,252. Sara Poe	Springhill, LA	

Name	From	Comments
3,253. Alicia Wright	Raleigh, NC	Because every animal deserves a chance at a good life.
3,254. Jennine Beckmann	Sterling, IL	
3,255. Joy Lang	Fresno, CA	Because what the earth comes with should not be over taken by man's greed
3,256. Jonathan Read	DALTON, NH	
3,257. Vsnessa Sherman	Anderson, SC	Animals deserve the best from us.
3,258. Ruby Ferrante	Milwaukee, OR	
3,259. Alexis Keoughholst	Quincy, MA	
3,260. Iwona Marcinczyk	Philadelphia, PA	It shoud be patient choice to go where they want for canine PT!!!
3,261. Jason Jaszka	Hanover park, IL	
3,262. Kathleen Babilonia	West Hills, CA	
3,263. Laura Swanton	Portland, OR	Please don't take the habitat away from these creatures!
3,264. Robert Riccio	Schaumburg, IL	
3,265. Edna Diamond	Lanoka Harbor, NJ	At the rate humans are going there will not be any wild animals left anywhere. This needs to stop and this development needs to be stopped
3,266. Susan Martin	Reno, NV	
3,267. Leah Boule	Whitehall, NY	
3,268. Christel Capps	san jose, CA	
3,269. Pam Freeman	Fayetteville, TN	
3,270. Deana Cole	Canby, OR	
3,271. john kovacsiss jr	massillon, OH	
3,272. Cherri Norman	Kennewick, WA	
3,273. Teresa Potts	Eatonville, WA	Our humanity is based out of the respect, care, and stewardship that we give to the earth and all other living things on it. Great progress has been made and greater progress is coming, we must continue on.
3,274. Sheena Workman	Drybranch, WV	
3,275. DeAnna Murillo	Fresno, CA	
3,276. paula hensel	marco island, FL	
3,277. Amorette Robeck	Plymouth, MN	Animals deserve the best care, and that isn't always a veterinarian. Allow animal parents to choose where rehab should take place.
3,278. Janet Gattsek	Brooklyn, NY	
3,279. Tina Shurtleff	Murphy, NC	
3,280. Patti Sampson	Ranchos de Taos, NM	Animals need therapy to live fuller lives, just Like we do!

Name	From	Comments
3,281. Tanya Wenrich	Selinsgrove, PA	
3,282. Justin ODonnell	Clackamas, OR	
3,283. Nikki Aylen	Cape town, za	I love dogs!
3,284. Tin Pasa	Liloan, ph	
3,285. Leeann Derry	Omaha, NE	
3,286. Diane Teske	Mill Creek, WA	
3,287. William Fischer	Maryland Heights, MO	
3,288. Troy Scheske	St Louis, MO	
3,289. Catherine Estrada	Clovis, NM	
3,290. Dena Weirich	Oceanside, CA	
3,291. Lesley.Medforth@eyeshadows.com Medforth	St Albans, gb	
3,292. Patrick Swierczek	Long Beach, CA	
3,293. Peggy Huff	Lawndale, CA	
3,294. Valerie Badger	Rutland, VT	
3,295. Janet Pridgen	Zebulon, NC	
3,296. Dolores Salcido	Tucson, AZ	
3,297. Lucy Pérez	Chilpancingo, mx	
3,298. Jennifer Long	Natchitoches, LA	
3,299. Denna Bowman	Louisville, KY	
3,300. Scott D.	San Mateo, CA	
3,301. Patricia Hudson	Pipe Creek, TX	The love care and work given to these trying to help should not find theyre pockets empty helping these poor . the answer is not death. The answer is love and caring.
3,302. Carlos Valdiviezo	New Castle, DE	
3,303. Stephen Mattison	Satellite Beach, FL	
3,304. Barbara Bradshaw	Punta Gord, FL	
3,305. Maria Miguel	Bear, DE	
3,306. Marina Oral	Frankfurt, de	
3,307. Dawn Altizer	Louisville, KY	
3,308. Shelley Milatz	Waterloo, ca	It gives them a better quality of life!
3,309. Susan Wilson	Hicksville, OH	
3,310. Melissa Riley	Clarksburg, WV	
3,311. Wendy Mays	Tempe, AZ	
3,312. Rhonda Roidt	Portage, WI	
3,313. Sue Filley	Elkhart, IN	
3,314. Debbie Webster	Waverly, NY	

Name	From	Comments
3,315. Helen lao	Riverview, FL	We need to protect animals for sure! Don't put them to the wall . Animals will fight back
3,316. Heidi Lampinen	Helsinki, fi	
3,317. Janna Roberts	Salem, OR	
3,318. Sharon York	Brookfield, MO	Take care of those in need.
3,319. CAMPBELL COBB	Stafford, VA	
3,320. Lillian Gilbert	Astroria, NY	
3,321. Kitty Williams	Santa Barbara, CA	
3,322. Toni Klos-Huber	Windsor Mill, MD	
3,323. Barbara Henry	Reddick, FL	All living beings should be treasured not abused neglected
3,325. Rick Slone	Urbana, OH	Because I'm a animal lover
3,326. Lori Winegardner	Saint Peters, MO	
3,327. Noni Boendi	CLAREMONT, CA	
3,328. Kim Predmore	Pickens, SC	Animals dont have a voice
3,329. Matt neubauer	Mount Prospect, IL	
3,330. Jagnarine Kanhai	Kissimmee, FL	People getting jailed for doing the tight thing
3,331. Mary Ann Leslie	Daphne, AL	I love animals. God gave us for companionship and it is our responsibility to take care of them.
3,332. Norma Figueroa	Cranston, RI	
3,333. Don Shew	Winchester, VA	
3,334. Robbie Keopple rkeopple50@gmail.	Little Rock, AR	
3,335. candice mason	sandy, UT	
3,336. Julie DiMartino	Long Beach, CA	
3,337. Thomas Carroll	Blaine, MN	
3,338. sandy gann	MC CALLA, AL	
3,339. Giuliana Negri	Fontanellato, it	
3,340. Barb Holly	BISMARCK, ND	
3,341. Julie Dawson	RAMONA, CA	
3,342. Debra Godwin	Hermitage, TN	
3,343. Sue Stermer	Arlington, VT	
3,344. Joani Graham	Marshalls Creek, PA	
3,345. Marlene Thompson	Pensacola, FL	
3,346. Elaine Leas	Greenacres, FL	
3,347. Florence Brackney	Englewood, CO	
3,348. Roxanna Stieber	Auberry, CA	

Name	From	Comments
3,349. Kris McEntee	Boise, ID	
3,350. John Comer	Fairview Park, OH	
3,351. william bostrom	arlington heights, IL	Want to save the cats ,,
3,352. Jane Clark	Corapeake, NC	
3,353. Peggy Stein	Beachwood, OH	Where in God's name can they go. Again, a lot of you are tired of hearing this from me, but they have every right to live too. If man takes away their home, where else ca they go?
3,354. Ana Rios	Kissimmee, FL	
3,355. Rick Burgess	Webster, FL	
3,356. Nancy Sharff	Simpsonville, SC	
3,357. Jessy Elian	Fort McMurray, ca	Animal cruelty is wrong
3,358. Mike Dielman	North Hollywood, CA	
3,359. Diann Roberts	Enola, PA	Must have our rights.
3,360. Karen Clow	Hastings, gb	
3,361. Nikki Elkins	Missoula, MT	
3,362. Lillie Stevens	Lexington, SC	
3,363. Meredith Turnbull	Boynton beach, FL	
3,364. Amanda Reid	West Palm Beach, FL	
3,365. Pilar Lu	Los Angeles, CA	
3,366. Kathleen Combass	KEYSTONE HEIGHTS, FL	Animals are important, and it creates jobs for many people.
3,367. Davdi Stefan	Pitesti, ro	Because i like dogs
3,368. Clare Batterton	Liverpool, gb	For Deserving Dogs
3,369. M Skinner	Arlington, VT	
3,370. Pam Roth	Hopewell Jct, NY	
3,371. Gina Nicholls	Melton Mowbray, gb	
3,372. Jennifer Pflugh	Spokane, WA	It's completely ridiculous to have physical therapy for animals ONLY in veterinary offices. Not only does it limit the help for animals but is also solely for financial purposes. A way for Veterinarians to make more money! If people can get physical therapy, not in a doctors office, why can't pets?
3,373. Nancy Walsh	Independence, MO	
3,374. Lillie Robinson	Rockwell, NC	Our fur babies didnt ask for the abuse most of them recieve so instead of punishing them punish the abuser
3,375. Kym Franklin	Birmingham, AL	Love all animals, No animal abuse of any and all kind
3,376. Deborah Smedley	Milton, DE	Although I'm not in California I believe my girl wouldn't have walked right without pt after TPLO CCO surgery that resulted in MRSA. She spent 16 months in a crate due to recuperation and her muscles had atrophied. Give them the <i>(continues on next page)</i>

Name	From	Comments
3,376. Deborah Smedley	Milton, DE	<i>(continued from previous page)</i> opportunity to get the pt they so need. It wasn't Rosie fault that she got MRSA.
3,377. Shari Stoddard	Elmira, OR	
3,378. Peggy Fergus	Lewisville, NC	
3,379. Christina Sams	Farmington, MN	
3,380. Cynthia BACON	Santa Barbara, CA	
3,381. Dawn Ingardia	San Marcos, CA	Because special needs dogs need us just as much as we need them!
3,382. Silvia Ronco	Tigliole, it	
3,383. Rebecca Crocker	Port richey, FL	
3,384. Josh Ehrnwald	Danville, IL	
3,385. Gabrielle Forest	LaSalle, ca	
3,386. Shirley Warner	London, gb	There is enough cruelty in this world all done by humans for gods sake have a conscious
3,387. Brandy Yates	Monessen, PA	My chihuahua is physically handicapped
3,388. Jill Tollefson	Willmar, MN	
3,389. Mary beth First	Chillicothe, MO	Please help us pass Laws <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> to put The Death Penalty in place for all Animal ABUSER'S!! This is an Evil War on Animal's!!! Let's help them now!!!
3,390. Kerry Shy	REDONDO BEACH, CA	
3,391. Mark Stewart	Scotland, gb	
3,392. Robert Hite	Orlando, FL	
3,393. Mia Lehavi	Newport, CA	
3,394. Kathleen Gause	Long Beach, CA	
3,395. Susan W	Morris, PA	Consumers should always be allowed to choose the qualified provider they wish their pet to go to. Restricting PT only to veterinary practices would not only make it cost prohibitive but also limit availability.
3,396. carolina varga	denver, CO	
3,397. Carly Meyer	Happy valley, OR	
3,398. Lisette Parshall	Carmel, IN	Dogs can get rehab without having to pay a vet to do it. Rehab can be taught. It doesn't need a degree to perform.
3,399. Patrice Cochrane	Rohnert Park, CA	
3,400. Nanette Oggiono	UPTON, MA	
3,401. Sarai Eguizabal	Adelanto, CA	I have a special needs dog and this would help a lot of animals out there.As well as owners with injured or disabled dogs . Dogs are part of our family so why wouldn't we provide more help for our feline friends. Please make this <i>(continues on next page)</i>

Name	From	Comments
3,401. Sarai Eguizabal	Adelanto, CA	<i>(continued from previous page)</i> available for every dog in need . this service will be a lot of help for the California community.
3,402. Demetra Charalambous	Eldersburg, MD	
3,403. Christine Bohley	Philmont, NY	
3,404. Bobbie Smith	Springfield, VA	
3,405. Merry Robinson	Manton, MI	
3,406. Stephania Garriola	New York, NY	I love animals.. people, Not so much these days except for PETA, CARE2, ASPCA & DEMOCRATS
3,407. Shay Edwards	Medical Lake, WA	People should be allowed to chose safe affordable treatment for their furry family members. It is unfair and unreasonable for veterinarians to monopolize treatment that can be done safely by another group.
3,408. Debbie Camaratta	Smyrna, DE	
3,409. Kathy Self	Independence, MO	I love animals
3,410. Jean Smith	Cleveland Heights, OH	
3,411. Janie Blankenship	Roanoke, VA	
3,412. Jason Cochran	Gaylordsville, CT	
3,413. Yari Contreras	Tampa, FL	Because it's a great cause, and we shouldn't limit individuals who are passionate and highly trained to only be confined to one way of doing things.
3,414. Isabel Basto	Estoril, pt	
3,415. Donna DeAtkine	Raeford, NC	Because PT works for both human and animal. Better quality of life. !!!
3,416. April Crompton	Minneapolis, MN	Worked in as PT therapists for years. Many has benefited from the experiences. Make everyone's quality of life a possible.
3,417. David Stokes	Blairsville, GA	I just love animals.
3,418. Samantha Burke	Schaumburg, IL	
3,419. Rose Randolph.	Southlake, TX	
3,420. Julo Axley	Knoxville, TN	
3,421. Brittany Spencer	Thomasville, GA	Animals have always been at the bottom Compared to humans . Let's put them first for once .
3,422. Ruth Finkel	Pittsburgh, PA	
3,423. Jackie Lasater	Ft lauderdale, FL	
3,424. Sarah Artzer	Topeka, KS	
3,425. Hazel Burns	Fulton, MS	
3,426. Donna Spinetta	Sparta, NJ	
3,427. Maria Dambrosio	Bermuda Dunes, CA	

Name	From	Comments
3,428. Linda Moreno	Adelanto, CA	
3,429. Amy Briscoe	Fultondale, AL	
3,430. Ameenah Nishter	Cardiff, gb	
3,431. Kathy Jordan	Simsboro, LA	
3,432. Diann Ricketts	Independence, MO	
3,433. Judith Pelletier	Moorpark, CA	
3,434. Shina Morris	New York, NY	Animals deserve care to improve their lives
3,435. Laura Saillen	Mahwah, NJ	
3,436. Bronwyn Strydom	Johannesburg, za	Animals are an important part of many lives, for company, therapy and service they become just like one of your children and therefore you should have the right to choose for them to give them your best and the best care!
3,437. Brandy Unruh	Saint Ignatius, MT	
3,438. Laurie Kane	Plano, TX	
3,439. Tish Lampert	Los angeles, CA	
3,440. Ambet Walling	Greenville, SC	We have to be the voice. Every animal deserves love and care.
3,441. Sean Garrick	Los Angels, CA	
3,442. Mary Powell	Oakland, CA	
3,443. Dee Blake	Sa, TX	
3,444. Barbara Abundiz	Los Angeles, CA	
3,445. Eileen Holt	Ashington, gb	
3,446. Patti Paulos	Riverside, CA	Dog lover, dog advocate
3,447. Angelica Torres	San Diego, CA	
3,448. Lucy Agbeko	Newcastle upon Tyne, gb	
3,449. Cheryl Smith	Louisville, KY	
3,450. Jessica Bridges	Brandon, FL	
3,451. Lee Michicoff	Corona, CA	
3,452. Michael Coffey	Greenville, SC	
3,453. Nancy Bryant	Ft Pierce, FL	
3,454. Mary Bristoll	Martensdale, IA	Animal caregiver
3,455. Tammy Valentino	Staten island, NY	
3,456. Kathy Garza	Nrh, TX	
3,457. Natasha LeVons-Salmon	Laurel, MD	
3,458. Laurita Zontek	Mount Pleasant, PA	
3,459. Dale Mellis	Ayr, gb	
3,460. Anne Hayton	Middlesborough, gb	

Name	From	Comments
3,461. Fabiola Galdames	Monroe Twp, PA	
3,462. Diana Logan-Buckles	Minneapolis, MN	
3,463. Kimberley Segura Kimberley Segura	Colorado Springs, CO	
3,464. Patrick Haskins	Camarillo, CA	
3,465. Rebecca Serna	Las Cruces, NM	
3,466. Carleisha Lewis	El Cajon, CA	
3,467. Susan Bortolussi	Westfield, MA	
3,468. Gisel Gonzalez	Van Nuys, CA	
3,469. Lieren Cavanaugh	Puyallup, WA	
3,470. Song Kinnamon	Easley, SC	
3,471. Lois LooneyKochie	Houston, TX	
3,472. Kathleen Basieiwcz	Hendersonville, NC	
3,473. Susan Cole	Bakersfield, CA	As humans we don't have to go the Doctors office to see a PT, why can't we have that option for our furbabies, too!
3,474. Karen Sheaffer	Vandergrift, PA	
3,475. Grisell Gonzalez	Bridgeport, PA	
3,476. Sharon Slike	Tampa, FL	
3,477. Jennifer Pena	Levittown, PA	
3,478. Evelyn Codd	Savannah, GA	
3,479. Brigitte Lindvers	Wietze, de	
3,480. Margaret Stewart	Fallbrook, CA	I've seen, first hand, the difference certified animal PT can make and access should not be limited!
3,481. Jeffrey Cox	Alta Loma, CA	This is obviously the vet/pharma lobby trying to assuage their power over pricing and access. Pet owners need more access to specialized care and programs to keep their pet family member happy and healthy. Qualified rehab specialists, small business owners, that are free to invest in their industry training and techniques and not a second or third focus for a vet.
3,482. Liam Palmer	Seattle, WA	I want injured dogs to have easier access to PT rehab.
3,483. Rhonda Parsons	Sagle, ID	Dogs need the same support as humans and we are advocating for them. These people are highly trained in what dogs need and we need them. We need to be able to choose the BEST for our animals.
3,484. Sophia Kreide	San Francisco, CA	Passing of this law will lead to less qualified animal physical therapists and a shortage for animals who really need it. Pet Pts are already highly trained and qualified, more so than <i>(continues on next page)</i>

Name	From	Comments
3,484. Sophia Kreide	San Francisco, CA	<i>(continued from previous page)</i> even human physical therapists and veterinarians, when it comes to rehab. Please rethink this!
3,485. Deirdre Barrett	lynn, MA	
3,486. Linda Lundqvist	Karlskrona, se	
3,487. Rosalina De La Cruz	Los Angeles, CA	
3,488. Rachel Beckwith	Nottingham, gb	
3,489. Joan Flores	Chattanooga, TN	
3,490. Joe Moag	Chicago, IL	
3,491. Jera Zaman	Poway, CA	As a dog mom and a California physical therapist I 100% support and empower this effort to keep the skilled therapists able to work in and control our expanding profession. More access to qualified, skilled and affordable care will promote rehab for all that need it! This is critical as we move toward saving and rehabbing more critically ill dogs and those that are no longer 'throw aways' for being 'differently abled'. Less access slows this movement and places more dogs at risk as we would recede to a less-enlightened society once again.
3,492. Miranda Gallahan	Olympia, WA	
3,493. Justin Granzella	Arvada, CO	
3,494. Lisa Foldy	Palos Hills, IL	
3,495. Krystal Shipley	Vista, CA	
3,496. kim hellman	Temecula, CA	My dogs have rehabbed through PT both on land in utilizing an underwater treadmill. I want to keep this access available - a general vet is a jack of all trades and master of NONE!!!
3,497. Debbie Moore	Rancho Cordova, CA	
3,498. Emmanuelle Bouge	Cardonnette, fr	
3,499. Alison Dudley	San Diego, CA	
3,500. Catherine Hemerson	Orange, CA	Our fur babies deserve this!!!!
3,501. Kelly Straub	Las Vegas, NV	Creating a vet monopoly serves no one but the vets. PTs lives are dedicated to rehab and if they are specialty trained, they are the best profession to offer rehab.
3,502. Linda Barraza	Hayward, CA	
3,503. Brooklyn Gunn	Walhalla, SC	Dogs are amazing just the way they are
3,504. Derek Tavares	New Bedford, MA	
3,505. Janine Penaflo	Nipomo, CA	
3,506. Jennifer Dickerson	Slidell, LA	

Name	From	Comments
3,507. Joy Gayton	St Peters, MO	I Think That This Is A Wonderful Idea & I Love The Idea Of Using Animal's For Physical Therapy.
3,508. Deborah Haynes	Fullerton, CA	I am an OTR/L licensed in California. I plan to move out of state sometime in the next few years to pursue animal rehab in states that allow OTs to practice animal rehab.
3,509. Tracy Gettle	Sacramento, CA	It's humanity
3,510. Kerrie Ragan	MAhwah, NJ	
3,511. Monica Kim	Los Angeles, CA	Every field has professionals in specialties for specific reasons. As a dog lover, I want all dogs to have their best chance with people who specifically studied for therapy to administer therapy and people who specifically studied medicine to administer medicine.
3,512. Lillian Flores	Bisbee, AZ	Cause animals are more pure and sweeter then a human
3,513. Christopher Harris	Montecito, CA	This regulation would damage animal welfare by significantly limiting access to physical therapy for pet owners.
3,514. Karen Kmiotek	Cheektowaga, NY	
3,515. ROXANNE Trombly	Plattsburgh, NY	
3,517. Dena Oxley	Valley Center, KS	
3,518. Dawn Ramsey	Sarasota, FL	
3,519. Passaraporn Phumradi	Nakonpathom, th	
3,520. Jerry Goodman	BROOKLYN, NY	
3,521. Amy Haugen	San Rafael, CA	
3,522. Tammy Yarber	Kingsport, TN	
3,523. Melissa Butler	Jamaica, NY	
3,524. Barbara Teti	Santa Barbara, CA	PT extended my dog's life and made her feel a lot better without medication. Vets are not specifically trained to do this work. If it's non invasive.. why would you need a vet? It just doesn't make sense!.. why can't pet owners decide to take their pet there or not?
3,525. Tina Avilla	Deltona, FL	
3,526. Cheryl Jordan	Hico, WV	
3,527. Jill Sweringen	SF, CA	
3,528. Robin St.Clair	Goodview, VA	
3,529. Dee McClarney	St. Louis, MO	
3,530. Liliana Elliot	Los Gatos, CA	
3,531. Margaret Ontiveros	OKC, OK	
3,532. Patricia Verhulst	Cleveland, WI	
3,533. Brian Doane	New Bedford, MA	

Name	From	Comments
3,534. Mj Kassar	Shelton, CT	
3,535. Natasha Bui	Chicago, IL	
3,536. Bradley Gunter	Tioga, ND	
3,537. Susan Holder	Cynthiana, KY	
3,538. Tk Buchanan	Lemoyne, NE	
3,539. Karen Deddeh	Corona, CA	
3,540. Carol Abrams	Sacramento, CA	
3,541. Carmela Bechtel	Modesto, CA	
3,542. Jordan Pyle	Surprise, AZ	
3,543. Jen Branson	Huntington Beach, CA	
3,544. Janice Valdez	Bonita, CA	I had my dog go to PT after cruciate ligament repair. It was the best thing. I followed the protocol by the vet & she lived a long life to 16 years old. PT for dogs is definitely a speciality. I believe a vet can recommend it for pets that need it. I don't believe the PT needs to be supervised by the vet. It is like sending your dog to a specialist. PT for animals is a speciality & should stay that way. Please don't complicate things for pet owners. It is already difficult to see their "fur-kids" in discomfort.
3,545. Monica Watts	Newport Beach, CA	
3,546. Annette Blanco	Kalona, IA	Because animals like humans need physical therapy to have happy lives!
3,547. Ashley Carleton	Brisbane, au	
3,548. Allison Wagner	Calif, CA	Some of these animald need rehabilitstion to get back to being healthy are maybe to walk.I think the animals should have quality care.
3,549. Melissa Klein	Santa Cruz, CA	
3,550. Goldyn Summitt	Forney, TX	
3,551. Vera Mata	Stockton, CA	I have had dogs and I would want to make my own decisions on who treats them.
3,552. Anna Sz	Morrisville, PA	
3,553. Christopher Winnett	Rochester, NY	
3,554. Silvia Garcia	Miami, FL	We
3,555. Julie Hershberg	Torrance, CA	
3,556. Bernice Smith	Henderson, NV	
3,557. Christy Moegelin	Lompoc, CA	
3,558. Kaley McDougall	Santa Barbara, CA	
3,559. Nicholas Cawadias	Ottawa, ca	All dogs should have access to the rehab facilities they need. Dogs are angels and should never be taken for granted.

Name	From	Comments
3,560. Susan Nichols	Moorhead, MN	
3,561. Lauren Manar	San Francisco, CA	
3,562. Marco Pascale	Bolton, ca	Dogs deserve the same treatment as humans, wonderful creatures that love unconditionally and deserve it reciprocated
3,563. Vincent Libonati	Mission Viejo, CA	
3,564. Kristen Negrotto-Weber	Middlesex, NJ	
3,565. Leah Marz	Solvang, CA	
3,566. Michelle Sobilo	Paupack, PA	
3,567. Elaine Butts	Dayton, OH	
3,568. Lisa Khan	Bronx, NY	
3,569. Jane Kwiatkowski	Pittsburg, CA	
3,570. Rjonda Ignativich	74107, OK	
3,571. Claudia Eckstrom	Columbia, MD	
3,572. Lisa Thacker	Clifton, CO	
3,573. Teresa Gann-Stuebgen	OTIS, OR	
3,574. Joy Lyons	Calais, ME	
3,575. Jaime Wolf	Lynchburg, VA	
3,576. Christy Lee	Cape coral, FL	
3,577. Chris Rowland	Las vegas, NV	
3,578. Deborah Runnells	Venice, CA	
3,579. Kerry Schwidde	Somersworth, NH	
3,580. Tricia Crump	Norco, CA	Physical therapy is often critical to the well being of our animals. A person can have massage therapy, accupuncture, chiropractic work all without the supervision of a general or family physician, why should it be different for our animals
3,581. Charmaine Broad	New York, NY	
3,582. Surojini Winterton	Cary, NC	Animal welfare is important to me and that begins with critical care for them.
3,583. Karin Andre	Canoga Park, CA	
3,584. Nancy Watson	KC, MO	
3,585. Brenda Guarnieri	Gardner, MA	
3,586. Jessica Douglas	Highwood, IL	
3,587. Michelle Blackley	Auburn, IL	
3,588. Gillian Kingston	Peabody, MA	
3,589. Ann Byrnes	Sugar hill, GA	

Name	From	Comments
3,590. catie Bertges	Baltimore, MD	
3,591. Rickie Linneman	Lusk, WY	
3,592. Julie Wilmot	Elkton, MD	
3,593. Cheryl Suarez	Chipley, FL	
3,594. Belinda Marrinan	Dalby, au	
3,595. Erica Gardano	Oakland, CA	Animal's quality care should not be limited in any way. Allow physical therapists to practice without the boundaries of Vet hours and oversight.
3,596. Sandy Rasmussen	Dayton, IA	
3,597. Teresa Yuncker	Florence, AL	If our dogs need special care to help them walk or any other physical therapy that will help. Then aloud them that help.
3,598. Jessica Hurtado	Olivehurst, CA	
3,599. Deepa Golub	Rangeley, ME	Making laws about everything and anything sometimes is not the solution.
3,600. Emma Murphy	Colorado Springs, CO	
3,601. Katy Hall	Santa Barbara, CA	I think animal physical therapy should be given the same recognition as human physical therapy. As the owner of a dog who's suffered from a FCE physical therapy helped rehabilitate him for a better quality of life. This industry should be able to operate among its own standards not requiring the practice to take place within a veterinary office. Additionally this adds professional career options to the veterinary field that is limited to competitive doctorate roles.
3,602. Emily Rossi	Amherst, NY	
3,603. Dawn Owend	Ventura, CA	
3,604. Roberta Limoli Barufaldi	Burlington, MA	
3,605. Alicia Boemi	Deer Park, IL	
3,606. Sharon Bouchard Sharon Bouchard	Somerset, MA	
3,607. Lynn Bower	Oakdale, CA	
3,608. Mary Argo	SACRAMENTO, CA	People need to be able to have access to all kinds of therapy for their animal. It is not in the best interest of the animal to have these limitations out on them. There are VERY talented people who have amazing abilities to help the healing process in an animal and they do not need to be stymied by these regulations. I live in the 95818 zip code.
3,609. Lynn Staab	Linneus, ME	
3,610. Rakim Merrill	Nashville, TN	
3,611. Anita Scanlon	Dyer, IN	
3,612. Janice Parker	Sonora, CA	

Name	From	Comments
3,613. Brianna Ross	Shadyside, OH	
3,614. Brandon Rosi	Indio, CA	
3,615. Huy Vo	Garden Grove, CA	
3,616. R R	Wichita Falls, TX	
3,617. Josh Hall	Slc, UT	
3,618. Michelle Kelley	Valley springs, CA	
3,619. Gena Richardson	Boise, ID	
3,620. Danelle Dickson	Takoma Park, MD	PTs are the experts in musculoskeletal rehab, and have the expertise and training to help these animals, and they should!
3,621. Marisa Ross	Columbus, OH	
3,622. Evan Turpin	Carpinteria, CA	
3,623. Maria Zapata	Seattle, WA	
3,624. Gabriela Correa	Fort Lauderdale, FL	
3,625. Lovenda Gregg	Salina, KS	
3,626. Bethany Platte	Lansing, MI	If you can choose a vet then why can't you choose an Animal PT. Where is this world coming to.
3,627. Lorelei Allard	Leominster, MA	
3,628. Analiza Pentagon	Anchorage, AK	
3,629. Carrie Jose	Newington, NH	Bc vets shouldn't have a monopoly in something they're not as fully qualified in. Physical therapists are experts in rehab
3,630. William Boyd	Pittsburgh, PA	
3,631. Rose Haslehurst	Lincoln, RI	
3,632. Katherine Kocos	Concord, CA	
3,633. Jason Wright	Bowling Green, KY	
3,634. Ginger Morrissey	Charlotte, NC	People should have a right to choose the provider for their pets. PTs are the movement specialists
3,635. Ivis Chavarria	Yonkers, NY	The well-being is always important form
3,636. Andressa Glubin	Baldwin, NY	
3,637. Jan Payne	Jackson, MI	
3,638. Dawn McCrory	Culver City, CA	Physical therapists are the experts in musculoskeletal conditions. They are trained at a very high level and receive a doctorate in their field of expertise. Animal rehab PTs receive extended training in animal anatomy so they can apply their highly trained principles of care to other beings. Physical therapists have direct access care responsibilities for humans. This should also extend to our human companions. I want my dogs to see an expert in rehab if that is what they need, without requiring a vet visit to tell me they hurt their paw or they're old and have arthritis, etc.
3,639. Elissa Gilbert	Lawrenceville, GA	

Name	From	Comments
3,640. Kimberly Montes	Los Angeles, CA	
3,641. Jerrilyn Kasmer	Hazlet, NJ	
3,642. Debra Zapata	Skowhegan, ME	
3,643. Jeffrey Symon	El Dorado Hills, CA	Animals need increased ease of access, not less!
3,644. Lisa Chamberlain	Spanish fort, AL	
3,645. Stephanie Gitlin	Long Island City, NY	
3,646. Sheila Alati	Buffalo, NY	
3,647. Jane Gold	Houston, TX	
3,648. Claudia Gemmer	Odenton, MD	
3,649. Carrie Gleason	Sedalia, CO	
3,650. Debora Pitts	Las Vegas, NV	
3,651. Disa Balderama	Downey, CA	
3,652. Karin Keaton	Sevierville, TN	
3,653. Stephanie Reilmann	Swansea, IL	
3,654. Chris Adams	Greenbelt, MD	
3,655. Simone Sakai	Cotia, br	
3,656. Tina Bullard	piqua, OH	
3,657. Brenda Bacot	Naples, FL	People need to be able to have access to all kinds of therapy for their animal. It is not in the best interest of the animal to have these limitations imposed on them.
3,658. Jamie Reifman	Chicago, IL	
3,659. Shani Schulman	OZONE PARK, NY	
3,660. Jeannette Desmarais	Yakima, WA	
3,661. Pamela Shaw	Cincinnati, OH	
3,662. Laura Schelstraete	Yuma, AZ	
3,663. John Trice	San Clemente, CA	
3,664. Irene Hausammann	Biel, ch	It is important for a physical treatment!
3,665. Davy Sheets	Hampton, VA	
3,666. Stephanie Mccallum	Granite falls, WA	
3,667. Abigail Perez	Austin, TX	
3,668. Brenda Kassab	Shelby Twp, MI	
3,669. Heather Mahon	West Jefferson, OH	Because I think we can help animals with physical ailments walk and
3,670. Pip Farrant	Plymouth, gb	

Name	From	Comments
3,671. Lydia Garrett	Puyallup, WA	
3,672. Sébastien Seguy	Santa Clara, CA	
3,673. Cary Harrison	Goleta, CA	Because I know the value these PT do for my dogs. They know more than a Vet about how muscles work and which exercises are needed to remedy the pain.
3,674. Elisabeth Vaughan	Marietta, GA	
3,675. Sydney Bruno	Williamsport, PA	
3,676. Diane Jones	Santa Barbara, CA	Listen to the experts! [redacted]
3,677. Lucia Garcia	Corpus Christi, TX	
3,678. Theresa Winnie	Ocala, FL	
3,679. Annie Livit	Brooklyn, NY	
3,680. Mary Lou Maher	Antioch, CA	
3,681. Brian Thacker	Charlotte, NC	
3,682. Julie Enos	Des Moines, IA	It would free them from pain making them stronger
3,683. Jean Avrck	Santa barbara, CA	Human PT's aren't supervised by MD's, requiring animal PT's fly be supervised by DVM's is overreach and will drive up the cost and limit the availability of animal rehab
3,684. Carrie Anthony	Nacogdoches, TX	
3,685. Tony Espinosa	Rochester, MN	
3,686. Elaine Totoritis	Richmond, VA	All healthcare for animals & humans should be available w/out being raped financially. All lives matter & are very important.
3,687. Sean Lee	Palm Beach Gardens, FL	
3,688. Veronica Diaz	Edinburg, TX	Because animals deserve health care as much as we do.
3,689. Ana Martins	Lisboa, pt	
3,690. Miguel Santos	Lisboa, pt	
3,691. Connie Kirkham	Clearlake Oaks, CA	Animals are a wonderful support for anyone!
3,692. Linda McAfee	West Mifflin, PA	
3,693. Liset Sedo	Culver City, CA	
3,694. Patricia Wolf	Lake Hughes, CA	obviously, to help the animals.
3,695. Lisa Springer	Battle Creek, MI	
3,696. Jennifer Turner	Ventura, CA	
3,697. Michele White	Roswell, GA	
3,698. Lashon Earl	East Rochester, NY	
3,699. Robin Sheppard	Nyack, NY	
3,700. Maria Mitchell	St Augustine, FL	
3,701. Kaeley Christensen	Santa Barbara, CA	

Name	From	Comments
3,702. Aspen Rasmussen	Fountain, CO	
3,703. Donna Johnson	Ventura, CA	Everything about caring for animals is important to me.
3,704. Ashley Salter	Santa ynez, CA	
3,705. Susan Black	Santa Barbara, CA	personal experience
3,706. Jana Lombardi	tualatin, OR	
3,707. Jeannine Kassity	Buellton, CA	
3,708. Debbie Merriman	Santa Barbara, CA	The work they do is amazing..... [?][?]
3,709. Linda Baker	Kihei, HI	
3,710. Julie Anderson	Santa Barbara, CA	I want animal PTs in CA to have options for where they work and for more of them to be available in our communities.
3,711. Annie Gupta	Santa Barbara, CA	Animals need good care!
3,712. Georgia Bottoms	Savannah, GA	Because I am a physical therapist who provides skilled intervention to the Canine population and feel our skills as a PT can only assist in providing a quality of life for canines and a professional relationship between PT's and vets...and I love Karen atlas [?][?]
3,713. Megan Kelly	Cape Town, za	Veterinary rehabilitation includes people from different professions and everyone has something to offer. Restricting veterinary rehab therapists and how they practice is not in the best interest of our patients or the profession.
3,714. Rita Morneault	Goleta, CA	physical therapy for my working dogs is very important PT understands the dogs body more then a vet.
3,715. Marla Cooper	Santa Barbara, CA	Because my dogs have greatly benefitted from the hard work of canine physical therapists.
3,716. Kate Morgan	Los Angeles, CA	I spent more than a decade working in the veterinary field, and the difference in the mood and energy of both clients and patients in physical therapy facilities is astounding. Animals are more calm and at ease...almost every pet I helped with physical therapy looked forward to their visits as did their owners, knowing the quality of the care and the individualize attention they were receiving. At veterinary offices it was a constant influx of upset, anxious and sometimes aggressive clients and patients. Furthermore, the physical therapists I have knows have always been 100% respectful and loyal to veterinarians' instructions and/or concerns. Physical therapists possess and ABUNDANCE of knowledge regarding their field and I see no reason why they should have someone who is not well versed in PT telling them what to do. The animal PT offices I am aware of are referral practices. To me, this is no different from saying a human GP must oversee an orthopedist. It makes no sense. Please do not close down the businesses of hard working experts in their field. Thank you.
3,717. Ken Leandro	Ventura, CA	

Name	From	Comments
3,718. Ginger Cusano	Huron, OH	Our furbabies are our children and as with human children, we parents know what's best for our babies
3,719. Tonya Whitaker	Liberty, SC	
3,720. Laura Knowles	San Dimas, CA	I am a physical therapist and know the healing properties of this profession.
3,721. Angelo Salvador Terrero	Syracuse, NY	
3,722. Sarah Lopez	Long Beach, CA	
3,723. Ilana Strubel	San Francisco, CA	Because it's ridiculous to prevent expert physical therapists with advanced training in animal physical rehabilitation from continuing to help animals in need while collaborating with local veterinarians. Requiring a vet onsite is like requiring all human PT facilities to have an MD on-site. It's excessive
3,724. Myrna Lee	Tallahassee, FL	
3,725. AbbeyRose Jerome	Gloucester, MA	They need help just as much as we do if we don't wanna help them till the end why would we have them in the first place
3,726. Rosanne Jancevich	Downers Grove, IL	
3,727. Carmen Celea	Bucuresti, ro	
3,728. Tony and Cindy Guarnieri	Stamford, CT	Animal therapy is vitally important to children and adults as well. They bring out the good in everyone.
3,729. Leslie Brackman	Santa Barbara, CA	PT has helped my dog recover from injury in the past and I'd like to be able to select the people I trust to work on my pets.
3,730. Derek NeSmith	Saint Cloud, FL	
3,731. Madelein Blundred	Lake Dallas, TX	
3,732. Gilson Tavares	Mogi das Cruzes, br	
3,733. Susan Woodhouse	Santa Barbara, CA	Animal physical therapist provide much needed specialized care to animals that some veterinarians may have given up in because they are too badly injured.
3,734. Alejandro Perez	Red Oak, TX	
3,735. Kari Delkener	Santa barbara, CA	
3,736. Patrice Hughes	Orlando, FL	
3,737. Tami Quick	Pickerington, OH	
3,738. Melinda Pierce	Santa Barbara, CA	
3,739. Betsy Mooney	Santa Barbara, CA	Animals are awesome therapists! It about choice.
3,740. Alvin Orillaneda	San Jose, CA	
3,741. Mary Celine Eising	Santa Barbara, CA	
3,742. Ann Reilly	Stevensville, MD	

Name	From	Comments
3,743. Marilyn Doud	Stockton, CA	I am a retired physical therapist. I have taken many courses in equine physical therapy, but would have risked my license to practice on humans if I were to truthfully tell clients that what I was doing was based on my physical therapy knowledge and education.
3,744. Frances Tesoriero	Bklyn, NY	We must think for the future! We must act now!
3,745. Dianne Etri	Bellmore, NY	
3,746. Bonnie Mccall	Williamstown, NJ	
3,747. Lee Miller	Cotati, CA	Multiple modalities do not need Veterinarians to accomplish these life improving work with my pets.
3,748. Helen Hoffman	Rancho Palos Verdes, CA	All beings deserve the access to best healthcare and in this case the caregiver should be able to decide which therapist they want to use.
3,749. Ioana Iverson	Langhorne, PA	
3,750. Chiu Wing Pong	Mountain View, CA	
3,751. Leslie Guenther	Buellton, CA	
3,752. Andrea Hennig	Dresden, de	
3,753. Aela Culver	Fort Worth, TX	
3,754. Ramona Bostain	Columbus, OH	
3,755. Trina Haney	Grand prairie, TX	
3,756. Gideon Lockspeiser	Los Angeles, CA	
3,757. Florante Galvez	San Jose, CA	You never know when your pets will need important services to help them when in need. Choosing best person to provide care matters.
3,758. DARLENE WOODEND	San Diego, CA	We need to have the freedom of choice for alternative therapy for our animals. The veterinarians don't have time to deal with therapy work when they have so much more important issues to deal with.
3,759. Kirstie Cruickshanks	Sunderland, gb	
3,760. Donald Burns	Toledo, OH	
3,761. Srilatha Pagadala	Plano, TX	
3,762. David Burchard	Azusa, CA	
3,763. Cindy Hatcher	Lake Worth Beach, FL	
3,764. catherine bochyński	SANTA ANA, CA	Animals are suffering without more immediate help to physical therapy. I know how much it helped me.
3,765. Thomas bochyński	SANTA ANA, CA	Animal owners should be able to chose whatever provider they feel will meet their pets needs..
3,766. Mikayla Neil	Scotland, gb	

Name	From	Comments
3,767. Jeanine Freeberg	Chicago, IL	Because it's in the best interest of the animals to have access to the skill set of a physical therapist. In human medicine, you'd never have your Dr. do your physical therapy. It's a different skill set.
3,768. Jennifer Bachman	Allentown, PA	
3,769. Caroline Adrian	Loveland, CO	
3,770. Erin Van Wagner	Williamstown, NJ	
3,771. Ilona Linden	Sierra Madre, CA	
3,772. rob damage	los ángeles, CA	
3,773. Kim Santell	PASADENA, CA	
3,774. Richard Lower JR	Sacramento, CA	Consumers should have a choice. Allowing only vets to provide physical therapy will cause prices to skyrocket and make it unavailable to a large part of the pet population.
3,775. Jason Bowman	PLACERVILLE, CA	
3,776. S. Allison	Sierra Madre, CA	
3,777. Jeanne Cermak	Bellevue, NE	
3,778. Elizabeth Clayton	Roxboro, NC	Animal therapy is very important to the young and old. My animals have gotten me through some very hard times
3,779. Shenika Felix	Los Angeles, CA	
3,780. Natalie Orsi	Goleta, CA	
3,781. Brianna Hammond	Santa Barbara, CA	I have seen dogs that others diagnosed as paralyzed be fully rehabilitated through physical therapy modalities
3,782. Lynn Ohls	Seattle, WA	
3,783. Joe Ferrell	Lexington, KY	Must treat animals as we deserve to be treated!![?][?][?]
3,784. John Reed	Pensacola, FL	
3,785. Darlene Cullington	Santa Barbara, CA	There should be options for pet owners other than just drugs to relieve pain. Humans have amazing results with rehab, so animals should have that option too!
3,786. Julie Yamashiro	Inglewood, CA	
3,787. Ebony bills	adelaide, ar	
3,788. Billie McKenzie	Martins Ferry, OH	
3,789. Lorraine Moore	London, gb	
3,790. Andrew Jiang	Oakland, CA	
3,791. Donna Hennig	Spruce Grove, ca	
3,792. Josef Wolff	Los Angeles, CA	Because Nazis should not get to choose how we take care of our pets.
3,793. Karin delaPeña	NEW YORK, NY	I love the animals in my life.
3,794. Francisco Vargas	Los Angeles, CA	
3,795. Christina Youm	Los Angeles, CA	
3,796. Paul Power	PACOIMA, CA	Because I want what I feel is best for my dogs.

Name	From	Comments
3,797. Deborah Currier	Denver, CO	People and the animals they care so deeply for should be allowed to have choice in the care of these animals. Animal based Physical Therapists should not be required to work under such close supervision of a veterinarian. It is important to partner with all of the animal's practitioners, but not to such a strong extent as to be directly supervised with them. This eliminates many avenues of care available to animals and does not promote any betterment of care or improvement to animal's life. It only goes to improve veterinarian control of this line of revenue.
3,798. Cheri Manb	Los angeles, CA	The care of our animals as is the care of our children is the responsibility and know-how of the parents who feed and shelter them. There are already laws in place should neglect or cruelty prevail. Leave pet owners alone. Lawmakers should. Oncern themselves with our homelessness and our elderly neglect, i.e., throwing them out of housing to make money. Thank you.
3,799. Sandra Lipschultz	Los Angeles, CA	Referral/consultation works in the human model, why are animals different (assuming similar rigorous training/licensing)?
3,800. Barbara Butler	Los Angeles, CA	Pet owners want only what's best for their pets. They are family members!!!
3,801. Cindy Stein	Thousand Oaks, CA	
3,802. Al Pelullo	West Hollywood, CA	
3,803. Donna Frye	Haddam, KS	
3,804. ewa glapinska	Nowy Targ, pl	
3,805. Lillian Rockholt	Hohenwald, TN	
3,806. dorothy livingston	Los Angeles, CA	I only want the best for my pet.
3,807. John Peterson	McMinnville, OR	
3,808. Ricki Bush	Van Nuys, CA	
3,809. Jennifer Neault	Harrison Twp, MI	
3,810. Erica Ellis	Olathe, KS	I am a student physical therapist and this is important to me because I am highly interested in becoming an animal rehab specialist in my future. There is no reason we shouldn't have the right to practice autonomously, as well as offer independence to consumers to choose who they want to treat their animals.
3,811. Lucy Hamby	Tujunga, CA	
3,812. Regan Davis	Remington, IN	
3,813. Monique Correa	Lake ronkonkoma, NY	
3,814. Bernadette Advincula	Delano, CA	I am a physical therapy student and I'm also a dog mom. I would love to have the opportunity to one day provide animal rehab.
3,815. Kaleigh Acosta	Escondido, CA	

Name	From	Comments
3,816. Justine Crowell	Minnetonka, MN	
3,817. Amy Wu	South El Monte, CA	
3,818. Rebekah Baltis	Clovis, CA	
3,819. Griselda rivera	Delano, CA	
3,820. Debbie Dumag Caasi	Delano, CA	
3,821. Elijah Jolly	Sanger, CA	I'm a Student PT that adores animals and want to see the best care given to them!
3,822. Teena Torres	Delano, CA	Because i have two dogs that i love as my babies. Both breeds are prone to hip dysplasia..
3,823. Ashlee Arellano	Bakersfield, CA	
3,824. Verica Ristovska	Windsor, ca	
3,825. Jesus Cerda Deniz	Delano, CA	I love dogs and PT.
3,826. Clint Nhan	Garden Grove, CA	
3,827. Jennifer Cantrell	West Liberty, KY	
3,828. Nanette Benna	Cleveland, OH	
3,829. Terry Wallerstedt	St. Joseph, MO	
3,830. Cheryl Turner	Brownwood, TX	
3,831. Colleen Jaehnig	Riverside, CA	
3,832. Pamela Mares	Riverside, CA	Want to choose who ever I wish !!
3,833. Jennifer Welter	Vacaville, CA	
3,834. Margery Walker	Ithaca, NY	As a Physical Therapist and LVT, I know first hand the education and hard work these professionals bring to each patient. They are an ASSET and will help grow the veterinarian and physical therapy professions.
3,835. Barbara Prilaman	Lakeside, CA	My dogs have used animal Pt many times!
3,836. Kaitlyn Duckworth	Vista, CA	
3,837. Claudia Steele-Major	Ventura, CA	
3,838. Kelsey Olin	Dalton, GA	
3,839. Kendra Harring	Los Angeles, CA	
3,840. Pantea Y	Santa monica, CA	
3,841. Marsha Swinson	Plains, MT	
3,842. Manuela Valenzik	Rülzheim, de	
3,843. Alesia Butsianava	Reno, NV	
3,844. Kathleen Rybicki	Green Bay, WI	

Name	From	Comments
3,845. Kyle Ianier	longmont, CO	I work in physical therapy as a PTA and I elieve both fields can benefit the other in a multi-disciplinarian approach to animal rehab; would love to see animal PT grow!
3,846. Donna Newton	Louisville, KY	
3,847. Ruby Purdy	Littleton, CO	
3,848. S P	L.w, FL	Love the fact you use the animals
3,849. Anne Blodgett	Tonawanda, NY	
3,850. Lois Chea	Wildwood, FL	
3,851. Matt Brown	Colorado Springs, CO	
3,852. Linda White	Broadway, VA	
3,853. Aurora Zarate	Denver, CO	
3,854. Harvey & Janet LeDoux	Spokane, WA	
3,855. Molly Rogers	Lancaster, CA	
3,856. Janine Coschigano	LANTANA, FL	
3,857. Jurate Kajokaite	Vilnius, It	
3,858. Roseanne Jackson	Fairfield, CA	
3,859. Yvonne McGhee	Glasgow, gb	
3,860. Kairna Dionne	Miami, FL	
3,861. Mary Argo	Sacramento, CA	People need a choice not a monopoly on choosing the right care for their animal. It's a disgrace that the veterinary community is once again trying to get rid of reliable alternate therapies. My zip code is 95818
3,862. Jenyfère Chiasson	Terrebonne, ca	
3,863. Salena Lujan	Fresno, CA	
3,864. Victoria Renwick	Chilliwack, ca	
3,865. Jillian Carr	Gautier, MS	
3,866. Cole Hughes	Cochrane, ca	Appreciation in physical therapy and the service it provides.
3,867. Linda Mudie	Calgary, ca	
3,868. Megan McLeod	Foothills, ca	
3,869. Kath Long	Auckland, nz	Regulation of qualified practitioners is necessary and physical therapists have expertise in this area to work as part o f a multidisciplinary team in conjunction with veterinarians.
3,870. Ana Barranta	Loxahatchee, FL	
3,871. Vivian Pio	San Diego, CA	I recently lost my beloved Luke. The last 2 1/2 years of his life we were very fortunate to have access to the services of a truly wonderful swim therapist. He was diagnosed with <i>(continues on next page)</i>

Name	From	Comments
3,871. Vivian Pio	San Diego, CA	<i>(continued from previous page)</i> spinal stenosis at age 11 and his weekly swim sessions truly eased his pain and kept his muscles toned so he could still enjoy his walks and most activities. He was nearly 14 when he passed away and I truly believe the therapy sessions not only extended Luke's life but improved his overall quality of life. It is important that more dogs and their owners have access to these wonderful therapists.
3,872. Jackie Hastie	Calgary, ca	I need someone who is very qualified when my performance dog is sore or lame. Laurie Edge Hughes fixes them up every time
3,873. Caitlyn Crandall	Ballston Lake, NY	
3,874. Shari Sprague	Loganville, GA	
3,875. Telma Grant	Bowmanville, ca	Patients need choice. Monopolies are bad
3,876. Ansi vd Walt Ansi vd Walt	Midrand, za	
3,877. Jeanne Mortimer	Johannesburg, za	I'm a physical therapist myself. We have independent practice rights for a reason - we earned it!
3,878. Laura Kennedy	Denver, CO	Because animals deserve everything.
3,879. Angela Harvey	Sydney, au	
3,880. Maureen Waugh	Regina, ca	
3,881. Kirsten Mcandrew	Motor city, ae	I am a vet physio and human physio who strongly agree with this!
3,882. Sandra Le Bris	Delta, ca	
3,883. May Römer	Hilversum, nl	Veterinary physical therapists are specialists highly trained in treating the locomotory system. Their palpational skills exceed those of most veterinarians. They deserve to be treated with respect to their knowledge and skills.
3,884. Heather Halton	Hawick, gb	Physiotherapists make real positive differences to the quality of life of many animals. Owners should be able to choose to be able to access physiotherapy for their animals.
3,885. Diana Bollweg	Johannesburg, za	I am a Physical Therapist with a special interest in treating Animals. I have been involved in PT for canine patients for 11 years. I have seen the expertise brought to the field of Animal Physical Therapy / Veterinary Rehab by the human trained Physical therapists who have the additional training to work with animals. They provide a high standard of care. It is important that animal owners as consumers have the right to choice to have the best care for their animals.
3,886. Cajsa Ericson	Gräddl, se	
3,887. Andrea Bassett	mitcham, gb	

Name	From	Comments
3,888. Paige T. Hodgins	Calgary, ca	I have personally seen the benefits an actual physiotherapist can offer to animals with significant dysfunctions and injuries. Veterinarians practicing rehab don't have the same level of knowledge about manual therapy and often "miss the mark" on treatments.
3,889. Connie Schulte	Overland Park, KS	
3,890. Leona Michael	Red Deer, ca	First hand experience with services provided by experienced animal therapists outside of vet - benefits HUGE!! AND my vet recommended them for my injured dog as she felt they were more qualified to treat the injury. Let them so what they took training for!!
3,891. Diane Paster	Gilbert, AZ	As a practicing rehabilitation veterinarian, I have learned a tremendous amount from animal physical therapists. They have helped me refine my palpation and manual therapy skills and consulted with me on complicated cases. They are highly trained professionals that do not need veterinary supervision and our patients deserve ready access to their expertise.
3,892. Kelly Huygens	Kaggevinne, be	Because I'm a vet who is also a PT and I would be sorry if some of the best co-workers I have would have to stop because their original degree isn't veterinarian but PT.
3,893. Kay Webb	Skipton, gb	
3,894. Robyn Roth	Reno, NV	Encouraging California to act responsibly allowing PT professionals to practice with animals as we are doing in NV and have done since 2004
3,895. Jennifer Hetrick	Harrisburg, PA	
3,896. Sophia Fagerholdt	Umeå, se	
3,897. Chrissie Velazquez	Santa Barbara, CA	
3,898. Penny Radostits	Edmonton, ca	Animal Physiotherapy helps so many pets lead better quality lives
3,899. Vera Carbaugh	Santa Barbara, CA	Because it's right & because my pet benefitted from a professional licenced animal PT provider. I want that for all pets.
3,900. Kathrine Rice	chandler, AZ	This is important because animals deserve better! Laws need yo be changed, not 10 years from now but yesterday! I will ALWAYS kerp speaking up for a better world for animal's. Anyhthing that is for improving the lives of animals....I'm in!! Thank You Karen♥
3,901. Nicki Cunningham	Toronto, ca	
3,902. Victoria Horton	Montecito, CA	
3,903. Joan Ortiz	Port Byron, IL	
3,904. Cupie Pagel	Cathcart, za	It is brilliant for rehabilitation after orthopedic surgery. Keeping top animal athletes at top performance. And much more

Name	From	Comments
3,905. Lisa Saez	Tom's River, NJ	Physical therapists are highly qualified and provide very skilled care for their canine patients. It would be a sin to deny this care to the dogs in California!
3,906. Ashley Tripodi	Colts Neck, NJ	
3,907. Liz Fernandez	Newbury Park, CA	I am a holistic veterinarian and know that most veterinarians do not have the time or expertise to do PT WELL
3,908. Leigh Ray	Beeliar, au	
3,909. Anna Sahlin	Lund, se	With good genuine education the animals get right and safe cares and rehabilitation.
3,910. Amie Hesbach	Maynard, MA	choice is a right
3,911. Bill York	Ventura, CA	I'm a dog lover and want pets to be able to get the right kind of care when they are in need.
3,912. Loren Borrelli	Perth, au	
3,913. Jean Silva	Santa Barbara, CA	
3,914. Hannah Gallagher	Loveland, CO	I am a physical therapist and certified canine rehabilitation therapist. I want my colleagues in other states to have the right to assess and treat animals as they have the knowledge, skills, and passion to do so.
3,915. Rica Lilly	Pasadena, CA	Animals and their owners should have the right to choose the care they need when and where they need it!
3,916. Sarah Avila	Goleta, CA	Animals should have access to practice that assists them to their best range in mobility, to live pain free, to be heard in their quest for support and care.
3,917. Janet DelVillaggio	Los Gatos, CA	I have seen the amazing things these PTs can do for our animals. Why would we require supervision for our pets that we do not require for ourselves (do you go to a doctor's office to get PT?) Consumers deserve the right to consult with their veterinarian, conduct their own research and select from a BROAD array of therapists.
3,918. Kate Copithorne	Calgary, ca	
3,919. Juliette Joyce	ARROYO Grande, CA	Want to PT available to as many animals as possible!
3,920. Erin Henderson	Norwood, NJ	
3,921. Carly Bennett	Torrance, CA	
3,922. rosemarie Piserchia	brick, NJ	
3,923. Erin Low	Goleta, CA	
3,924. Judy Zube	Williamsport, MD	Don't want California to end up like Maryland laws
3,925. Jeffrey Doornbos	Santa Barbara, CA	
3,926. Amber Lewis	Vero Beach, FL	Amber Callaway lewis
3,927. Jennifer Grossman	Sm, CA	Care for animals should be done by those with the appropriate training.
3,928. Michaela Toffoli	Surrey, ca	

Name	From	Comments
3,929. Marie Bergergård	Malmö, se	
3,930. Kristin Anderson	Bear, DE	
3,931. Julia Peairs	Clearlake, CA	I am a PT interested in canine rehabilitation and I am no longer planning on working in California due to the legislation.
3,932. Bessie Dorbert	Belair, MD	
3,933. Manuela m Combs	Lagrange, GA	
3,934. Nancy Jordan	Mishawaka, IN	
3,935. Katrina Geylani	Mission Viejo, CA	
3,936. Debbie Leach	Belvidere, NJ	I have taken my dogs to various rehabilitation practices. There is a big difference in the capabilities as well as how they practice, see appointments and charge for their services. People need to be able to select the provider of their choice
3,937. Maureen Burke	Warminster, PA	
3,938. Jean Owen	Morristown, NJ	I have worked with some great PT and some really not so good PT for my dogs. I would not be happy if I was forced to use someone that is not a good fit for my dogs.
3,939. Patty Hobin	Montclair, NJ	
3,940. Sandra Sepcaru	Brooklyn, NY	I want to have the right to choose the best practioner for my animal.
3,941. Bernadette Fletcher	North Wales, PA	
3,942. Carol Casella	Staten Island, NY	
3,943. Mary Lou Hanlon	Warren, NJ	
3,944. Laura O'Neill	Bear, DE	It is already hard enough to find animal PT in some areas and if we are further restricted by vet, our pets will actually get LESS care than more.
3,945. Laura Begg	Basking ridge, NJ	This is a highly individualized decision and no one should be forced on who they utilize for therapy. Animals and needs differ widely as does the talent of the PT. Let people choose
3,946. Lyn O'Donnell	New Egypt, NJ	It's our right to choose who we trust we our canine companion
3,947. Anne Andrie	Buxton, ME	
3,948. Jean Muenster	Simi Valley, CA	
3,949. Elsie Maylott	LEESBURG, VA	
3,950. Lonnie Robertd	Marion, VA	
3,951. Hollis Posner	Palm Beach Gardens, FL	As a dog owner I want to have the right to decide where I take my dog for physical help.
3,952. Gail Banta	Fort Collins, CO	

Name	From	Comments
3,953. Linda Rose	Mountainside, NJ	I compete with my dogs and their appointments with they physical therapist are what keep them sound! No vet could take the time to work and identify soreness etc. like a PT does!
3,954. Regina Burton	Warrington, PA	When my dog needs PT I want to select the best for my dog's treatment and not have my vet dictate who I go to for PT.
3,955. Janie Harris	Zionsville, PW	WHO matters!
3,956. Yulia Yulia Bamks	Dubai, ru	
3,957. Sue Wieder	Revere, PA	
3,958. Maggie Reed	Hartland, WI	Dogs and cats deserve to have the same care we do.
3,959. Maryanne Borowski	Millstone, NJ	
3,960. Patricia West-Low	Pine Beach, NJ	Because my dogs have benefited from certified canine PT , and I believe others should have that option as well. As a PT myself, I believe that my dog's canine PT knows more about rehab than our Vet. This is not to undermine the skill or knowledge of my vet who is a smart, skilled diagnostician. The knowledge base is simply different. It's time to stop this paternalistic view of medicine and rehab.
3,961. Sally Silverman	Wyncote, PA	
3,962. Nancy Dolan	Staten island, NY	
3,963. sandy battista	castlegar, ca	Animal Owners should have the right to choose the care they want for their pets.
3,964. Dorothy Kulina	Pine Beach, NJ	We all should have a choice where & how our animals are cared for, not the governments involvement.
3,965. Leanna Wheeler	Vinton, IA	
3,966. Jerri Miller	Boulder, CO	
3,967. LaDonna Akin	Barstow, CA	I live in a rural area with no access to a P.T. for my girl. Many people don't have the time to learn these things. I hope this is helpful and most of all reasonable costs for low income families who love their pets
3,968. Tim and Erin LeBlanc	Flagstaff, AZ	
3,969. Amiee Higgins	Chico, CA	I'm a lover of pets.
3,970. Susan Tilford	Lyndon, KY	
3,971. Ronald Price	Leetsdale, PA	
3,972. Christina Harmon	Louisville, KY	
3,973. Helen Smith	Birmingham, gb	
3,974. Dawna Nunn	Arlington, TX	
3,975. Teresa Lawson	Walnut cove, NC	

Name	From	Comments
3,976. Judith Baxtermaciejewski	Yorba Linda, CA	
3,977. Erica Benchia	WARREN, OH	
3,978. Linda C Morris	South Lake Tahoe, CA	I want my dogs to have access to certified Canine Physical Therapist services
3,979. Lauren Bogart	Sunnyvale, CA	As a California resident and a pet parent, I want my dogs to be able to have access to the best care, and i want the ability to be able to select their service providers, including animal physical therapists.
3,980. Sara Hyatt	Campell, CA	I have friends who are loving and knowledgeable physical therapists and vets, and this work is highly needed.
3,981. kennon hudson	los gatos, CA	My animals are family. I rescue seniors dogs who often have mobility issues. PT has given them a new life.Please support this!!
3,982. Chantal Day	Zephyr Cove, NV	
3,983. Doug Morris	South Lake Tahoe, CA	
3,984. Francis Bowers	Winnipeg, ca	
3,985. Lynn Springer	Carpinteria, CA	
3,986. Tanu Garg	Muzaffarnagar, in	
3,987. Amanda Ellis	Boston, MA	every animal deserves the chance that we can give them!
3,988. Bryan McCullough	Santa Barbara, CA	
3,989. Sarah Obryon	Pasadena, MD	
3,990. Tomo Morita	Gardena, CA	
3,991. Andrea Garcia	San Ysidro, CA	It is important to me because I truly have a passion for all animals and would like to see them get therapy that they deserve.
3,992. Alexandra Bowers	Santa Barbara, CA	My dog has had multiple surgeries and been in rehab every time - for a successful recovery!!
3,993. Jesse Cronquist	Cottonwood, AZ	
3,994. Selma Gonzalez	El Paso, TX	
3,995. Sherri Kulik	Norfolk, VA	
3,996. Katie Miller	New York, NY	
3,997. Michelle Morris	Fort Wayne, IN	
3,998. Corrinne Keddington	Westminster, CO	
3,999. Davina Arroyave	New york, NY	
4,000. Erika Fudim	Mission Viejo, CA	
4,001. Anne-Kathrin Schulte	Huntington beach, CA	
4,002. Sue Jones downer	Taunton, gb	

Name	From	Comments
4,003. Courtney Hyde	Indianapolis, IN	
4,004. Jean Bellm	Spring Hill, FL	
4,005. Sahara Magana	Santa Cruz, CA	
4,006. Dominika N	COVENTRY, gb	
4,007. Mary Hufstedler	Wilmington, NC	Any possibility for an animal to regain use of limbs is very important to the animal!
4,008. Susan Smith	Woodland hills, CA	
4,009. Amy Hoffman	Orlando, FL	Every living being needs a second chance.
4,010. Jairo Buenaventura	Summerville, SC	
4,011. Steven Elmore	McCordsville, IN	Because dogs help us in so many ways and we need to help them back in as many ways as possible and this is a huge step.
4,012. Jennifer Reinish	Santa Barbara, CA	
4,013. Elissa Jefferes	Rehoboth Beach, DE	
4,014. Sarina Love	Valley village, CA	
4,015. Stacy Gradel	Vero beach, FL	Physical therapist is a specialty service and those that go out of their way to get trained and educated to help further our pets lives should be accepted into the pet community.
4,016. Courtney White	Tulsa, OK	
4,017. Tatiana Quaife	Irvine, CA	
4,018. Kari Cronin	Ann Arbor, MI	
4,019. Kim Theobald	Chicago, IL	
4,020. Amy Ezell	Los Angeles, CA	
4,021. Amanda B	Mead, WA	Compassion towards those in need, who rely on humans to be their voice
4,022. Sophie Kaphahn	Upper hutt, nz	
4,023. Abigail Noh	PASADENA, CA	I will be a graduating DPT with a high interest in canine rehabilitation. I would love nothing more than to assist in healing canines because they have healed me in many ways.
4,024. Carys Burnham	Sutton Coldfield, gb	
4,025. Bree Hubert	HAWTHORNE, CA	
4,026. Lori Pecora	Phoenix, AZ	
4,027. Ellen Bloome	Delray Beach, FL	I am a Canine PT
4,028. Jon Davis	Chicago, IL	
4,029. Shannon Graham	Sonoma, CA	

Name	From	Comments
4,030. Meghan Eigenbrod	Chicago, IL	My dog has had a DPT for 2 years and it has been the best thing for him. We recommend this route of preventative and therapeutic care to everyone who thinks their dog would benefit.
4,031. andreana pena	CULVER CITY, CA	
4,032. Caoimhe Sweeney	Letterbarra, ie	Although I don't live in America, I do live in a country where physical therapy (physiotherapy) is provided through independent therapists under vet referral. It is a system that can and does work and it's bizarre to suggest otherwise.
4,033. Valerie Rabot	Potts Point, au	
4,034. Laura Miller	Covington, LA	
4,035. Mary Cash	Milwaukee, WI	
4,036. Matt Morgan	West Hollywood, CA	I am a PTA and i know dogs will benefit from canine PT.
4,037. Marsha Grindle	CLEVELAND, GA	We need to protect
4,038. Britt Calvert	Chicago, IL	
4,039. Melissa Pflugh	Oakland, NJ	
4,040. Liz Fernandez	Thousand Oaks, CA	Clients and patients!need better access to PT
4,041. Miriam Martin	Kissimmee, FL	
4,042. Deeya Bhandari	Seattle, WA	
4,043. Jayne Lee	Torrance, CA	
4,044. George Butler	Covington, LA	
4,045. Maggie Platt	Palo Alto, CA	People should be able to choose who their pets receive PT from
4,046. Chinanan Khurasee	Toronto, ca	
4,047. Teresa Mateo	Las Vegas, NV	
4,048. Judith Hall	La Quinta, CA	I am a PT trained in Canine Rehab and I was looking forward to helping animals. This law has made this very difficult for me to do.
4,049. Kira Meskin	Chicago, IL	
4,050. Rachel Conger	Temple City, CA	
4,051. Nicole Miller	Placentia, CA	
4,052. Nilsa Bonilla	Kissimmee, FL	
4,053. Melissa Henning	Culver City, CA	
4,054. Carrie Profitt	Kalispell, MT	
4,055. Shannon Gillespie	Long Beach, CA	I have friends who are PTs and have agility dogs that benefit greatly from working with them.
4,056. KC Cooper	Agoura, CA	Because many of the vets are being bought out by corporations. They only care about money, not the animals that are my world. I will choose what is best for me and mine.

Name	From	Comments
4,057. Walter Ailes	Martinsburg, WV	less credentials and more effective treatment
4,058. Teresa Miller	Somis, CA	Veterinarians don't have the time or training that animal therapy professionals have, and many don't want it. They chose Veterinary field of work for the science and medicine of healing their patients. I believe that many many of them welcome and hope that animal physical therapists compliment their treatments for the patient and desire to build a working relationship with one goal in mind...providing the best care and healing for each patient! I have seen this first hand in my own pets.
4,059. Carrie Calay	Rancho Cordova, CA	respect for p[rofessionally trained colleagues in other fields. Vets want control of good income streams.
4,060. Jennette Kovacs	Twmpleton, CA	
4,061. Anne Howard	Watsonville, CA	Access to the right practitioner is so critical for optimal outcomes, vets should not be limited in their direction of care for their patients.
4,062. Patience Prine-Carr	Moss Landing, CA	
4,063. Donna Allen	Boulder Creek, CA	Every little bit helps.
4,064. Pamela McDonald	Saratoga, CA	I want to control who my animals see for their health and well-being. In addition, we do need to subject them to the stress of a vet office visit when we are trying to rehab them. Many practitioners are able to make house calls to make it easier and safer for them.
4,065. Susan Hoisington	Aptos, CA	I have been helped by physical therapy and that help can be shared with our animal family.
4,066. Marie DeBevoise	Santa Barbara, CA	
4,067. Michele Nihipali	Hauula, HI	
4,068. Jackie Lee-Kang	San Jose, CA	
4,069. Vicky Walling	Sunnyvale, CA	
4,070. Susan Lee	Citrus Heights, CA	I care about getting the proper treatment for the health of our animals. Even within the veterinarian field, there are specialities why should rehab be any different?
4,071. Romisa Morakabi	Tarzana, CA	I believe physical therapists have the proper knowledge to help animals in rehabilitation and passing this law will limit animals in need to get proper treatment
4,072. Carlos Contreras	Los Angeles, CA	Because we need to focus on all living creatures.
4,073. Shahla Lashkari	Tarzana, CA	I think animals need help for treatment
4,074. Darren Hawks	Ben Lomond, CA	We need to provide qualified, dedicated therapy for our animals. Being a veterinarian, I know that this can best be achieved by allowing well-trained PTs do the job. This is the model successfully used in human medicine.
4,075. Carlos Torrico	Caba, ar	

Name	From	Comments
4,076. Araz Gharibi	Glendale, CA	As a pursuing DPT with the love of specializing in animal rehabilitation I don't want this right to be taken away from me.
4,077. Llani Shmorak	Calabasas, CA	I am a physical therapy student and want to work with animals during my career when I graduate
4,078. Marcis Hodes	Ben Lomond, CA	
4,079. Mark Shmorak	Calabasas, CA	
4,080. Mary Green	La Honda, CA	
4,081. Charles Hahn	Hollister, CA	
4,082. Amanda Hutchinson	San Jose, CA	I have been through major injuries with my dogs and the ability to get access to great therapy for my dogs should not be limited to only vet practice. Firstly the costs involved and the space needed would be a huge issue. Please do not require this.
4,083. Lisa Williams	Lebanon, OR	
4,084. ann nuno	Gilroy, CA	Qualified therapists should be able to continue to provide rehab services to animals in their least restrictive environment which is often their own home (just like OT & PT's do w/ children). Owners should have the right to find a provider who is a good fit for them and their animal and is specialized in providing rehabilitative care not medical care. MD's do not provide physical and occupational therapy for humans. The training and knowledge required is different than that obtained in medical school. Animals should be treated w/ a veterinarians clearance by qualified rehab specialists just like humans are treated by qualified OT's and PT's under the recommendations/clearance of an MD
4,085. Sarah Johnson	Sebastopol, CA	You would never let a Dr without a degree in Physical therapy do Pt on a human,. Why would you let a vet with no training or minimal training do Pt on your pet or have to supervise a human PT when they have no training. A human PT has canine education and certification . They have years of manual therapy training & experience with humans, then get training on canines. Manual therapy is a skill that takes years to leArn, not something a vet can learn in a week end course. The dog is diagnosed by a vet, given a prescription for rehab to a physical therapist then re-examed by a vet to determine progress & evaluation . It is illegal and conflict of interest for a human dr to own or supervise human physical therapy. veterinarians Should not have a financial gain in rehabilitation for pets. Certified PT in Animal rehabilitation should NOT need to be supervised by a vet.
4,086. Denis Maguire	Cork, ie	
4,087. Christine Alves	Colfax, CA	Quality of life for every animal.
4,088. Maria Lashkari	Tarzana, CA	Because i am in love with animals ♥[?]

Name	From	Comments
4,089. Laurie Rogers	Fremont, CA	I want the best treatment available to my dog and this doesn't always mean it comes from a veterinarian office only.
4,090. Patrice Tipton	Norco, CA	My vets know nothing about physical therapy. PT's have to be Vet Techs plus at least another year of schooling. This should be enough!
4,091. DENISE SANGSTER	El Cerrito, CA	
4,092. Annmarie Perrelle	Chicago, IL	
4,093. mary vw	turlock, CA	
4,094. Eleza Kerfoot	Elverta, CA	
4,095. Kathleen Wyland	El Sobrante, CA	Injured animals need physical therapy just like humans do! Human PTs work in their own offices, animals PTs should be able to do the same.
4,096. Keri Lamberton	Santa ynez, CA	Physical therapy helped by dog gain full use of her leg after surgery. So important for quality of life
4,097. Victoria Everich	San Diego, CA	
4,098. Karen S	Oxnard, CA	
4,099. Kristin Farrow	Stewart, MN	
4,100. Brenda Dickey	Maricopa, AZ	
4,101. Juliana Schiesari	Woodland, CA	
4,102. Lindsey Valentine	San Marcos, CA	
4,103. Yvette Skinner	Vallejo, CA	
4,104. Valerie Hanson	Eureka, CA	
4,105. Margaret Blair	Jackson, CA	
4,106. Angela Fox	Tracy, CA	
4,107. Cecilia Holmgren-Kates	Concord, CA	These animals does a fantastic job in the field and should be treated as any other first responder. If this helps them be healthier, it will make them able to do even more to help. A win-win for us all, two-legged as well as four-legged.
4,108. Lee Ann Caldwell	Pleasanton, CA	
4,109. Mindy Bello	Liberty Hill, SC	Animal PTs are trained specically to provide rehabilitation--they are Specialists in that field. Working under the direction of a veterinarian is unnecessary; as humans, when we see a specialist in a certain field, he/she is not working under the supervision of an MD. The same precedence should apply.
4,110. Julie Purcell	Running Springs, CA	
4,111. Caitlynn Fernane	San Jose, CA	
4,112. Catherine Thorn	Santa Clara, CA	My friend is a PT
4,113. Sarah Carrick	San jose, CA	

Name	From	Comments
4,114. Phyllis Rayca	Elliottsburg, PA	It's simply not possible for a veterinarian to become proficient in all specialties, so it makes no sense to restrict physical therapy for animals be administered only by veterinarians, or by physical therapists working in a veterinary practice and under the direct supervision of the veterinarian. Physical therapy facilities for animals are best situated apart from a veterinary practice, to prevent the PT patients from exposure to patients affected with a contagious illness, too.
4,115. Dawn Holley	Santa Cruz, CA	
4,116. Peter Sellas	Riverside, CA	
4,117. Andrea Bishop	Oakland, CA	

**Title 16. Professional and Vocational Regulations Division
Division 20. Veterinary Medical Board
Article 4
Animal Physical Rehabilitation, § 2038.5**

45-Day Public Comment Period: March 13, 2020 through April 27, 2020

Rebecca Duerr <Rebecca.Duerr@bird-rescue.org>
Fri 3/13/2020 5:50 PM

- Sotelo, Justin@DCA

Hi Justin,

I am a wildlife rehabilitation vet who made written and oral comments during the initial period of this whole topic a few years ago. Eventually, the VMB president verbally stated when I attended hearings in Sacramento that "wildlife is exempt", after I persisted in bring the topic up. However, it remains a point of confusion - wildlife rehabilitation is a very active field in this state and nearly 100,000 animals go through the hands of wildlife rehabilitators each year under permits from CDFW and USFWS. There is nothing in VMB rules that exempts these animals from falling under these 'physical rehabilitation' rules.

I would like to petition to have a single sentence added that states something like:

"This regulation does not apply to wild animals being rehabilitated under permits from California Department of Fish and Wildlife and the U.S. Fish and Wildlife Service."

As it is, there is tremendous confusion regarding which parts of the VPA must be followed when treating wildlife at wildlife centers, especially in regards to this current topic which uses the ill-defined terms 'animal' and 'physical rehabilitation'. Wildlife in rehabilitation need physical therapy all the time prior to release and neither domestic animal veterinarians nor RVTs are trained to do it.

Thank you for your attention,

Becky
Rebecca Duerr DVM MPVM PhD
Veterinarian
Research Director

[C] 530.574.3977
[P] 707.207.0380 x110
[F] 707.207.0395
Rebecca.Duerr@Bird-Rescue.org

International Bird Rescue
San Francisco Bay Center
4369 Cordelia Road
Fairfield, CA 94534
www.Bird-Rescue.org

Joanne Bak <jbak@pawrehabvets.com>
Wed 8/12/2020 10:24 PM

To:

- Sotelo, Justin@DCA

Cc:

- staff@cvma.net;
- VMB@DCA

VMB.APRSUPPORTLETTER.JBAK.08.13.20.pdf
215 KB

Dear Justin Sotelo

Please see attached letter in SUPPORT of the proposed APR regulations and submit for public hearing.

Thank You,

Dr. Joanne Bak

Joanne Bak DVM, CCRT
Certified Canine Rehabilitation Therapist
Veterinary Medical Director/Practice Owner

PAW REHAB
Pacific Animal Wellness Rehabilitation Center
14942 Ventura Blvd
Sherman Oaks, CA 91403
Email: info@pawrehab.com
Phone: (818) 847-7299



DATE: 08/13/2020

ATTENTION: VMB Board Members

Jaymie Noland, DVM, President
Kathy Bowler, Vice President
Christina Bradbury, DVM
Jennifer Loreda, RVT
Mark Nunez, DVM
Dianne Prado
Cheryl Waterhouse, DVM
Alana Yanez

CC: VMB@dca.ca.gov
justin.sotelo@dca.ca.gov
[CVMA staff@cvma.net](mailto:CVMA_staff@cvma.net)

RE:

Regulatory Public Hearing Related to Animal Physical Rehabilitation: Agenda time 4. proposed regulatory action to adopt Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations (CCR), related to Animal Physical Rehabilitation.

Dear Veterinary Board Members,

I hope you are able to review this letter prior to reaching a decision on this matter so that my voice is heard as a representative of not only veterinarians but of veterinary rehabilitation practitioners who have a sworn duty to protect animal health.

I am submitting this letter in SUPPORT of the currently proposed animal physical rehabilitation regulations.

I, **Joanne Bak, DVM (CA license 12760)** am an active licensed veterinarian in the state of California and am in good standing. I am a **Certified Canine Rehabilitation Therapist, and a CVMA, SCVMA, AVMA, and AARV (American Association of Rehabilitation Veterinarians)** member. I am currently a practice owner and veterinary medical director of a veterinary rehabilitation facility, **PAW REHAB**, the Pacific Animal Wellness Rehabilitation Center in the Sherman Oaks neighborhood of Los Angeles, CA.

I have previously written letters in opposition to AB 3013 by Assembly Member Chu in 2018 and to the VMB Animal Rehabilitation Task Force in 2017 regarding legislation of Animal Rehabilitation Therapy supporting direct veterinary supervision as well as have recommended further defining duties an RVT vs PT vs VA may perform which I am happy to see being further addressed. **As a Doctor of Veterinary Medicine with 25 years of veterinary experience, including almost 15 years of practicing animal physical rehabilitation in veterinary medicine, I believe my opinion should be valued.** Having practiced at a number of veterinary facilities, I have seen circumstances in which I have found a need for direct veterinary supervision in this setting. I have worked alongside countless veterinary board certified specialists and veterinary general practitioners who feel the same. **I believe it is of the utmost importance to protect our patients and our clients from illegal or unsupervised practice of veterinary medicine, as well as to protect us as veterinarians and to acknowledge our knowledge and training as well as the training received by our RVTs.**

It is clear that the specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals and, to that end, the California Veterinary Medical Board has pursued regulatory language to continue on with the inclusion of licensed physical therapists wishing to provide services to animals. The regulation of licensed physical therapists is currently recognized as an 'unlicensed veterinary assistant' and subjects them to work under direct supervision of a veterinarian and in a veterinarian's hospital/clinic is in the best interests of consumer protection, harm reduction and patient safety.

My ability to foster inter-professional relationships and collaborate is not currently hindered and the consumer's ability to access these professionals is not restricted. Veterinarians, veterinary technicians and veterinary assistants have training and education regarding the subject of rehabilitation available to them via several sources including CE coursework, veterinary universities and even residency programs for board certification for veterinarians as well as recognition by the National Association of Veterinary Technicians in America (NAVTA) Committee Veterinary Technician Specialties (CVTS) of the Academy of Physical Rehabilitation Veterinary Technicians.

As a licensed DVM in California and Certified Canine Rehabilitation Therapist, I have been monitoring this issue closely for years. I support the CVMB's definition of Animal Physical Rehabilitation (APR) as the practice of veterinary medicine; this is consistent with language from the American Veterinary Medical Association and other national organizations. The veterinarian is to evaluate, diagnose, and determine the best course of treatment. The physical therapist does not have the skillset to evaluate and respond to animal medical needs. I am strongly opposed to physical therapists who want to practice APR (Animal Physical Rehabilitation) by referral. APR, by definition, constitutes the practice of veterinary medicine. For the safety of animals and consumers, it must be performed either by a licensed veterinarian, or by a trained individual under the supervision of a veterinarian.

Below are my supporting comments and references regarding this in more detail. You may also reference my prior letters in support of veterinary regulation regarding APR submitted and dated 04/13/17 and 03/30/18. **Additionally, I would encourage your review and support of Dr. Richard Sullivan's of Bay Cities Pet Hospital of Torrance, CA (member of the VMB Multi-disciplinary Advisory Committee) written comment dated 04/17/2020 which was attached in reference for SUPPORT of the proposed changes due to his personal experience and review as well as the other supporting letters submitted by the other veterinarians, RVTs and pet owning public.**

Thank you,



Joanne Bak DVM, CCRT
Certified Canine Rehabilitation Therapist
Veterinary Medical Director/Practice Owner

PAW REHAB
Pacific Animal Wellness Rehabilitation Center
14942 Ventura Blvd
Sherman Oaks, CA 91403
Email: info@pawrehab.com
Phone: (818) 847-7299

Supporting comments and references regarding: Regulatory Public Hearing Related to Animal Physical Rehabilitation: Agenda time 4. proposed regulatory action to adopt Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations (CCR), related to Animal Physical Rehabilitation.

Animals should be overseen by a veterinarian after a veterinarian has established a Veterinary-Client-Patient-Relationship (VCPR), made a diagnosis, and determined that rehab would be a safe and beneficial intervention for their animal patients. Allowing qualified physical therapists to practice on their own animal physical rehabilitation premises under indirect supervision would NOT further increase safe access for consumers. Veterinarians have been collaborating with other licensed professionals of their choice, while simultaneously protecting the consumer, within the boundaries of their facilities or by direct supervision for decades. This approach is consistent with the CA VMB's current regulatory language, the outcome of the 2018 Appropriations committee failure to pass AB 3013, and the CVMA position. Inclusion of properly qualified and licensed physical therapists in the Veterinary Practice Act is already encompassed by utilizing the "veterinary assistant" terminology and creation of additional definitions is redundant to our profession and is confusing to the consumer.

I strongly encourage the APPROVAL of a physical therapist being under the Direct Supervision of Veterinarian for the safety of the patient and keeping the skills to the veterinary team that are licensed to do so. There are only a handful of stand-alone physical therapist in the state of California who would be affected by this regulation. I feel like it is within the interest of the consumer and the consideration of the years of education of a veterinarian that this regulation be APPROVED.

"The [Veterinary Medicine Practice Act (Act)] requires a person who practices veterinary medicine or any branch thereof on animals to hold a valid, unexpired, and unrevoked license issued by Board 2 ([Business and Professions Code (BPC)] § 4825). The Act defines the practice of veterinary medicine to include the administration of a drug, medicine, application, or treatment of whatever nature for the prevention, cure, or relief of a wound, fracture, bodily injury, or disease of animals, except where the medicine, appliance, application, or treatment is administered by an RVT or VA at the direction of and under the direct supervision of a licensed veterinarian (BPC § 4826). The practice of veterinary medicine includes diagnosing or prescribing a drug, medicine, appliance, application, or treatment of whatever nature for the prevention, cure, or relief of a wound, fracture, bodily injury, or disease of animals. (BPC § 4826, subd. (b).) Only licensed veterinarians can practice veterinary medicine. (BPC § 4825.) Pursuant to regulations adopted by the Board, individuals not licensed as veterinarians may perform health care tasks on animals under the supervision of a licensed veterinarian. (BPC § 4836.) Therefore, the California State Legislature established by statute the prohibition of the practice of APR ("animal physical rehabilitation") by anyone other than a licensed veterinarian."

"RVTs may perform specified animal health care tasks under the indirect/direct supervision of a licensed veterinarian. (CCR, tit. 16, § 2036.) The Board considers any individual who is not an RVT or a licensed veterinarian a veterinary assistant. (CCR, tit.16, § 2034, subs. (c).) Accordingly, animal rehabilitation physical therapists that are not licensed veterinarians or RVTs are considered veterinary assistants and may perform auxiliary animal health care tasks under the direct or indirect supervision of a licensed veterinarian or the direct supervision of an RVT. (CCR, tit. 16, § 2036.5.)"

All licensed veterinarians are qualified to practice veterinary medicine as defined in BPC section 4826, which includes animal rehabilitation. The Board's APR proposed regulation would authorize non-veterinarians to perform APR under the supervision of a veterinarian. The Board's proposed regulation does not go beyond what is already prohibited by statute.

The Veterinary Medical Board enforces the Veterinary Medicine Practice Act (Act) and oversees veterinary licensees, veterinary technician registrants, and veterinary assistant

controlled substance permit holders. APR falls under the practice of veterinary medicine; therefore, APR should remain under the supervision of a veterinarian. The Veterinary Medical Board is the entity that oversees and enforces laws regarding APR treatment.

Physical therapists are only licensed to practice on humans by the Physical Therapy Board of California of which the VMB has no jurisdiction to regulate the PT's license, education or certifications so this is a conflict of interest in protecting the animal patient's well being. APR needs oversight and regulation in order to protect consumers and pets.

Physical therapists working under the direct supervision of a veterinarian and in a veterinarian's hospital/clinic is in the best interest of consumer protection and patient safety.

All 50 states allow veterinarians to perform APR without any additional certifications and without restrictions. Veterinary care should be directed by a veterinarian who: is physically in the facility; determines who provides care and can oversee the level of supervision; monitors patient response to prescribed treatment; and, responds to medical emergencies should they arise.

Veterinarian supervision is critical to animal care and successful recovery. It is not safe for animals to be treated in an unsupervised environment since: (1) urgent care for the animal would not be available if there was an emergency; (2) immediate adjustments to appropriate medications could not be made; (3) medical questions could not be answered at the time of APR treatment; (4) additional examination, testing or diagnoses of a new medical condition could not be made at the time of APR treatment; (5) a treatment plan and decisions to adjust the plan could not be discussed before the APR is implemented;

APR should not be performed by individuals who are not licensed or registered by the Board, unless they are directly supervised by a veterinarian. Under this proposal, RVTs, in accordance with their level of experience and skill, would be authorized to perform APR under direct or indirect veterinarian supervision depending on the competency assessed by the supervising veterinarian for the tasks performed. The Board has determined a VA should not be able to perform APR under any degree of supervision less than direct supervision for the protection of the animal patient with the exception as it pertains to a range setting where the supervising veterinary is in the near vicinity of the VA performing healthcare tasks. Only licensed veterinarians and RVTs possess the knowledge and training to plan and supervise APR for animal patients and ensure proper animal handling, recognize pain and discomfort, and provide emergency care and assistance as needed in the particular field of APR.

I do feel that veterinary technicians, veterinary assistants and physical therapists can all play a role in performing rehabilitation therapy for animals and I value their knowledge, skills, and experience. I believe a collaborative approach can be achieved and have had very positive experiences with both veterinary technicians and physical therapists. From my many years of experience in veterinary medicine and rehabilitation therapy, I am certain that the only way PTs and unlicensed veterinary assistants should perform physical rehabilitation on animals is under **direct veterinary supervision**. This best reflects what our profession stands for and is in the best interest of the veterinary patient and their pet parents or caretakers.

Please feel free to contact me for any questions regarding my above statements.

Regards,



Joanne Bak DVM, CCRT
Certified Canine Rehabilitation Therapist
Veterinary Medical Director/Practice Owner

PAW REHAB

Pacific Animal Wellness Rehabilitation Center
14942 Ventura Blvd
Sherman Oaks, CA 91403
Email: info@pawrehab.com
Phone: (818) 847-7299

Jannis Swerman <jannis.swerman@gmail.com>
Wed 8/12/2020 7:46 PM

To:

- Sotelo, Justin@DCA

In regards to the meeting on Thursday, August 13, I urge you and your colleagues to SUPPORT Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation.

When in need, I learned that having a licensed veterinarian was imperative in making the best decisions for my pet's care and therapy.

thank you,

Jannis Swerman Rubinstein

Dave Heine <dave@dave-heine.com>
Wed 8/12/2020 6:17 PM

To:

- Sotelo, Justin@DCA

Consumer support template letter.docx
16 KB

Good Morning:

I am writing to you this evening to request your support in uphold Section 2038.5 of the California Code. Attached is my letter and my reason that Veterinarians should be the only practitioners involved in the care of our animals.

Please feel free to call me, if I can provide any support during your meeting.

Thank you

Dave Heine

August 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Veterinary Medical Board
1747 N. Market Boulevard, Suite 230
Sacramento, California 95834-2987

Via Email @ justin.sotelo@dca.ca.gov or FAX @ 916-928-6849

Re: SUPPORT of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation

I am submitting this letter in SUPPORT of Section 2038.5 related proposed animal physical rehabilitation regulations.

The field of animal physical rehabilitation needs oversight and regulation by a veterinarian to protect me as the consumer and my animals.

Allowing licensed physical therapists to work unsupervised or without direct supervision negatively impacts me as a consumer as I would have to take additional time and spend additional money on follow up care with a veterinarian related to my pet developing infections and pain. Most importantly, this risks my pet's safety!

As someone that has had to have a pet go through intense therapy after the first of it's kind knee surgery 6 years ago and having our girl, Mishka spend 7 weeks living at the University of Florida Small Animal Hospital learning how to walk on her new knee joint, I can tell you first hand that human medical providers would lack the experience and knowledge of what needed to be done to get her to walk again.

Allowing "human" treatment providers to work on our animals, would be the same as my veterinarian controlling my medical issues. While I am sure that we humans have similar diseases that animals do, a veterinarian would not be trained nor qualified to treat a human. The same holds true for a Physical Therapist to treat my dog. A weekend seminar, while a great learning tool is not a basis for the knowledge of animals or how their anatomy works.

I ask for you to uphold Section 2038.5 and to pursue proper legislative remedies that help animals get the care they need, where they need it in California.

Sincerely,
Dave Heine
220 Silverglen Lane
Altamonte Springs, FL 32714
321-231-8926
Dave@Dave-Heine.com

Jessica <jshamblen@gmail.com>
Wed 8/12/2020 4:46 PM

To:

- Sotelo, Justin@DCA

Hello,

I support Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation.

Thank you,
Jessica Shamblen

mlh1214 <mlh1214@aol.com>
Wed 8/12/2020 3:17 PM

To:

- Sotelo, Justin@DCA

I SUPPORT 2038.5 of article 4, division 20, title 16 of the California code of regulations, relating to animal physical rehabilitation.

MARK HARTSHORN

Rod Libbey <rodlibbey88@gmail.com>
Wed 8/12/2020 3:04 PM

To:

- Sotelo, Justin@DCA

.....
I fully support Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation.

--
Rod Libbey

tommy steele <tommysteele@me.com>
Wed 8/12/2020 1:29 PM

To:

- Sotelo, Justin@DCA

August 13th 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Veterinary Medical Board
1747 N. Market Boulevard, Suite 230
Sacramento, California 95834-2987

Via Email @ justin.sotelo@dca.ca.gov or FAX @ 916-928-6849

Re: SUPPORT of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation

I am submitting this letter in SUPPORT of Section 2038.5 related proposed animal physical rehabilitation regulations.

The field of animal physical rehabilitation needs oversight and regulation by a veterinarian to protect me as the consumer and my animals.

Allowing licensed physical therapists to work unsupervised or without direct supervision negatively impacts me as a consumer as I would have to take additional time and spend additional money on follow up care with a veterinarian related to my pet developing infections and pain. Most importantly, this risks my pet's safety!

I ask for you to uphold Section 2038.5 and to pursue proper legislative remedies that help animals get the care they need, where they need it in California.

Sincerely,

Thomas and Iolanda Steele

STEPHANIE STEPHENS <stephanie.stephens@mac.com>
Wed 8/12/2020 12:47 PM

To:

- Sotelo, Justin@DCA

Thank you so much.

I'm in support of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation. We demand safe care for our pets and family members. I've personally seen the valuable and dramatic difference that physical therapy, WITH Veterinarians, can make in our dogs lives.

Please support this!
Stephanie

Edward Fries <eafries1754@att.net>
Wed 8/12/2020 10:01 AM

To:

- Sotelo, Justin@DCA

The only care provided for animal physical therapy is under supervision of a Veterinarian. No physical therapist should be allowed animal care without Veterinary Supervision.

Edward A. Fries D.V.M.

Keri Wilson <kspwilson@gmail.com>
Wed 8/12/2020 9:57 AM

To:

- Sotelo, Justin@DCA

I am writing to you to voice my support of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation. I believe a Veterinarian must be on site supporting the care of animals in rehabilitative care. I took my French Bulldog to 3 separate facilities when rehabbing his spinal condition. It is expensive care. It wasn't until I visited CARE in Santa Monica that we started to see a marked improvement—the only of the 3 places we tried where we saw a doctor every time. It made a major difference. I would not go anywhere again unless we are seen and cared for by a Vet.

Keri P. Wilson.

Clayton Kau <clayton.kau@cox.net>
Wed 8/12/2020 9:30 AM

To:

- Sotelo, Justin@DCA

My wife and I whole-heartedly support the approval of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation

Jerald Friedman <jfriedman@friedmandevelopers.com>
Wed 8/12/2020 9:28 AM

To:

- Sotelo, Justin@DCA

My wife and I are in support of proposition that all animal rehab be supervised by a veterinarian.
Please make this mandatory thank you Jerald and Judith Friedman

Roxanne Paulson <roxp.32@gmail.com>
Wed 8/12/2020 9:03 AM

To:

- Sotelo, Justin@DCA

I am in support of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation.

Thank you
Roxanne Paulson

Jack Luftman <dentj10@yahoo.com>
Wed 8/12/2020 8:48 AM

To:

- Sotelo, Justin@DCA

- Jessica Luftman <jhwaldman@gmail.com>

.....

As animal lovers we are in total SUPPORT of Section 2038.5 of Article 4 Division 20, Title 16 of the California Code of Regulations related to Animal Physical Rehabilitation.

Sincerely,

Barbara and Jack Luftman

Clayton Kau <clayton.kau@cox.net>
Wed 8/12/2020 7:52 AM

To:

- Sotelo, Justin@DCA

My wife and I whole-heartedly support the approval of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation

Clayton and Jaimie Kau
Palos Verdes Estates

Sheila Maher <mahersailor@yahoo.com>
Wed 8/12/2020 6:50 AM

To:

- Sotelo, Justin@DCA

I support the approval of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation.

Thanks, Sheila and Chris Maher

Debie Gibson <dkg53@comcast.net>
Wed 8/12/2020 1:15 AM

To:

- Sotelo, Justin@DCA

I SUPPORT Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related SUPPORT of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation.

Thank you,

Debie Gibson

Paula N. Miller <paulanissenmiller@gmail.com>
Wed 8/12/2020 1:05 AM

To:

- Sotelo, Justin@DCA

.....

I, as a lifelong dog owner, strongly support the approval of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Therapy.

Having gone through five TPLO surgeries with various dogs over the years I know very personally the value of proper physical therapy under the direction and watchful eyes of a qualified veterinarian. All surgeries and recoveries were very successful enduring my beautiful pets and long and healthy life.

Please help our loving pets by strengthening the regulations.

Thank you.

Paula L. Miller

Christine Halley <georgejackandtheboy@yahoo.com>
Tue 8/11/2020 9:57 PM

To:

- Sotelo, Justin@DCA

I demand safe care for our four-legged family members. I SUPPORT Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation.

Thank you,
Ms. Chris Halley

Brian Fielding <hdwredes@gmail.com>
Tue 8/11/2020 9:43 PM

To:

- Sotelo, Justin@DCA

I am unable to attend the meeting, but wish to express our support of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation.

**Sincerely,
Brian Fielding**

Leslie Berger <leslie@leslieberger.com>
Tue 8/11/2020 9:01 PM

To:

- Sotelo, Justin@DCA

I SUPPORT of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation.

Leslie Berger

Jessica Smialek <jessica.smialek@gmail.com>
Tue 8/11/2020 8:54 PM

To:

- Sotelo, Justin@DCA

Hi,

I would like to register my support for Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation. My dog receives physical therapy, and I feel much safer knowing trained vets are there to oversee her care.

Thank you!

-Jessica
Sherman Oaks, CA

Keri Wilson <kspwilson@gmail.com>
Tue 8/11/2020 8:06 PM

To:

- Sotelo, Justin@DCA

I am writing to you to voice my support of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation. I believe a Veterinarian must be on site supporting the care of animals in rehabilitative care. I took my French Bulldog to 3 separate facilities when rehabbing his spinal condition. It is expensive care. It wasn't until I visited CARE in Santa Monica that we started to see a marked improvement—the only of the 3 places we tried where we saw a doctor every time. It made a major difference. I would not go anywhere again unless we are seen and cared for by a Vet.

Keri P. Wilson.

Mike Sioson <michael.a.sioson@gsk.com>
Tue 8/11/2020 3:30 PM

To:

- Sotelo, Justin@DCA

Dear Mr. Sotelo,

I am writing you to express my strong support to always have a licensed veterinarian present or supervising a physical rehabilitation session for a pet. Having an animal doctor ultimately responsible for the work and actions of the rehab center automatically raises the qualifications and training that will be available and carried out at these rehab centers.

Our pets are family members and we would never take short cuts or risk their health unnecessarily to potentially save a few dollars.

Thank you for your time.

Sincerely,

Mike Sioson
Concerned pet parent

Annette Odello <aodello@bluedevils.org>
Tue 8/11/2020 2:34 PM

To:

- Sotelo, Justin@DCA

.....

Please protect my pets.
Annette Odello

merisimon@gmail.com
Tue 8/11/2020 1:35 PM

To:

- Sotelo, Justin@DCA

.....

I SUPPORT Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation.

I strongly believe that Vet should be on hand while a pet is receiving physical therapy.

Thank you,

Meri Simon

vpbrian@aol.com
Tue 8/11/2020 1:13 PM

To:

- Sotelo, Justin@DCA

Office of Justin Sotelo

I am in support for the approval of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation.

This allows Physical Therapists to work collaboratively with veterinary professionals and requires a veterinarian to be present in the facility when therapies are done.

We need to implement safe care for our animals and ALL animals.

Respectfully,

Victoria Brian

Barbara Sage <BSAGE@BZBM.com>
Tue 8/11/2020 1:02 PM

To:

- Sotelo, Justin@DCA

Please consider this as my statement of support with regard to approval of the Section 2038.5 of Article 4, Division 20, Title 16 of the CA Code of Regulations related to Animal Physical Rehabilitation. 40 hours of unaccredited training in dog therapy pales in comparison with the schooling and experience required to become a veterinarian. I would want to know that my pet was getting the very best care when it comes to physical rehabilitation. Thank you.

Barbara Sage

Kate Yanov <kyanov1@hotmail.com>
Tue 8/11/2020 12:44 PM

To:

- Sotelo, Justin@DCA

Dear Justin,

We have a dog that has had neurologic issues since 2015. I have also personally worked in "human" physical therapy for 6+ years. I do not believe that a human PT can properly administer quality care to animals as they are completely different species with different baselines of vitals and anatomic makeup. A critical point in human PT is that the patient can verbally communicate if they are in pain to the provider. This is not possible in working with animals. Only a skilled veterinarian can determine this.

I fully SUPPORT Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation.

Please consider the affect your vote will have on animals (& lawsuits) across the state if this article is passed. Feel free to contact me if you'd like to talk about this issue in further detail.

Be well,
Kate Yanov Birtch

Laura Untiedt <laura_untiedt@yahoo.com>
Tue 8/11/2020 12:40 PM

To:

- Sotelo, Justin@DCA

.....

Justin,

I support having a vet in attendance during an animal's physical therapy.

Safety first over profit and unsafe practices.

Thank you.

Rick Gala <ricg1660@yahoo.com>
Tue 8/11/2020 12:14 PM

To:

- Sotelo, Justin@DCA

Hello sir,

I just wanted to voice my opinion on the APT with a Vet present. My dog is so important to me that I think a Veterinary Doctor should always be present anytime any animal has to have APT.

Thank you for your time and consideration in this matter.

Rick Galande

Julie McGill <jamcgill@kilowattmktg.com>
Tue 8/11/2020 12:11 PM

To:

- Sotelo, Justin@DCA

It is unsafe for Physical Therapists to practice on pets without a veterinarian on site.
I SUPPORT Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of
Regulations, related to Animal Physical Rehabilitation.

Julie McGill

Julie McGill
Kilowatt Marketing

Lindsay Levin <misslindsay76@gmail.com>
Tue 8/11/2020 12:06 PM

To:

- Sotelo, Justin@DCA

I vehemently SUPPORT Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation

Veterinarians are uniquely trained and the most capable professionals to provide rehabilitation therapy to animals. Would you want a vet treating your child?

Lindsay Levin

Donald Allin <donymudge@icloud.com>
Tue 8/11/2020 10:30 AM

To:

- Sotelo, Justin@DCA

.....

I am writing in support and approval of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation. Please vote affirmative on this issue. It will insure that a veterinarian is present and controlling all aspects of AR. Failing this measure would be equivalent to allowing nurses to write prescriptions for a doctor. That can't happen, just as what can happen if this AR measure fails. Thanks for listening.

Nancy Ehrlich <nehrlichrvt@gmail.com>
Tue 8/11/2020 10:08 AM

To:

- Sotelo, Justin@DCA

August 11, 2020

Veterinary Medical Board
1747 N Market Blvd Ste 230
Sacramento CA 95834

Re: Support for Animal Rehabilitation Regulation

Dear Veterinary Medical Board:

I am writing on behalf of the California Registered Veterinary Technicians Association in support of the proposed regulation regarding Animal Rehabilitation (AR). We believe that the Veterinary Medical Board's (VMB) proposal to allow RVTs to perform AR under the level of supervision determined by the prescribing veterinarian is appropriate. RVTs are trained and licensed to deal with veterinary emergencies, so they are qualified to treat animals when a veterinarian is not present. We also concur with the decision to require Direct Supervision for veterinary assistants.

We realize that human Physical Therapists (PTs) would like to be able to perform AR under Indirect Supervision, but as the VMB determined, PTs cannot be treated any differently than other veterinary assistants under current law. As the VMB does not regulate the licensing of PTs, they have no ability to give PTs any special consideration - just as they could not allow a human dermatologist or ophthalmologist to see animal patients without a veterinarian present.

Physical Therapists can be very helpful as part of a team providing AR. The regulation as proposed allows PTs to work with their veterinary colleagues to provide Animal Rehabilitation.

We urge the VMB to approve the proposed regulation as written.

Regards,
Nancy Ehrlich, RVT
Regulatory/Legislative Advocate, CaRVTA

Bob Brensel <Bob@scriptworksrx.com>
Tue 8/11/2020 9:24 AM

To:

- Sotelo, Justin@DCA

Dear Justin,

I am extremely concerned that a group of physical therapists with 40 hours of education wants to replace a veterinarian who has a much wider scope of professionalism and expertise in handling pets.

As a compounding pharmacist that deals with both humans and animals, I can tell that there is a tremendous difference in the ways animals metabolize medicine as well as the profound differences in anatomy.

If my dog needs rehabilitation services, I want it done under supervision of a veterinarian period.

In my business, I rely on the expertise of veterinarians every day. I also learn from them every day. In our present day culture, our pets are of utmost importance and we need a veterinarian to be responsible for every part of the care given to our pets.

I support section 2038.5.

Best Regards,

--

Bob Brensel, RPh
ScriptWorks
480 N. Wiget Ln
Walnut Creek, CA 94598
www.scriptworksrx.com
<https://vimeo.com/398276425/1182ccc5cf>

Kimberly <kberlyk75@gmail.com>
Tue 8/11/2020 8:58 AM

To:

- Sotelo, Justin@DCA

I want to express my SUPPORT of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation.

Animals do not have a voice if things go wrong. Supervision and consultation are important from a veterinarian given the physical therapists don't have the same training.

Kimberly Kerlin

Rebecca Bhatt <beckybhatt@gmail.com>
Tue 8/11/2020 8:45 AM

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To:

- Sotelo, Justin@DCA

[EXTERNAL]: beckybhattach@gmail.com

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I am contacting you in **SUPPORT** of **Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation.**

My dog has degenerative disc disease and had emergency surgery at UC Davis 2 years ago. Since then we have been seeing Dr. Erin Troy and her staff for our dog's rehabilitation care. The detail of care and oversight of our dog's wellness plan have been outstanding. Dr. Troy is able to monitor her medications and progress and the therapy team supports the daily routines and exercises that have changed our dog's quality of life. 40 hours of unaccredited training in dog therapy is NOT enough to replace the care of a professional veterinary team with a much wider scope of training.

I thank you for considering my experience in your decision,

Rebecca Calzia-Bhatt

Susan Marquez <chuloboy@yahoo.com>
Tue 8/11/2020 8:26 AM

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To:

- Sotelo, Justin@DCA

[EXTERNAL]: chuloboy@yahoo.com

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I would not let my pet get rehabilitation unless a veterinarian was present to oversee and have input. The pet cannot speak for itself. So the veterinarian needs to be there to be the animals advocate thank you Susan Marquez

Jane Doe <lavacity@comcast.net>

Tue 8/11/2020 8:08 AM

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To:

- Sotelo, Justin@DCA

[EXTERNAL]: lavacity@comcast.net

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My dog Kai is 8. She was seriously injured as a puppy and has been in pt therapy for 8 years. A good maintenance routine, with vets and pt, keeps Kai happy, healthy and moving.. thank God for the team of physical therapists and vets. There have been many times when something would come up requiring vet support. And so, I continue to support vets on site of physical therapy work.

Thank you
Laura Sinclair

Sherry Untiedt <sherry.untiedt@betahg.com>
Tue 8/11/2020 8:06 AM

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To:

- Sotelo, Justin@DCA

[EXTERNAL]: sherry.untiedt@betahg.com

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Good morning Justin,

It's been brought to my attention that physical therapist with 40 hours of uncredited training for dogs think they can care for our pets without a veterinarian on site. That is a dangerous practice. Why don't they want a veterinarian on-site because it cost more money to run the practice. You can't take money over the lives of human or K-9 lives. Would you allow a child to go to someone who has 40 hours training that is uncredited? Absolutely not.

Therefore, I **SUPPORT** of **Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation**. Please keep our dogs safe and give them the care they deserve. That is the least we can do. Don't let our pets down.

Thank you,
Sherry Untiedt

Sherry Untiedt
Underwriter
Professional Liability

BETA Healthcare Group
1443 Danville Boulevard, Alamo, CA 94507
925.838.6070 **MAIN** 925.314.7652 **DIRECT**
sherry.untiedt@betahg.com
www.betahg.com

John D Curry <johndcurry@gmail.com>
Tue 8/11/2020 7:48 AM

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To:

- Sotelo, Justin@DCA

[EXTERNAL]: johndcurry@gmail.com

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Dear Mr Sotelo

Please register my support for

Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation.

Thank you.

**Dr. John D Curry
Concord, CA, 94518**

Linda Drattell <lindadrattell@gmail.com>

Tue 8/11/2020 7:47 AM

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To:

- Sotelo, Justin@DCA

[EXTERNAL]: lindadrattell@gmail.com

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Hello,

I am writing to voice support for **Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation.**

Dr. Erin Troy has provided vital physical therapy for the past eighteen months for our dog, Lucy, who had been injured before we adopted her. The physical therapists who treat Lucy regularly confer with the veterinarian on site, which has helped guide whether a particular therapy is working, if we need to step back a bit, or if Lucy is strong enough to proceed to the next level of physical therapy. I cannot imagine a physical therapist without the proper training and guidance from a veterinarian being able to make the same proper determinations.

Thank you.

Linda Drattell

Kathleen Nelson <katlynelson@gmail.com>

Tue 8/11/2020 7:31 AM

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To:

- Sotelo, Justin@DCA

[EXTERNAL]: katlynelson@gmail.com

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SUPPORT of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation

Mary fithugh <mfitzhugh41@gmail.com>
Mon 8/10/2020 11:06 PM

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To:

- Sotelo, Justin@DCA

[EXTERNAL]: mfitzhugh41@gmail.com

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I want to write to you in **SUPPORT of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation.** When it comes to my furry baby I want to be sure people are dully licensed/accredired and under supervision of a veterinarian. I am a speech pathologist and work with some amazing physical therapists, but know that they do not know animals, did not learn on animals and having a short course is not adequate to fully understand animals.

Thank you for your time.

Mary Fitzhugh

Van Rylander <vanrylander@gmail.com>
Mon 8/10/2020 10:42 PM

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To:

- Sotelo, Justin@DCA

[EXTERNAL]: vanrylander@gmail.com

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Hi Justin,

Need to voice my opinion for proper representation in the state of California that i reside, I support **Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation.** DO NOT let untrained (40hrs is a true joke) 'therapists' profit from "treating" animals...

Also as my dog and I are innocent victims of a vicious pitbull attack, I urge you to join the progressive mindset of Miami-Dade County and institute a pitbull ban and severe punishments for offenders.

As I struggle a to overcome both mentally and physically from the life altering pitbull attack, I urge you to follow the socratic method and use factual data use it to help save our loved one's life and prevent tragedies by supporting Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation and towards working on the movement to remove literal weapons off the street known as pitbulls..

Sincerely,

Carl V.B. Rylander

p.s. please advise on where i how i may personally help these causes.

Michele Duffy <spaceharmony@gmail.com>
Mon 8/10/2020 10:13 PM

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To:

- Sotelo, Justin@DCA

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133 KB

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[EXTERNAL]: spaceharmony@gmail.com

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Dear Mr Sotelo

**I'm writing in SUPPORT of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation
Pls do not allow PT with little training replace Vet MDS we need credentialed support of our pets!**

Thanks
Michele Duffy

Error! Filename not specified.

Michele Duffy, BTB M.F.S.
Principal & Founder

Albione Becnel <abecnel@gmail.com>
Mon 8/10/2020 10:10 PM

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To:

- Sotelo, Justin@DCA

[EXTERNAL]: abecnel@gmail.com

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To whom It May Concern,

I am writing to support **Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation.** I owe a dog and only want a safe and a good standard of care for my pet.

Thank you,

Albione Becnel

Marie Morris <kingsamazon@gmail.com>
Mon 8/10/2020 9:53 PM

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To:

- Sotelo, Justin@DCA

[EXTERNAL]: kingsamazon@gmail.com

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Dear Mr Sotelo:

As a former employee of a specialty and emergency veterinary practice (Sage Veterinary Specialty Internal Medicine and Surgery), and as a client of Muller Veterinary Hospital for many years, and a pet owner all of my life, I feel it is important to make you aware of my feelings on the above-referenced California regulation.

Please consider that while the pets are undergoing their physical therapy, possible unforeseen and urgent issues may arise. For the safety of the animals, it is important to realize that they deserve to have a licensed veterinarian on site during any rehabilitation or physical therapy treatment. I would no more want my animal to be treated in an urgent situation by a physical therapist whose experience is limited to practicing on humans without a veterinarian close at hand, than for my child to be treated in a similarly urgent situation by a veterinarian. The needs could be similar, but in no way are they the same.

From my years of experience at the veterinary hospital, I know that a human doctor would not be able to practice the same medicine on my pets that they do on humans, and I do not feel that 40 hours of unaccredited training for dog therapy is any substitute for specialized training that may be necessary to treat an animal should they need care urgently.

Please communicate my support of this measure and see that the regulation remains part of California code.

Sincerely,

Marie Morris

Susan Hollingshead <susanm.hollingshead@gmail.com>
Mon 8/10/2020 9:45 PM

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To:

- Sotelo, Justin@DCA

[EXTERNAL]: susanm.hollingshead@gmail.com

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Dear Mr. Sotelo, my husband and I would like to vigorously express our strong support for the approval Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation. After a 10-year process of investigating what would be the safest way for pets to receive Animal Physical Rehabilitation (APR) therapies in California, a consensus has been reached. All parties involved have had an opportunity to be heard in multiple forums. However, a group of Physical Therapists want to practice on pets without a veterinarian on site. They believe that 40 hours of unaccredited training in dog therapy is enough to replace the care of a professional veterinary team with a much wider scope of training. No one in the last 10 years has been able to disprove one very important fact - pets will be safer receiving APR if a veterinarian is on site.

Please make note of our support.

kristin biechler <biechlerk@gmail.com>

Mon 8/10/2020 9:42 PM

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To:

- Sotelo, Justin@DCA

[EXTERNAL]: biechlerk@gmail.com

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I SUPPORT of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation
Please have a veterinarian on site for all APR.

Sincerely,

Kristin Biechler

4833 Proctor Rd

Castrop Valley, CA 94546

Annette Odello <aodello@bluedevils.org>
Mon 8/10/2020 8:58 PM

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To:

- Sotelo, Justin@DCA

[EXTERNAL]: aodello@bluedevils.org

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I am very concerned that my pets get the very best care. Please protect them.

Annette Odello
925-383-0424
Martinez, Ca 94553

Nalini George <nalini8@gmail.com>
Mon 8/10/2020 8:53 PM

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To:

- Sotelo, Justin@DCA

[EXTERNAL]: nalini8@gmail.com

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SUPPORT of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation.

**Thank you
Nalini George
Lafayette CA**

Sherrie Klein <kleintwo@icloud.com>

Mon 8/10/2020 8:20 PM

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To:

- Sotelo, Justin@DCA

[EXTERNAL]: kleintwo@icloud.com

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I vehemently **SUPPORT Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation**

Veterinarians are uniquely trained and the most capable professionals to provide rehabilitation therapy to animals. Would you want a vet treating your child??

Sherrie Klein
PO Box 1787
Lafayette, CA 94549

LUANNE RUTHERFORD <kahani89@comcast.net>
Mon 8/10/2020 7:59 PM

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To:

- Sotelo, Justin@DCA

[EXTERNAL]: kahani89@comcast.net

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Dear Justin:

I have been a long time animal lover who has rescued many animals and provided them with the love, training and care to allow them to live the best life possible. Part of that love and care is of course appropriate veterinary care, which includes at times physical therapy. In fact, one of my dogs had to undergo surgery on both knees. To complicate matters, she had special needs and required particular veterinary care during her recoveries, which included physical therapy. Were it not for skilled veterinary supervision of that therapy, my dog would not have made the amazing recoveries she did.

I am therefore writing to you in support of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation that would require professional oversight for physical therapy.

Animals are so much a part of our lives and families. Perhaps because they cannot speak on their own behalves, we must stand to protect them and provide them with the safe medical care they truly deserve. Allowing unlicensed medical care for our pets is unconscionable and must not be permitted. Please do the right thing and vote to approve this section of the CA Code of Regulations.

Very truly,
Luanne Rutherford, on behalf of Kahani, Faust, Shadow, Noodge and Maly

Nancy Silvey <nsilvey@comcast.net>
Mon 8/10/2020 7:19 PM

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To:

- Sotelo, Justin@DCA

[EXTERNAL]: nsilvey@comcast.net

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Would you want your children treated for a disease by an untrained doctor?
Our pets are also our children and deserve to be treated by a trained veterinarian.
Let's make sure that the laws don't allow otherwise.
Rick Silvey.

Kathy LaCross <kathylacross@comcast.net>
Mon 8/10/2020 7:06 PM

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To:

- Sotelo, Justin@DCA

[EXTERNAL]: kathylacross@comcast.net

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I completely support the intent of the proposed law below:

Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation

My last dog, a fantastic golden retriever named Cody who lived 12 1/2 years, was the beneficiary of long term care at Muller Veterinary Hospital's Canine Rehabilitation Center in Walnut Creek, CA. I cannot imagine any therapeutic setting for a dog with his issues - seizures and severe arthritis - other than one that is part of a veterinary practice.

Thank you for the opportunity to share this and be heard.

Kathleen LaCross

Melissa Guariglia <msmeliss33@gmail.com>

Mon 8/10/2020 7:03 PM

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To:

- Sotelo, Justin@DCA

[EXTERNAL]: msmeliss33@gmail.com

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I am in **SUPPORT** of **Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation** to ensure that my pets are protected and only treated and rehabilitated under the care of a licensed DVM.

Melissa Guariglia, PsyD

Pronouns: She/Her/Hers

Pam Thompson <pokeyt@comcast.net>
Mon 8/10/2020 6:55 PM

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To:

- Sotelo, Justin@DCA

[EXTERNAL]: pokeyt@comcast.net

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Good afternoon

I want to show my **SUPPORT** of **Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal PhysicalW Rehabilitation.**

My dog Penny has been going to hydrotherapy and laser sessions every other week for at least 4 years now. The treatments she has received there by the therapist under the direction of Dr Troy at Canine Rehabilitation Center has been fantastic. Penny has a spine disease and has had to have two neurological surgeries. 4 years ago the neurologist told me that Penny would only be mobile for about 6 months. I take Penny for a walk every day. Her mobility is getting a bit worse but I know that the reason she is still walking is because of the sessions and excellent care she gets at Canine Rehabilitation Center. Please don't change this!

Pam Thompson
Hayward, CA

Jeff Smith DVM <myvet@mac.com>

Tue 8/4/2020 5:12 PM

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To:

- Sotelo, Justin@DCA

[EXTERNAL]: myvet@mac.com

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Dear Mr. Sotelo and Members of the California Veterinary Medical Board,

Regarding objections to current language regulating APR, I offer the following input. My credentials include private veterinary practice for the last 35 years, CCRP certification and APR practitioner, and past president, governor and delegate of the CVMA.

The first question to answer is:

Is Animal Physical Rehabilitation (APR) a component of veterinary practice?

And the more controversial second question is:

What is the best way to serve and protect animal physical rehabilitation patients and their owners?

Here is a succinct analysis that I believe provides the answer to those questions:

- **Veterinary Practice:** It has been established that Animal Physical Rehabilitation is a component of veterinary medical care because it requires the expertise, technology, oversight and regulatory compliance that only veterinarians can provide. As such, APR needs to be performed under the supervision of a veterinarian.

Dentistry is a very analogous service that has faced the same challenges and same arguments from non-veterinary providers. ***In the final analysis both veterinary (animal) physical rehabilitation and veterinary (animal) dentistry should be under the direct supervision of licensed veterinarians because only DVM's have the education, training, equipment, experience, authority, regulatory oversight, and malpractice protections that California consumers are entitled to for those allowed to practice veterinary medicine.***

- **Human Training:** Suggesting that that human-trained physical therapists should be able to independently practice on animals would by extension allow human dentists to perform veterinary dentistry, or human surgeons to perform veterinary surgery, or human

psychiatrists to perform veterinary behavior therapy--all without the direct supervision of a licensed veterinarian. Likewise, if crossing from human care to veterinary care were to be sanctioned, then the reciprocal of crossing from veterinary care to human care would logically follow--meaning that veterinary physical rehabilitation practitioners should be allowed to practice PT on humans (since DVMs are licensed to provide PT on non-human primates this would be much less of a leap than the reverse)! **Clearly, the reason we have distinct human and veterinary fields is because each require their own extensive knowledge base, their own specialized equipment and facilities, and their own insurance and regulatory compliance.**

- **DVM Training:** What APR requires but human PT training lacks:

- DVM's are trained in the behavior of animals
- DVM's are trained in pain management of animals
- DVM's can prescribe both pharmaceutical and non-drug therapies for animals
- DVM's are trained in anatomy and physiology of animals
- DVM's are trained in lameness and locomotion--4 legged versus 2 legged
- DVM's have diagnostic equipment available—like x-rays, ultrasound, and MRI
- DVM's have access to emergency and resuscitation capabilities
- DVM's can diagnose problems, monitor recovery, and prescribe therapy for animals
- DVM's are licensed, insured, and regulated to care for animals

There ARE myriad dramatic differences between humans and animals AND there are further remarkable differences between different species like dogs, cats, and horses. Here are just three dramatic differences between humans and animals: Animals use quadrupedal locomotion (4-legged) versus bipedal locomotion which creates entirely different locomotive forces and adaptations; Animals walk on their “toes” instead of on their “heels” which requires completely different structural and anatomic architecture; Animal skeletal muscle recovery and response is functionally and quantitatively much different than humans, while tendinous and ligamentous tissues respond asynchronously. Every one of these factors has a dramatic impact on any rehabilitation plan.

APR certification of even 200 hours for non-DVMs (equal to 5 weeks of the first year of veterinary school) is inadequate and does not begin to scratch the surface of the knowledge and experience held by licensed Doctors of Veterinary Medicine. Learning the so called “Red Flags” does not begin to adequately prepare PT’s to recognize or respond to the huge range of potential problems and non-human diagnoses that veterinary patients can present with. Suggesting that because PT’s practicing APR in other states have not been subject to complaints or malpractice claims (assuming this is even true or comprehensive) gives them proof of competence, in no way demonstrates the expertise, effectiveness, or accountability of those practitioners. APR trained PT’s would be a most welcome addition to the veterinary care team as long as they are under the direct supervision of a licensed DVM.

- **Public Need:** ACVSMR, CCRP, CCRT, and other certified and/or supervised veterinary rehabilitation specialists are available for those seeking advanced expertise in APR while also being DVM supervised or administered. More than 100 of these specialists are available in California with a large number of general practices also offering rehabilitation services—**so there is no scarcity of care.**

- **Public Oversight:** Veterinary practice (including APR) needs to be regulated by the VMB. **Other agencies within the Department of Consumer Affairs (Physical Therapy, Dentistry, etc.) simply do not have the expertise to regulate veterinary facilities, veterinary practitioners, or veterinary patients.** Again, the differences between human

practice and veterinary practice are so dramatic that the standards from one do not apply to the other. This point is significant insofar as the argument that the PT Board should somehow still be responsible for regulating and overseeing PT's practicing APR.

Conclusion: Non-DVM PT's should practice under the supervision of a DVM since APR is a component of veterinary practice and since this provides consumers the proper care and protection guaranteed by the Practice Act. The potential for harm to patients and consumers is high when rehabilitation is managed without proper veterinary training—the IVDD dog with a disc compressing the spinal cord, the young kitten with a fractured femur developing a quadriceps contracture, or the lame horse with a hairline fracture extending into a joint are but a few good examples of high risk cases. Intermittent or infrequent off-site monitoring by a DVM is inadequate to manage these cases because they require ongoing reassessment and readjustment of their status and therapy.

A team approach with the DVM as the leader and with the authority to directly supervise the APR-trained PT would be the best solution in terms of patient safety and consumer protection. The level of supervision needs to be direct in order to provide an adequate level of oversight and accountability.

Thank You,

Jeff Smith DVM, CCRP

[Middletown Animal Hospital](#)
[All Valley Equine](#)
[Digatherm Digital Thermal Imaging](#)
[Assisi Loop tPEMF](#)
21503 Highway 29
Middletown, CA 95461
707-696-9000 cell
707-987-2000 clinic
707-987-2082 fax
myvet@mac.com
middletownvet.net

Amy Wurbel <amywurbel@yahoo.com>
Wed 7/29/2020 9:02 AM

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To:

- Sotelo, Justin@DCA;
- Rodda, Timothy@DCA

Letter to the Board.docx
13 KB

[EXTERNAL]: amywurbel@yahoo.com

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Samantha Rae <samantharaemua@yahoo.com>

Tue 7/28/2020 4:18 PM

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To:

- Sotelo, Justin@DCA;
- Rodda, Timothy@DCA

Sam Letter.docx

28 KB

[EXTERNAL]: samantharaemua@yahoo.com

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Lauryn Harker <laurynmayo@usa.net>
Mon 7/27/2020 12:43 PM

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To:

- Sotelo, Justin@DCA;
- Rodda, Timothy@DCA

[EXTERNAL]: laurynmayo@usa.net

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July 27, 2020

To Whom It May Concern:

This letter is my personal request for the Board to consider the adoption of the proposed modifications with regards to the regulatory action CCR, Title 16, Section 2038.5 including subsections A-E.

As the board is aware Animal Physical Rehabilitation is a rapidly growing field in our industry and currently there are individuals practicing that have little to no medical training with regards to non-human species care. As a California licensed RVT, as well as a Certified Canine Rehabilitation Practitioner, I have acquired hundreds of hours of training and instruction in order to best serve the veterinary community that I live in. I work under the supervision of a veterinarian that knows my abilities and her patient's medical needs. I cannot express how strongly I oppose layman or human physical therapists expanding their practice into the animal medical field when no standardized qualifications currently exist to verify their competency to be able to do so. This lapse in regulation does not serve in the best interest of our profession nor in the patients we treat. Instead, I enthusiastically request that the proposed regulations set forth in the action be brought before you for consideration as soon as possible.

It has long been established in veterinary medicine that the licensed veterinarian with the VCPR would be the one to determine what levels of care the RVT is permitted to perform with regards to each patient and client. This standard, rightly so, relies on the veterinarian's expertise and personal knowledge of the patient, the owner, and the support staff. In medical care, it is the veterinarian who determines the degree of supervision of the RVT, requiring this same standard with regards to APR would be consistent with the Board and its standard of care policies.

The same is true currently with VA's. Most VA tasks require direct supervision of the veterinarian and the proposed action would be in line with our states current policies regarding

supervision of VAs including human physical therapists. This new policy not only serves the best interest of our patients, but is consistent with the boards 2015 AR rule-making and would therefore be easily implemented into our practices.

And finally, I would like to commend the Boards rulings regarding the rejection of authorizing PT's to perform APR with indirect veterinary supervision. It is an honor and privilege to be counted among this state's distinguished group of trained, licensed RVT's. I am grateful to the Board for recognizing the value in an RVT's training and knowledge and the distinction made between the RVTs training and qualifications to recognize pain, discomfort, and provide emergency medicine above the Physical Therapists knowledge. This ruling is yet again a reminder that this Board is wholly dedicated to the pursuance of best practices that can be afforded in our medical profession.

Thank you for your time,

If I can be of service to you regarding this issue, please feel free to contact me.

Lauryn Harker RVT, CCRP

Laurynmayo@usa.net

714-552-1511

Alicia Flores <koster Alicia@gmail.com>
Tue 4/28/2020 5:12 PM

To:

- DCA Director's Office;
- PT@DCA;
- Sotelo, Justin@DCA;
- Rodda, Timothy@DCA

RE: CONSUMER SUPPORT TO CA VMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am a concerned pet owner in California . I am submitting this letter to **SUPPORT** the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their pets and the California Veterinary Medical Board has pursued regulatory language to continue with the inclusion of licensed physical therapists wishing to provide services to animals. The ability to foster inter-professional relationships and collaborate is not currently hindered and the consumer's ability to access these professionals is not restricted.

The regulation of physical therapists is currently recognized as an 'unlicensed veterinary assistant' and subjects them to work under direct supervision of a veterinarian and in a veterinarian's hospital/clinic is in the best interests of consumer protection, harm reduction and patient safety. As a dedicated pet owner, I demand that my pet's veterinary care be directed by a DVM who is physically in the facility, determines who provides care and can oversee the level of supervision, monitor patient response to prescribed treatment, and respond to medical emergencies should they arise.

Respectfully,

A handwritten signature in black ink, appearing to be the name of the sender, written in a cursive style.

Anita Flett <ditaflett@sbcglobal.net>
Tue 4/28/2020 1:51 PM

To:

- Sotelo, Justin@DCA;
- Rodda, Timothy@DCA;
- DCA Director's Office;
- PT@DCA;
- VMB@DCA

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to SUPPORT the proposed animal physical rehabilitation regulations. As a registered veterinary technician (RVT) in California, I have been monitoring this issue closely for years and have been repeatedly disappointed with the egregious attempts from opposing individuals and groups to undermine the regulatory authority of the Board, the restricted healthcare duties assigned to the RVT in California and mandate additional training in a single specialty (advanced certification) in veterinary medicine.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals and the proposed California Veterinary Medical Board regulatory language protects my professional license, ability to perform work within the profession and prevents unnecessary educational expense (outside of current licensing renewal requirements). Including an exemption for licensed physical therapists who have undergone the necessary training on animals in the practice act is unnecessary. It is my recommendation for these individuals to pursue education and licensing in veterinary medicine should they desire a different level of supervision outside of DIRECT.

Licensed physical therapists who have been specifically trained on animals may already practice their craft on animals as an 'unlicensed veterinary assistant' under the direct supervision of a veterinarian or RVT. This provides consumer protection and harm reduction for the animal patient and all providers associated with care. I support the CVMB definition of animal rehabilitation as the practice of veterinary medicine and is consistent with language from the American Veterinary Medical Association and other national organizations. A licensed physical therapist with advanced training on animals does not need more reasonable guidelines, job opportunities and ability to earn a living are not dramatically reduced and consumer access to care is not limited. This regulation is not a restraint of the trade for a physical therapist because of the current and proposed language.

Other states who have regulated this field (i.e. Nevada, Colorado and Nebraska) do not have the same regulatory standards for licensing of veterinary professionals as we do in California. Specifically, TITLE PROTECTION and DESIGNATED HEALTHCARE tasks. Should California regulatory language change, the RVT may suffer infringement on duties, further title protection violations, loss of potential jobs or unfair wages with the creation of an Animal Physical Rehabilitation Assistant designation. Furthermore, a physical therapist is not an appropriate licensee and does not have the authority to supervise the RVT without veterinarian supervision.

The issue of animal physical rehabilitation has been going on for far too long. Assembly Bill 3013 - Animal Physical Rehabilitation Bill of 2018 failed in Appropriations and I do not support

the Bill. I am SUPPORT to this regulation as written. Should the time come where a compromise is needed, I SUPPORT the position of the California Registered Veterinary Technician Association.

Sincerely,

Anita B Flett RVT
401 Black Oak Drive
Petaluma, CA 94952
ditaflett@sbcglobal.net

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Jon Klingborg <drklingborg@me.com>
Tue 4/28/2020 5:54 AM

To:

- Sotelo, Justin@DCA;
- Rodda, Timothy@DCA

APR Board Letter April 2020.pdf
91 KB

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Please accept my amended letter.

Thank you,

Jon Klingborg, DVM

April 26, 2020

Dear Veterinary Medical Board:

As a member of the Multi-Disciplinary Committee for nine years, I've had a front row seat to the discussions surrounding Animal Physical Rehabilitation. I understand and respect the Board's important role in protecting the public and animals of California.

I support the language being considered for CCR 2038.5 Animal Physical Rehabilitation. It is important to note that this language has already been through three different deliberative vetting processes. Scores of hours of testimony, debate, discussion and committee work went into the language before the VMB. It began as work performed by an MDC SubCommittee and was refined by the VMB's Animal Rehabilitation Task Force. With the exception of the language pertaining to Veterinary Assistants, this language was also approved by the Veterinary Medical Board in April 2017.

Unfortunately, I understand that the need to codify this language in the Veterinary Practice Act creates a predictable opportunity for some individuals to attempt to "re-litigate" this issue. There has been a small vocal group who have advocated that the Veterinary Medical Board should create a new pathway for Physical Therapists to work on animals.

I will attempt to quickly address the most commonly made arguments against the proposed language that I've heard over the past decade and share some brief background.

Does this APR language unfairly exclude Physical Therapists from using their knowledge to help animals?

No. PTs are absolutely allowed to work on animals under direct veterinary supervision.

Remember: not even the Physical Therapists' *own practice act* gives them the authority to work on animals. Wouldn't you think that PTs should start with changing *their own practice act* before coming to the VMB? They haven't pursued this because APR is not a mainstream focus of the Physical Therapy profession. Instead, a small group has been driving this 'APR bus' for years.

Access Issues?

It has been stated that there is an Access issue that unfairly disadvantages animal owners seeking APR services (when APR is restricted to DVM supervision only.)

The reality is that in California there are *more* Veterinary practitioners* of Animal Physical Therapy than there are Veterinary Ophthalmologists, Cardiologists or Neurologists. *Clients aren't waiting for weeks to see a qualified veterinarian for APR services.*

(*Practitioners= Board Certified Specialists and/or DVMs with a certificate in Animal Physical Rehabilitation.)

There has never been any proof offered that there is an 'access' issue.

Moreover, Access is not the 'Mission' of a Licensing Board. The discussion in front of the Veterinary Medical Board is appropriately focused on maintaining a Minimum Standard of Care for patients and consumer protection.

"Follow The Income Stream"

It has been suggested that the VMB is simply trying to protect a veterinarian's 'income stream' when attempting to regulate APR.

What is ironic is that the most vocal advocates of additional certification programs and allowing PTs to provide off-site APR services are the same people who stand to benefit economically.

One of the strongest advocates for PTs is a veterinarian who manages a certification course in Colorado (\$7,500+ tuition for the program.) Another is a PT offering a 3 day APR workshop for \$1200/person.

These 'certification' courses are unaccredited and not overseen by *any* governing educational Body. Two years ago, this was pointed out and they were "looking into" becoming accredited. This still hasn't happened.

Yes, 'income stream and conflict-of-interest' are clearly evident . . . 'nuff said.

The Aggregate

A lot was made of the fact that Nevada has allowed PTs direct access to animal patients since 2004 and there has only been one complaint (as of 2017.) (Also, this information was not corroborated.)

Somehow, this 1 complaint (since 2004) was extrapolated into 73 years (?) of 'aggregated' service without any problems.

The reality is that 'absence of evidence is not evidence of absence':

- 1) the sample size upon which to base this aggregate is very small,
- 2) clients don't always know when harm has been done,
- 3) there are multiple barriers to filing a complaint and many clients choose not to do so.

If COVID-19 has taught us anything, it's that it is difficult to extrapolate from small data sets what is really going on in a population.

“Veterinarians are not sufficiently trained to properly perform APR”

All 50 states allow a veterinarian to perform APR without additional certifications and without any additional restrictions.

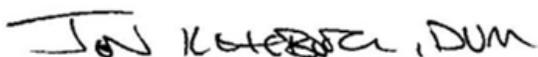
Conclusion:

We live in a State that has laws designed to protect animals and consumers. Sometimes, a Licensing Board has a duty to protect the consumer from himself.

Yes, there are many examples where the consultative relationship between a veterinarian and a physical therapist has benefitted the consumer and the patient, but the farther apart these two are geographically (e.g. in different facilities) the more likely an adverse event will occur. There are major and significant issues with liability when an animal is harmed by treatment that occurs outside of veterinary supervision.

APR is the practice of veterinary medicine. As such, it should remain under the watchful eye and engaged brain of the Supervising Veterinarian. The language before you accomplishes this quite effectively and clearly.

Respectfully submitted,



Jon Klingborg, DVM

Pat Lavender <twohandsforpaws@gmail.com>
Wed 8/12/2020 8:43 PM

To:

- Sotelo, Justin@DCA;
- Rodda, Timothy@DCA;
- DCA Director's Office;
- PT@DCA

August 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov
Timothy.Rodda@dca.ca.gov
DCA.DirectorsOffice@dca.ca.gov
PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations. It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to practice my craft under reasonable guidelines.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, my job opportunities and ability to earn a living would be dramatically reduced. **This regulation would be a restraint of my trade.**

Other states have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am OPPOSED to this regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists

who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before us on this matter.).

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists. Unfortunately, the CVMB opposed that bill largely based on the misrepresentations by members of the veterinary profession who successfully were able to sway Board opinion.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals *after* a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015. A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

Pat Lavender
1274 Tanemura Cres
Kelowna, B.C. Canada
twohandsforpaws@gmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Siefertman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Marilyn Doud <pasorider@me.com>
Wed 8/12/2020 5:08 PM

To:

- Sotelo, Justin@DCA

.....

I am a physical therapist, and have been following this issue for many years. It appears that the veterinarians are still insisting on direct supervision by a vet when a properly educated and experienced physical therapist is treating an animal. This model would probably work in a small animal veterinary clinic that is set up with a vet on site, where clients could easily transport their pets to the clinic for treatment. It would not work for large animals except for, possibly, a large veterinary hospital. My particular area of interest is horses, and very few clients with an injured horse will want to trailer their horse, 60+ miles in some cases, for therapy that needs to be done as a series of treatments. I can tell you from personal experience that it is often difficult to get a veterinarian to come to a barn for an emergency (although the good ones will often drop everything and reschedule other clients if they're needed for a serious emergency). My point is that large animal veterinarians do not have time to stay at a client's farm for 45-60 minutes to supervise a physical therapist. This proposed regulation will result in horse owners being denied access to qualified physical therapists, and will result in poorer outcomes for injured horses.

I support requiring a referral from a veterinarian, with the same kind of communication that occurs between doctors and PT's about human patients. Requiring the veterinarian to be present for each treatment, however, would be difficult, if not impossible, and I suspect that most large animal vets would strongly object to this requirement.

The CA VMB, in conjunction with the CA PT Board, might want to consider the regulations that exist in Nevada. Physical therapists who meet specific educational requirements must spend a stated number of hours with a veterinarian, after which they get an endorsement on their PT license that allows them to treat animals. I hope this would be considered, as it would assure the referring veterinarian that the PT to whom he or she refers a client would meet their expectations in terms of education and experience.

Marilyn Doud, PT, Retired



Steven L. Simas
Daniel J. Tatick
Ryan M. Keever
Sasha G. Aguilar

August 12, 2020

Justin Sotelo
Lead Administrative & Policy Analyst
Timothy Rodda
Administration/Licensing Manager
Veterinary Medical Board
1747 N. Market Street, Suite 230
Sacramento, California 95834

VIA EMAIL AND US MAIL

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

**Re: *Opposition to Proposed Regulatory Action*
Animal Rehabilitation
*California Code of Regulations Section 2038.5***

Dr. Mr. Sotelo and Mr. Rodda:

Our law firm represents the California Association of Animal Physical Therapists (“CAAPT”) and the Animal Physical Therapy Coalition (“APTC”).

As you know, APTC is a grassroots coalition representing veterinarians, physical therapists, RVTs and consumers. APTC has been working diligently with the Veterinary Medical Board (“Board”) to establish common sense animal rehabilitation regulations and legislation in California.

CAAPT is a grassroots association/coalition of licensed physical therapy professionals who seek to play a leading role in defining appropriate legislative/regulatory language in California.

On behalf of our client groups, we are writing to state opposition to the adoption of the Board’s proposed regulation on Animal Physical Rehabilitation, California Code of Regulations, title 16, section 2038.5 (“Proposed APR Regulation”). As you have already received comments directly from our client groups, this letter will focus on the legal defects and deficiencies in this regulation and process.

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A. The Board's Animal Rehabilitation Regulation Unlawfully Enlarges the Scope of Veterinary Practice Defined by Statute

Examining the California Veterinary Medicine Practice Act ("Act") confirms that the Proposed APR Regulation oversteps the Board's regulatory authority in three ways. First, the Act does not authorize veterinarians to practice physical therapy, as the Legislature has confirmed. Second, the Proposed APR Regulation violates the Administrative Procedure Act as exceeding the Board's scope and legal authority. And third, the Proposed APR Regulation represents an improper attempt for the Board to increase its scope of veterinary practice without proper legislation.

1. The Veterinary Scope of Practice Does Not Include Physical Therapy

Business and Professions Code section 4826 defines the scope of veterinary practice under California law:

A person practices veterinary medicine, surgery, and dentistry, and the various branches thereof, when he or she does any one of the following:

- (a) Represents himself or herself as engaged in the practice of veterinary medicine, veterinary surgery, or veterinary dentistry in any of its branches.
- (b) Diagnoses or prescribes a drug, medicine, appliance, application, or treatment of whatever nature for the prevention, cure, or relief of a wound, fracture, bodily injury, or disease of animals.
- (c) Administers a drug, medicine, appliance, application, or treatment of whatever nature for the prevention, cure, or relief of a wound, fracture, bodily injury, or disease of animals, except where the medicine, appliance,

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- application, or treatment is administered by a registered veterinary technician or a veterinary assistant at the direction of and under the direct supervision of a licensed veterinarian subject to Article 2.5 (commencing with Section 4832) or where the drug, including, but not limited to, a drug that is a controlled substance, is administered by a registered veterinary technician or a veterinary assistant pursuant to Section 4836.1. However, no person, other than a licensed veterinarian, may induce anesthesia unless authorized by regulation of the board.
- (d) Performs a surgical or dental operation upon an animal.
 - (e) Performs any manual procedure for the diagnosis of pregnancy, sterility, or infertility upon livestock or Equidae.
 - (f) Uses any words, letters, or titles in such connection or under such circumstances as to induce the belief that the person using them is engaged in the practice of veterinary medicine, veterinary surgery, or veterinary dentistry. This use shall be prima facie evidence of the intention to represent himself or herself as engaged in the practice of veterinary medicine, veterinary surgery, or veterinary dentistry.

(Amended by Stats. 2012, Ch. 239, Sec. 1. (AB 1839)
Effective January 1, 2013.)

Nowhere in this statute defining the scope of veterinary practice, the violation of which can be a misdemeanor,¹ is any mention of animal rehabilitation or physical therapy. Physical therapy is defined as “the art and science of physical or corrective rehabilitation or of physical or corrective treatment of any bodily or mental condition.”² Corrective rehabilitation or treatment is missing from the Act.

¹ Business & Professions Code section 4831.

² Business and Professions Code section 2620(a).

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Further, while section 4826 even articulates the veterinarian's modes of treatment such as drugs, administration of medicine and appliances, and treatment, prevention and cure of wounds, fractures, bodily injury, or disease of animals, it falls short of authorizing veterinarians to practice physical therapy or to provide physical therapy modalities. Physical therapy modalities include:

...use of the physical, chemical, and other properties of heat, light, water, electricity, sound, massage, and active, passive, and resistive exercise, and shall include physical therapy evaluation, treatment planning, instruction and consultative services.³

Section 4826 does not come close to authorizing veterinarians to perform physical therapy on their patients and it is clearly outside the scope of lawful veterinary practice.

When courts construe statutes and the legislative intent behind them, they look at what the statute enumerates and will not *read into it* as the Board is trying to do in enacting the Proposed APR Regulation. Pursuant to the doctrine of *expressio unius est exclusio alterius*, the enumeration of acts within the operation or exception of a statute will preclude the inclusion by implication other acts not specified.⁴ Based upon the language of section 4826, animal rehabilitation is not expressly authorized as part of veterinary practice. Thus, we do not believe a court will read animal rehabilitation or physical therapy into this section, especially when the Legislature was clear in defining the scope of veterinary practice.⁵⁶

³ Business and Professions Code section 2620(a).

⁴ *Henderson v. Mann Theaters Corp.* (1976) 65 Cal.App.3d 397, 403.

⁵ *Phillippe v. Shappell Industries* (1987) 43 Cal.3d 1247, 1265.

⁶ Further, the U.S. Supreme Court has made clear in *North Carolina State Board of Dental Examiners v. Federal Trade Commission* (2015) ___ U.S. ___, 135 S.Ct. 1101, that injunctive relief may be proper and Board members may even be liable when the Board's action such as the Proposed APR Regulation unfairly restricts competition.

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2. The Proposed APR Regulation Violates the Administrative Procedure Act

As the Board knows, its regulations must meet the established requirements of the Administrative Procedure Act and be approved by the Office of Administrative Law (“OAL”). In this case, the Proposed APR Regulation fails to comply with the Administrative Procedure Act.

Government Code section 11349.1 requires OAL to review all regulations and determine whether they comply with statutory standards set forth in Government Code section 11349. The Proposed APR Regulation fails to comply with the requirements of “consistency.”

Government Code section 11349(d) provides that “consistency” means the regulation is in harmony with, and not in conflict with or contradictory to, any existing statutes, court decisions, or other provisions of law. Courts have held that “[a]dministrative regulations that alter or amend the statute or enlarge or impair its scope are void and courts not only may, but it is their obligation to strike down such regulations.”⁷ Because the Proposed APR regulation will enlarge the scope of the Act, namely Business and Professions Code section 4826, it will not pass muster either by OAL or in any subsequent judicial review. And courts do not have to defer to the Board’s interpretation. Rather, they exercise their own independent judgment.⁸ Neither a reviewing court nor OAL will find any reference to APR in the Act, thus, the Proposed APR Regulation fails the consistency requirement of the Administrative Procedure Act.

B. The Board’s Stakeholder’s Task Force Recommendation

At the February 2, 2017 Animal Rehabilitation Task Force meeting, the Task Force approved the following language:

California licensed physical therapists with advanced certification in Animal Physical Rehabilitation (with such

⁷*Aguilar v. Superior Court* (2009) 170 Cal.App.4th 313, 323.

⁸ *Samantha C. v. State Department of Developmental Services* (2010) 185 Cal.App.4th 1462, 1481–1483, citing *Murphy v. Kenneth Cole Productions, Inc.* (2007) 40 Cal.4th 1094, 1105, fn. 7.

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certification to be defined by the Veterinary Medical Board and Physical Therapy Board working cooperatively) may provide animal physical rehabilitation under the degree of supervision to be determined by the veterinarian who has established a veterinarian-client-patient relationship, on a veterinary premises or an Animal Physical Rehabilitation premises (as defined in regulation by the Veterinary Medical Board and the Physical Therapy Board working cooperatively), or a range setting.⁹

This common-sense language does not conflict with the Act. A veterinarian-client-patient relationship (“VCPR”) must be established, which is vital and allows the veterinarian to manage the care provided to the animal.¹⁰ The veterinarian and physical therapist work together.

This language protects the public because in addition to the veterinarian establishing a VCPR, the physical therapist must obtain *advanced* certification in Animal Physical Rehabilitation (“APR”). The advanced training/certification would include courses that are approved by the Registry for Approved Continuing Education (RACE). The public is further protected by the Board’s oversight of an APR premises license, for which the requirements are to be determined and defined by the Board working cooperatively with the Physical Therapy Board. The Board will ensure protection of the public by developing appropriate minimum standards for an APR premises.

C. Direct Supervision Not Necessary When VCPR Established

California Code of Regulations, title 16, section 2032.1(b), requires the following elements to establish a veterinarian-client-patient relationship:

- (1) The client has authorized the veterinarian to assume responsibility for making medical judgments regarding the

⁹ April 19-20, 2017 Veterinary Medical Board Meeting Minutes at page 11
<https://www.vmb.ca.gov/meetings/minutes/20170419_vmb.pdf> (as of August 11, 2020).

¹⁰ See California Code of Regulations, title 16, section 2032.1.

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health of the animal, including the need for medical treatment,

(2) The veterinarian has sufficient knowledge of the animal(s) to initiate at least a general or preliminary diagnosis of the medical condition of the animal(s). This means that the veterinarian is personally acquainted with the care of the animal(s) by virtue of an examination of the animal or by medically appropriate and timely visits to the premises where the animals are kept, and

(3) The veterinarian has assumed responsibility for making medical judgments regarding the health of the animal and has communicated with the client a course of treatment appropriate to the circumstance.

California Code of Regulations, title 16, sections 2032.1(e) and (f), state:

No person may practice veterinary medicine in this state except within the context of a veterinarian-client-patient relationship or as otherwise permitted by law. A veterinarian-client-patient relationship cannot be established solely by telephonic or electronic means.

Telemedicine shall be conducted within an existing veterinarian-client-patient relationship, with the exception for advice given in an “emergency,” as defined under section 4840.5 of the code, until that patient(s) can be seen by or transported to a veterinarian. For purposes of this section, “telemedicine” shall mean the mode of delivering animal health care services via communication technologies to facilitate consultation, treatment, and care management of the patient.

Once a VCPR has been established by a veterinarian, that veterinarian possesses sufficient knowledge, including the knowledge gained from a hands-on examination of the animal, to utilize

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telemedicine to continue treating the patient for the condition under which the VCPR was established (i.e., a medical condition for which APR is warranted) and is authorized to do so under the Act.

Similarly, once a VCPR has been established, the veterinarian possesses sufficient knowledge regarding the animal such that the veterinarian can provide relevant information to a physical therapist with advanced certification in APR and then provide indirect supervision of the physical therapist providing services at an APR premises regulated by the Board. The veterinarian and physical therapist work collaboratively to provide veterinary treatment (by the veterinarian) and APR (by the physical therapist with the required certification) to the animal. The physical therapist maintains treatment records and provides those records, to include a treatment plan, to the veterinarian who established the VCPR and the veterinarian provides indirect supervision for the APR performed by the physical therapist. The veterinarian and the physical therapist have a symbiotic relationship in that each can provide services the other cannot: the veterinarian performs a thorough examination of the animal and determines a diagnosis and the physical therapist establishes a treatment plan and performs modalities not included in the Act consistent with advanced training and experience in physical or corrective treatment, exercise, bodily movement, mobility and wellness, none of which are included in the Act.

For these reasons, direct supervision of a physical therapist by the veterinarian is unnecessary and should not be mandated by the Proposed APR Regulation.

D. Opposition to Proposed Regulation

The Initial Statement of Reasons asserts that the proposed regulatory action will not have a significant adverse economic impact on businesses. However, that statement is simply not true. Should this regulation be enacted, several established APR practices will no longer be allowed to exist and will be forced to close. Veterinary practices are unable to sustain employment of a physical therapist due to the

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expense and the fact that not all animals require such care by a physical therapist.

Should this proposed regulation pass, the public will not be protected because the proposed regulation does not require that veterinarians, RVTs or veterinary assistants receive advanced certification in APR, or any training or certification at all.

Finally, public interest is not served by this proposed regulation. The proposed regulation will limit the availability of APR to consumers and their animals, unfairly affecting the most rural and disadvantaged citizens of this state.

For the reasons set forth above, CAAPT and APTC remain opposed to the proposed regulation and encourage the Board to vote against the proposed regulation. Specifically, the proposed regulation unlawfully enlarges the scope of veterinary practice, does not reflect the common-sense language developed by the Animal Rehabilitation Task Force allowing indirect supervision, does not protect consumers and does not serve the public interest.

Sincerely,



Steven L. Simas
Simas & Associates, Ltd.

SLS:ma

cc: Karen Atlas, President, Animal Physical Therapy Coalition (via email)
Kimberly Kirchmeyer, Director, California Department of Consumer Affairs (via email)
Jessica Sieferman, Executive Officer, California Veterinary Medical Board (via email)
Melissa Armstrong, Senior Paralegal (via email)

George Doddington <george.doddington@gmail.com>
Tue 8/11/2020 12:25 PM

To:

- Sotelo, Justin@DCA

Cc:

- Muller Veterinary Hospital <mullerveterinaryhospitalwalnutcreek@rapport2.com>

.....

I am quite capable of using my own judgment in selecting health care providers for my animals. I don't need, I don't want, and I can't afford unnecessary government intrusion into the care of my animals.

--

George Doddington

Elizabeth Hudson <e_hudson@comcast.net>
Tue 8/11/2020 12:14 PM

To:

- Sotelo, Justin@DCA

Mandating that a licensed veterinarian be present for animal physical therapy will ultimately harm animals.

I've had great results for my animals by using therapist without any veterinarian present. These therapist build reputations by word of mouth; they have to be good or they won't be referred by clients.

The expense of the licensed veterinarian will make the physical rehabilitation too expensive for many owners, and therefore prevent any treatment of the animal. If an owner wants a veterinarian present, and can afford it, they have that option. Mandating that a veterinarian be present will price many owners out of the market.

The current system is not broken! This is an attempt by veterinarians to push out other providers who are providing valuable services at affordable prices. The only winner if **Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations passes will be the bank accounts of the veterinarians. There will be many animals who loose by no longer getting the benefit of this non invasive therapy.**

I recently had a veterinarian make a mistake in medicine that caused my dog's last day to be very painful. It was an honest mistake. Everyone makes mistakes, so pointing to a few therapist that have poor results is a scare tactic that ignores the many mistakes veterinarians make.

This legislation is a money grab and anti competition by veterinarians.

Please leave the system as is. Any owner who hires a therapist has their animals interest in heart and will be evaluating the provider.

Elizabeth Hudson

Topp, Kimberly <Kimberly.Topp@ucsf.edu>
Sun 8/9/2020 10:01 PM

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□
□
□
□

To:

- Sotelo, Justin@DCA;
- Rodda, Timothy@DCA

Cc:

- DCA Director's Office;
- PT@DCA

[EXTERNAL]: Kimberly.Topp@ucsf.edu

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August 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations. **As a licensed physical therapist in California, I have been monitoring this issue closely for years and have been repeatedly disappointed with the egregious attempts the California Veterinary Medical Board has taken to monopolize this area of animal healthcare.**

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to practice the craft under reasonable guidelines.

By relegating licensed physical therapists who have been specifically trained on animals to being an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd and an unnecessary expense for the consumer. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, job opportunities and ability to earn a living would be dramatically reduced. **This regulation would be a restraint of trade.**

Other states have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am OPPOSED to this regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done).

The issue of animal physical rehabilitation has gone on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals *after* a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

Kimberly S. Topp, PT, PhD, FAAA
Professor and Chair Emeritus
Physical Therapy and Rehabilitation Science
University of California San Francisco
Kimberly.topp@ucsf.edu

VMB@DCA
Fri 8/7/2020 3:02 PM

□
□
□
□
□

To:

- Sotelo, Justin@DCA;
- Rodda, Timothy@DCA

From: Louis Ling <louisling@me.com>

Sent: Friday, August 7, 2020 11:48 AM

To: VMB@DCA <VMB@dca.ca.gov>

Cc: Beth Williams <k9rehab@aol.com>

Subject: Public Comment on Proposed Adoption of Section 2038.5, Article 4, Division 20, Title 16, or the CCR (Animal Physical Rehabilitation)

[EXTERNAL]: louisling@me.com

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To the California Veterinary Medical Board:

Carolyn and I are Nevadans who were asked by our veterinary physical therapist, Beth Williams, P.T., to testify to you regarding our experiences here in Nevada regarding our very successful use of veterinary physical therapy services as an adjunct to our regular veterinary services. Years ago, we adopted a French Bulldog named Coco from a bulldog rescue group after Coco had been abandoned by her previous owner for reasons of cost and hassle related to Coco's recovery from hemilaminectomy surgery. At the time, Coco could not walk more than about 50 feet, and most of that involved a combination of stumbling steps and dragging of her back legs.

In Nevada, our regulations allow licensed physical therapists to obtain additional training to provide animal physical therapy by registering with the Nevada State Board of Veterinary Medical Examiners. Ms. Williams maintains her own practice at which she has a water treadmill, a small swimming pool, a treadmill, and numerous other pieces of physical therapy equipment. She also provides laser therapy. Per Nevada regulation, she makes medical records related to the treatments she provides to Coco, and she sends those records to our regular veterinarian so that when we meet with our veterinarian, we can discuss Ms. Williams' progress and treatments with our veterinarian.

Through the coordinated efforts of our regular veterinarian and weekly visits with Ms. Williams, Coco has been walking a mile daily with our other dogs and she walks (mostly) around the house. When Coco lost sensation in her back legs last July as a result of a rare negative reaction to a rabies booster (necessitated when we caught her using a dead bat as a chew toy), Ms. Williams worked intensively with Coco, and after three months tugging around a cart, Coco began walking again, and she is now walking a mile with our other dogs every day.

So Coco and Ms. Williams are our heroes - Coco because she has had the heart to learn to walk TWICE in her life, and Ms. Williams because she has facilitated Coco's recoveries and progress.

The regulation before the California Veterinary Medical Board does not seem to be the best solution for the stated concern, namely that there are unlicensed people providing animal physical therapy services to California's animals. As a consumer who has years of positive experience with our registered but free-standing animal physical therapist, we highly commend this model. Ms. Williams' services are affordable because she is free-standing, and we are certain that if she was forced to work for a veterinarian in a veterinarian's office such as is required by the regulations now under consideration, she likely would not do so, or if she did do so, her services would be more expensive as the veterinary practice would control the costs and would mark it up to assure profitability for the employing veterinarian.

Furthermore, the California regulation equates physical therapists with registered veterinary technicians, and this does not seem fair to either profession. Physical therapists train uniquely in physical therapy and only physical therapy. Registered veterinary technicians train generally and are veterinary nurses, essential to good veterinary medical care in a thousand ways. But RVTs are not PTs, and PTs are not RVTs.

The proposed regulation smack strongly of turf protection by veterinarians and does not further good public policy or protection. In the human world, physical therapists are separately licensed and work free-standing, where they work cooperatively and in conjunction with human physicians. They are not required to be employed by physicians, nor do they have to work with physicians supervising them. Furthermore, in human medicine there is no equivalence of physical therapists with nurses: instead, each has his or her unique skills and knowledge to offer to a particular patient to further the patient's healing.

Again, we commend Nevada's regulatory structure to the California Board. It is brief, clean, and simple. In fact, here is Nevada's regulation *in toto*:

ANIMAL PHYSICAL THERAPY

NAC 638.750 "Animal physical therapy" defined. (NRS 638.070) As used in [NAC 638.750](#) to [638.790](#), inclusive, "animal physical therapy" means the rehabilitation of injuries in a nonhuman animal through the use of the following techniques, but does not include animal chiropractic:

1. Stretching;
2. Massage therapy;
3. Rehabilitative exercise;
4. Hydrotherapy;
5. Application of heat or cold; and
6. Stimulation by the use of:
 - (a) Low-level lasers;
 - (b) Electrical sources;
 - (c) Magnetic fields; or
 - (d) Noninvasive therapeutic ultrasound.

(Added to NAC by Bd. of Veterinary Med. Exam'rs by R009-04, eff. 4-26-2004; A by R091-06, 11-13-2006)

NAC 638.760 Requirements to practice; application for certificate of registration; fee. (NRS 638.070)

1. A person shall not practice animal physical therapy in this State unless he or she is:
 - (a) A veterinarian;
 - (b) A licensed veterinary technician who complies with the provisions of [NAC 638.053](#); or
 - (c) A physical therapist who has obtained a certificate of registration pursuant to this section and complies with the provisions of [NAC 638.780](#).
2. A physical therapist who desires to secure a certificate of registration to practice animal physical therapy in this State must make written application to the Board.
3. The application must be on a form provided by the Board, include any information required by the Board and be accompanied by satisfactory proof that the applicant:
 - (a) Is of good moral character;
 - (b) Has been an active licensed physical therapist in this State for at least 1 year;
 - (c) Is in good standing with the State Board of Physical Therapy Examiners;
 - (d) Has successfully completed at least 100 hours of instruction or course work, or a combination of both, in the area of animal physical therapy, which must include, without limitation, assessment and planning of treatment, behavior, biomechanics, common orthopedic and neurological conditions, comparative anatomy, neurology, and therapeutic modalities and exercises; and
 - (e) Has completed at least 125 hours of supervised clinical experience in animal physical therapy with a licensed veterinarian.
4. The application must be signed by the applicant and notarized.
5. Except as otherwise provided in [NAC 638.790](#), upon receipt of the application and information required by subsection 3 and payment of the fee required pursuant to [NAC 638.035](#), the Board will issue to the physical therapist a certificate of registration.

(Added to NAC by Bd. of Veterinary Med. Exam'rs by R009-04, eff. 4-26-2004; A by R075-06, 11-13-2006; R072-09, 4-20-2010)

NAC 638.770 Expiration and renewal of certificate; fee. (NRS 638.070)

1. Each certificate of registration issued pursuant to [NAC 638.760](#) or renewed pursuant to this section expires on January 1 of each year.
2. Each application for renewal of a certificate of registration must be:
 - (a) Submitted in the form established by the Board;
 - (b) Signed by the physical therapist;
 - (c) Accompanied by proof that the physical therapist completed, during the 12-month period immediately preceding the beginning of the new registration year, at least 5 hours of continuing education in animal physical therapy approved by the Board; and
 - (d) Accompanied by proof that his or her license as a physical therapist in this State is active and that he or she is in good standing with the State Board of Physical Therapy Examiners.
3. A physical therapist who fails to renew his or her certificate of registration before it expires forfeits the certificate of registration.
4. Except as otherwise provided in [NAC 638.790](#), upon receipt of the application for renewal and the information required by subsection 2 and payment of the renewal fee required pursuant to [NAC 638.035](#), the Board will renew the certificate of registration of the physical therapist.

(Added to NAC by Bd. of Veterinary Med. Exam'rs by R009-04, eff. 4-26-2004; A by R072-09, 4-20-2010)

NAC 638.780 Standards of practice for physical therapist holding certificate; maintenance of records. (NRS 638.070)

1. A physical therapist who has been issued a certificate of registration pursuant to [NAC 638.760](#) may practice animal physical therapy only:
 - (a) Under the direction of a veterinarian licensed in this State who has established a valid veterinarian-client-patient relationship concerning the animal receiving the animal physical therapy before the animal physical therapy is performed; and
 - (b) If the physical therapist assumes individual liability for the quality of the animal physical therapy performed.
2. The veterinarian under whose direction the physical therapist performs the animal physical therapy:
 - (a) Is not required to supervise the physical therapist during the animal physical therapy.
 - (b) Is not liable for the acts or omissions of the physical therapist who performs the animal physical therapy.
3. Each physical therapist who has been issued a certificate of registration shall:
 - (a) Maintain in this State for at least 4 years a separate written medical record of each animal receiving animal physical therapy from the physical therapist.
 - (b) Within 48 hours after the initial visit with the animal, mail or transmit electronically a complete copy of the medical record to the veterinarian under whose direction the physical therapist performs the animal physical therapy.
 - (c) Within 48 hours after each subsequent visit with the animal, mail or transmit electronically a progress report to the veterinarian under whose direction the physical therapist performs the animal physical therapy.
4. Any medical record made pursuant to subsection 3 must be available for inspection by the Board or its representative.
5. The veterinarian shall include the copy of the medical record received pursuant to subsection 3 in the medical record required pursuant to [NAC 638.0475](#). The written medical record must include, without limitation:
 - (a) The name, address and telephone number of the owner of the animal;
 - (b) The name or identifying number, or both, of the animal;
 - (c) The age, sex and breed of the animal;
 - (d) The dates of care, custody or treatment of the animal;
 - (e) The results of a basic rehabilitation examination related to physical therapy;
 - (f) The diagnosis and treatment plan related to physical therapy recommended by the physical therapist for the animal; and
 - (g) The progress and disposition of the case.

(Added to NAC by Bd. of Veterinary Med. Exam'rs by R009-04, eff. 4-26-2004; A by R063-13, 6-23-2014)

NAC 638.790 Disciplinary action. ([NRS 638.070](#))

1. A violation of a provision of [chapter 638](#) or [640](#) of NRS or a regulation adopted by the State Board of Physical Therapy Examiners or the Nevada State Board of Veterinary Medical Examiners is a ground for disciplinary action.
2. If the Nevada State Board of Veterinary Medical Examiners determines that an applicant for a certificate of registration pursuant to [NAC 638.760](#) or a physical therapist who has been issued a certificate of registration pursuant to [NAC 638.760](#) has committed any act which is a ground for disciplinary action, the Board may:
 - (a) Refuse to issue a certificate of registration;
 - (b) Refuse to renew a certificate of registration;
 - (c) Revoke a certificate of registration;
 - (d) Suspend a certificate of registration for a definite period or until further order of the Board;

(e) Impose a fine in an amount not to exceed \$10,000 for each act that constitutes a ground for disciplinary action;

(f) Place a physical therapist who has been issued a certificate of registration on probation subject to any reasonable conditions imposed by the Board, including, without limitation, requiring courses in continuing education or a periodic or continuous review of his or her animal physical therapy practice;

(g) Administer a public reprimand;

(h) Require the physical therapist who has been issued a certificate of registration to take a competency examination or a mental or physical examination; and

(i) Require the physical therapist who has been issued a certificate of registration to pay all costs, including, without limitation, attorney's fees, incurred by the Board in taking disciplinary action against him or her.

(Added to NAC by Bd. of Veterinary Med. Exam'rs by R009-04, eff. 4-26-2004)

On behalf of all pet owners in California who own loving, determined little animals like our Coco, please make physical therapy services MORE available and LESS expensive to California's pets, not LESS available and MORE expensive. Please consider a model like Nevada's regulations.

Thank you for your time and consideration.

Louis Ling & Carolyn Cramer

Javier & Bego Escobedo <javierybego@hotmail.com>
Wed 5/6/2020 6:55 PM

To:

- Sotelo, Justin@DCA;
- Rodda, Timothy@DCA;
- DCA Director's Office;
- PT@DCA

For some reason, this email did not leave my Outbox until today. Please consider it as you make decisions regarding this very important topic.

April 25, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations. It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

We have been working with a phenomenal physical therapist with our 10-year old Boxer with DM, and we are convinced her care and instruction has extended the quality of life of our pet. Typical DM dogs deteriorate very fast, our dog is one year and still strong.

Sincerely,

Bego Lozano

Justin Sotelo, Lead Administrative + Policy Analyst

Dear Mr Sotelo,

Re - Opposition of CVMB Animal Rehab Proposed Regulations

I am submitting this letter to oppose the proposed animal physical rehabilitation regulations.

There is no doubt that the emerging new field of animal physical rehabilitation needs regulation to protect the consumers and their animals. But, the Vet Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed specialists!

It is absurd to relegate these specialists as "unlicensed veterinary assistants" who must be under the direct supervision of a veterinarian.

As consumers we expect and deserve such quality care distinguished by trained physical therapists. We must have that educational competency assured.

RECEIVED
MAY 11 2020
VMB/RVTC

Sincerely,

Kimberly R Marti DDS

Kimberly R Marti DDS

14625 Torrey Pines Drive
Auburn, CA, 95602

email: kmmartidds@hotmail.com

Timothy Rodda, Administration Licensing Manager
 California Veterinary Medical Board
 1747 North Market Blvd, Suite 230
 Sacramento, CA 95834

RECEIVED
 MAY 11 2020
 VMERVIC

Dear Mr Rodda, Re Opposition of CVMB Animal Rehab
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 under the direct supervision of a veterinarian.

As consumers we expect and deserve
 such quality care distinguished by trained physical
 therapists. That educational competency should be
 assured.

Sincerely

Kamath R. Marti DAB
 email: krmarti@dab@notmail.com
 709

Louisa La Farge <llafarge@sbcglobal.net>
Sat 5/2/2020 5:29 AM

To:

- Sotelo, Justin@DCA;
- Rodda, Timothy@DCA;
- DCA Director's Office;
- PT@DCA

April 25, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

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Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

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This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Louisa La Farge

Ksenija Andric <ksenija.andric.lcsw@gmail.com>
Wed 4/29/2020 12:48 PM

To:

- Sotelo, Justin@DCA

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

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I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Ksenija Andric, LCSW

K Doria <pawsdrsb@gmail.com>
Tue 4/28/2020 4:10 PM

To:

- Sotelo, Justin@DCA;
- Rodda, Timothy@DCA;
- DCA Director's Office;
- PT@DCA

20200428-1607.pdf
1 MB

Kelly Doria, DVM
All Paws House Calls
805-453-3825



All Paws House Calls
1187 Coast Village Road Suite #1, #703
Montecito, CA 93108

April 27, 2020

Justin Sotelo,
Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board 1747 North Market Blvd.,
Suite 230
Sacramento, CA 95834
justin.Sotelo@dca.ca.govTimothy.Rodda@dca.ca.govDCA.DirectorsOffice@dca.ca.govPT@dca.ca.gov

RE: VETERINARY OPPOSITION TO CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am a licensed veterinarian in California and a member of the CVMA. I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations. It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to inter-professionally collaborate and hinders the consumer's ability to access these professionals. By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision of a veterinarian and ONLY in a veterinarian's hospital/clinic is absurd. As a veterinarian, I would like the choice to be able to refer my patients to a properly trained PT and determine for myself what level of supervision is appropriate. Allowing the veterinarian to evaluate, diagnose, and determine the best course of treatment is appropriate. If the best course of treatment is to send my patients to an animal physical therapist, then I would like the choice to be able to do that for my patients and clients. It is unreasonable to believe that veterinarians have the same skillset as a PT, much less even want to offer specialty rehab services themselves. It would be the highest standard of professional medical care for me to be able to refer my patients out to the professionals who are competent in this specialty. I have personally seen the differences in outcomes from the services of a licensed physical therapist certified in canine rehabilitation and therefore recognize the important role these professionals play in the care and well-being of our companion animals. I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals after a veterinarian has established a Veterinary-Client-Patient-Relationship (VCPR), made a diagnosis, and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (after the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other



licensed professionals of their choice, and allow for Board oversight to protect the consumer. (Such oversight is completely lacking when human chiropractors practice on veterinary patient without even indirect supervision, often without the attending veterinarian's knowledge of such care. This Board does nothing to address the overreach of the Chiropractic profession, but when Animal Physical Therapists seek to participate legally and in good standing with the Veterinary community they are demonized for their efforts.)

This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us (like Colorado, Nevada and Nebraska). Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

The issue of animal physical rehabilitation has been going on for far too long. A legislative remedy is the clear solution (akin to AB 3013—the Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists.

Sincerely,



Kelly Doria, DVM
CA License # 12154
USDA Accreditation number 0009612
805-453-3825
pawsdrsb@gmail.com

Tim <tmo7734@gmail.com>
Tue 4/28/2020 2:26 PM

To:

- Sotelo, Justin@DCA;
- Rodda, Timothy@DCA;
- DCA Director's Office

April 28, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

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This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Tim Orlando

Frances Mueller <fwmfwm@gmail.com>
Tue 4/28/2020 1:00 AM

To:

- Sotelo, Justin@DCA

Cc:

- Rodda, Timothy@DCA;
- DCA Director's Office;
- PT@DCA

opposeletter.pdf
258 KB

(Please see attached letter)

April 27, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: VETERINARY OPPOSITION TO CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

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Allowing the veterinarian to evaluate, diagnose, and determine the best course of treatment is appropriate. If the best course of treatment is to send my patients to an animal physical therapist, then I would like the choice to be able to do that for my patients and clients. It is unreasonable to believe that veterinarians have the same skillset as a PT, much less even want to offer specialty rehab services themselves. It would be the highest standard of professional medical care for me to be able to refer my patients out to the professionals who are competent in this specialty. I have personally seen the differences in outcomes from the services of a licensed physical therapist certified in canine rehabilitation and therefore recognize the important role these professionals play in the care and well-being of our companion animals.

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consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us (like Colorado, Nevada and Nebraska). Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

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Sincerely,

Frances Mueller, DVM, MS

1442 Topar Ave., Los Altos, CA 94024

fwmfwm@gmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Lisa Linke <lisa.linke@mac.com>
Sun 8/16/2020 12:07 PM

To:

- Sotelo, Justin@DCA

Dear Justin -

I am late in writing this - I apologize. I want to tell you about Zoey, my fourteen year old dog

Five years ago, she suffered a back injury and could not walk. I invested time and energy into her healing. With the kind and certified care of licensed professionals, after about six months of therapy, she was walking like her old self. We don't hike in the mountains like we used to, but she has lived since then as a normal dog with a very good life.

I especially treasure her now, as my other dog passed just shy of 16 in February, and she is my companion in this pandemic as I live alone. He also received the benefit from physical therapy and acupuncture, which kept him agile and comfortable through his very last days.

The care she receives is so valuable for her ongoing maintenance of her injury that it is the only time we leave the house in the pandemic - to travel thirty minutes to our preferred animal rehab facility.

I demand safe care for Zoey, and the many other animals like her. **I SUPPORT Section 2038.5 of Article 4, Division 20, Title 16 of the CA Code of Regulations related to Animal Physical Rehabilitation.**

Thank you.

Suzanne Rode <suzannemrode@yahoo.com>
Sat 8/15/2020 11:57 AM

To:

- Sotelo, Justin@DCA

I support the approval of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation.

We are firm believers that licensed veterinarians should have oversight for animal physical rehabilitation. My dog has had wonderful treatment from a local animal physical rehabilitation center, and we have had significant interaction with the Veterinarian who dictates the care that he receives. I firmly believe this is critical to the welfare of the animals.

Thank you.

Suzanne Rode Hunt

Chuck Marre <chuck.south40@yahoo.com>
Fri 8/14/2020 7:51 PM

To:

- Sotelo, Justin@DCA

.....

I support licensed veterinary care. Please SUPPORT Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation.

Chuck Marre
Concord, CA

Aimee Pitta <shewrites2@sbcglobal.net>
Fri 8/14/2020 12:27 PM

To:

- Sotelo, Justin@DCA

I demand safe care for my four-legged family member. I SUPPORT Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation.

Thank you

Aimee Pitta
90068

Brandon Bark <bdbark@gmail.com>
Fri 8/14/2020 10:52 AM

To:

- Sotelo, Justin@DCA

Re: SUPPORT of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation

I am submitting this letter in SUPPORT of Section 2038.5 related proposed animal physical rehabilitation regulations.

The field of animal physical rehabilitation needs oversight and regulation by a veterinarian to protect me as the consumer and my animals.

Allowing licensed physical therapists to work unsupervised or without direct supervision negatively impacts me as a consumer as I would have to take additional time and spend additional money on follow up care with a veterinarian related to my pet developing infections and pain. Most importantly, this risks my pet's safety!

I ask for you to uphold Section 2038.5 and to pursue proper legislative remedies that help animals get the care they need, where they need it in California.

Sincerely,

Brandon Bark

Jill Iwata <jill_iwata@yahoo.com>
Fri 8/14/2020 8:37 AM

To:

- Sotelo, Justin@DCA

Hi Mr. Sotelo,

I wish to voice my support to continue regulating direct on-site veterinary supervision to provide Animal Physical Rehabilitation services in California. It is important and safe to provide oversight to animal patients by licensed veterinarians, trained for disease and pain management on animal species, when administering therapeutic measures such as physical rehabilitation services.

Sincerely,

Jill Iwata, DVM
CA license 15195
UC Davis School of Vet Med, Class of 2003

Elizabeth Chaney <emchaney2@gmail.com>
Thu 8/13/2020 9:43 PM

To:

- Sotelo, Justin@DCA

I support Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation and cannot stress enough the importance of professional oversight our pets are receiving their veterinary care.

Thank you,
Elizabeth Chaney

Karen Dyer <kdyerm65@gmail.com>
Thu 8/13/2020 7:00 PM

To:

- Sotelo, Justin@DCA

Mr. Sotelo,

I was outraged to hear that our dogs are unable to receive the care that they need. In today's pandemic it is important to be able to take our companions to receive their PT and other cares.

With Covid 19 still ravaging our World some having to stay home and not being able to spend time with our friends and family the only companion that is there for us is our animals. If our animals are unable to be treated it will break our hearts is something that could have helped them be unavailable.

Please help our family pets be considered important enough that you would support: Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Therapy Rehabilitation.

Thank you,

Karen L. Dyer

Johanna Chu <jnchu@fastem.com>
Thu 8/13/2020 5:56 PM

To:

- Sotelo, Justin@DCA

Mr Soletto,

Per the present email, I would like to express my total support to the approval of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation.

Best regards,

Johanna Chu

Jill Pedersen Lamont <mrs wax@comcast.net>
Thu 8/13/2020 3:57 PM

To:

- Sotelo, Justin@DCA

I **SUPPORT Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation.** I value professional oversight when my pets are receiving their veterinary care.

Jill Lamont

Madeline Graham <drmadigraham@gmail.com>
Thu 8/13/2020 2:17 PM

To:

- Sotelo, Justin@DCA

Hope I'm not too late but just want to add my name to say I support Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation. There should absolutely be a veterinarian supervising treatment of animals for medical conditions. Thanks

Madeline Graham, DVM 7226CA

Patty Armstrong <parmstr2@wested.org>
Thu 8/13/2020 1:35 PM

To:

- Sotelo, Justin@DCA

Dear Mr. Sotelo,

I hope I am not too late with my letter to you. I'm writing in regard to Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation. I understand the Board is voting on whether to keep the proposed language for animal rehab in California and I want to implore that you vote in favor of keeping the language as proposed. As an owner/caregiver of a Boxer who required over a year of physical therapy, I can speak personally of the importance of having a licensed veterinarian oversee this treatment. While the work performed by Animal Physical Rehabilitation Therapists requires a great amount of training specific to animals, they are not veterinarians and should not make medical decisions about an animal. If my precious animal's rehab had not been overseen by a veterinarian, I am confident the quality of the care would not have been as superior as it was and she likely would not have lived as long as she did.

As we both know, Animal Physical Rehabilitation is a specialized field. It requires specialized training and should be practiced by licensed practitioners. That said, those practitioners should only be practicing under the oversight of a veterinarian. Without veterinarian oversight, PRTs would not be able to identify pain and prescribe medications, diagnose other issues/ailment (e.g., tumors, heart conditions, etc.), recognize and stabilize emergencies, and most important, read referring medical records. They must work in concert to ensure the best treatment is offered.

I support this regulation and urge you to vote in favor of the proposed language.

Sincerely,
Patty Armstrong

Patty Armstrong,
Director of Test Development
Standards, Assessment, and Accountability Services (SAAS)
WestEd
707.799.4628
parmstr2@wested.org

Kathy LaCross <kathylacross@comcast.net>
Thu 8/13/2020 12:51 PM

To:

- Sotelo, Justin@DCA

Please note my support of the bill below:

On 08/10/2020 7:06 PM Kathy LaCross <kathylacross@comcast.net> wrote:

I completely support the intent of the proposed law below:

Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation

My last dog, a fantastic golden retriever named Cody who lived 12 1/2 years, was the beneficiary of long term care at Muller Veterinary Hospital's Canine Rehabilitation Center in Walnut Creek, CA. I cannot imagine any therapeutic setting for a dog with his issues - seizures and severe arthritis - other than one that is part of a veterinary practice.

Thank you for the opportunity to share this and be heard.

Kathleen LaCross

Connie Howard <carinamia@me.com>
Thu 8/13/2020 12:34 PM

To:

- Sotelo, Justin@DCA

.....
Related to Animal Physical Rehabilitation.

Vets know how to do this. People trained in even canine rehabilitation (and all of the human range of rehab) do not know how to recognize respiratory and cardiology emergencies. They cannot administer CPR. They can't identify pain and prescribe medications. And, they cannot diagnose conditions that need to be treated as part of rehab.

I support keeping Veterinarians only for this kind of work.

Best regards

Connie Howard

Ingrid Ericson <iericson63@gmail.com>
Thu 8/13/2020 12:02 PM

To:

- Sotelo, Justin@DCA

Dear Mr. Sotelo,

I have had 5 Dogs with Joint issues over the years and have had the privilege of having accredited facilities to take them to for their rehabilitation. Twice, while my older dogs were in therapy, they needed the attention of my Veterinarian who is on site. My Dog had been sent out to a Otho specialist for a knee replacement and then transferred back to my Veterinarians on site rehabilitation facility. There was an error made in that surgery that my vet caught during her APR training that day, If it She had not been available to care for my pets emergency that day, I would have been forced to put my pet down.

Sincerely,

Ingrid Ericson-Yamamoto

Rosita Fabian <rfabk9s@comcast.net>
Thu 8/13/2020 11:48 AM

To:

- Sotelo, Justin@DCA

To Justin Sotelo or whom it may concern,

I have had 5 of my rescue Golden Retrievers go through rehab situations both at Bishop Ranch Veterinary Clinic and predominantly at Muller Veterinary Hospital and Canine Rehabilitation.

I have felt great comfort, trust and assurance having these treatments done and especially the fact that the Veterinarians on site have done both pre-evaluation and post-evaluation of the treatments, working hand in hand with the therapist. The therapeutic treatments are therefore completely relevant and become part of the dog's ongoing file for whatever information is needed during the pet's lifetime.

I am in total SUPPORT of SECTION 2038.5 OF ARTICLE 4, DIVISION 20, TITLE 16 OF THE CALIFORNIA CODE OF REGULATIONS, RELATED TO ANIMAL PHYSICAL REHABILITATION

Our pets are family members and their security in any treatment given is of the utmost importance to us. We appreciate you making this a given rather than an issue to be debated.

Thank you for your time and effort,
Dr. Rosita E. Fabian-Anthony, MVZ

Jack Luftman <dentj10@yahoo.com>
Thu 8/13/2020 11:42 AM

To:

- Sotelo, Justin@DCA

.....

We are in SUPPORT of Section 2038.5 of Article 4 Division 20, Title 16 of the California Code of Regulations related to Animal Rehabilitation.

Barbara and Jack Luftman

Alan Doyle <doylesibes@gmail.com>
Thu 8/13/2020 11:35 AM

To:

- Sotelo, Justin@DCA

Dear Mr. Sotelo:

Thank you for the opportunity to comment on the regulation pending today before the Veterinary Medical Board.

I support the regulation as in the best interest of the health of our companion animals and of Californians seeking the best and most professional medical care for those animals.

That support is based on my experience.

My veterinarian, Dr. Erin Troy, closely supervised the work of her staff therapists who treated my dog Sue following life-saving emergency surgery at UC Davis VMTH. The therapy was medically nuanced because it had to balance treatment for two major surgeries that had been performed nearly simultaneously. Without that doctor-therapist teamwork, my dog would not have regained her health over time and with it four more years of quality life.

While my dog's situation admittedly was extreme, any physical rehabilitation therapy is part of the spectrum of veterinary medical care. It makes no sense to risk a pet's health by allowing some of that care to be performed outside a veterinarian's supervision.

The Board should approve this proposal.

Thank you.

Alan Doyle
Vallejo, CA
[Doylesibes@gmail.com](mailto:doylesibes@gmail.com)

Jessica Waldman <jhwaldman@gmail.com>
Thu 8/13/2020 11:35 AM

To:

- Ruth A Combs <rarc2@verizon.net>
- Sotelo, Justin@DCA

.....
This is so good!

> On Aug 13, 2020, at 9:11 AM, Ruth A Combs <rarc2@verizon.net> wrote:

> To Justin Sotelo,

> I am sending this in SUPPORT of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation. Following are my reasons why.

> I have been using animal Physical Therapy for over 10 years. I started with a well intentioned place, with no on staff veterinarian. Two different times, I needed to make a separate appointment with my regular vet, just to get pain medications regulated and to address new issues arising during the process. A loss of time and money and discomfort to my dog. I then began to go to a veterinarian supervised facility, where over the years, they have literally saved one of my dog's life, by recognizing and treating immediately an infection that could have cost the dog her leg.

> My Rottweiler with bone cancer and a torn cruciate ligament was kept comfortable and pain managed because the Doctor on staff was able to recognize complications, and promptly administer the medications he needed. Truly a blessing.

> I am involved in rescue. I had one dog that was abandoned with a dislocated hip and required FHO surgery, which he got. I was then able to take him to Rehab where his progress, pain levels and over all health was constantly monitored and adjusted as needed. That would not have been possible were a Veterinarian not been present to supervise his healing.

> Overall, having Doctor supervised clinic, saves money, time, and most of all pet welfare and wellbeing. That SHOULD be the standard, or REMAIN the standard in all Animal Physical Rehabilitation facilities. We definitely need the Physical Therapists and the amazing work they do, but we need the Veterinarians to be present.

> Thank you for your time,

> Ruthie Combs

MaryAnne Gugel <mgugel.44@gmail.com>
Thu 8/13/2020 11:31 AM

To:

- Sotelo, Justin@DCA

I'm sending this email in support of Section 2038.5 of Art. 4, Div. 20, title 16 of the California Code of Regulations, relating to animal physical rehabilitation.

Sincerely,
MaryAnne Gugel

Nathaniel Cornejo <nathaniellcornejo@gmail.com>
Thu 8/13/2020 11:30 AM

To:

- Sotelo, Justin@DCA

To whom it may concern,

I would like to voice my support of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation. Low-quality animal healthcare is a danger to the long-term health and rehabilitation of our pets, a system already burdened with problems of visibility and representation. It is not a question that pets serve a crucial social function, many in vocations dedicated to support of the public good. We ought to honor their contribution by insisting on high-quality care.

Thank you for your time.

Best,
Nathaniel Cornejo

Maria Reese <maria@jrealty.org>
Thu 8/13/2020 11:27 AM

To:

- Sotelo, Justin@DCA

Dear Mr. Sotelo,

Please use this email as an indication of my support for SUPPORT of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation. I am a huge dog and cat lover, and most of my family members treat their animals like additional family members. If anything happened to them, they would be devastated. However as much as they are invested in their animals, I don't think they would understand the nuance of receiving animal rehabilitation under the care of a medically trained vet verses receiving this delicate care without vet oversight, There is obviously a huge difference in training and education between a vet and a physical therapist. Please please don't let pets be put in harm's way.

Thank you,

Maria

Thanks, Maria

Maria Reese

Josh Brann <ak.brann@gmail.com>
Thu 8/13/2020 11:18 AM

To:

- Sotelo, Justin@DCA

Regarding: Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation

Dear Mr. Sotelo,

I would like to take a minute to express our family's support for the above referenced regulatory code section. Our family's dog suffered a soft tissue injury in her leg last year, and required physical rehabilitation. We felt that the treatment and overall process greatly benefited from the presence of a licensed veterinary doctor on site, who was able to provide specific detailed inputs from a qualified medical professional. While our overall rehabilitation process went smoothly, we felt much more confident and comfortable about the process knowing that a licensed veterinarian was present.

We would like to strongly support the above referenced regulatory code section, and highly encourage you to as well.

Thank you,

Josh Brann

Jessica Waldman <jhwaldman@gmail.com>
Thu 8/13/2020 11:15 AM

To:

- Sotelo, Justin@DCA

The Veterinary Medical Board Letter 2020.docx
36 KB

Please see attached letter in support.

August 13, 2020

Attn: Veterinary Medical Board, Mr Justin Sotelo

Justin.Sotelo@dca.ca.gov

The Veterinary Medical Board (VMB) of California created task forces in both 2011 and in 2017 to explore the best relationship between Animal Physical Therapy (APR) and the VMB, and I have served on both these task forces. The VMB concluded twice that APR is considered veterinary medicine and that whoever practiced APR needs to be under the direct supervision of a veterinarian. Two times in one decade this issue has been thoroughly examined and decided on by the Veterinary Medical Board that non-veterinarians practicing APR needs to supervised by a veterinarian.

As a reminder, physical therapists ARE currently practicing APR all over the state of California under direct supervision, collaboratively working with veterinarians. See Title 16 Section 2035 of the Veterinary Practice Act. * (**There are currently less than 50 physical therapists in the field**)

And, the Veterinary Practice Act has included chiropractors to work on veterinary patients, also under direct supervision of a veterinarian. See Title 16 Section 2038 of the Veterinary Practice Act.

Why Yes on Section 2028.5 of Article 4, Division 20, Title 16 of the California Code of Regulations

- 1) **It is safer for the pets.** Pets that receive APR are often sick animals. They have had major surgery, they are senior pets who are in pain, they are pets with open wounds, they are pets that are paralyzed and have urinary catheters or drains in for their wounds. These pets need medication for pain, antibiotics after surgery or wounds, sedative meds for therapy, bandages, open wound care, catheter care, medical assessments of infections and surgery sites, and only veterinarians are trained in this level of care.
- 2) **Emergencies happen.** Pets have emergencies or urgent health situations during rehabilitation therapy and need medical assistance. These are sick pets, senior pets, disabled pets--this is why they are in need of APR. Rehabilitation veterinarians have often seen collapse during therapy, seizures during therapy, fainting from heart disease during therapy, bleeding tumors during therapy, respiratory emergencies during therapy, severe pain during therapy. Physical therapists are not trained to save the pets life.
- 3) **Pets have multiple medical issues** that need to be considered. Pets that have undergone major surgery or who are seniors have other problems, like heart conditions, seizures, chronic pain or cancer. Sometimes they have diseases that we don't even know before they come to us. Is a pet with a heart condition ok for swim therapy? Is a pet with cancer cleared for exercises? Sick pets need constant reassessment of what is acceptable for their therapies and physical therapists have no training in animal pain, medicine, pathology, nor treatment.
- 4) **It undermines professional safeguards:** Practice acts exist to provide guidelines under which professionals must operate to provide their level of care. They include education requirements, ethics, job tasks and accountability. Each profession is different and to think a human trained professional can provide safe and effective care to a veterinary patient is as illogical as a veterinarian providing care to your human child. Just because a small group of human practitioners wants to practice on pets without veterinarian onsite does not mean this is best for the animal patient. *If this bill passes, then the human ophthalmologists will create a bill to practice ophthalmology on pets. Next, rehabilitation veterinarians will start a bill that they can practice rehabilitation medicine on people. IS THIS OK? Professionals are trained in their own field, extensively, this is the field in which they should practice.*
- 5) **It is not fair to the pet owner/consumer.** Consumers have no idea when someone hangs up a shingle that says "pet rehabilitation" whether veterinarians are on site or not and what the risk is to their pet. They don't know their pet won't be medically assessed when needed and they don't know that their pet won't be safe in an emergency.
- 6) **It is not fair to the pet owner/consumer:** Many pet owners have pet insurance and some of the policies do not cover rehabilitation if not provided under direct supervision of a veterinarian.

7) **Physical Therapists currently CAN and DO practice APR with the existing statutes.** The current statute allows for PTs to provide APR with a veterinarian on site. The opportunity currently exists for PTs to collaborate safely and effectively with veterinarians to help animal patients and *this law is not needed.*

8) **Most other states require direct supervision.** New York, Louisiana, Vermont and Missouri are examples of states that require direct supervision.

9) **Access exists to APR.** There are currently over 120 veterinarians and veterinary technicians with advanced certifications in APR in the state of California. There are less than 50 physical therapists certified in APR. There is no shortage of access to rehabilitation practitioners. There are currently less than 60 veterinary ophthalmologists in the state of California. This does not mean that we would ask the human ophthalmologists to practice on pets so we can increase access!

10) **Who will be liable?** When a pet is injured or hurt or something major is missed without a veterinarian onsite, who is held accountable? With a veterinarian onsite it is a Physical Therapist' liability. If this bill passes the Physical Therapy Board cannot address animal issues and the Veterinary Medical Board cannot address issues with Physical Therapists. As it is written the Physical Therapists are liable. How can they be liable when they don't even know how to identify a medical issue? There would be no accountability for the consumer.

The California American Physical Therapy Association does not support physical therapists practicing independently on animals. On March 22, 23 2018, at the Department of Consumer Affairs it was decided that AB 3013 would not be supported. See Item Report 9AE, Legislative Report 10AVI. If their own organization won't support the bill, this shows how small this interest group really is.

The opposition for 2028.5 was prompted by a small group of people, including physical therapists who want to practice on pets and an owner of a program who certifies physical therapists to perform rehabilitation on pets, neither of which have pet's welfare in mind. Without question it is in the pets and the consumer's best interests to have a veterinarian directly supervising a physical therapist for the small animal model, and, this model currently exists, so why would we consider another option? At no time in the last 10 years during the many meetings to discuss this important issue has anyone in the room said otherwise. Please help us protect the pets in California by guaranteeing veterinarians on site during rehabilitation therapy for small animals, just as the Veterinary Medical Board has decided twice in the past. Please protect the consumer by keeping their pets safe. Please protect all professions by allowing us each to do what we love, and what we are trained to do. **Vote to support 2028.5.** This has been a long ten years of this topic, please close this chapter and help us to go back to doing what we do best, taking care of the animals.

Dr. Jessica Waldman
Veterinarian certified canine rehabilitation therapist, certified veterinary acupuncturist.
Medical Director California
Animal Rehabilitation
14 years of exclusive Animal Physical Therapy practice

www.CalAnimalRehab.com



ralmoran@comcast.net
Thu 8/13/2020 11:15 AM

To:

- Sotelo, Justin@DCA

Dear Mr. Sotelo,

I am in SUPPORT of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation.

Thank you,

Ralph Moran
ralmoran@comcast.net

Debbie Johnson <sockiemonster@aol.com>
Thu 8/13/2020 11:15 AM

To:
Sotelo, Justin@DCA

.....
I'm am sending as much Support as I can for this measure to be sure Veterinarians are on site at any time an animal is undergoing physical therapy.

I had a Border Collie who went to therapy for approximately 4 years. I k now he had a longer and much happier life because of it. Just like people he was an athlete and in his older years he paid the price with arthritis. He did not have any emergencies but I know of dogs that have. Had there not been a Vet on site the dogs may not have gone home that day.

I wouldn't go to a therapist who wasn't licensed and I don't think our four legged friends should either.

So, I fully support this proposal.

Debbie Johnson & Boomer

dianeparry53@aol.com
Thu 8/13/2020 11:14 AM

To:

- Sotelo, Justin@DCA

I am behind and fully Support Section 2038.5 of Article 4 Division 20, Title 16 of the California Code of Regulations related to Animal Physical Rehabilitations. Thank you, Diane Wise

Wahrlich <wahrlich@comcast.net>
Thu 8/13/2020 11:04 AM

To:

- Sotelo, Justin@DCA

I strongly support the approval of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation.

I presently have two dogs in physical therapy. One dog, a 7 year old Lab, came to us as a rescue needing TPLO surgery. The surgery did not go well. It took six months for her bone to heal. (The surgery was not performed by the vet or clinic who is overseeing her physical therapy). When I was finally given the all clear for my girl to begin physical therapy we were still dealing with a very fragile knee and no muscle mass. My dog was seen by a veterinarian at a very highly recommended clinic with an equally highly rated rehabilitation center. After the veterinarian examined/evaluated my dog she recommended physical therapy.

I was able to meet the physical therapist who would be working with my dog at that appointment. The vet and the physical therapist discussed how the physical therapist would proceed. After each physical therapy appointment the Vet receives a report/evaluation from the physical therapist. Based on that information the vet and the therapist determine what activities/treatments my dog would receive at her next appointment. From time to time the vet drops in to observe these therapy sessions.

I have been taking my dog to this physicality for therapy for over a year. She is now fully recovered and able to resume the activities she so enjoyed before her injury required surgery. This could not and would not have been accomplished without the collaborative efforts of the vet and the physical therapist.

I strongly feel that my dog's full recovery is a direct result of this team's efforts, the physical therapist and her veterinarian working collaboratively. They were critical to her recovery.

Again, I strongly support the approval of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation, as I would have absolutely no confidence in unqualified individuals who do not have the education currently required caring for my dog. I spent thousands of dollars on her surgery. Her recovery was as critical as the surgery. We owe her complete recovery to the collaboratively efforts of her vet and her physical therapist. They are the team that she has had from the beginning. I am very appreciative for their efforts and hope that if my dog requires surgery on her other knee that we can be guaranteed that she will once again have a professional team that will oversee the physical therapy that she will most assuredly require.

Thank you.

Sincerely,

Catherine Wahrlich

Clayton & Jaimie Kau <ckau@earthlink.net>
Thu 8/13/2020 11:00 AM

To:

- Sotelo, Justin@DCA

I whole-heartedly support the approval of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation.

Cooper Kau

C MCK <bdrclle@gmail.com>
Thu 8/13/2020 10:58 AM

To:

- Sotelo, Justin@DCA

It is very important to the welfare and health of my Border Collie Maeve, and my Boxer Angel, and all animals that a veterinarian be on sight in the PT facility in case anything unforeseen should happen during a therapy session. The pet can also be reevaluated for a change in therapy protocol and RXed new medication if necessary on the spot during the physical therapy session if needed. Without a veterinarian on sight the welfare of the pet may be greatly compromised.

I hope you will support Animal Physical Rehabilitation (APR) to be supervised by Veterinarians.

Thank you for your time & support

Carol McKernan

rd moreno <rdmoreno@gmail.com>
Thu 8/13/2020 10:57 AM

To:

- Sotelo, Justin@DCA

To Whom It May Concern:

As a resident of California and guardian of a dog and a cat who have greatly benefited from veterinarian-supervised Animal Physical Rehabilitation (APR), I support the approval of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations.

I know that my pets will be safer receiving APR if a veterinarian is on site because a physical therapist practicing without a supervising veterinarian is unable to perform the following:

- Recognize and stabilize emergencies
- Identify pain and prescribe pain medication
- Diagnose other ailments such as new tumors, heart conditions, skin issues, etc.
- Monitor patient safety during sessions
- Diagnose a postoperative infection, read my pets x-rays, manage wounds, apply splints, etc.

Sincerely,

RD Moreno

Hope Fulton <hope1120@yahoo.com>
Thu 8/13/2020 10:52 AM

To:

- Sotelo, Justin@DCA

Good Morning Justin,

I was made aware that Physical Therapists want to practice on our pets without a veterinarian on site.

I'm writing to let you know I would not want my dog or anyone's pet receiving APR if not guided by a veterinarian on site.

As such, I SUPPORT the approval of Section 2038.5 of Article 4, Division 20, Title 16 of the Ca. Code of Regulations, related to Animal Physical Rehabilitation.

Thank you for your time and consideration.

Hope Fulton

Jennifer Neale <bitewing2002@yahoo.com>
Thu 8/13/2020 10:43 AM

To:

- Sotelo, Justin@DCA

Good morning,

I send this email to voice my support of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation.

It is crucial for pet safety that veterinarians' presence be required when their patients are receiving therapy. This not only elevates the standard of care for animals but also ensures better outcomes in emergency situations, should they arise, during these therapies.

Please adopt this regulation that safeguards animals from any non-supervised treatment that could potentially cause harm to the animal patient.

I look forward to the passage of this regulation that is so importantly needed in the pet and animal community.

Thank you for your time.

Sincerely,
Jennifer Neale
Lifelong Pet Parent

Jean McKinley <fuguewriter@comcast.net>
Thu 8/13/2020 10:36 AM

To:

- Sotelo, Justin@DCA

Mr. Sotelo,

I SUPPORT Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation.

Sincerely,

Jean McKinley

Donna Roth <oakdell@mac.com>
Thu 8/13/2020 10:30 AM

To:

- Sotelo, Justin@DCA

Dear Members of the Veterinary Medical Board,

I have been a pet owner and animal lover my whole life. I know that along with loving them comes the deep responsibility to care for them in the kindest, most generous and effective way possible. I take this very seriously and consistently bring them to general vets and specialty vets. I have had more than one person tell me that in the next life they'd want to come back as one of my dogs!

My experience with veterinary supervised animal rehabilitation has been long and deep. I have had 4 dogs taken care of by Dr. Jessica Waldman at CARE in Los Angeles during the last 14 years. I've always had labs who, as sweet and wonderful as they are, come with their own well known set of physical problems. I brought my dogs to CARE precisely because it was a facility that was run by a vet who also collaborated with physical therapists. Just after she opened, I brought my lab Arlo to her because he was having so much trouble standing and walking. He previously had had surgery for laryngeal paralysis and one day was more tired than usual in the clinic and during his visit. The therapists, who were also very good, thought he was being a little "lazy" during his exercise part of the therapy. When Dr. Waldman came in she noticed his breathing was a little heavy and immediately asked me to get chest X-rays. It turned out that he had pneumonia, and was the first of many bouts, and had it not been for her, who knows what the outcome would have been? We were able to get him successfully treated, but the emergency hospital told us if we had not disced it as soon as we did, it would have been a much more dire situation. I can think of multiple other times when the veterinarians discovered medical issues with my dogs that I didn't know. What if no vet was there? If it weren't identified?

When I first brought Arlo, I was weeping and said to Dr. Waldman that I just wanted him to be able to run on the beach again. With their great and compassionate medical care, sure enough he was able to do the thing he loved most.

Three of my pets have not been able to walk before, and using medications in combination with therapies and home care they all got their legs back under them in the most inspiring way. It felt like a miracle to me, but it was because of proper pain assessment, understanding the diagnosis, prescribing proper medication at the same time as treatments got my pets up and walking.

My dog now is a current patient at CARE and the vets recently found a dangerous cancer tumor on her for which I'm getting treatment. All pets have lumps but which ones are need attention? A vet onsite is a constant medical advocate. I get emails or calls from the docs there to check out certain things and I always follow up. They've been trained. They go to school for this and I feel nothing but lucky to have the kind of care and guidance they provide. But it's not a fluke. I couldn't possibly treat my dogs physical challenges without the combined medication and physical therapy they receive. I've had dogs in so much pain they can't get up. It's heartbreaking for me but unimaginable for them.

Dr Waldman has found other ailments from eye issues to vomiting caused by reflux to severe inner ear infections, along with pneumonia, tumors and other life threatening situations.

Just the other day our dog Bailey couldn't get up. It was terrifying for us and for her. She was panicked. I called Dr Waldman at 9 pm and she was able to confer with the vet at ASEC about possible diagnosis and medication in ways I or even a highly trained PT couldn't possibly have done. And her experience was far greater than the vet on call, as lovely as he was, he was at a loss to identify what it was. She has been treating her herniated disc with an effective combination of medication, therapy and pain management.

I know having veterinarians supervising my beloved dogs' care have not just increased the quality of their lives but the length and joy of them.

So I urge you to please support the proposed regulation to keep vets supervising physical therapists. so that pets like mine can get treatment and remain safe.

Many thanks,

Donna Roth

Clayton Kau <clayton.kau@cox.net>
Thu 8/13/2020 10:30 AM

To:

- Sotelo, Justin@DCA

Resending since I am told that you are only counting ballots sent tomorrow.

----- Forwarded Message -----

From: Clayton Kau <clayton.kau@cox.net>
Date: 8/12/2020 9:30:00 AM
Subject: Animal Physical Rehabilitation
To: justin.sotelo@dca.ca.gov

My wife and I whole-heartedly support the approval of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation

Tami Zamrazil <tamizami@yahoo.com>
Thu 8/13/2020 10:30 AM

To:

- Sotelo, Justin@DCA

Dear Mr. Sotelo,

I am writing to register my strong support for Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations related to Animal Physical Rehabilitation.

Our pets are much safer receiving APR if a veterinarian is on site.

A physical therapist practicing without a supervising veterinarian is unable to perform the following:

- Recognize and stabilize emergencies
- Identify pain and prescribe pain medication
- Diagnose other ailments such as new tumors, heart conditions, skin issues, etc.
- Monitor patient safety during sessions
- Diagnose a postoperative infection, read your pets x-rays, manage wounds, apply splints, etc.

Thank you in advance for registering my support.

Kind Regards,
Tami Zamrazil

Rob Paratte <robparatte@gmail.com>
Thu 8/13/2020 10:26 AM

To:

- Sotelo, Justin@DCA

Justin Sotelo, Lead Administrative & Policy Analyst
Veterinary Medical Board
1747 N. Market Boulevard, Suite 230
Sacramento, California 95834-2987

Via Email @ justin.sotelo@dca.ca.gov or FAX @ 916-928-6849

SUPPORT of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation

I am submitting this letter in SUPPORT of Section 2038.5 related proposed animal physical rehabilitation regulations.

The field of animal physical rehabilitation needs oversight and regulation by a veterinarian to protect me as the consumer and my animals.

Allowing licensed physical therapists to work unsupervised or without direct supervision negatively impacts me as a consumer as I would have to take additional time and spend additional money on follow up care with a veterinarian related to my pet developing infections and pain. Most importantly, this risks my pet's safety!

I ask for you to uphold Section 2038.5 and to pursue proper legislative remedies that help animals get the care they need, where they need it in California.

Sincerely,
Rob Paratte
15 Graceland Lane San Carlos, CA 94070
415 308 6089
robparatte@gmail.com

Robert Paratte

Kristy Paratte <kparatte@gmail.com>
Thu 8/13/2020 10:25 AM

To:

- Sotelo, Justin@DCA

I am submitting this letter in SUPPORT of Section 2038.5 related proposed animal physical rehabilitation regulations.

The field of animal physical rehabilitation needs oversight and regulation by a veterinarian to protect me as the consumer and my animals.

Allowing licensed physical therapists to work unsupervised or without direct supervision negatively impacts me as a consumer as I would have to take additional time and spend additional money on follow up care with a veterinarian related to my pet developing infections and pain. Most importantly, this risks my pet's safety!

I ask for you to uphold Section 2038.5 and to pursue proper legislative remedies that help animals get the care they need, where they need it in California.

Sincerely,

Kristy

Stack, Tom <Tom.Stack@cbnorcal.com>
Thu 8/13/2020 10:24 AM

To:

- Sotelo, Justin@DCA

PLEASE insure there is a licensed and accredited DVM on site for all physical therapies performed on pets. It is irresponsible otherwise. make it happen.

Thank you,

Tom

Jamie Boretz <jboretz@calanimalrehab.com>
Thu 8/13/2020 10:23 AM

To:

- Sotelo, Justin@DCA

Good Morning,

I am submitting this email in support of the language which states that Animal Physical Rehabilitation needs to have a veterinarian directly supervising physical therapists. I work at the top animal rehab center in Southern California along with Dr. Jessica Waldman. I have worked here for 5 years and have personally seen many cases where it was very important to have a veterinarian on-site. Specifically, we have a pet boarding with us right now that is recovering from Distemper and is having consistent seizures and tremors. This pet is definitely not stable enough to be treated by a physical therapist with no veterinary supervision. We have had pets that have needed to be transferred to emergency facilities in the middle of the night – this is only possible because a vet is on call 24 hours and is able to recognize if the pet is truly having an emergency.

It makes sense to have a veterinarian supervising in all rehab cases because a physical therapist is unable to prescribe medication, they are unable to diagnose conditions, they are not trained to deal with emergencies and may not even be able to recognize an emergency when it is happening. Often times a pet will come in with a severe wound or pressure sore – a physical therapist would not be able to properly address this without a veterinarian present. If the wound is infected, how would a physical therapist culture the wound and then prescribe antibiotics if needed?

In conclusion, I have seen in my experience that it is absolutely necessary for a veterinarian to be involved and supervise all rehab cases. There are too many variables and other medical issues that could arise when dealing with these patients.

Thank you for your consideration,

Jamie Boretz
Lead Receptionist
California Animal Rehabilitation

Angel Gulermovich <agulermovich@artandlogic.com>
Thu 8/13/2020 10:17 AM

To:

- Sotelo, Justin@DCA

Dear Mr. or Dr. Sotelo,

I'm writing in support of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation. I have a very sweet dog who was born with severe scoliosis. She has had weekly rehab sessions for the four and a half years she has been with us, and will for the rest of her life. She is a happy, healthy dog who simply has a physical handicap, as some humans do. Her rehab sessions help keep her that way. Her therapy has always been under the supervision of a veterinarian. I consider this vital for her health and safety. I hope that this legislation becomes law.

Sincerely,

Angelique Gulermovich

In case this is needed for this email to count:
Angelique Gulermovich

PETER MILCOVICH <milco5@comcast.net>
Thu 8/13/2020 10:15 AM

To:

- Sotelo, Justin@DCA

Cc:

- PETER MILCOVICH <milco5@comcast.net>

Dear Sir, I am writing to support Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation. My dog had back surgery around 6 years ago. Luckily, Dr Erin Troy one of the founders of Animal Rehabilitation had a practice near where we live in Walnut Creek, CA. Her protocol was to meet with each family and dog that applied to be part of the physical rehab program. Through her expert diagnosis she was able to develop a totally competent program for the Physical Rehab Specialist to follow. Dr Troy often observed our dog's progress during the rehabilitation program. Through her expert eyes she changed some of the procedures to further advance our pet's progress. Thankfully our dog was able to make great progress and lived a very happy and complete life following a very major surgery. It is very vital that a Doctor oversee and be on site to make the necessary corrections to insure a successful outcome. Rehearsalab Specialists learn on the job and take unaccredited courses. That is great, but that certainly does not match a DVM specialist degree for Animal Veterinary care and Rehab Professionalism. **I strongly support Section 2038.5 of Article 4., Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation.**

Peter Milcovich

Mort Bauchman <mortpv@yahoo.com>
Thu 8/13/2020 10:13 AM

To:

- Sotelo, Justin@DCA

Cc:

- Jack Luftman <dentj10@yahoo.com>

Dear Mr. Sotelo,

We want to lend our support for Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation.

Very truly yours,

Mort & Peggy Bauchman

mona <monasdvm@aol.com>
Thu 8/13/2020 10:10 AM

To:

- Sotelo, Justin@DCA

Hi Mr. Sotelo,

I wish to voice my support to continue regulating direct on-site veterinary supervision to provide Animal Physical Rehabilitation services in California. It is important and safe to provide oversight to animal patients by licensed veterinarians, trained for disease and pain management on animal species, when administering therapeutic measures such as physical rehabilitation services.

Sincerely,
Mona S. Miller, DVM
CA license 10840
UC Davis School of Vet Med, Class of 1990

Koo Koo <koorodog1@gmail.com>
Thu 8/13/2020 9:54 AM

To:

- Sotelo, Justin@DCA

I would like to add my full support for Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations.

As an owner of a senior dog who has been and continues to be truly benefitting from weekly physical therapy, I sincerely believe much of the treatment would not be as effective or possible without involvement and oversight by the licensed veterinarian.

Veterinarian involvement also provides an added level of care for my pet beyond just the physical therapy. They have been able to help identify and provide additional medical advice for issues both related and unrelated to her treatments.

Overall, my pet's physical therapy would definitely not be as safe or successful if not for the oversight by the attending veterinarian. Only their involvement provides me with the comfort and assurance that my pet is in the best of hands.

Thank you.

Alison Hino

Carol Berry <cberry8@sbcglobal.net>
Thu 8/13/2020 9:50 AM

To:

- Sotelo, Justin@DCA

We are writing you today to demand safe care for your four-legged family members. We SUPPORT of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation. Our family members would not be mobile today without the rehabilitation experience provided by trained veterinary physical therapists.

Carol Berry and Mark Brooks

Alan Jones <arjones22@gmail.com>
Thu 8/13/2020 9:48 AM

To:

- Sotelo, Justin@DCA

I am writing to express my SUPPORT for Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation. It is important to have veterinarians involved in this activity.

Thank you,

Alan Jones

Timo Kiessling <timo.kiessling@gmail.com>
Thu 8/13/2020 9:47 AM

To:

- Sotelo, Justin@DCA

Dear Mr. Sotelo,

I am contacting you as I am concerned about some recent developments regarding Animal Physical Rehabilitation (APR) therapies in California. The health and welfare of animals should not be treated less or differently than the health and welfare of humans. There are hundreds of animal rights organizations world-wide fighting a long uphill battle to stop the abuse and neglect of animals. As human beings, we are the most advanced form of life on this planet. It is our duty to care for and protect all other forms of life. We have obviously failed already on many levels. In order to not further develop backwards as a society, we need to start making the right decisions. Please take a moment to think about what I said and consciously make a decision that will have a positive impact on the life of animals. Please approve Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation.

Thank you very much for your attention to this important matter.

Best regards,
Timo Kiessling

Kelly Fishman <drkelly@strutanimal.com>
Thu 8/13/2020 9:45 AM

To:

- Sotelo, Justin@DCA

FishmanVMB.pdf
40 KB

August 13th 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Veterinary Medical Board
1747 N. Market Boulevard, Suite 230
Sacramento, California 95834-2987

Via Email @ justin.sotelo@dca.ca.gov

Re: SUPPORT of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation

Hello,

I am submitting this letter in SUPPORT of Section 2038.5 related proposed animal physical rehabilitation regulation. I believe that any medical treatment, including physical therapy, should be directly supervised by a veterinarian.

I have observed several occurrences in my practice as a rehabilitation veterinarian that have demonstrated where a physical therapist has a lack of knowledge of veterinary medicine. A certification program is not the equivalent of doctorate. The 2 certification programs for canine rehabilitation provided to physical therapists do not teach a physical therapist how to perform CPR on an animal, triage of medical emergencies in animals, how to recognize cancer in animals, how to recognize pain in animals, and how to recognize the signs of any medical condition (such as hypothyroidism, urinary tract infections, pressure sores). In addition, a human patient is able to clearly communicate distress while our animal patients cannot, thus the need for veterinary supervision.

As a business owner of a mobile physical rehabilitation practice, I must abide by the VMB Minimum Standard Regulations that ensure the safety of the animals in my care. Physical therapists are unable to follow the VMB Minimum Standard Regulations because they do not have enough training to do so.

If there are changes allowing physical therapists to work with less veterinary supervision, how will the VMB ensure the safety of animals?

Sincerely,
Dr. Kelly Fishman DVM, CVA, CCRT
CA License Number 20777
Owner Kelly M. Fishman DVM Veterinary Corporation
70 Laidley Street

San Francisco CA 94131
415-691-0656

--

Kelly Fishman DVM, CVA, CCRT
Strut Animal Mobility Specialists
DrKelly@StrutAnimal.com

August 13th 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Veterinary Medical Board
1747 N. Market Boulevard, Suite 230
Sacramento, California 95834-2987

Via Email @ justin.sotelo@dca.ca.gov

Re: SUPPORT of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation

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If there are changes allowing physical therapists to work with less veterinary supervision, how will the VMB ensure the safety of animals?

Sincerely,

Dr. Kelly Fishman DVM, CVA, CCRT

CA License Number 20777

Owner Kelly M. Fishman DVM Veterinary Corporation

70 Laidley Street

San Francisco CA 94131

415-691-0656

Tedd Rosenfeld <teddr@me.com>
Thu 8/13/2020 9:45 AM

To:

- Sotelo, Justin@DCA

Cc:

- jwaldman@calanimalrehab.com

Good morning Justin,

I SUPPORT of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of

Thank you,
Tedd Rosenfeld

carolyn mueller <coremueller@gmail.com>
Thu 8/13/2020 9:44 AM

To:

- Sotelo, Justin@DCA

Please!!!!

SUPPORT of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation

I am applaud at the thought of leaving my dog with a PT without a certified Vet. on the premise. When humans need help we have both certified PT's and Doctors on the premise! Why should we treat our dogs otherwise?

Again I urge you to support the above legislation with both PT and Vets on the premise...the safest way.

Thank you for your time

Carolyn

--

Carolyn Mueller MA, PMA-CPT
Corekinetics Pilates
www.corekinetics.com

--

Carolyn Mueller MA, PMA-CPT
Corekinetics Pilates
www.corekinetics.com

emcafee@calanimalrehab.com
Thu 8/13/2020 9:42 AM

To:

- Sotelo, Justin@DCA

Hi Justin,

I am writing in support of keeping the law requiring a veterinarian to supervise animal rehabilitation. I strongly believe this is an essential part of keeping animals healthy and safe during their treatment. First, it is essential to have a proper diagnosis to know what you are treating, which can only be obtained by a veterinarian. There are also multiple cases that require emergency treatment. Prescribing and adjusting medications is a large part of our day to day work in rehab medicine too, and it is helpful to have the same person prescribing/adjusting the medication that is the one seeing the patient each treatment.

As a personal aside, I know in human medicine physical therapists are allowed to treat without a prescription from a doctor. I personally had a terrible experience with this - my mother-in-law saw a physical therapist for a problem and the PT said she should cancel her doctor's appointment because it could be treated just with PT. So she canceled the doctor's appointment and tried PT for months before finally going to the doctor... and finding out the problem was cancer. The cancer had spread, and I can't help but wonder if she would still be with us today if she had been under a doctor's care months earlier before trying only PT.

I feel like this is way more likely to happen in veterinary rehabilitation, because animals can't speak and they need someone very qualified in diagnosing medical conditions to figure out what the problem is before trying rehabilitation.

I thank you very much for considering my opinion on this matter. I feel very strongly about it, and I really appreciate your time!

Dr. Elisa McAfee, DVM
Associate Veterinarian
California Animal Rehabilitation

Michelle McGowan <shella.mcgowan@gmail.com>
Thu 8/13/2020 9:36 AM

To:

- Sotelo, Justin@DCA

Dear Justin,

I am writing today to express my strong **SUPPORT** of **Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation**. I feel it is critical to have professional oversight when our furry four legged family members are receiving their veterinary care.

Thank you for your consideration.

Sincerely,
Michelle McGowan

Diane DeStefano <dianedestefano@gmail.com>
Thu 8/13/2020 9:34 AM

To:

- Sotelo, Justin@DCA

Dear Justin,

I am in support of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation. As a volunteer at the West LA Shelter, I have brought many dogs to APR, and I would never feel comfortable bringing any animal to be treated for serious physical therapy without having a vet present.

It is too easy for completely unqualified people to cause injury to our beloved pets.

Thank you,
Diane DeStefano
310-850-5322
Los Angeles, CA 90025

Diane DeStefano
Producer - Unscripted TV
dianedestefano@gmail.com

David McAfee <d.mcafee712@gmail.com>
Thu 8/13/2020 9:31 AM

To:

- Sotelo, Justin@DCA

Hello,

I would like to express my support of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation.

I can speak to this personally - my mother had gone to physical rehab for a condition, and due to the lack of regulations for physical medicine in humans, she was not required to see a doctor, or for her PT to be supervised by a physician at any point. As a result, the physical therapist incorrectly diagnosed her with a prolapse, and treated her for that condition. She went to months of PT, but eventually, the condition worsened and by the time she sought out the opinion of a doctor, it turns out she had cancer that had evolved all the way to Stage 3. She died from this condition, but I believe her likelihood of surviving could have greatly improved had a doctor assessed the situation immediately when she arrived for PT.

Please consider this my STRONG support that Animal Physical Rehabilitation (APR) will be supervised by veterinarians.

Thank you for your time,

David

Mary Jane Sturm <fan3cy@comcast.net>
Thu 8/13/2020 9:30 AM

To:

- Sotelo, Justin@DCA

I am writing to express my belief that any animal receiving rehab must have a veterinarian on duty. Rehab has been a part of my life as a boxer owner for the past 50 years. The problems that can and do arise during rehab are often life threatening. Having a veterinarian on duty has and will save lives. Please do NOT water down the veterinary rehab bill that is currently before you.

Thank you for your support. We are counting on your assistance.

Sincerely

Mary Lee Carey

Lori Polkowski <lpolkowski@calanimalrehab.com>
Thu 8/13/2020 9:29 AM

To:

- Sotelo, Justin@DCA

I am writing in support of this approval. I am a veterinarian that has been practicing for 16 years. I worked as an emergency and regular veterinarian for 10 years, and rehabilitation therapy for 6 years. I am appalled to think that an individual that was schooled for treating humans would be able to treat animals without veterinary supervision. That is absolutely disastrous. I am a veterinarian and would not start practicing on humans for the same reasons. I have worked with human physical therapists who are great with humans, but this does not translate to working with animals and I have seen several mistakes made by them, along with missing key problems and major medical issues that were misdiagnosed as orthopedic or neurologic in nature. Not only that, but they are not trained in animal behavior, how animals communicate pain and even signs to warn them about animals biting and animal handling. Just last week, I had a physical therapist tell me they 'are not worried about getting bit by animals, even cats'. This clearly shows how poor their knowledge is on this subject as cat bites can cause infections that are deadly.

For the protection of animals, also of the owners of these animals I support this and absolutely never want to see a human physical therapist practicing without veterinary supervision. I support Animal Physical Rehabilitation to be supervised by veterinarians.

Thank you,

Dr. Lori Polkowski
Veterinarian
Certified Canine Rehabilitation Therapist
Certified Veterinary Acupuncturist
California Animal Rehabilitation
2237 Colby Avenue, Los Angeles, CA 90064

Catherine Louise Spicer <clspicer310@comcast.net>
Thu 8/13/2020 9:27 AM

To:

- Sotelo, Justin@DCA

To Whom it may concern:

I agree with the California Veterinary Medical Board (CVMB) that Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation must be supported. I am not a professional in that field, but I care very much about the quality of care that animals receive and won't stand by and see it degraded and in the hands of people who are not trained.

I fully support those professionals who are standing up for this to ensure quality care for animals.

Thank you,

Catherine Spicer

Meredith <mergpv@aol.com>
Thu 8/13/2020 9:25 AM

To:

- Sotelo, Justin@DCA

I demand safe care for Pets. I SUPPORT of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation.

Meredith Gibbs
3242 Parkhurst Dr
Rancho Palos Verdes
California 90275

Kristen Hagler RVT CCRP <goldengaitk9@gmail.com>
Thu 8/13/2020 9:25 AM

To:

- Sotelo, Justin@DCA

2020 August 07 Reg Support LETTER.pdf
70 KB

Please find my full statement in SUPPORT of the regulations being discussed.

Thank you.

-Kristen

Kristen L. Hagler BS RVT VTS (Physical Rehabilitation) CCRP CVPP OACM CBW VCC

Academy of Physical Rehabilitation Veterinary Technicians

CEO & President

Organizing Committee Credentialing and Case Review Chair

www.aprvt.com

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August 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov
Timothy.Rodda@dca.ca.gov
DCA.DirectorsOffice@dca.ca.gov
PT@dca.ca.gov
vmb@dca.ca.gov

RE: VETERINARY SUPPORT TO CA VMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

As a registered veterinary technician (RVT) in California, I have been monitoring this issue closely for years and have been repeatedly disappointed with the egregious attempts from opposing individuals and groups to undermine the regulatory authority of the Board, the restricted healthcare duties assigned to the RVT in California and mandate additional training in a single specialty (advanced certification) in veterinary medicine. I am a licensed registered veterinary technician (lic#6298) in California and a member of the CVMA and CaRVTA. I am submitting this letter to SUPPORT the proposed animal physical rehabilitation regulations. the CaVMB definition of animal rehabilitation as the practice of veterinary medicine which is consistent with language from the American Veterinary Medical Association and other national organizations. A licensed physical therapist with advanced training on animals does not need more reasonable guidelines, job opportunities and the ability to earn a living are not dramatically reduced by the language, and consumer access to care is not restricted. This regulation is most certainly not a restraint of the trade for a physical therapist because of the proposed language.

It is clear that the specialty field of animal physical rehabilitation continues to emerge, needs oversight and regulation to protect the consumer and their animals and the California Veterinary Medical Board has pursued regulatory language to continue on with the inclusion of licensed physical therapists wishing to provide services to animals. The veterinarian's I work with (directly and indirectly) currently have the ability to foster inter-professional relationships, collaboration is not currently hindered, and the consumer's ability to access these professionals is not restricted.

The regulation of licensed physical therapists working in veterinary medicine in California is currently recognized as an 'veterinary assistant' and subjects them to work under direct supervision of a veterinarian and in a veterinarian's hospital/clinic which is in the best interests of consumer protection, harm reduction and patient safety. As a registered veterinary technician working with licensed veterinarians, we are able to access a trained physical therapist, if deemed necessary or desired, by having them physically in our facility which enables oversight, an appropriate level of supervision, monitoring patient response to prescribed treatment, and of utmost importance responding to medical emergencies should they arise.

The veterinarian is to evaluate, diagnose, and determine the best course of treatment. It is not within the currently regulatory language, nor appropriate, to send patients to an animal physical therapist without an individual licensed by the CA VMB directly on site. While I recognize the majority of veterinarians do not have the same skillset as a licensed physical therapist, in converse, the physical therapist does not have the skillset to evaluate and respond to animal medical needs. At a minimum, a registered veterinary technician should be directly accessible to address medical needs of the animal patient and protect consumers from potential harm. It is the highest standard of professional medical care for veterinarians to be able to refer patients for

professional services by those who are competent in this specialty to a facility with a veterinarian and physical therapist, who both have appropriate training and knowledge. I have personally seen the differences in outcomes from the services of a licensed physical therapist certified in canine rehabilitation working without direct supervision of a veterinarian and those who have provided services with direct supervision of a veterinarian and therefore recognize the important role these professionals play in the care and well-being of our companion animals.

I urge you to put a stop to any regulatory effort that drastically changes the supervision level from direct to indirect supervision, redefines referral methods to paraprofessional healthcare providers (such as the physical therapist), the creation of supplementary categories of individuals who may provide services (animal physical rehabilitation assistant) and any language which may undermine the current title protection and duties of the registered veterinary technician. Specifically, qualified and licensed physical therapists should continue to work under the direct supervision of a veterinarian. Do not allow them to work on animals at a facility not overseen by a veterinarian after a veterinarian has established a Veterinary-Client-Patient-Relationship (VCPR) or make a “physical therapy” diagnosis, and hire unlicensed or untrained assistants to perform therapies on animals. Allowing qualified physical therapists to practice on their own animal physical rehabilitation premises under indirect supervision would NOT further increase safe access for consumers. Veterinarians have been collaborating with other licensed professionals of their choice, while simultaneously protecting the consumer, within the boundaries of their facilities or by direct supervision for decades. This approach is consistent with the CA VMB’s current regulatory language, the outcome of the 2018 Appropriations committee failure to pass AB 3013, and the CVMA position. Additionally, using recommendations consistent with the other states that have gone before us (like Colorado, Nevada and Nebraska) is not in the best interests of California regulatory law in general because our state is unique with demographics, geography and existing approaches to medicine. Inclusion of properly qualified and licensed physical therapists in the Veterinary Practice Act is already encompassed by utilizing the “veterinary assistant” terminology and creation of additional definitions is redundant to our profession and is confusing to the consumer.

The issue of animal physical rehabilitation has been going on for far too long and legislative “remedies” have required extensive effort and time without a clear resolution (akin to AB 3013—the Animal Physical Rehabilitation Bill of 2018). Should there be a legislative fix, based on a collaborative effort between both professions, to include a licensed professional regulated by the CA VMB I would support such a change. For example, an animal physical rehabilitation facility where the CA licensed veterinarian establishes the VCPR provides services with the support of a registered veterinary technician and a qualified and licensed physical therapist. This is a reasonable compromise for both professions and consumers protection and reduction of harm to the animal patient is mitigated. Please note – at the end of this email is my public comment for the hearing on August 13, 2020.

Sincerely,



Kristen Hagler BS RVT VTS (Physical Rehabilitation) CCRP CVPP OACM CBW VCC
PO BOX 875
Cotati, CA 94903
GoldenGaitK9@Gmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Siefertman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Thank you for the time to speak today. My name is Kristen Hagler. I am a California RVT with 20 years of experience in animal rehabilitation holding multiple credentials and board certifications. I am president of a international technician specialty organization recognized by the American veterinary governing bodies and am considered an exceptionally qualified subject matter expert. I support the regulations for animal rehabilitation as proposed.

Consumer Access

Consumer access for rehabilitation and pain management has grown since the early 2000's. In California there are a combined number of nearly 190 veterinarians and registered veterinary technicians, if not more, who have completed advanced coursework or board specialty recognition in rehabilitation and pain management.

In comparison, Veterinary Ophthalmology, founded FIFTY years ago has only 20 board certified veterinarians listed in the state of California. Why aren't human ophthalmologists here lobbying to treat animals and increase consumer access? Aren't they just as qualified to treat pets using the same arguments of consumer protection, access and safety? What would stop them from doing so if these regulations are changed yet again? Precedents must be evaluated carefully.

Violation of current regulations and lack of training: RVT Protected Duties

Opposing these regulations violates RVT and DVM protected job duties. Physical Therapists will be allowed to place/replace splints, perform castings on animals and prescribe a brace without direct supervision of a DVM. Improper placement of a medical appliance can cause significant or permanent harm and is being done to animals. I have experienced this with several patients in our practice where an ill-fitting brace was prescribed by a non-veterinarian and the dog developed permanent nerve injury and chronic pain. A weekend course in brace/splint or casting does not guarantee a non-veterinarians ability to perform this task on animals safely without supervision.

In closing, pets need help, a lot. Injuries and medical attention are needed frequently.

Accidents happen: Young dog exercising in underwater treadmill. Dog suddenly decides to stop walking and gets off course and gets the skin on his ankle stuck in a crevice between the treadmill belt and metal platings. He suffers an injury to his ankle which was immediately treated, reducing pain and long term damage.

Conditions go unnoticed by pet owners: A middle aged dog with severe weakness in the rear legs comes in for regular hydrotherapy and I immediately notice it's slightly swollen abdomen. Owners haven't noticed anything different and casually mention the pet has been a little slower and the bladder is difficult to release. In reality the bladder is the size of a small watermelon; in danger of bursting at any moment killing the pet. Immediate attention by a veterinarian saved her life.

I challenge a non-veterinarian and members of the public to recognize the subtle abnormalities in animals that pet parents are unaware of but are obvious to the RVT or DVM or effectively deal with an emergency. If you don't know what to look for, imagine all the things that are going unnoticed.

Matthew Vatandoust <mvatandoust@outlook.com>
Thu 8/13/2020 9:24 AM

To:

- Sotelo, Justin@DCA

I am a supportive of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations related to Animal Physical Rehabilitation.

Sincerely,

Matthew Vatandoust

Curran Leigh <leighcurran1@gmail.com>
Thu 8/13/2020 9:21 AM

To:

- Sotelo, Justin@DCA

.....

My dog was losing the use of his hind legs and has been undergoing rehabilitation in the care of an outstanding vet, physical therapist and acupuncturist. The progress he's made has been remarkable. If it weren't for the careful attention he's been getting from the vet while undergoing his therapies I doubt he would have made much progress at all. For these reasons and more my dog and I demand safe care and SUPPORT Section 2038.5 of Article 4, Division 20, Title 16 of the CA Code of Regulations related to Animal Physical Rehabilitation.

Thank you,

Leigh Curran

Mike Aragon <maragon705@yahoo.com>
Thu 8/13/2020 9:21 AM

To:

- Sotelo, Justin@DCA

To whom it may concern,

I hope this email is not too late. **I support the approval of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation.**

I personally feel more at ease if a licensed veterinarian is on site during APR therapy on my dog. I have had one dog who had required therapy while recovering from injuries late in life and I just felt more comfortable knowing that a veterinarian was on site at the facility during her sessions.

Very soon a second dog of mine is going to need physical therapy to help her recover from TPLO surgery and knowing that there will be a licensed veterinarian on premises in case something happened makes me feel a lot safer. There are accidents that can happen during the course of treatment that a Physical Therapist may not have the training or knowledge how to treat so just having that licensed veterinarian nearby to assist I know is a very important factor for me and I'm sure other people.

So once again I support the approval of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation.

Thank you for your time.

Sincerely Mike Aragon

Jade Tai-Kiessling <jade.taikiessling@pearllawgroup.com>
Thu 8/13/2020 9:20 AM

To:

- Sotelo, Justin@DCA

As a current dog owner and a lifelong owner of animals, I am in full support of having a professional veterinary team on-site during APR therapies.

A veterinarian holds **at least 8 to 10 years** of medical knowledge and training to make a diagnosis of the animal's medical condition and is able to determine whether the rehabilitation will be harmful or beneficial to the animal patient. A physical therapist who holds only **40 hours** of unaccredited training does not have comparable knowledge of medical conditions or knowledge on how to handle sudden medical changes or emergencies during rehabilitation appointments. It would be potentially harmful to the animal if the wrong diagnosis is made. My responsibility as a dog owner is to ensure that my dog receives the best medical care and I entrust veterinary professionals with this care. I would not feel comfortable handing him over to a physical therapist without any veterinary oversight and input – this would be like rolling the dice, crossing my fingers, and “hoping for the best,” which goes completely against everything I stand for as a pet owner. **It is inherently dangerous and irresponsible for physical rehabilitation to occur without oversight from a veterinary professional.**

Jade Tai-Kiessling

Case Manager, Pearl Law Group

In association with Pearl Immigration

tinavmoran@comcast.net
Thu 8/13/2020 9:17 AM

To:

- Sotelo, Justin@DCA

Cc:

- tinavmoran@comcast.net

Dear Mr. Sotelo,

I am in SUPPORT of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation.

Thank you,

Tina Moran
tinavmoran@comcast.net

Mary Jane Sturm <fan3cy@comcast.net>
Thu 8/13/2020 9:15 AM

To:

- Sotelo, Justin@DCA

Dear Sir:

I am an 86 year old retired teacher who has been responsible for the health of my many dogs for the past 65 years. The care received by every one of them by a professional veterinary team with adequate training has always been one of the most important things in my life.

It is urgent to me, for the continued safety of all of our animals, that we join together to support the approval of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation.

Thank you very much.

Mary Jane Sturm

Angie (Xin) Huang <angexh@gmail.com>
Thu 8/13/2020 9:15 AM

To:

- Sotelo, Justin@DCA

I am submitting this letter in SUPPORT of Section 2038.5 related proposed animal physical rehabilitation regulations.

The field of animal physical rehabilitation needs oversight and regulation by a veterinarian to protect me as the consumer and my animals.

Allowing licensed physical therapists to work unsupervised or without direct supervision negatively impacts me as a consumer as I would have to take additional time and spend additional money on follow up care with a veterinarian related to my pet developing infections and pain. Most importantly, this risks my pet's safety!

I ask for you to uphold Section 2038.5 and to pursue proper legislative remedies that help animals get the care they need, where they need it in California.

Sincerely,
Angie Huang

Nami Park <npark1@gmail.com>
Thu 8/13/2020 9:14 AM

To:

- Sotelo, Justin@DCA

.....

Dear Mr. Sotelo,

I am writing to state that I STRONGLY support the above. And to be clear it is support of Section 2038.5, Article 4, Division 20, Title 16 of the CA Code of Regulations, related to Animal Physical Rehabilitation. Having had to use services of a rehabilitation veterinarian in the past years with my two dogs, I understand the value of having the services being supervised by a licensed veterinarian. In both my dogs, she was able to diagnose medical issues outside of the original reason for her services. One was sadly, life-threatening.

Regards,
Ms. Park

Mary Lou Rane <drmarylourane@gmail.com>
Thu 8/13/2020 9:13 AM

To:

- Sotelo, Justin@DCA

Hello! I demand safe care for my pets and all animals and support Section 2038.5 of Article 4, Division 20, Title 16. Thank you so much for helping us achieve our hearts desire for this!

Mary Lou Rane, PhD

Nushin Shir <shirdds@yahoo.com>
Thu 8/13/2020 9:13 AM

To:

- Sotelo, Justin@DCA

.....

Dear Mr. Sotelo:

Hereby, I emphasize and support of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation.

As a healthcare provider myself, I emphasize the necessity of having a certified and qualified veterinarian present for all the physical therapy and related treatments on all animals and pets – as they are more than a pet, they are members of our families.

Thank you,

Nushin Shir, DDS, MPH

Home <blondie_13@comcast.net>
Thu 8/13/2020 9:12 AM

To:
Sotelo, Justin@DCA

.....
Please, please, please STOP this madness. I thought after the meetings in 2017 that this was over - the human PT's wanting to do therapy on animal clients without the care of a veterinarian on site. This is a plea to make a final decision to leave the care of our animals to those who are qualified, have trained, get continuing education for it...!

At the public hearing in 2017, I spoke about my first dog Gretchen who at 11 years old was diagnosed with osteocarcinoma. She was 2 weeks shy of 13 y.o. when she crossed the rainbow bridge.

I did a google search for pet therapy and found The Canine Rehabilitation Center/Muller Veterinary Hospital in Walnut Creek to help her with walking and pain management.

Gretchen was doing hydrotherapy when she collapsed. The PT rang the alarm. I opened the door to the tank and picked her head up out of the water. Before I could get her out of the tank, there were 5 people (vets and vet techs) picking her up and taking her into the hospital. They stabilized her, gave her warm air and brought me back to see her. They took X-rays and told me that the cancer was systemic. I called my parents to ask if they wanted to come see her. Laying there, she kept lifting her head to look at the three of us and give us kisses and then we let her go. It actually brings me to tears remembering and writing this but I am so thankful that we all got to say goodbye to her.

Had this been done at someone's home, in their garage, not under the care of a vet and in a vet hospital, Gretchen would not have received the care that she did nor would my family and I have been able to say our goodbyes and let her cross the rainbow bridge peacefully.

So, please, find for the best treatment and care of animals which would require physical rehabilitation to be in the proper facility under the care of a properly trained and qualified animal PT's with a veterinarian on site.

Thank you,
Susie Abel and in memory of Gretchen

Ruth A Combs <rarc2@verizon.net>
Thu 8/13/2020 9:11 AM

To:

- Sotelo, Justin@DCA

.....

To Justin Sotelo,

I am sending this in SUPPORT of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation. Following are my reasons why.

I have been using animal Physical Therapy for over 10 years. I started with a well intentioned place, with no on staff veterinarian. Two different times, I needed to make a separate appointment with my regular vet, just to get pain medications regulated and to address new issues arising during the process. A loss of time and money and discomfort to my dog. I then began to go to a veterinarian supervised facility, where over the years, they have literally saved one of my dogs life, by recognizing and treating immediately an infection that could have cost the dog her leg.

My Rottweiler with bone cancer and a torn cruciate ligament was kept comfortable and pain managed because the Doctor on staff was able to recognize complications, and promptly administer the medications he needed. Truly a blessing.

I am involved in rescue. I had one dog that was abandoned with a dislocated hip and required FHO surgery, which he got. I was then able to take him to Rehab where his progress, pain levels and over all health was constantly monitored and adjusted as needed. That would not have been possible were a Veterinarian not been present to supervise his healing.

Overall, having Doctor supervised clinic, saves money, time, and most of all pet welfare and wellbeing. That SHOULD be the standard, or REMAIN the standard in all Animal Physical Rehabilitation facilities. We definitely need the Physical Therapists and the amazing work they do, but we need the Veterinarians to be present.

Thank you for your time,
Ruthie Combs

Gwen <rubiwang@aol.com>
Thu 8/13/2020 9:10 AM

To:

- Sotelo, Justin@DCA

Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations related to Animal Physical rehabilitation

I am writing to ensure that our pets medical care remains under the oversight of veterinarians.

Please let me know if there is anything else I can do to make sure that this happens?

Thank you

Gwen Rubin

Amy Kopf <amykopf913@gmail.com>
Thu 8/13/2020 9:08 AM

To:

- Sotelo, Justin@DCA

August 13th 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Veterinary Medical Board
1747 N. Market Boulevard, Suite 230
Sacramento, California 95834-2987

I am submitting this letter in SUPPORT of Section 2038.5 related proposed animal physical rehabilitation regulations.

The field of animal physical rehabilitation needs oversight and regulation by a veterinarian to protect me as the consumer and my animals.

Allowing licensed physical therapists to work unsupervised or without direct supervision negatively impacts me as a consumer as I would have to take additional time and spend additional money on follow up care with a veterinarian related to my pet developing infections and pain. Most importantly, this risks my pet's safety!

I ask for you to uphold Section 2038.5 and to pursue proper legislative remedies that help animals get the care they need, where they need it in California.

Sincerely,
Amy Kopf

CYNTHIA MCCUNE <cymccune@comcast.net>
Thu 8/13/2020 9:08 AM

To:

- Sotelo, Justin@DCA

Dear Mr. Sotelo –

I'm writing to you to express my support of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation. I believe that the presence of a veterinarian on site is vital to provide the standard of care that my pet deserves as well as help ensure my pets wellbeing. I wouldn't ask for anything less for myself, a child or my furry child. I've taken my dog to rehabilitation therapy for years now because of chronic, debilitating joint and mobility issues. Her therapists work in partnership with her veterinarians (she actually has two) continually, consult regularly and adjust treatment often to ensure her comfort and safety.

Thank you for your time.

Cindy McCune

Shannon Green <shannonrosegreen@gmail.com>
Thu 8/13/2020 9:07 AM

To:

- Sotelo, Justin@DCA

August 13th 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Veterinary Medical Board
1747 N. Market Boulevard, Suite 230
Sacramento, California 95834-2987

Re: SUPPORT of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation

I am submitting this letter in SUPPORT of Section 2038.5 related proposed animal physical rehabilitation regulations.

I am a very devoted pet owner and diligent in making sure that my pets are provided with the best veterinary care possible.

The field of animal physical rehabilitation needs oversight and regulation by a veterinarian to protect me as the consumer and my animals, which are family members to me.

Allowing licensed physical therapists to work unsupervised or without direct supervision is irresponsible and would negatively impact me as a consumer. I would have to take additional time and spend additional money on follow up care with a veterinarian related to my pet developing infections and pain. Most importantly, this risks my pet's safety! Licensed physical therapist are not veterinarian's and are not trained to identify symptoms and signs of pain, infection, respiratory distress and general anatomy of various species of household pets. I ask for you to uphold Section 2038.5 and to pursue proper legislative remedies that help animals get the care they need, where they need it in California.

Sincerely,
Shannon Green

Kimberly <kberlyk75@gmail.com>
Thu 8/13/2020 9:07 AM

To:

- Sotelo, Justin@DCA

I want to express my SUPPORT of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation.

Animals do not have a voice if things go wrong. Supervision and consultation are important from a veterinarian given the physical therapists don't have the same training.

Kimberly Kerlin

Juan M Solis <juan@calanimalrehab.com>
Thu 8/13/2020 9:06 AM

To:

- Sotelo, Justin@DCA

Hi,

I strongly agreed in passing this important measure to safeguard the wellbeing of our Pets for Physicals Rehabilitation. Therefore, Myself working in this field, I find it very important to have a DVM on site whenever animal rehabilitation is performed. I have seen it, time and time again, where we found possible issue on pets related or non-related to animal physicals rehabilitation and the owners need a qualify professional to dictate their best advice to treat their pets.

" support the approval of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation."

Best regards,

**Juan Solis
Therapy-Aide
juan@calanimalrehab.com**

Siv M C Modler <sivmc.modler@gmail.com>
Thu 8/13/2020 9:05 AM

To:

- Sotelo, Justin@DCA

August 13th 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Veterinary Medical Board
1747 N. Market Boulevard, Suite 230
Sacramento, California 95834-2987

Re: SUPPORT of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation

I am submitting this letter in SUPPORT of Section 2038.5 related proposed animal physical rehabilitation regulations.

The field of animal physical rehabilitation needs oversight and regulation by a veterinarian to protect me as the consumer and my animals.

Allowing licensed physical therapists to work unsupervised or without direct supervision negatively impacts me as a consumer as I would have to take additional time and spend additional money on follow up care with a veterinarian related to my pet developing infections and pain. Most importantly, this risks my pet's safety!

I ask for you to uphold Section 2038.5 and to pursue proper legislative remedies that help animals get the care they need, where they need it in California.

Sincerely,

Siv

Siv Modler

Melissa Blanc <melissablanc@sbcglobal.net>
Thu 8/13/2020 9:04 AM

To:

- Sotelo, Justin@DCA

Hi Justin,

I believe as a RVT myself, that veterinarians and RVTs with CCRP certification are the best to take care of our pets. I am in SUPPORT of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation.

Hoping for the best outcome with our veterinarian and RVT's taking care of our pets.

Thank you for taking the time and effort for this great cause.

Melissa Blanc, RVT

Julie Burnet <julie.burnet@earthlink.net>
Thu 8/13/2020 9:02 AM

To:

- Sotelo, Justin@DCA

Dear Justin,

Please note I am 100% in support of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations related to Animal Physical Rehabilitation. A veterinarian SHOULD be on site and supervising an APR at all times.

Thank you for your consideration.

Julie Burnet

Mary Rose Cafiero <mcafiero@hotmail.com>
Thu 8/13/2020 9:01 AM

To:

- Sotelo, Justin@DCA

August 13, 2020

Re: SUPPORT of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation

I am submitting this letter in SUPPORT of Section 2038.5 related proposed animal physical rehabilitation regulations.

The field of animal physical rehabilitation needs oversight and regulation by a veterinarian to protect me as the consumer and my animals.

Allowing licensed physical therapists to work unsupervised or without direct supervision negatively impacts me as a consumer as I would have to take additional time and spend additional money on follow up care with a veterinarian related to my pet developing infections and pain. Most importantly, this risks my pet's safety!

I ask for you to uphold Section 2038.5 and to pursue proper legislative remedies that help animals get the care they need, where they need it in California.

Sincerely,

Mary Cafiero

Krista Sutton <krista.sutton@gmail.com>
Thu 8/13/2020 9:01 AM

To:

- Sotelo, Justin@DCA

SUPPORT of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation

Krista Sutton

Brock Bartimus <brock@calanimalrehab.com>
Thu 8/13/2020 9:00 AM

To:

- Sotelo, Justin@DCA

.....

Hello,

I am writing to express my support for the proposed language that Animal Physical Rehabilitation must be supervised by a veterinarian. As a person who has worked in an animal rehabilitation clinic for 7 years, I have first hand witnessed many times that a veterinarian was needed while a pet was in a physical therapy session with a physical therapist and an assistant. There are often times veterinarians here need to check vitals or intervene in the session, sometimes that can include sending the pet to the emergency room. I think it is safest for all involved to have a veterinarian supervising Animal Physical Rehabilitation.

Best,

Brock Bartimus
Clinic Manager
California Animal Rehabilitation
2237 Colby Avenue, Los Angeles, CA 90036

Julia Tomlinson <drjulia@tcrehab.com>
Thu 8/13/2020 8:52 AM

To:

- Sotelo, Justin@DCA

california letter 2020.doc
661 KB

Please see the attached letter in support of Section 2038.5 thank you.

Julia

Julia Tomlinson BVSc MS PhD DACVS
Diplomate, American College of Veterinary Sports Medicine & Rehabilitation (Specialist)
Twin Cities Animal Rehabilitation & Sports Medicine Clinic,
VROMP | *Veterinary Rehabilitation & Orthopedic Medicine Partners* practice

12010 Riverwood Dr, Burnsville MN 55337
www.tcrehab.com #952-224-9354 fax # 952-224-9194

Co-founder, Veterinary Rehabilitation & Orthopedic Medicine Partners
Founder, American Association of Rehabilitation Veterinarians

August 13, 2020

To whom it may concern,

I was asked to provide a few examples from my practice, illustrating why a veterinarian always needs to be supervising rehabilitation in the clinic. Below are examples from the past years. Many of these dogs had been cleared for rehabilitation by their regular veterinarian; because animals hide ill health well, and concerning symptoms show up quickly, in order to save lives, maintain public health, health of the animal population, and adhere to our oath to animal welfare, we need to be monitoring cases during rehabilitation even if they have been referred and cleared by a veterinarian. It is not a case of 'this would have been missed anyway', we are making physical demands on our rehabilitation patients, so issues tend to be easily unmasked, and our physical challenges can unveil problems that need immediate attention.

Case examples of emergencies:

Just two days ago we had an elderly Beagle mix come in for therapy and the veterinary technician noted his abdomen looked bigger than usual (he is overweight so the change was subtle). She alerted me (the veterinarian) and we quickly imaged the dog discovering he had bloated. We got him to the emergency clinic within 20 min which for bloat can mean the difference between life and death.

Last week we had a mixed breed female dog who has arthritis come in for the first therapy session and she was panting a lot. She had seemed fine, had eaten that AM and her owner thought she was just a little car sick. Her pulse was rapid and bounding and her gums an injected color. She went to the emergency clinic and was diagnosed with severe hypertension, was hospitalized overnight.

A German Shepherd older dog with arthritis in multiple joints presented for first hydrotherapy, looked lethargic and on physical was found to have an acute bleed from a ruptured spleen, we got him to emergency fast and he survived as his spleen was removed.

A Corgi with degenerative myelopathy who was lethargic on therapy day, pale gums, had immune mediated hemolytic anemia. Her blood count was dangerously low, symptoms mild considering, we got her in treatment and she responded well.

A Pug with spinal cord disease who was on a medication for inflammatory bowel disease was walking slower than usual during therapy. The veterinary technician sensed something was really wrong and pulled me aside for examination. Fast pulse rate, thoracic auscultation normal, pale mucous membranes. Loose dark stools that AM – he was referred to the emergency clinic and had an acute intestinal bleed associated with his medications. He had to have blood transfusions. Exercise while anemic had unmasked his issue.

We have come across various cardiac issues found on examination after looking a 'little tired' during therapeutic exercises. An example is an English Bulldog with hip and elbow arthritis was panting a lot during her visits to us even though we were working with low stress handling and using modalities not strenuous exercise therapy. On auscultation her heart rate was 320bpm, she was referred to the University on an urgent basis and diagnosed with cardiomyopathy.

Over the past year we have had four cases of osteosarcoma, synovial cell tumor, or fibrosarcoma that presented for osteoarthritis and stiffness. As you may be aware, in particular with osteosarcoma, prolonging survival is dependent on rapid detection. Regular DVMs can clear an animal for rehabilitation, then the animal can present months afterward (because the client acted slowly), by this time an undetectable problem becomes a detectable one, but only to the trained eye.

We have had seizures in clinic, several due to brain tumors but some idiopathic. Dogs and cats were referred for ataxia (wobbliness) and for strengthening.

A senior dog was being seen by a human trained therapist and she suggested the supplement melatonin to help the dog with nighttime sleep issues. This dog was already taking seligiline, prescribed by the regular vet, who did not know about the melatonin. The dog presented to me for second opinion after having begun tremors, collapse and hyperexcitability – a known interaction of the two substances.

Other less emergent issues are still very important:

Spread of infection is a big concern, small wounds can carry resistant, destructive bacteria. Wound management is not a significant part of any rehabilitation training for non-veterinarians, and our veterinary patients are not usually susceptible to the bacteria humans are, symptoms can differ. However, animals can be a source of infection for humans in the home (zoonoses). Different management, care regarding contamination of equipment, and advice regarding cross-species infection is not part of rehabilitation training, it is part of veterinary training. Wounds occur secondary to bandages, braces, orthoses and prosthesis. None of these should be managed without direct veterinary oversight, yet they are considered part of animal rehabilitation. Ringworm can spread through a house rapidly and symptoms in some dogs can be just light scaling. Even wound that appear to have healed can be a risk, and understanding the veterinary history is of paramount importance, especially when using water therapy. We have had dogs that are carriers for methicillin resistant staphylococcus pseudointermedius (different to the human flesh-eating bacteria, but a very important veterinary health concern) and had we not halted all rehabilitation and cultured the healed wound site, our equipment could have transmitted infection easily to other dogs. A non-veterinarian would likely have taken care to wash their hands but would not have realized the risks of the infection from the skin around the healed wound, would not have identified the problem as the wound had healed and would not have understood the risk of equipment contamination. Dogs with anal sac abscesses have been referred, and their infected anal sac has the potential to contaminate the clinic. This is not immediately obvious and requires veterinary rectal exam to diagnose, it does cause an uncomfortable gait.

We see frequent urinary tract infections in dogs and cats with disabilities, the pain of an infection can cause a marked worsening of mobility, but there is also the risk of contamination of equipment. It is not immediately obvious to a non-veterinarian that a patient is infected. There are also issues of urinary retention (blockage) which can lead to kidney damage and can happen suddenly, even after appearing normal to the referring veterinarian.

Systemic hormonal issues can have a marked effect on a patient's ability to heal, it is one way to recognize thyroid disorders, so rehabilitation veterinarians are often the first veterinarian to recognize the issue and institute treatment (poor healing of ligament and tendon injuries for example).

A problem we run into in my state, is that once a patient is cleared by their primary care veterinarian for routine chiropractic, the client will not only see the chiropractor for routine care, they will also see the as first line of care after an accident or a sudden worsening of symptoms. This is legal under the chiropractic practice act and questionable, but likely legal under the veterinary medical board because a veterinarian cleared the animal for "routine care". Because of the limited knowledge based regarding veterinary patients, human trained clinicians do not recognize subtle signs of different issues – a cat who had rear weakness and stiffness having an acute onset urinary blockage is one example from my area. Another is a dog with luxating patellas who worsened and was seen for 10 months by a chiropractor, the whole time having had a torn cruciate ligament (ACL), the dog was in significant pain which was not being treated.

Sporting dogs are routinely worked on at events by human health care professionals who have gained 'certification' in animal rehabilitation, or animal chiropractic by one of the commercial (and mostly unregulated) courses available. These people cross state lines. They also perform manual therapies that have significant effects on a patient and can temporarily mask an injury, resulting in further damage. My equine colleagues would be able to expand more, but one case that particularly sticks in my mind is a dog who strained, then tore their quadriceps muscle, a three-month recovery. Looking at the records from the 'therapist', an obvious pattern of decline was visible between Day 1, run 2 and Day 2 run 1, however the therapist cleared the patient to keep running the full three days until the dog (a Border Collie who is very fit) finally progressed from a limp to being 3-legged lame. Dogs have also been exercised with fractured toes and unstable joints after receiving clearance from a therapist at a trial. From a welfare standpoint this is unacceptable.

A dog came into the clinic for massage with a local massage therapist who very responsibly only works out of veterinary clinics. She was not a patient of ours but suffered a collapse immediately after massage and we had to stabilize her. The dog turned out to be in heart failure (massage can affect blood flow and worsen symptoms of poor circulation), a regular veterinarian would not know this specific detail, to avoid massage. Veterinary notes were not sent to the massage therapies, the dog was just cleared for massage aimed at relieving stiffness and mobility issues.

Dietary and supplementation issues:

I have unfortunately come across many examples of diets and supplements recommended by therapists with human medical training who have been certified in animal rehabilitation and chiropractic. They have no training in veterinary nutrition. The general consensus seems to be 'a supplement cannot do any real harm, and diet is easy'. But they can cause serious interactions as evidenced by the melatonin case above.

A therapist recommended vitamin A supplementation to help the nervous system of a weak dog, the dog ended up with skeletal hyperostosis, a horrible disease which nearly fuses vertebral bones. I see vitamin A frequently recommended by human practitioners working on animals. Vitamin E is also often recommended, some at levels which can cause reduced ability to clot blood.

A diet was recommended by a chiropractor that was heavily weighted toward organ meat as this was 'high in B vitamins', there is actually a paucity of scientific evidence to support that. The dietary change resulted in the dog getting osteopenia (osteoporosis). The primary care veterinarian saw the dog every 6-12 months and was not aware of the diet change. There is nothing in the chiropractic act in my state to prevent a chiropractor from making these recommendations (or a Physical Therapist).

Medication reactions:

A dog being concurrently treated for Cushings disease with the medication trilostane (limits cortisol in the blood to return it to normal levels) was receiving routine manual therapies from a human practitioner, because she did sports. She had become weaker and more reluctant to run, presented to me by the owner for a second opinion as to whether there was an injury because the human practitioner was not getting results (primary care veterinarian unaware of any issues, last checked a month ago). She was in an Addisonian crisis due to abnormal drop in her cortisol causing changes in blood pressure and other dramatic issues, she was at risk of total collapse.

A patient was referred to me for arthritis treatment having seen a human therapist for several months with little results, she seemed to be getting weaker. The dog had been ataxic/unsteady at the end of walks. The patient was on several pain medications and had lost several pounds body weight after exercise therapy. Because of the weight loss (that the primary care veterinarian was unaware of), she was getting a relatively higher dose of the medication gabapentin and that was the cause of the issue. We lowered the dose appropriately and informed the primary care veterinarian.

As the veterinary specialty college (ACVSMR) grows membership and as we train more specialists we have far more access to specialists than we did back in 2011 when the CA task force was formed. We also have far more access to rehabilitation certified veterinarians and their veterinary technicians, especially now there is a VTS specialty for techs. My last veterinarian resident in sports medicine and rehabilitation, who just finished her training in July and will take her specialty examination in February has just taken a job in San Diego.

Sincerely,

Julia Tomlinson BVSc, MS, PhD, DACVS, DACVSMR
Specialist in Sports Medicine & Rehabilitation
Founder, American Association of Rehabilitation Veterinarians

Grant Miller <GMiller@cvma.net>
Thu 8/13/2020 8:50 AM

To:

- Sotelo, Justin@DCA

CVMA Support Letter for Proposed Regs.pdf
78 KB

Good morning Justin,

Please see attached.

Sincerely,

Grant Miller, DVM
Director of Regulatory Affairs
California Veterinary Medical Association
1400 River Park Dr. Suite 100
Sacramento, CA 95815

1400 River Park Drive, Suite 100
Sacramento, CA 95815-4505
916-649-0599
fax 916-646-9156
staff@cvma.net
www.cvma.net

August 12, 2020

Justin Sotelo
Veterinary Medical Board
1747 N. Market Blvd. Ste. 230
Sacramento, CA 95834

Re: Proposed Regulation – California Code of Regulations, Title 16 Section 2038.5

The California Veterinary Medical Association (CVMA) is in support of the Veterinary Medical Board's Proposed Regulation on Animal Rehabilitation.

For many years, the CVMA has addressed the Veterinary Medical Board (VMB) on issues related to illegal practice in veterinary medicine. Unlicensed persons have been performing animal rehabilitation (AR) and the law has been ambiguous in this regard. The CVMA has participated in numerous meetings of both the Multidisciplinary Committee (MDC) and the VMB that have allowed for open and intensive dialogue on animal rehabilitation by all stakeholders. The resulting proposal includes careful consideration of all aspects of the Veterinary Medicine Practice Act.

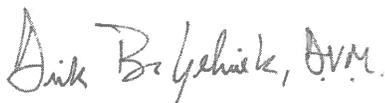
Animal rehabilitation is a rapidly expanding veterinary specialty and the necessity for stricter oversight and enforcement has been justified at many meetings. CVMA member veterinarians have testified to the need for an accurate diagnosis in order to develop an effective treatment plan and prognosis, that consideration must be given to existing medical problems, and that drug regimens must be balanced with the physical modalities of treatment. Additionally many of these patients may develop new medical issues and may be in a fragile condition, such as with senior pets. Only veterinarians have the education and experience to manage these cases and are the only licensed professionals allowed to diagnose and treat or supervise treatment of animals.

The CVMA strongly supports the Veterinarian-Client-Patient Relationship (VCPR) model and corresponding veterinarian supervision that is essential to protect both animals and consumers.

We are pleased that the proposed language defines animal rehabilitation, clarifies who may render treatment, and provides an increased level of safety for animal patients. It will allow for greater enforcement of unlicensed activity in veterinary medicine and afford a greater level of protection for pet owners in California.

Thank you for your work on this issue.

Sincerely,



Dirk Yelinek, DVM
CVMA President

From: Steve Soboroff <steve@soboroff.com>
Sent: Thursday, August 13, 2020 8:44 AM
To: VMB@DCA <VMB@dca.ca.gov>
Subject: Re. Vet medical board hearing

.....
please accept this as our public comment

Vets need to be onsite and that we support those regulations. after our dog was cleared for rehab the rehab vet found bone cancer which led us to aggressively treat and had him live a longer happier life. If no vet, wouldn't have been caught.

during routine visits you received advice for eyes, pain levels with pain management adjustments, diet or meds (if that day came in with diarrhea.)

The boards job to protect pets and consumers, cannot occur without a vet there.

Thanks for all you do

Patti Soboroff

Steve Soboroff
Los Angeles Police Commissioner

Nanette Parratto-Wagner <npwagner001@gmail.com>
Thu 8/13/2020 8:44 AM

To:

- Sotelo, Justin@DCA

I'm writing in SUPPORT of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation.

I'm a veterinary practitioner in Florida who has, sadly, treated patients who've been "treated" by unlicensed individuals. Those individuals may have had good intentions, but they lacked the knowledge and expertise of a veterinarian to guide their attempts to help animals.

I've also been a member and former Chair of the Board of Veterinary Medicine in Florida. Unlicensed activity is a significant problem that only brings harm to veterinary patients and to the clients who were seeking care.

Please consider carefully your duty to protect consumers and their animals.

Nanette Parratto-Wagner, DVM, PhD
Orlando, FL 32828
FL VM 3920

SUPPORT - RECEIVED ON & AFTER 8/13/20

Attachment 7

From: Nushin Shir shirdds@yahoo.com
Subject: Safe Care for Our Pets
Date: Aug 13, 2020 at 9:13:06 AM
To: justin.sotelo@dca.ca.gov

Dear Mr. Sotelo:

Hereby, I emphasize and support of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation.

As a healthcare provider myself, I emphasize the necessity of having a certified and qualified veterinarian present for all the physical therapy and related treatments on all animals and pets – as they are more than a pet, they are members of our families.

Thank you,

Nushin Shir, DDS, MPH

Pls excuse typos as the message is
Sent from my iPhone

Annika <acarpenter@ripleydesign.com>
Thu 8/13/2020 8:26 AM

To:

- Sotelo, Justin@DCA

As a lifelong owner of animals of all species, I am in **SUPPORT** of **Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation.**

It is very important to me that the animals do not get poor care due to lack of training for certification.

Animal owners should not have to question if an Animal Rehab technician is qualified. 40 hours of training is not enough.

Thank you for your consideration

Alicia Flores <kosteralicia@gmail.com>
Thu 8/13/2020 7:58 AM

To:

- Sotelo, Justin@DCA

SUPPORT of Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation

Muller Veterinary Hospital <mullervetwc@gmail.com>
Thu 8/13/2020 7:48 AM

- Sotelo, Justin@DCA

Good Morning

My name is Erin Troy and I have been a veterinarian for 27 years and I have been practicing Physical Rehabilitation and Pain Management for 20 years. I am one of the first veterinarians in CA to practice APR. My priority is and always will be the safety of animal patients. APR is safest when practiced with a veterinarian on site. This has never been disputed. It is unfair to the pet, their family and the PTs to not have a veterinarian on site. 40 hrs of unaccredited classes cannot replace a professional veterinary team.

PTs don't know what they don't know.

Emergencies happen. We have had patients seizure as they walk into the therapy room, we have had dogs collapse, we have had dogs in congestive heart failure and the family thought they were just under the weather, e have had a dog in a diabetic crisis and the family thought they played to hard the day before. If a vet had not been on site these pets and their families would have suffered.

PTs may be able to take a temperature but can they hear an irregular heart beat or a murmur or check a blood pressure or a blood glucose on a patient that is just not himself?

No of course not and it is not fair to expect them to that's why we NEED a vet on site.

Over 80% of our rehab patients come w unrecognized and untreated pain. A painful body cannot be safely rehabbed. Pain must be diagnosed by a vet and the multi modal treatment almost always requires medications which must be prescribed and managed by a veterinarian. I am making changes in pets medications on a weekly basis.

We don't practice in a rehab only bubble. Many pets that come to rehab are older and have multiple diseases and are on multiple medications none of which the PT can manage. Its not fair to the pet, the family or the PT to not have a vet on site to assist the patients that are panting, have blood in their urine, have an increased appetite or have had vomiting and diarrhea. We address all of these on site as they happen so the pet does not suffer from delay in care and the family does not suffer the frustration of trying to get a vet appointment in days or, as in our current situation, sometimes weeks.

In the name of safety for the pets and the pet families of California I urge you to adopt the wording as put forth today.

Thank you.

Erin Troy DVM CCRP CVPP

--

Muller Veterinary Hospital and The Canine Rehabilitation Center
2735 N. Main Street, Walnut Creek, CA 94597

carla robbins <pinkapinka94@gmail.com>
Thu 8/13/2020 6:18 AM

To:

- Sotelo, Justin@DCA

.....

This is a statement to support safe care for animals while undergoing rehabilitation by insuring there is veterinary supervision at the facility.

I am voicing my support for Section 2038.5 of Article 4, Division 20 Title 16 of Ca Code of Regulation related to Animal Physical Regulation.

Thank you,

Carla Robbins D.V.M.

Barbara Lee <barbara@canineconditioningcentre.ca>
Sat 8/22/2020 5:59 AM

To:

- Sotelo, Justin@DCA;
- Rodda, Timothy@DCA;
- DCA Director's Office;
- PT@DCA

CVMB-PT-Opposition Letter.docx
16 KB

Please see attached letter

Thank you

Barbara Lee PT MCPA Dip. Canine Rehab

Niagara Canine Conditioning Centre
188 Bunting Road, Unit 5A,
St Catharines, Ontario,
L2M 3Y1
Phone: 289-362-5900
Fax: 289-362-5901
www.canineconditioningcentre.ca

August 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

Fax: (916) 928-6849

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov
Timothy.Rodda@dca.ca.gov
DCA.DirectorsOffice@dca.ca.gov
PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations. As a physical therapist and member of the Animal Rehab Division of the Canadian Physiotherapy Association, I have been monitoring this issue closely for years and have been repeatedly disappointed with the dishonorable attempts the California Veterinary Medical Board (CVMB) has taken to monopolize this area of animal healthcare. I have written to you in the past and it is obvious that no consideration was given to this matter then.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits the ability of physical therapists to legally practice under reasonable guidelines.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, public access will be hindered to a service that currently being provided by physical therapists, and business continuity will be prohibited. Additionally, this regulation would be a restraint of physical therapist trade.

Other states have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am OPPOSED to this regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before us on this matter).

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the

legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists. Unfortunately, the CVMB opposed that bill largely based on the misrepresentations by members of the veterinary profession who successfully were able to sway Board opinion. It appears that the Veterinary Medical Boards (in Canada as well as California) function to protect their own interests! The check and balance needs to come from above! A monopoly does not serve or protect the public.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. California physical therapists are asking for qualified and licensed PT's to work under the direct or indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals after a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

Barbara Lee PT MCPA Dip. Canine Rehab

Niagara Canine Conditioning Centre,
188 Bunting Road, Unit 5A,
St. Catharines, Ontario,
L2M 3Y1, Canada

Phone: 289-362-5900

E mail: barbara@canineconditioningcentre.ca

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Siefertman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Carly Neubert <healthy.carly@gmail.com>
Mon 8/17/2020 6:15 PM

To:

- Sotelo, Justin@DCA

Medicine, including veterinary medicine, is a retail service. I demand the right to choose qualified professionals for my pet's needs.

I demand more access to physical therapists that have been trained on animals.

I believe that a qualified physical therapist can and should treat my pet and DOES NOT need to be supervised by a veterinarian who does not have any training in physical therapy.

Veterinarian medicine is great, but their education does not include adequate physical therapy training. All providers of animal rehab/PT should be required to be certified and meet competency standards.

In health,

Carly Neubert, BA, NC

Robyn (Sugarland Ranch) <robyn@sugarlandranch.org>
Mon 8/17/2020 10:38 AM

To:

- Sotelo, Justin@DCA

Cc:

- karen.atlas805@gmail.com

Justin Sotelo 081420.pdf
60 KB
AOPT APT SIG.pdf
83 KB

IMAGING SIG.pdf
53 KB
3 attachments (196 KB)Download all

Good morning Mr. Sotelo,

Please find attached my follow-up comments to the public hearing on August 13, 2020 re: animal physical rehabilitation. Thank you for the opportunity.

Robyn Roth, PT, APT, MPA

August 15, 2020

Justin Sotelo, Lead Administrative & Policy Analyst Justin.Sotelo@dca.ca.gov
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: FOLLOW UP TO PUBLIC HEARING AUGUST 13, 2020, UNABLE TO PRESENT AT PUBLIC HEARING DUE TO TECHNICAL DIFFICULTIES.

Dear Mr. Sotelo,

I attempted to comment during the public hearing August 13th, however, there were technical difficulties in that I could hear others, but they could not hear me. Thank you for the opportunity to respond to comments made during the hearing, specifically those comments by a DVM. Apologies, cannot recall her name. She mentioned employing physical therapists who she presented as having a lack of knowledge re: animal care and cited the example of a physical therapist having no knowledge re: applying a muzzle to a canine Patient. She further cited that physical therapists employed by her were unable to neither read or screen radiographs nor recognize a long list of clinical issues that required immediate evaluation by a DVM. I'm wondering why acute Patients requiring DVM intervention were in a rehabilitation situation as she described? In the NV model, the referring DVM is responsible to ensure that Patients referred to rehabilitation are appropriate and stable for rehabilitation regardless of the rehabilitation setting. When I heard this DVM's comments, I'm concerned. Since she opened this door, I'm going to balance her comments with the following three separate cases that walked into my clinic when I was practicing. I'll let you formulate your own opinion re: competency and/or negligence issues involved for comparison purposes:

Patient #1: Referred to me by a RDVM with a Dx of CrCL rupture. Patient arrived non-ambulatory with significant neuro deficits, although these complications were not included in the medical records that I received from the DVM. A specific neuro dx, e.g., FCE vs. disk vs. mass or other neurological disorder, was not determined as the Client declined diagnostics. As a side note, many of the RDVMs referring cases to me, referred those Patients because they understood that a physical therapist had a far stronger neuro background and had the ability to screen and evaluate those cases for them. The majority of these Patients were then referred on to a boarded neuro specialist unless the Client declined. Patient #1 was not referred to a Specialist because the Client declined and opted for continued PT and the referring RDVM agreed. Case management skills (previously I also held a case management certification/CCM) were helpful assisting the RDVM to discuss with the Client re: how an orthopaedic dx was given and indeed that was not the issue nor the reason for referral. Good news is that this Patient by discharge ambulated to the Client's car. This RDVM was satisfied and appreciative of an effective team approach & positive outcome.

Patient #2: Referred to me by a RDVM who actually represented to the Client as having a "special interest in surgery". The Patient arrived with a significant WB lameness post TTA procedure. Following my evaluation, the DVM was contacted with concerns, I then asked to see the post op rads and yes, PTs can read rads especially those that are seen more than frequently after working in a veterinary specialty hospital as well as support from an emerging imaging special interest group within the APTA (*see attached APTA Imaging SIG information*). Bottom line, the TTA hardware was incorrectly implanted. Patient was referred to a Specialist, end result, Patient lost its limb after complications from the initial surgery. This particular DVM, moved on to another State

and yes, I do believe that this case was forwarded to the NV Board. However, the resultant disciplinary action, in my opinion, did not alter behavior nor did it fit "the crime". By the way, just for information and as you are likely already aware, when a DVM is "disciplined" and this public reprimand is posted to the "Federation's" website, it really serves no purpose, because this "national" posting merely refers a Consumer back to the original State's website and the original disciplinary action. From a consumer advocacy perspective, this action lacks transparency and is not useful to the public.

Patient #3: Referred to me by another RDVM who according to the Client represented herself as being a skilled surgeon and although the Client absolutely was positive that no other alternative was given, the DVM's medical record indicated that there had been a discussion re: a choice of being referred to a boarded surgeon. The Client repeated many times, this was not the case. Dx was post op extracapsular repair of ruptured CrCL. The Patient arrived on a stretcher, in severe pain, lethargic, with a draining purulent wound at the surgical site. The DVM was immediately contacted wherein she asked me, the PT, what I thought needed to be done. The case was referred on to the boarded surgeon and with extensive treatment, more surgeries, the Patient survived. To my knowledge, this case was not presented to the NV Board. Worthy to note, in subsequent years, this particular DVM's license was suspended and eventually the suspension ended and she remains practicing in the community.

Despite the DVM's public comments re: physical therapists' competencies (or lack thereof), I've spent many hours at Veterinary conference sessions in oncology, internal medicine, shelter medicine, cardiology, neurology, dermatology, hospice including euthanasia and more. Of course I've continued many hours of continuing education in animal physical therapy more than the current requirement, however, my point is that PTs can comfortably take a seat at the table. So to even suggest that PTs are ignorant re: the care of animals in any of the areas that I heard via public comments is not only offensive, it is more than ridiculous. To be clear, the mere examples above show the opposite side of the equation although I would like to think that the above examples are in the minority.

Although perhaps outside the scope of the public hearing, yet related and specific to animal physical therapy, I have to share with you some additional observations. I have found that veterinary medicine as a whole, perhaps excluding the large University settings, lacks any formal standardized quality improvement process and that the Board, at least in this State, does not see this as their role and disciplinary actions typically do not include any substantial remedy to return a deemed incompetent and/or negligent DVM to be fully functional again with the ability to effectively treat Patients. To be fair, this problem also exists with other professional Boards, in my opinion. I also see efforts by the Veterinary Medical Association to tie down a unified Standard of Care. I'm attaching an article that you may find of interest. This situation leads me to believe that the field of veterinary medicine lags far behind human medicine re: quality, outcome measures and clinical practice guidelines. I do understand there are many reasons for this situation. I get enthused and excited every time I have the opportunity to be on campus at for example, UC Davis, it reinstates my faith in veterinary medicine and that yes, so much progress has indeed been made but there is a long way to go. So to suggest that licensed physical therapists WITH THE NECESSARY TRAINING AND EXPERIENCE should be subjugated as an "unlicensed assistant", requiring direct supervision by a DVM is totally absurd.

So I hope that you can see from my very vivacious yet serious comments on what I call the 'State of Affairs', it is difficult for me to digest what is happening in California re; the animal physical therapy field. This one, for starters, may be simple, follow Nevada, work as an interdisciplinary team, integrate and welcome PTs into your sand box acknowledging our expertise and contributions. We bring **VALUE** to the veterinary team at a graduate level. Clients are happy and it renders the Veterinarian's job easier with optimal clinical outcomes This relationship is similar to the relationship that PTs have long held with their human physician colleagues. Ensure that there are competency requirements for all aboard, i.e., Vets, PT's and RVT's.

Moving onto addressing physical therapists' training and advanced certifications in multiple specialty fields. Within the APTA and under our Academy of Orthopaedic Physical Therapy (AOPT), there are multiple "special interest groups", known as SIGs. The Imaging SIG as well as the Animal Physical Therapy SIG fall under the auspices of the AOPT. A couple of documents re: these two SIGs are attached for your reference. Physical therapy, similar to veterinary medicine, is becoming more and more specialized. We have an obligation to utilize our colleagues with specific expertise and advanced training in certain areas in order to assure a quality outcome and Client satisfaction. I've found that this may be less likely to occur in veterinary medicine, e.g., RDVMs attempting procedures that should have been referred to a Specialist colleague right out the gate, in my opinion, placing Consumers and their animal at risk.

Lastly, I do understand the contrasts between Nevada and California in that the Nevada legislature has delegated authority to the various Boards therefore, we were able to do what we did in creating a separate category for Animal Physical Therapists in 2004. The California legislature has not done so therefore I heard over and over again during the hearing that you were unable to more actively engage because you do not have the "statutory authority". Why are you not seeking the statutory authority to properly have oversight over this specialty area of practice? What are you waiting for? It seems clear that this issue cannot be resolved in regulation unless, and until, you receive authority from the Legislature. So why are you continuing to pursue this same failed regulatory approach you attempted back in 2015? Your actions are inconsistent with what the Legislature has asked of you in their 2016 Sunset Review.

You have an opportunity to be a leader in this endeavor. Thank you.

Respectfully submitted,

Robyn Roth, PT, APT, MPA
Email: robyn@sugarlandranch.org

ANIMAL PHYSICAL THERAPY SIG IS UNDER THE AUSPICES OF THE ACADEMY OF ORTHOPAEDIC PHYSICAL THERAPY - APTA

PURPOSE

The purpose of the Animal Physical Therapy Special Interest Group (ARSIG) of the Academy of Orthopaedic Physical Therapy is to provide a platform for physical therapists and physical therapist assistants to educate, promote, and advance the practice of animal physical therapy and wellness in all state jurisdictions. The ARSIG encourages active development of collegial relationships with the veterinary community to promote the highest standards of quality care in animal physical therapy.

MISSION:

To Lead and Innovate In the Art and Science of Physical Therapy in Animal Physical Therapy

VISION:

Serve as the premier resource for excellence in practice, education, research, and advocacy by physical therapists in animal physical therapy, fitness, and performance.

STRATEGIC GOALS:

- **EDUCATION:** Develop competent physical therapists in animal physical therapy and provide opportunities for life-long learning through continuing education.
- **POLITICAL ADVOCACY:** Influence legislative changes to support the practice of physical therapy in animal physical therapy in all 50 states.
- **EVIDENCE-BASED PRACTICE:** Provide evidence to support clinical practice by physical therapists in animal physical therapy.
- **PUBLIC RELATIONS AND MARKETING:** Create a brand for physical therapy in animal physical therapy and disseminate through multiple sources (e.g. webpage, social media, brochures, published materials).

**This SIG was formed in 1998. Hx of animal PT in the USA goes back to 1978 with Ann Downer, PT "*Physical Therapy for Animals*". Past history goes back to 1939 with Sir Charles Strong MCSP SRP "*Common Sense Therapy for Horse Injuries*" leading to the Association of Chartered Physiotherapists in Animal Therapy (ACPAT) in England. Other countries followed: CHAP (Canadian Horse & Animal Physical Therapists Association; NVFD (Nederlandse Vereininging voor Fysiotherapie bij Dieren), Also established in South Africa, Australia, Sweden, Germany, Finland and New Zealand.

IMAGING IS A SIG (SPECIAL INTEREST GROUP) UNDER THE AUSPICES OF THE ACADEMY OF ORTHPAEDIC PHYSICAL THERAPY - APTA

MISSION STATEMENT

- The Imaging SIG is recognized as a leading authority for imaging in physical therapist practice.
- The SIG leads by:
 - Providing professional development opportunities for physical therapists
 - Sharing current information related to imaging in physical therapist practice
 - Identifying opportunities for outreach and interdisciplinary collaboration
 - Supporting practice and research initiatives

GOALS

- To be a valued resource for PTs involved with imaging.
- The SIG serves:
 - Identifying, sharing, supporting, and contributing to the evidence base in imaging in physical therapist practice
 - Identifying, sharing and supporting the evidence base in imaging PT
 - Providing opportunities for professional development and education
 - Monitors and supports activities that may impact the use of imaging in physical therapy
 - Developing practice competencies
 - Fostering imaging curriculum development in physical therapist education programs to prepare future practitioners

**PTs in the military have been doing nerve conduction studies/EMG as well as musculoskeletal ultrasound. Continuing education with additional certifications are available for PTs. Certainly PTs once again with additional training, are able to, in collaboration with other Specialists/professionals, are capable and expected to be able to view radiographs involving the musculoskeletal system as well as MRIs, e.g., re: neurological problems.

Commentary

A new look at standard of care

Gary Block DVM, MS

From Ocean State Veterinary Specialists, 1480 S County Trail, East Greenwich, RI 02818.

Address correspondence to Dr. Block (GBYLC@aol.com).

The term “standard of care” (SOC) has been defined many times in case law. In *Vaughn v Menlove*,¹ a case from 1837 and one of the oldest legal references to SOC, the court wrote that an individual under a duty of care must have “proceeded with such reasonable caution as a prudent man would have exercised under such circumstances.” Similarly, in veterinary tort law, the SOC has been defined as “the standard of care required of and practiced by the average reasonably prudent, competent veterinarian in the community,”² with one court stressing “nor does the legal standard set the threshold for liability at a particularly high level. The average or normal practitioner, not the best or most highly skilled, sets the standard.”³ These legal definitions, however, do not provide the kind of clear, practical, clinically relevant guidelines that veterinarians need to help them understand and meet the SOC or that veterinary state boards need to consistently identify and appropriately discipline veterinarians who may be accused of malpractice.

Although the SOC essentially represents the minimum acceptable level of care, there is much confusion surrounding the term, with the SOC frequently mischaracterized as equivalent to “best practices.” Several recent articles have fostered this misperception by using the term SOC to denote gold standard or ideal care. This includes an article⁴ in which the authors contend that failure to submit uroliths for quantitative analysis constitutes negligent care, an article⁵ that concludes CO₂ lasers have “become a standard of care in general practices and in specialty and referral practices,” and another article⁶ that suggests that “endoscopy is becoming the standard of care for thoracic surgery.”

There is also some confusion surrounding SOC because, historically, courts have ruled that a veterinarian’s actions must be considered in comparison to prevailing community standards or the actions of veterinarians in similarly situated communities, a standard known as the locality rule. These geographic distinctions likely arose because of a presumed lack of access in certain areas to the latest information, most recent equipment, and newest medical developments. However, this can create a perplexing situation whereby because of state-to-state variation in

how the SOC is defined, a different SOC might be applied to veterinary practices treating the same theoretical patient on different sides of a state border. Given the increasing emphasis on continuing education in veterinary medicine, the increase in online educational opportunities, and the widespread access to experts through various electronic means of communication, geographic SOC variability may no longer be defensible despite its persistence in many current state practice acts. For many of these reasons, human medicine appears to be migrating from a state-mandated to a nationally accepted SOC.⁷

Confusion regarding the definition of SOC can likewise arise because expert testimony is frequently used in legal proceedings to prove that a defendant breached the applicable SOC.⁸ Although expert testimony is often used in this way in veterinary malpractice cases, the SOC is different for general practitioners than it is for specialists, with one commentator noting that “whenever a specialist diagnoses or treats an animal for a condition covered by his specialty he is likely to be held to an exceedingly high standard of care—and a much higher standard than would be applied to a generalist practicing in the same community.”⁹

There is increasing recognition that in veterinary medicine, the SOC, rather than representing a single baseline for the minimum accepted level of care, should instead reflect a continuum of acceptable care that takes into account available evidence-based medicine, client expectations of care, and financial limitations that may limit diagnostic and treatment options.¹⁰ Because animals are considered property in the eyes of the law and owners are (in general) entitled to decide how much or how little to spend on their pets’ care, veterinarians are all too often faced with ill or injured pets whose owners essentially dictate what the SOC is going to be. Faced with a choice between providing what might be considered substandard care and providing no care, veterinarians will typically default to providing some care even if they know better options exist. Legally, veterinarians cannot provide care that falls below the SOC, but in reality, veterinarians commonly do so because of owners’ financial limitations.

For most veterinarians in clinical practice, the concept of SOC only becomes important when a malpractice complaint is brought by a client to a state's board of veterinary examiners. The members of these boards are tasked with investigating and determining whether a veterinarian may have breached the SOC. However, the information veterinarian board members use in making these assessments may be based more on their clinical experience than on evidence-based practices or clinical practice guidelines. Some state practice acts specifically recommend that the Principles of Veterinary Medical Ethics of the AVMA be used as the standard for professional conduct and that violation of these principles be considered a cause for disciplinary action. However, although the Principles of Veterinary Medical Ethics are a valuable resource, they are too general to provide guidance to veterinarians with regard to the SOC in specific clinical settings.

A variety of professional organizations have produced consensus statements, clinical practice guidelines, and white papers on various clinical practice topics, but there appears to be no agreement regarding whether these recommendations constitute a true SOC, and current recommendations do not cover every clinical scenario. In many instances, therefore, the SOC that applies in any particular clinical situation may be unclear. Surely, we can do better than this and provide some consistency and transparency, particularly for veterinary state boards. For physicians, clinical practice guidelines produced by specialist associations, US government agencies, and health-care organizations are collated by the National Guideline Clearinghouse to assist practitioners and patients in making decisions about appropriate health care in specific clinical circumstances. Creating a database of such white papers, consensus statements, and disease monographs for veterinary medicine and combining it with the growing body of evidence-based medicine could serve as an excellent first step for our profession and provide a resource for veterinary state boards and private practitioners alike.

Although the concept of SOC has been around for more than 100 years, there seems to be a general lack of recognition of the medical and legal ramifications

of SOC for veterinarians. Recent articles^{11,12} suggest that the veterinary profession is finally starting to acknowledge and address some of the shortcomings related to SOC. The concept of SOC lies at the intersection of clinical practice, veterinary ethics, and the law. Although the term itself is frequently used in journal articles and conference presentations, the profession, to a large extent, lacks any consensus on what constitutes SOC in clinical veterinary medicine. This creates ambiguity and inconsistency in the care that practitioners provide, compromises the care pets receive, and prevents regulatory agencies and the courts from assessing veterinarian competence in a systematic and rational way. Redefining the SOC should be a priority for our profession in the next decade.

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For all commentaries, views expressed are those of the authors and do not necessarily reflect the official policy of the AVMA.

LEIGH STEVENS <leighstevens13@mac.com>
Fri 8/14/2020 7:40 AM

To:

- Sotelo, Justin@DCA;
- Rodda, Timothy@DCA;
- DCA Director's Office;
- PT@DCA

Dear Mr. Sotelo and Mr. Rodda,

I was a speaker at the public hearing today and due to technical difficulties was unable to respond during the public commentary period for Agenda item 4—Commenting on the Proposed Adoption of 2038.5, Article 4, Division 20, Title 16 of the CCR, APR. A few changes to the document were proposed and a few comments were made that were factually incorrect.

1) After consulting with a CRI instructor, I was told that the failure rate is not high but people do fail and have to redo their assignments. Additionally, the program is only open to DVMs, PTs, or vet techs (mostly licensed/registered).

2) A comment was made that the UC Davis School of Veterinary Medicine has classes on Animal Physical Rehab and language was added to the proposal that UC Davis has a Department of Animal Physical Rehabilitation. I think that is something that should be fact checked. There was an implication that the Veterinary School Curriculum covered everything one needed to know to be competent in Animal Physical Rehabilitation, but there is nothing relating to sports medicine, kinesiology, or biomechanics in the veterinary curriculum or modalities like Joint Mobilizations (unless maybe in the Equine Lameness classes). Additionally, according to the UCD Vet Med website, there are no 4th year student rotations listed for the Department of Animal Physical Rehabilitation and the department is run by "A credentialed physical therapist with extensive human and animal experience."*

Of course, I have been practicing for a while so things might have changed. Can you provide me with the number of hours in the mandatory course work and in which disciplines the students receive instruction to be considered to have competency to provide Animal Physical Rehab as a DVM?

Thank you for allowing me to make this clarification.

Best regards,
Leigh Stevens, DVM

*<https://www.vetmed.ucdavis.edu/hospital/small-animal/integrative-medicine>

Leigh Stevens, DVM
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-FearFree Certified Practitioner

-Animal Hospice & Palliative Care Certificate

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Kathy <bmwshepard@hotmail.com>
Thu 8/13/2020 4:40 PM

To:

- Sotelo, Justin@DCA

.....

I am opposed to proposed animal rehabilitation regulations that will create An unnecessarily restrictive environment for qualified animal physical therapists to practice in California. This legislation will further limit consumers' access to quality care and reduces the necessary collaboration between physical therapists and vets to help animals get the help they need.

Thank you.

Katherine Shepard



<https://physiotherapy.ca/divisions/animal-rehabilitation>

animalrehab@physiotherapy.ca

Box 2001 ~ Cochrane, Alberta, T4C 1B8 ~ Canada

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RECEIVED
AUG 13 2020
VMB/RVTC

FAX TRANSMITTAL SHEET

TO: Justin Sotelo & Timothy Rodda
1-916-928-6849

DATE: AUG 13, 2020

RE: OPPOSITION to CVMB Animal Physical
Rehab Regulations

OF PAGES 4 (Including Transmission Sheet)

MESSAGE:



Canadian Physiotherapy Association

PO Box 2001, Cochrane, Alberta, T4C 1B8 Canada
Phone / Fax: (403) 932-4432

Website: www.physiotherapy.ca/Divisions/Animal-Rehabilitation
E-mail: animalrehab@physiotherapy.ca

RECEIVED
AUG 13 2020
VMB/RVTC

August 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

Fax: (916) 928-6849

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov
Timothy.Rodda@dca.ca.gov
DCA.DirectorsOffice@dca.ca.gov
PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations. As the Advocacy Lead for the Animal Rehab Division of the Canadian Physiotherapy Association, I have been monitoring this issue closely for years and have been repeatedly disappointed with the dishonorable attempts the California Veterinary Medical Board (CVMB) has taken to monopolize this area of animal healthcare.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits the ability of physical therapists to legally practice under reasonable guidelines.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd. If the CVMB is successful with defining

animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, public access will be hindered to a service that currently being provided by physical therapists, and business continuity will be prohibited. Additionally, this regulation would be a restraint of physical therapist trade.

Other states have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am OPPOSED to this regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before us on this matter).

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists. Unfortunately, the CVMB opposed that bill largely based on the misrepresentations by members of the veterinary profession who successfully were able to sway Board opinion. I am tired of writing letters to Veterinary Medical Boards (in Canada as well as California) who function to protect their own interests! The check and balance needs to come from above!

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. California physical therapists are asking for qualified and licensed PT's to work under the direct or indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals after a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

Personally, as a physical therapist that has taught hundreds of veterinarians and physical therapists in the practice of canine rehabilitation, I am actually of the mindset that physical therapists should be direct access practitioners – allowed to see animals without veterinary directive. From what I have witnessed as an instructor, as a clinician, as a mentor, and as a board member of our Canadian Animal Rehab Division, I do not think that physical therapists pose a risk to the animal patient, and they are already well versed in collaborative practice. Something that the veterinary industry is currently lacking!

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,



Laurie Edge-Hughes, BScPT, MAnimSt (Animal Physiotherapy), CAFCI, CCRT
Advocacy Lead, **The Animal Rehab Division of the Canadian Physiotherapy Association**
PO Box 2001, Cochrane, AB T4C 1B5, Canada
physio@fourleg.com / animalrehab@physiotherapy.ca

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Siefertman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members



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FAX TRANSMITTAL SHEET

TO: Justin Sotelo & Timothy Rodda

FAX #: 1-916-928-6849

DATE: AUG 13, 2020.

RE: OPPOSITION to CVMB Animal Physical Rehab Regs.

OF PAGES 15 (Including Transmission Sheet)

MESSAGE:

August 13, 2020

TO:

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

The California Veterinary Medical Board's proposal to pursue regulatory language, without including an exemption for licensed physical therapists who have undergone the necessary training on animals, limits choice of and access to qualified and licensed animal care providers.

To deem licensed physical therapists who have been specifically trained on animals as 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts the consumer. I want MORE choice and access to licensed physical therapists for my animal, not less. Be clear, the CVMB is proposing a monopoly!

True provision of consumer protection would include mandatory educational standards for ALL who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on an animal. The proposed regulation does nothing in regards to consumer safety or protection.

So not only do I OPPOSE these regulations because it takes away choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners (veterinarians included) who would be allowed to practice on an animal.

Consumers have spoken loud and clear on this issue for years. Consumers want increased access to animal physical therapists in California, the United States, and abroad! Rural areas will be better served, costs for services can be competitive, and there will be more choice of qualified practitioners. I do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Name *Daniel Hodgins*

Address 19 Midnapore Place SE Calgary Alberta

Phone 403-630-1299

Email address daniel.jb.hodgins@gmail.com

August 13, 2020

TO:

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

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I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Name *Kristin Harrigan*

Address *1289 Kingsland Rd. SE Andree*

Phone *403.973.6991*

Email address *kharrigan@shaw.ca*

August 13, 2020

TO:

Justin Sotelo, Lead Administrative & Policy Analyst
 Timothy Rodda, Administration/Licensing Manager
 California Veterinary Medical Board
 1747 North Market Blvd., Suite 230
 Sacramento, CA 95834

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

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I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Name *Kim Good*
 Address *RR #1 Carstairs AB TOMOWO*
 Phone *403-807-3237*
 Email address *Kimberly.good94@gmail.com*

August 13, 2020

TO:

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

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I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Name *Olison Arnhambaut*
Address *Box 1356 Bragg Creek AB*
Phone *403 473 3674*
Email address *rob4vs@gmail.com*

August 13, 2020

TO:

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

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Sincerely,

Name CHRIS HALL
Address 92 HARVEST OAK PL CALGARY
Phone 403-69-1105
Email address bulast5@icloud.com

August 13, 2020

TO:

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

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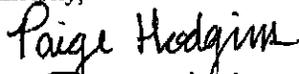
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Sincerely,



Name Paige Hodgins

Address 19 Midnapore Place SE

Phone 403-968-1324

Email address paige.tywonik@gmail.com

August 13, 2020

TO:

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
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Sincerely,

Name JANINE M'GEE (US CITIZEN)

Address 357 ERIN WOODS CIRCLE SE CALGARY, AB

Phone 403-701-9271

Email address janineanddogs@hotmail.com

August 13, 2020

TO:

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

Fax: (916) 928-6849

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov Timothy.Rodda@dca.ca.gov DCA.DirectorsOffice@dca.ca.gov PT@dca.ca.gov

RE: **OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS**

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Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts the consumer. I want MORE choice and access to licensed physical therapists for my animal, not less. Be clear, the CVMB is proposing a monopoly!

True provision of consumer protection would include mandatory educational standards for ALL who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on an animal. The proposed regulation does nothing in regards to consumer safety or protection.

So not only do I OPPOSE these regulations because it takes away choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners (veterinarians included) who would be allowed to practice on an animal.

Consumers have spoken loud and clear on this issue for years. Consumers want increased access to animal physical therapists in California, the United States, and abroad! Rural areas will be better served, costs for services can be competitive, and there will be more choice of qualified practitioners. I do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Name *Rebecca Lehman*

Address *624 16 A ST NW Calgary AB T2N 2C8*

Phone

Email address *lynnrbkh@hotmail.com*

August 13, 2020

TO:

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

Fax: (916) 928-6849

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov Timothy.Rodda@dca.ca.gov DCA.DirectorsOffice@dca.ca.gov PT@dca.ca.gov

RE: **OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS**

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

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Sincerely,

Name

Peter Hughes

Address

Box 1581 Cochrane AB T4C 1B5

Phone

403 818 0933

Email address

peter.hughes@xplorvet.com

August 13, 2020

TO:

Justin Sotelo, Lead Administrative & Policy Analyst
 Timothy Rodda, Administration/Licensing Manager
 California Veterinary Medical Board
 1747 North Market Blvd., Suite 230
 Sacramento, CA 95834

Fax: (916) 928-6849

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov Timothy.Rodda@dca.ca.gov DCA.DirectorsOffice@dca.ca.gov PT@dca.ca.gov

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Sincerely,

Name *Billy Hughes*

Address *PO Box 1581 Cochrane, AB, T4C 1R5*

Phone *587-580-5485*

Email address *bleh1997@gmail.com*

August 13, 2020

TO:

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

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Sincerely,

Name Saige materi

Address 723 millar RD NE Calgary, AB, Canada

Phone 587-968-3350

Email address Saigemateri@gmail.com

August 13, 2020

TO:

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

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Sincerely,

Name *Baley Patzer*

Address *3544 2nd Ave SW Calgary AB T3C 0A1 Canada*

Phone *403 608 6145*

Email address *baleypatzer@gmail.com*

August 13, 2020

TO:

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

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Sincerely,

Name *Kate Copithorne*

Address *252021 Range Road 50 Calgary AB T3Z2L1*

Phone *403-808-5804*

Email address

K.Copithorne@hotmail.com

August 13, 2020

TO:
Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

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Sincerely,

Megan McLeod

176103 2190 Drive West, Foothills, AB, Canada

403-966-0494

MeganMcLeod@Shaw.ca



The Canine Fitness Centre Ltd.

4515 Manhattan Rd SE

Calgary, Alberta T2G 4B3

Phone: (403) 204-0823 Fax: (403) 204-0609

www.caninefitness.com

FAX TRANSMITTAL SHEET

TO: Justin Satelo & Timothy Rodda

FAX #: 1-916-928-6849

DATE: AUG 13, 2020.

RE: OPPOSITION to CVMB Animal Physical Rehab Regulations

OF PAGES 9 (Including Transmission Sheet)

MESSAGE:

August 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS
Dear Mr. Sotelo and Mr. Rodda,

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It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits the ability of physical therapists to legally practice under reasonable guidelines.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, public access will be hindered to a service that currently being provided by physical therapists, and business continuity will be prohibited. Additionally, this regulation would be a restraint of physical therapist trade.

Other states have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am OPPOSED to this regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before us on this matter).

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists. Unfortunately, the CVMB opposed that bill largely based on the misrepresentations by members of the veterinary

SO-1

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I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. California physical therapists are asking for qualified and licensed PT's to work under the direct or indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals after a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

NAME: Sandra Oxtoby

ADDRESS: #2 1918 33rd St SW Calgary, AB T2E 2S5

PHONE: 403 9698292

E-Mail ADDRESS Sandra@caninefitness.com

SO-2

August 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

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Sincerely,

Margaret Kraeling PT CCRT

NAME:

Margaret Kraeling

ADDRESS:

38 Douglas Woods Way SE

PHONE:

403-236-2578

E-Mail ADDRESS

margaret@caninefitness.com

MK-2

August 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

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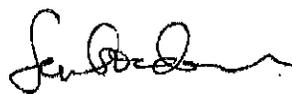
JG-1

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Sincerely,

NAME: Jennifer Gordon 
ADDRESS: Po Box 1266, Bragg Creek, AB, T0L 0K0
PHONE: 403.837.7376
E-Mail ADDRESS: jgordon sanophysio @ gmail . com

JG-2

August 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

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Other states have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am OPPOSED to this regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before us on this matter).

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists. Unfortunately, the CVMB opposed that bill largely based on the misrepresentations by members of the veterinary

E.L. - 1

profession who successfully were able to sway Board opinion. It appears that the Veterinary Medical Boards (in Canada as well as California) function to protect their own interests! The check and balance needs to come from above! A monopoly does not serve or protect the public.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. California physical therapists are asking for qualified and licensed PT's to work under the direct or indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals after a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

NAME: Erin Lanting

ADDRESS: 16 Millpark Way S.W Calgary AB T2Y2M6

PHONE: 687-433-8744

E-Mail ADDRESS: eboe@ualberta.ca

E.L.-2.



The Canine Fitness Centre Ltd.
4515 Manhattan Rd SE
Calgary, Alberta T2G 4B3
Phone: (403) 204-0823 Fax: (403) 204-0609
www.caninefitness.com

FAX TRANSMITTAL SHEET

TO: Justin Sotelo & Timothy Rodda

FAX #: 1-916-928-6849

DATE: AUG 13, 2020

RE: OPPOSITION to CVMRB Animal Physical Rehab Reg.

OF PAGES 4 (Including Transmission Sheet)

MESSAGE:

August 13, 2020

TO:

Justin Sotelo, Lead Administrative & Policy Analyst
 Timothy Rodda, Administration/Licensing Manager
 California Veterinary Medical Board
 1747 North Market Blvd., Suite 230
 Sacramento, CA 95834

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

The California Veterinary Medical Board's proposal to pursue regulatory language, without including an exemption for licensed physical therapists who have undergone the necessary training on animals, limits choice of and access to qualified and licensed animal care providers.

To deem licensed physical therapists who have been specifically trained on animals as 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts the consumer. I want MORE choice and access to licensed physical therapists for my animal, not less. Be clear, the CVMB is proposing a monopoly!

True provision of consumer protection would include mandatory educational standards for ALL who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on an animal. The proposed regulation does nothing in regards to consumer safety or protection.

So not only do I OPPOSE these regulations because it takes away choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners (veterinarians included) who would be allowed to practice on an animal.

Consumers have spoken loud and clear on this issue for years. Consumers want increased access to animal physical therapists in California, the United States, and abroad! Rural areas will be better served, costs for services can be competitive, and there will be more choice of qualified practitioners. I do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Name

KATHY CLARK

Address

832 WEST CHESTERMERE DR
 CHESTERMERE, AB

Phone

403-272-5046

Email address

KPCLARK135@GMAIL.COM

August 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations. As a physical therapist and member of the Animal Rehab Division of the Canadian Physiotherapy Association, I have been monitoring this issue closely for years and have been repeatedly disappointed with the dishonorable attempts the California Veterinary Medical Board (CVMB) has taken to monopolize this area of animal healthcare.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits the ability of physical therapists to legally practice under reasonable guidelines.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, public access will be hindered to a service that currently being provided by physical therapists, and business continuity will be prohibited. Additionally, this regulation would be a restraint of physical therapist trade.

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SV-1

profession who successfully were able to sway Board opinion. It appears that the Veterinary Medical Boards (in Canada as well as California) function to protect their own interests! The check and balance needs to come from above! A monopoly does not serve or protect the public.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. California physical therapists are asking for qualified and licensed PT's to work under the direct or indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals after a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,



NAME: Sue Van Evra

ADDRESS: 326 Point McKay Gardens NW, Calgary, Alberta Canada
T3B 4V8

PHONE: 403-493-3300

E-Mail ADDRESS svanevra@gmail.com

SV-2

Paula Langan <paula@california-dressage.org>
Thu 8/13/2020 2:51 PM

To:

- Sotelo, Justin@DCA

August 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way

to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Paula Langan

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Siefertman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Timmi Elcock <t.elcock@icloud.com>
Thu 8/13/2020 1:47 PM

To:

- Sotelo, Justin@DCA

.....

I am opposed to proposed animal rehabilitation regulations that will create An unnecessarily restrictive environment for qualified animal physical therapists to practice in California. This legislation will further limit consumers' access to quality care and reduces the necessary collaboration between physical therapists and vets to help animals get the help they need.

Thank you.

Timmi Elcock

Cathy McKibben <winefruitoftheday@gmail.com>
Thu 8/13/2020 1:30 PM

To:

- Sotelo, Justin@DCA

.....

I am opposed to proposed animal rehabilitation regulations that will create An unnecessarily restrictive environment for qualified animal physical therapists to practice in California. This legislation will further limit consumers' access to quality care and reduces the necessary collaboration between physical therapists and vets to help animals get the help they need.

Thank you. Cathy McKibben

Diane Lamoreaux <d2l44001@yahoo.com>
Thu 8/13/2020 12:45 PM

To:

- Sotelo, Justin@DCA;
- Rodda, Timothy@DCA;
- DCA Director's Office;
- PT@DCA

August 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst

Timothy Rodda, Administration/Licensing Manager

California Veterinary Medical Board

1747 North Market Blvd., Suite 230

Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

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By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

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True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

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This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.
Sincerely,

Diane M Lamoreaux

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Suzanne Thomas <ellenacres@aol.com>
Thu 8/13/2020 12:14 PM

To:

- Sotelo, Justin@DCA

To the Members of the Veterinary Board:

I am writing in strong opposition to the adoption of Section 2038.5 Article 4 Division 20 Title 6. This proposal severely limits the rights and access of animal owners to qualified practitioners and restricts the ability of licensed and trained animal rehabilitation professionals to practice in their field.

There is no mandate that a physician be at the elbow of every sports and physical therapist, chiropractor and bodyworker and it is preposterous to insist that this be the case for animal clients.

This proposal is at best misdirected and at worst a monopolization of the animal rehabilitation field. It would limit the scope of quality care and place undue hardship on practitioners, veterinarians, consumers and their animals.

Thank you!

Sincerely,
Suzanne Thomas

Molly Clement <Molly@kitkaufman.com>
Thu 8/13/2020 12:12 PM

To:

- Sotelo, Justin@DCA

From: Molly Clement <Molly@kitkaufman.com>

Date: August 13, 2020 at 11:25:05 AM PDT

To: "justin.sotelo@dca.ca.gov" <justin.sotelo@dca.ca.gov>

Subject: CVMB proposed regulations for animal Physical Therapists

To Whom It May Concern:

Thank you for the opportunity to express my opposition to the CVMB proposed animal rehab regulations.

These regulations are an unnecessary overreach by the CVMB. Properly trained PTs are a huge, unsung asset to veterinary medicine, especially as many animals are living longer due to better diet, exercise and medical care.

If the CVMB succeeds in restricting PTs to veterinary supervision, options for care will become extremely limited. In conversation with my veterinarian, co-owner of a well-known animal hospital in the Bay Area, he has stated that his practice is too big and busy to manage Physical Therapy as well. He recommended the PT I have used and there is a strong professional relationship between the two facilities. There is currently more need than the available PT facilities can meet (long wait lists at the few veterinary facilities that do provide PT) which would be made worse if the CVMB succeeds. I also predict that costs will increase!

On a personal note, my dog will be 18 1/2 next week. Her longevity and quality of life are directly attributable to her weekly visits to a PT. A knowledgeable, experienced, dedicated therapist who is not vet supervised but works closely with medical professionals when needed.

Also, in these uncertain times when so many are worried about losing their livelihoods, this effort by the CVMB seems particularly mean-spirited.

Thank you.

Sincerely,

Carlyn Clement

Diane Francis <dianerene@cox.net>
Thu 8/13/2020 12:01 PM

To:

- Sotelo, Justin@DCA

Dear Sir,

I am writing to you as a past and current owner of many animals and a consumer of veterinary and physical therapy services.

I have been extremely fortunate to have found skilled and caring veterinarians in my town who also realize they aren't educated nor competent in physical therapy, and hence, referred me to an animal physical therapist with which I have had a trusted relationship for years. This PT is highly skilled and has provided healing therapies and pain relief to each of my injured animals way beyond my expectations.

As a consumer, I deserve the right to choose health providers for myself AND my animals. I do this with great care and research. There are good and bad actors in every profession, and it is incumbent upon each of us to determine their competency for our purposes. Yes, there are examples of PTs that have harmed animal (purportedly), but I have *personal* experience with vets who have hurt my animals. This means nothing, one moves on with better information and makes better choices next time.

As consumers, our access to PT for our animals is limited, and where available has long wait times.

I believe that this regulation would obviously limit PTs in their livelihood, and hand it over to the vets, while making it more difficult for the consumer to find adequate therapeutic care for their animals.

If the CVMB doesn't believe that PTs are currently trained adequately, then collaborate with them and develop a curriculum instead of bitching about it.

Thank you,
Diane René Francis

Keri McLain <kerimclain@gmail.com>
Thu 8/13/2020 12:00 PM

To:

- Sotelo, Justin@DCA

.....

With all due respect I request that you DO NOT restrict the regulations for excellent PT treatments for animals. I am a consumer and have seen all the good that comes from this necessary expertise. One of my rescue dogs was able to extend his paralyzed life because of the expertise and professionalism of his Physical Therapist. He because of her led a meaningful life. Why would the California Legislature ever want to eliminate choice for a consumer to receive a service from a highly qualified professional.

Thank you!

Keri McLain
Former Santa Clara City Council Member

Sent from my iPhone:
Keri Procnier McLain, PhD

From: Natalie Lindberg <lindberg.natalie@gmail.com>

Sent: Thursday, August 13, 2020 11:59 AM

To: VMB@DCA <VMB@dca.ca.gov>

Subject: Re: Notification of Posted Materials - August 13, 2020 Teleconference Board Meeting / Regulatory Public Hearing Related to Animal Physical Rehabilitation

Regarding today's teleconference meeting regarding Animal Rehabilitation Definition.

OPPOSITION: Section 2038.5, Article 4, Division 20, Title 16 of CCR, Animal Physical Rehabilitation

My name is Natalie Lindberg, a California licensed Registered Veterinary Technician. I wish to express my continued opposition of the proposed VMB language for Animal Rehabilitation.

While I respect the intended purpose of the VMB to better protect animal patients and California consumers against laypersons, it is more important to have further clarification of the proposed AR language to better define its aspects of regulation.

If there is proof of a need for regulation of "the large number of unlicensed people engaging in animal rehabilitation", I respectfully request a written copy for review.

Citing AR as being "harmful if not directly supervised by a veterinarian" - does not make sense for the purpose intended. AR supervised by a veterinarian, does not automatically deem the practice of AR as safe and effective, especially if the veterinarian does not have animal rehabilitation expertise.

Citing that AR can only be performed by a California licensed Veterinarian, Registered Veterinary Technician, Physical Therapist, but not clarifying their AR competency requirements – also does not make sense for the intended purpose.

Citing "no reasonable alternative has been identified" when no apparent current input from VMB members working in the field of AR (with and without direct veterinary supervision) does not make sense for the intended purpose. The number of direct supervision facilities available in the state of California is limited and does not meet the demand for needed pet care and can be cost prohibitive to the consumer. Alternatives can be identified.

The standard of AR care needs to be defined, and the competency of AR practitioners needs to be defined. As well, citing hydrotherapy, massage and exercise as Veterinary Medicine needs to be reviewed.

Effectively, while attempting to regulate unlicensed activity - the proposed language condemns licensed professionals with education, knowledge and but do not have a veterinarian on the premise and watching the session. Essentially, pioneers of Animal Rehabilitation movement in California would be considered in violation of the laws of the VMB, as currently proposed, without respect for how this specialized field of care came to be, nor where it is going.

I believe it is appropriate for the diagnosis of an animal's condition to be initiated by a qualified, licensed veterinarian. I also believe that an AR treatment plan to be initiated by a licensed, AR

qualified, professional. I believe the execution of the AR tasks should be formed by AR qualified individuals, and supervision be mandated by the referring veterinarian.

This is no longer an “emerging specialty” of animal care, and needs current language inducted into bylaws of both the veterinary and the physical therapy professions.

It would be reasonable to expect that whomever assumes care for the AR patient also assumes responsibility for safety of the patient, and should be expected to hold the education, skillset, licenses, insurance etc. to validate competency, compliance and patient safety. Plans for medical emergencies should be in place at any AR care facility.

It would also be reasonable to expect that an outsourced facility should be expected to stay in active communication with the patient’s primary care veterinarian and any other veterinarians as per standards of care via California Veterinary Practice Act.

As a CVMA Member, a SDCVMA Member, CARVTA Member as well as AARV Member I have been educated, trained, and continue to work in the arena of Animal Rehabilitation since 1998 - I would like my voice of opposition to be heard and sincerely appreciate the opportunity to be included in the process of defining Animal Rehabilitation in California, and the lawful working orders thereof.

With Respect and Gratitude,
Natalie Lindberg CARVT lic 3004

Hillary Conant <drconant.sbvis@gmail.com>
Thu 8/13/2020 11:55 AM

To:

- Sotelo, Justin@DCA

Dear Mr. Sotelo and the Veterinary Medical Board,

I have been an active member of the CVMA since 2007 and am a small animal veterinarian and practice owner. I attempted to log on to the virtual hearing this morning, but had difficulty with the technology and finally joined the meeting during the recess. I was hoping to make a public comment, opposing the current legislation.

I very much value the ability to refer to a HIGHLY skilled and trained animal rehab physical therapist that is NOT a veterinarian. It is absurd to think that physical therapists should be directly supervised by veterinarians. Very few veterinarians, other than those specifically trained in rehab, have ever been taught the techniques that certified animal physical therapists utilize. Even those of us who have a special interest in rehab and physical therapy do not possess the knowledge and skills that extensive training and years of high-level practice bring to a certified physical therapist. I heard you say that we cannot apply the human model to animals because animals can't verbalize their pain? The TRAINED physical therapists I have encountered are extremely skilled in picking up on the same clues veterinarians use to interpret discomfort in an animal. Animal communication, and potential side effects of therapy should absolutely be part of the training and certification program for physical therapists. But there is no reason to believe they won't be as successful as veterinarians are at this.

Please contact me with any questions. I apologize for the brevity.

Dr. Hillary Conant

--

Dr. Hillary Conant
Santa Barbara Veterinary Integrative Services (SBVIS)
drconant.sbvis@gmail.com

Valerie Sterling <valeriesterling12@gmail.com>
Thu 8/13/2020 11:50 AM

To:

- Sotelo, Justin@DCA

To Whom it may concern,

I am writing to you to express my opposition to the Proposed Regulatory Action Concerning Animal Physical Rehabilitation Section 2038.5 (Division 20, Tidal 16, California Code of Regulations).

A recent letter submitted to you by Richard Katz, PT, DPT, MA (President of the California Physical Therapy Association) is an accurate summary of my feelings and beliefs on this matter.

I urge you to withdraw the current regulatory proposal and seek an alternative solution which will specifically allow qualified and licensed Physical therapists to work under the direct OR indirect supervision of a veterinarian.

Thank you very much for your consideration on this matter.

Sincerely,
Valerie Watase, PT.

Jasmine Quach <dearjasminequach@gmail.com>
Thu 8/13/2020 11:41 AM

To:

- Sotelo, Justin@DCA

Hi Justin,

My name is Jasmine Quach and I will be attending vet school this upcoming September. I currently work at a vet clinic that offers animal rehabilitation therapy and I OPPOSE the proposed animal rehabilitation regulations.

--

Best Regards,
Jasmine Quach

Debra Voulgaris (via Google Docs) <debrav711@gmail.com>
Thu 8/13/2020 11:39 AM

To:

- Sotelo, Justin@DCA

Cc:

- AKramer@beachanimalrehab.com

APR legislative Hearing 8132020.pdf
30 KB

8/13/2020

To all concerned,

I am a veterinarian in California and one of the owners of Beach Animal Rehabilitation. I am a residency trained veterinarian with multiple certifications, one in canine rehabilitation. I appreciate the concern that animals be given safe and appropriate treatment, and I share the same concerns. However, I want to address some areas that I do not feel are being fairly assessed.

There is no doubt that many animals going to physical rehabilitation have concurrent issues that could be overlooked and potentially be very serious. Recognizing these issues is very important which is why a veterinarian should do the initial intake and the general veterinarian should be involved as well. There could be unexpected issues that arise, and recognizing them is something that comes with experience. Someone who has worked with animals for years, is more likely to be able to recognize an arising issue whether they are vets, RVT's and PT's- the level of experience is in my opinion the most important factor. The skill, knowledge and experience of a PT that has been working with dogs and cats for years should not be dismissed or minimized- they have learned over time about many of the conditions we worry about through direct experience. And I personally believe that all professionals, veterinarians, PT's RVT's etc should have direct supervision for at least the 1st year of their career. But there is a time when we/they are qualified and capable, and should be allowed to practice with some support and respect of the industry we/they are serving. I work with incredible, skilled physical therapists and they often catch things that were missed by veterinarians. I agree, there should be a veterinarian involved, but 'direct' supervision is not realistic and diminishes the qualification of the PT, not to mention that veterinarians have other things to do- we are busy and the last thing we need to do is stand over a PT who is uniquely qualified to do their job. Most PT's with appropriate training and some experience, are more than capable of recognizing an issue and responding accordingly.

I realize that authorizing physical therapists to perform APR with indirect veterinarian supervision was rejected because:

“only licensed veterinarians and RVTs possess the knowledge and training to plan and supervise APR for animal patients and ensure proper animal handling, recognize pain and discomfort, and provide emergency care and assistance as needed in the particular field of APR”.

But I take issue with this assessment. Are RVT's really qualified to supervise a PhD in physical therapy with years of experience working with animals?? RVT's have a different type of training, and it is valuable, but many RVT's take an online training course, do not always have a degree, and the VMB just stated that RVT's do not need certification which raises many questions about our patients safety. Many vet techs got their training on the job and many PT's

have also had clinical training outside the scope of rehab by working with veterinarians. It seems strange to put someone with potentially so little formal training as the supervisor of a PhD, CCRP PT with years of experience. I think this needs to be re-assessed.

This is an issue that has been going on for years. There are incredible PT's out there that know about animals- they know what pain looks like- they know when something is wrong and will notify a veterinarian immediately. Do they really need to understand every facet of the disease?? No. They are more skilled than anyone at rehabilitation so I think they should be welcomed to do their job. I do think CE should be required mandating CPR, pain recognition and other courses relevant to what they do, but so must we all. I can't tell you how many veterinarians out there are incompetent and negligent with all the right credentials- those are the people you should be going after.

Thank you for your time and consideration.

Sincerely,

Debra Voulgaris MA, DVM, CVA, CCRP

Medical Director Beach Animal Rehabilitation

Sara Robledo <srobledo@thewholepetvet.com>
Thu 8/13/2020 11:39 AM

To:

- Sotelo, Justin@DCA

OPPOSE the proposed animal rehabilitation regulations.

WPV Main <wpv@thewholepetvet.com>
Thu 8/13/2020 11:39 AM

To:

- Sotelo, Justin@DCA

We OPPOSE the proposed animal rehabilitation regulations.

Best Regards,
The Whole Pet Vet

Renee Drumm <reneescottdrumm@gmail.com>
Thu 8/13/2020 11:39 AM

To:

- Sotelo, Justin@DCA

I am writing to inform you that I strongly believe that animal physical rehabilitation should be done by LICENSED professionals. Not by unlicensed vet techs, or even veterinarians. Physical therapy is its own specialized field. Just like you wouldn't want your cardiologist to give you physical therapy, a regular veterinarian or a vet tech is simply not equipped to provide physical therapy to an animal. In fact, I believe they could do more harm than good.

I have had my dogs in physical rehabilitation before and it has worked wonders -- in the hands of licensed professionals who know what they are doing. I also do not believe that Animal physical therapist should have to work underneath a vet or in a vet's office. This is not the case for humans, why on earth should it be the case for pets?

Thank you,
Tonya Renee Scott Drumm
San Jose, CA

Rae Greulich <rae.greulich@gmail.com>
Thu 8/13/2020 11:38 AM

To:

- Kirchmeyer, Kimberly@DCA;
- Sotelo, Justin@DCA

+3 others

I'm a consumer.

The Department of Consumer Affairs is supposed to PROTECT Consumers. By allowing the proposed CVMB Animal Physical Rehab Regulations to pass, the Department of Consumer Affairs will be allowing veterinarians to fleece consumers while they unknowingly pay for inferior treatment conducted by untrained people – treatment that could potentially injure their pets. I urge you to consider these regulations very, very carefully.

These proposed regulations do not mandate proper training for every individual who practices physical therapy on animals and the uninformed consumer is none the wiser. These regulations leave the field wide open to sloppiness and abuses by less than honorable practitioners. That's very dangerous!

It is clear that the Regs would be a lucrative win for the California veterinarians who are fighting so hard to push it through, but that by no means would make it right if this bill passes. So let's not look to the CA Veterinary Medical Board to protect my pet.

I AM HERE TO PROTECT MY PET AND I AM COUNTING ON THE DEPT OF CONSUMER AFFAIRS TO PROTECT ME.

Physical therapists in California must have a master's degree to become licensed. They then go on and receive advanced training to become specifically certified to work on animals. Obviously, as a consumer THIS is the level of competency I want in the person manipulating the limbs of my fragile animal.

The moral high ground here goes to those fighting for mandatory educational standards for all who practice in the specialty of animal rehabilitation before they are allowed to perform physical therapy on a pet. The proposed regulations are severely lacking. This bill has to go back to the drawing board.

karen.atlas@yahoo.com
Thu 8/13/2020 11:37 AM

To:

- Sotelo, Justin@DCA

FitzsimmonsUCSFoppositionVMBregs.pdf
158 KB

Please confirm receipt. I have been asked to send this on her behalf.

Mailing Address:
Box 0736
San Francisco, CA 94143-0736

Physical Address:
1500 Owens Street, Suite 400
San Francisco, CA 94158-2332

tel: (415) 514-6777
fax: (415) 514-6778

August 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a licensed physical therapist in California, I have been monitoring this issue closely for years and have been repeatedly disappointed with the egregious attempts this Board has taken to monopolize this area of animal healthcare.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to practice my craft under reasonable guidelines.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, my job opportunities and ability to earn a living would be dramatically reduced. **This regulation would be a restraint of my trade.**

Other states have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am OPPOSED to this regulation as written and urge that it be

withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before us on this matter.).

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists. Unfortunately, the CVMB opposed that bill largely based on the misrepresentations by members of the veterinary profession who successfully were able to sway Board opinion.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals *after* a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

Sincerely,



Amber Fitzsimmons PT, MS, DPTSc
Associate Professor and Chair
Department of Physical Therapy and Rehabilitation Science
Department of Anatomy

University of California, San Francisco
San Francisco, CA 94143-0736
Amber.Fitzsimmons@ucsf.edu

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Anna Isabel Christjansen <annaisabelchr@gmail.com>
Thu 8/13/2020 11:36 AM

To:

- Sotelo, Justin@DCA

.....

Hello,

I OPPOSE the proposed animal rehabilitation regulations

karen.atlas805@gmail.com
Thu 8/13/2020 11:35 AM

To:

- Sotelo, Justin@DCA

NV PT opposition ltr 081320.docx
151 KB

Please confirm receipt.

karen.atlas@yahoo.com
Thu 8/13/2020 11:35 AM

To:

- Sotelo, Justin@DCA

VET-oppose-template-letter-8.13.2020F (1).docx
17 KB

Please confirm receipt.

----- Forwarded Message -----

From: Juli Potter <julis6pack@msn.com>
To: karen.atlas@yahoo.com <karen.atlas@yahoo.com>
Sent: Tuesday, August 11, 2020, 03:14:57 PM PDT
Subject: Veterinary Opposition to CVMB

Karen,
I do hope this helps!!
I wish you the vet best!
Juli

August 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: VETERINARY OPPOSITION TO CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am a licensed veterinarian in Virginia as well as a Certified Canine Rehabilitation Therapist. I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to inter-professionally collaborate and hinders the consumer's ability to access these professionals.

Allowing the veterinarian to evaluate, diagnose, and determine the best course of treatment is appropriate. If the best course of treatment is to send my patients to an animal physical therapist, then I would like the choice to be able to do that for my patients and clients. It is unreasonable to believe that veterinarians have the same skillset as a PT, much less even want to offer specialty rehab services themselves. It would be the highest standard of professional medical care for me to be able to refer my patients out to the professionals who are competent in this specialty. I have personally seen the differences in outcomes from the services of a licensed physical therapist certified in canine rehabilitation and therefore recognize the important role these professionals play in the care and well-being of our companion animals.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals *after* a veterinarian has established a Veterinary-Client-Patient-Relationship (VCPR), made a diagnosis, and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (after the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the

consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us (like Colorado, Nevada and Nebraska). Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

The issue of animal physical rehabilitation has been going on for far too long. A legislative remedy is the clear solution (akin to AB 3013—the Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists.

Sincerely,

Juli Potter, DVM, CCRT
2449 Shutterlee Mill Rd
Staunton, VA 24401
#703-927-1824
Julis6pack@msn.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

karen.atlas@yahoo.com
Thu 8/13/2020 11:34 AM

To:

- Sotelo, Justin@DCA

PT_oppose_template_letter_8.13.2020F_.pdf
78 KB

Please confirm receipt.

----- Forwarded Message -----

From: jagare.linn <jagare.linn@gmail.com>

To: "karen.atlas@yahoo.com" <karen.atlas@yahoo.com>

Sent: Tuesday, August 11, 2020, 10:09:22 PM PDT

Subject: Jag delar PT_oppose_template_letter_8.13.2020F_ med dig

August 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a licensed physical therapist in California, I have been monitoring this issue closely for years and have been repeatedly disappointed with the egregious attempts this Board has taken to monopolize this area of animal healthcare.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to practice my craft under reasonable guidelines.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, my job opportunities and ability to earn a living would be dramatically reduced. **This regulation would be a restraint of my trade.**

Other states have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am OPPOSED to this regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before us on this matter.).

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly

included the physical therapists. Unfortunately, the CVMB opposed that bill largely based on the misrepresentations by members of the veterinary profession who successfully were able to sway Board opinion.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals *after* a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

Linn Jägare

Långtibble Storsätra 432

740 40 Vänge

SWEDEN

linn@djuribalans.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Siefertman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

karen.atlas@yahoo.com
Thu 8/13/2020 11:33 AM

To:

- Sotelo, Justin@DCA

PT opposition letter 08-13-20.pdf
3 MB

Please confirm receipt.

----- Forwarded Message -----

From: Erin Pasley <erinpasley10@gmail.com>
To: "karen.atlas@yahoo.com" <karen.atlas@yahoo.com>
Sent: Wednesday, August 12, 2020, 07:06:05 AM PDT
Subject: PT opposition letter for 08/13/20

I am attaching my letter to be submitted for tomorrow's meeting. I hope it is helpful. Thank you for being willing to submit for those of us who aren't able to during the restricted hours.

Erin Pasley PT, DPT, APT

August 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a Licensed Physical Therapist, Doctor of Physical Therapy (DPT), and Animal Physical Therapist, I have been monitoring this issue closely and have been repeatedly disappointed with the egregious attempts this Board has taken to monopolize this area of animal healthcare.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to practice my craft under reasonable guidelines.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd. **I have a Doctorate in Physical Therapy, which is a specialty branch of rehabilitation, with advanced knowledge in how to address impairments and disabilities to help restore functional abilities and quality of life by addressing the neurological and musculoskeletal systems. I find it offensive that a current "unlicensed veterinary assistant" is allowed to perform animal physical rehabilitation without any knowledge or skills just because they are merely being directly supervised by a Veterinarian. I also find it offensive that physical therapists are being recommended to be grouped in this "unlicensed" category, which would strip away and create a public perception of ignorance on the part of the physical therapist. When in actuality, physical therapists are trained specialists in the field. Because of the skill set and education of a physical therapist, we are qualified to perform animal physical therapy, without direct supervision of a Veterinarian, which has been proven in the human model for decades as compared to the current "unlicensed veterinary assistant". As a DPT it is my job to understand my scope of practice and work closely with the referring Veterinarian for medical management of the client. This DOES NOT have to be done with direct supervision.**

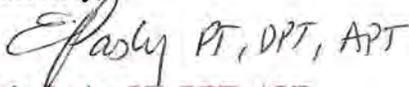
Other states have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am OPPOSED to this regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before us on this matter.).

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists. Unfortunately, the CVMB opposed that bill largely based on the misrepresentations by members of the veterinary profession who successfully were able to sway Board opinion.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals *after* a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under **INDIRECT** supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,



Erin Pasley PT, DPT, APT

Unleashedptw@gmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Siefertman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

karen.atlas@yahoo.com
Thu 8/13/2020 11:33 AM

To:

- Sotelo, Justin@DCA

PT_oppose_Ann Essner.docx
31 KB

Please confirm receipt.

----- Forwarded Message -----

From: Ann Essner <ann.essner@evidensia.se>
To: karen.atlas@yahoo.com <karen.atlas@yahoo.com>
Sent: Wednesday, August 12, 2020, 01:02:38 AM PDT
Subject: Oppose letter

Hi Karen,

Please send this in for me.

Thank,
Ann

Ann Essner
Leg. sjukgymnast, Med. Dr.
Specialist i fysioterapi inom veterinärmedicin
Godkänd av Jordbruksverket
Evidensia Djurkliniken Gefle
026- 10 63 10
www.evidensia.se

August 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to **OPPOSE** the proposed animal physical rehabilitation regulations.

I am a licensed human physical therapist with continuing education in veterinary medicine. In addition I am also approved by the Swedish Board of Agriculture to practice animal physiotherapy without supervision from a veterinarian in Sweden. Since more than 10 years I have been state-authorized in veterinary medicine and I have been working side-by-side with veterinarians in several animal hospitals, veterinary clinics and to provide unique physiotherapeutic services.

I have been monitoring the issue with the proposed animal physical rehabilitation regulations and closely for years and have been repeatedly disappointed with the egregious attempts this Board has taken to restrict this area of animal healthcare.

I am certain that the proposed animal physical rehabilitation regulations are threatening the animal welfare.

It is clear that the emerging specialty field of animal physical rehabilitation and physical therapy needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to practice my craft under reasonable guidelines.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work **ONLY** under direct supervision and for a veterinarian is absurd. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines.

Other American states (i.e. Nevada, Colorado and Nebraska) and several other countries i.e. Sweden and South Africa have successfully regulated this field in much more appropriate ways that serve the consumer, pets, and professionals alike. I am **OPPOSED** to this regulation as written and urge that it be

withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states and countries have done that have gone before you on this matter.).

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists. Unfortunately, the CVMB opposed that bill largely based on the misrepresentations by members of the veterinary profession who successfully were able to sway Board opinion.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals *after* a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,



Dr Ann Essner

Licensed PT, MPT, DPT
Board Certified Specialist in Animal Physiotherapy, PhD
Clinical researcher, Uppsala University

IVC Evidensia, Djurkliniken Gefle

Norra gatan 1

803 21 Gävle, Sweden

ann.essner@evidensia.se

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Siefertman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

karen.atlas@yahoo.com
Thu 8/13/2020 11:31 AM

To:

- Sotelo, Justin@DCA

PT oppose template letter 8.13.2020F -CADrian.docx
21 KB

Please confirm receipt.

----- Forwarded Message -----

From: Carrie Adrian <carrie.adrian@vca.com>
To: Karen Atlas (karen.atlas@yahoo.com) <karen.atlas@yahoo.com>
Sent: Wednesday, August 12, 2020, 06:51:15 PM PDT
Subject: CVMB - OPPOSITION LETTER 08132020

Karen,

Can you please send my letter in on my behalf at the appropriate time so it will be considered by the CVMB?

My sincere thank you,

Caroline Adrian

Caroline Adrian, PT, PhD, FIAVRPT
Animal Physical Therapist (PTL#6972)
Director, Rehabilitation Services
VCA Animal Hospitals
Carrie.Adrian@vca.com • (303) 877-7485

August 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

My name is Caroline Adrian from Loveland, Colorado. I am a licensed physical therapist who has successfully transferred my skills to animal patients over 20 years ago, when there was no such thing as veterinary physical therapy or rehabilitation in the United States. I was the first physical therapist hired full time in a private practice in Feb 2000.

I have since established myself in this field, educating and developing collaborative relationships with veterinarians for the past 20 years.

- I've lectured across the United States and around the world - Japan, Argentina, Sweden, Brazil, Italy, England, to name a few - at various Physical Therapy and Veterinary conferences
- I've written chapters in books about veterinary rehabilitation
- I've sat on expert panels with other board certified veterinary specialists
- I've published peer-reviewed research papers in a prestigious veterinary journal
- I've performed pro bono work, collaborating with zoo veterinarians to treat exotics
- I direct rehabilitation services for the largest veterinary hospital group in the country
- I completed a PhD in canine biomechanics from Colorado State University's Clinical Sciences department within the Veterinary Teaching Hospital, taking courses side-by-side with veterinary students and veterinarians

And this journey has been rewarding all along the way. We learn from one another and strive to do what is best for our patients. Collaboration with other licensed professionals is not a new concept. Engineering and medicine have come together to develop new implant devices and perform biomechanical research, among so many other professional collaborations...it's endless! The human rehabilitation model consists of a variety of licensed professionals – medical doctors, athletic trainers, occupational therapists, etc., all working towards common goals for each patient.

In 2007, I created and was hired into a position as Director of Rehabilitation Services for the largest veterinary hospital group in our country. I see the limitations in patient care. I see across the country, other states that have common sense language that is working.

I am submitting this letter to vehemently **OPPOSE** the proposed animal physical rehabilitation regulations, with extensive knowledge and experience that this collaboration works! We grow. We learn from each other. And we improve our skills and knowledge by working together.

As a licensed physical therapist in Colorado, I have been monitoring this issue closely for years and have been repeatedly disappointed with the egregious attempts this Board has taken to monopolize this area of animal healthcare.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits the ability to practice my craft under reasonable guidelines.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, my job opportunities and ability to earn a living would be dramatically reduced. **This regulation would be a restraint of my trade.**

Other states have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am OPPOSED to this regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution, which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before us on this matter).

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists. Unfortunately, the CVMB opposed that bill largely based on the misrepresentations by members of the veterinary profession who successfully were able to sway Board opinion.

I strongly urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals *after* a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

Caroline Adrian, PT, PhD
Fellow, IAVRPT
Animal Physical Therapist
4224 Sedona Hills Dr.
Loveland, CO 80537
Carrie.adrian@vca.com
(303) 877-7485

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

lla2003@aol.com
Thu 8/13/2020 11:29 AM

To:

- Sotelo, Justin@DCA

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544 bytes

OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

see attachment

linda aroyan

Marjorie Randall <mrando8@gmail.com>
Thu 8/13/2020 11:29 AM

To:

- Sotelo, Justin@DCA

.....
As a consumer of both veterinary medicine and animal physical therapy I strongly oppose the proposed restrictions.

I take my dog to both veterinarians and a physical therapist and he has benefitted from both but the processes have been very different, as is the expertise.

Our physical therapist is licensed and proficient, with many years of experience in animal rehabilitation and participating in ongoing training. I would never trust my best friend's welfare to anyone less qualified. Rather than replacing the work of our veterinarian she specializes in a specific field. She is well trained in all matters of safety and has demonstrated that in the years we have been going to her. She and our vet work in partnership but not under each other's license. Each has her own expertise.

Our veterinary office could never accommodate the scheduling of such frequent and lengthy visits, and they don't have nearly the room required for physical therapy treatment.

His physical therapist, a licensed therapist with specialized training in rehabilitating animals, uses a 1600 square foot facility which houses a traditional treadmill and an underwater treadmill, which has proven invaluable in working with my senior dog's arthritis and injured joints. She also has a lap pool which allows injured animals to exercise safely in ways that support their joints.

A physical therapist working with animals must absolutely meet mandated competency standards. The potential for harm is too great to allow anything less. I am grateful to have the choice of selecting a qualified therapist freely.

Please feel free to reach out if I can be of any further help.

Thank you,
Marjorie Randall

karen.atlas@yahoo.com
Thu 8/13/2020 11:29 AM

To:

- Sotelo, Justin@DCA

Karen From Sheila Malavasi Consumer_oppose_template_letter_8.13.2020F.docx
17 KB

Please confirm receipt.

----- Forwarded Message -----

From: smalavasi@att.net <smalavasi@att.net>
To: "karen.atlas@yahoo.com" <karen.atlas@yahoo.com>
Sent: Thursday, August 13, 2020, 07:07:07 AM PDT
Subject: RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Hi Karen,

Here it is in email and I also attached as word doc. Let me know you got this.

Sheila

August 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov
Timothy.Rodda@dca.ca.gov
DCA.DirectorsOffice@dca.ca.gov
PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

I have been deployed by the state of California – OES, to many disasters with my search dog, and at the end of a long hard day working my canine, there were physical therapists there to

work on our canines. This service is greatly appreciated by many of the canine handlers throughout the state.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.
Sincerely,

Sheila Malavasi
16381 Jody Cir.
Westminster, CA 92683
smalavasi@att.net

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

August 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
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E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

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So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

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I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Sheila Malavasi
16381 Jody Cir.
Westminster, CA 92683
smalavasi@att.net

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

karen.atlas@yahoo.com
Thu 8/13/2020 11:28 AM

To:

- Sotelo, Justin@DCA

pt_oppose_template_letter_8.13.2020f_.docx
17 KB

Please confirm receipt

----- Forwarded Message -----

From: Jessica Gadayan <msjlclark@gmail.com>
To: "karen.atlas@yahoo.com" <karen.atlas@yahoo.com>
Sent: Thursday, August 13, 2020, 07:17:12 AM PDT
Subject: Hearing

Hi Karen,

It has been some time since we spoke. I hope you are doing well. I was in an ortho residency last year and was busy studying for the OCS before COVID hit. I would love to have been able to attend the vet board hearing today, but just saw the email from CPTA and unfortunately will be working in clinic during the entire meeting.

I was hoping you could add my name to the letter opposing the Vet Board's proposed regulations. Below is my info to add to the letter. It looked like the template language was for all PTs (not just animal rehab certified) but if you need any background, I am in the process (2nd class at CRI) of getting my CCRT certification, but have not completed it yet.

Jessica Gadayan, PT, DPT, OCS

August 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a licensed physical therapist in California, I have been monitoring this issue closely for years and have been repeatedly disappointed with the egregious attempts this Board has taken to monopolize this area of animal healthcare.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to practice my craft under reasonable guidelines.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, my job opportunities and ability to earn a living would be dramatically reduced. **This regulation would be a restraint of my trade.**

Other states have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am OPPOSED to this regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before us on this matter.).

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly

included the physical therapists. Unfortunately, the CVMB opposed that bill largely based on the misrepresentations by members of the veterinary profession who successfully were able to sway Board opinion.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals *after* a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

Jessica Gadayan, PT, DPT, OCS

1737 Solano Ave. Apt. 305, Berkeley, CA 94707

msjlclark@gmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

karen.atlas@yahoo.com
Thu 8/13/2020 11:28 AM

To:

- Sotelo, Justin@DCA

20.08-12.LTR.VMB.2038.5.Opp.FINAL (2).pdf
801 KB

Please confirm receipt to ensure this letter is considered.

Thank you,

Karen



Steven L. Simas
Daniel J. Tatick
Ryan M. Keever
Sasha G. Aguilar

August 12, 2020

Justin Sotelo
Lead Administrative & Policy Analyst
Timothy Rodda
Administration/Licensing Manager
Veterinary Medical Board
1747 N. Market Street, Suite 230
Sacramento, California 95834

VIA EMAIL AND US MAIL

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

**Re: *Opposition to Proposed Regulatory Action*
Animal Rehabilitation
*California Code of Regulations Section 2038.5***

Dr. Mr. Sotelo and Mr. Rodda:

Our law firm represents the California Association of Animal Physical Therapists (“CAAPT”) and the Animal Physical Therapy Coalition (“APTC”).

As you know, APTC is a grassroots coalition representing veterinarians, physical therapists, RVTs and consumers. APTC has been working diligently with the Veterinary Medical Board (“Board”) to establish common sense animal rehabilitation regulations and legislation in California.

CAAPT is a grassroots association/coalition of licensed physical therapy professionals who seek to play a leading role in defining appropriate legislative/regulatory language in California.

On behalf of our client groups, we are writing to state opposition to the adoption of the Board’s proposed regulation on Animal Physical Rehabilitation, California Code of Regulations, title 16, section 2038.5 (“Proposed APR Regulation”). As you have already received comments directly from our client groups, this letter will focus on the legal defects and deficiencies in this regulation and process.

Justin Sotelo
Timothy Rodda
August 12, 2020
Page 2

A. The Board's Animal Rehabilitation Regulation Unlawfully Enlarges the Scope of Veterinary Practice Defined by Statute

Examining the California Veterinary Medicine Practice Act (“Act”) confirms that the Proposed APR Regulation oversteps the Board’s regulatory authority in three ways. First, the Act does not authorize veterinarians to practice physical therapy, as the Legislature has confirmed. Second, the Proposed APR Regulation violates the Administrative Procedure Act as exceeding the Board’s scope and legal authority. And third, the Proposed APR Regulation represents an improper attempt for the Board to increase its scope of veterinary practice without proper legislation.

1. The Veterinary Scope of Practice Does Not Include Physical Therapy

Business and Professions Code section 4826 defines the scope of veterinary practice under California law:

A person practices veterinary medicine, surgery, and dentistry, and the various branches thereof, when he or she does any one of the following:

- (a) Represents himself or herself as engaged in the practice of veterinary medicine, veterinary surgery, or veterinary dentistry in any of its branches.
- (b) Diagnoses or prescribes a drug, medicine, appliance, application, or treatment of whatever nature for the prevention, cure, or relief of a wound, fracture, bodily injury, or disease of animals.
- (c) Administers a drug, medicine, appliance, application, or treatment of whatever nature for the prevention, cure, or relief of a wound, fracture, bodily injury, or disease of animals, except where the medicine, appliance,

Justin Sotelo
Timothy Rodda
August 12, 2020
Page 3

- application, or treatment is administered by a registered veterinary technician or a veterinary assistant at the direction of and under the direct supervision of a licensed veterinarian subject to Article 2.5 (commencing with Section 4832) or where the drug, including, but not limited to, a drug that is a controlled substance, is administered by a registered veterinary technician or a veterinary assistant pursuant to Section 4836.1. However, no person, other than a licensed veterinarian, may induce anesthesia unless authorized by regulation of the board.
- (d) Performs a surgical or dental operation upon an animal.
 - (e) Performs any manual procedure for the diagnosis of pregnancy, sterility, or infertility upon livestock or Equidae.
 - (f) Uses any words, letters, or titles in such connection or under such circumstances as to induce the belief that the person using them is engaged in the practice of veterinary medicine, veterinary surgery, or veterinary dentistry. This use shall be prima facie evidence of the intention to represent himself or herself as engaged in the practice of veterinary medicine, veterinary surgery, or veterinary dentistry.

(Amended by Stats. 2012, Ch. 239, Sec. 1. (AB 1839)
Effective January 1, 2013.)

Nowhere in this statute defining the scope of veterinary practice, the violation of which can be a misdemeanor,¹ is any mention of animal rehabilitation or physical therapy. Physical therapy is defined as “the art and science of physical or corrective rehabilitation or of physical or corrective treatment of any bodily or mental condition.”² Corrective rehabilitation or treatment is missing from the Act.

¹ Business & Professions Code section 4831.

² Business and Professions Code section 2620(a).

Justin Sotelo
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August 12, 2020
Page 4

Further, while section 4826 even articulates the veterinarian's modes of treatment such as drugs, administration of medicine and appliances, and treatment, prevention and cure of wounds, fractures, bodily injury, or disease of animals, it falls short of authorizing veterinarians to practice physical therapy or to provide physical therapy modalities. Physical therapy modalities include:

...use of the physical, chemical, and other properties of heat, light, water, electricity, sound, massage, and active, passive, and resistive exercise, and shall include physical therapy evaluation, treatment planning, instruction and consultative services.³

Section 4826 does not come close to authorizing veterinarians to perform physical therapy on their patients and it is clearly outside the scope of lawful veterinary practice.

When courts construe statutes and the legislative intent behind them, they look at what the statute enumerates and will not *read into it* as the Board is trying to do in enacting the Proposed APR Regulation. Pursuant to the doctrine of *expressio unius est exclusio alterius*, the enumeration of acts within the operation or exception of a statute will preclude the inclusion by implication other acts not specified.⁴ Based upon the language of section 4826, animal rehabilitation is not expressly authorized as part of veterinary practice. Thus, we do not believe a court will read animal rehabilitation or physical therapy into this section, especially when the Legislature was clear in defining the scope of veterinary practice.⁵⁶

³ Business and Professions Code section 2620(a).

⁴ *Henderson v. Mann Theaters Corp.* (1976) 65 Cal.App.3d 397, 403.

⁵ *Phillippe v. Shappell Industries* (1987) 43 Cal.3d 1247, 1265.

⁶ Further, the U.S. Supreme Court has made clear in *North Carolina State Board of Dental Examiners v. Federal Trade Commission* (2015) ___ U.S. ___, 135 S.Ct. 1101, that injunctive relief may be proper and Board members may even be liable when the Board's action such as the Proposed APR Regulation unfairly restricts competition.

Justin Sotelo
Timothy Rodda
August 12, 2020
Page 5

2. The Proposed APR Regulation Violates the Administrative Procedure Act

As the Board knows, its regulations must meet the established requirements of the Administrative Procedure Act and be approved by the Office of Administrative Law (“OAL”). In this case, the Proposed APR Regulation fails to comply with the Administrative Procedure Act.

Government Code section 11349.1 requires OAL to review all regulations and determine whether they comply with statutory standards set forth in Government Code section 11349. The Proposed APR Regulation fails to comply with the requirements of “consistency.”

Government Code section 11349(d) provides that “consistency” means the regulation is in harmony with, and not in conflict with or contradictory to, any existing statutes, court decisions, or other provisions of law. Courts have held that “[a]dministrative regulations that alter or amend the statute or enlarge or impair its scope are void and courts not only may, but it is their obligation to strike down such regulations.”⁷ Because the Proposed APR regulation will enlarge the scope of the Act, namely Business and Professions Code section 4826, it will not pass muster either by OAL or in any subsequent judicial review. And courts do not have to defer to the Board’s interpretation. Rather, they exercise their own independent judgment.⁸ Neither a reviewing court nor OAL will find any reference to APR in the Act, thus, the Proposed APR Regulation fails the consistency requirement of the Administrative Procedure Act.

B. The Board’s Stakeholder’s Task Force Recommendation

At the February 2, 2017 Animal Rehabilitation Task Force meeting, the Task Force approved the following language:

California licensed physical therapists with advanced certification in Animal Physical Rehabilitation (with such

⁷*Aguilar v. Superior Court* (2009) 170 Cal.App.4th 313, 323.

⁸ *Samantha C. v. State Department of Developmental Services* (2010) 185 Cal.App.4th 1462, 1481–1483, citing *Murphy v. Kenneth Cole Productions, Inc.* (2007) 40 Cal.4th 1094, 1105, fn. 7.

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Timothy Rodda
August 12, 2020
Page 6

certification to be defined by the Veterinary Medical Board and Physical Therapy Board working cooperatively) may provide animal physical rehabilitation under the degree of supervision to be determined by the veterinarian who has established a veterinarian-client-patient relationship, on a veterinary premises or an Animal Physical Rehabilitation premises (as defined in regulation by the Veterinary Medical Board and the Physical Therapy Board working cooperatively), or a range setting.⁹

This common-sense language does not conflict with the Act. A veterinarian-client-patient relationship (“VCPR”) must be established, which is vital and allows the veterinarian to manage the care provided to the animal.¹⁰ The veterinarian and physical therapist work together.

This language protects the public because in addition to the veterinarian establishing a VCPR, the physical therapist must obtain *advanced* certification in Animal Physical Rehabilitation (“APR”). The advanced training/certification would include courses that are approved by the Registry for Approved Continuing Education (RACE). The public is further protected by the Board’s oversight of an APR premises license, for which the requirements are to be determined and defined by the Board working cooperatively with the Physical Therapy Board. The Board will ensure protection of the public by developing appropriate minimum standards for an APR premises.

C. Direct Supervision Not Necessary When VCPR Established

California Code of Regulations, title 16, section 2032.1(b), requires the following elements to establish a veterinarian-client-patient relationship:

- (1) The client has authorized the veterinarian to assume responsibility for making medical judgments regarding the

⁹ April 19-20, 2017 Veterinary Medical Board Meeting Minutes at page 11
<https://www.vmb.ca.gov/meetings/minutes/20170419_vmb.pdf> (as of August 11, 2020).

¹⁰ See California Code of Regulations, title 16, section 2032.1.

Justin Sotelo
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August 12, 2020
Page 7

health of the animal, including the need for medical treatment,

(2) The veterinarian has sufficient knowledge of the animal(s) to initiate at least a general or preliminary diagnosis of the medical condition of the animal(s). This means that the veterinarian is personally acquainted with the care of the animal(s) by virtue of an examination of the animal or by medically appropriate and timely visits to the premises where the animals are kept, and

(3) The veterinarian has assumed responsibility for making medical judgments regarding the health of the animal and has communicated with the client a course of treatment appropriate to the circumstance.

California Code of Regulations, title 16, sections 2032.1(e) and (f), state:

No person may practice veterinary medicine in this state except within the context of a veterinarian-client-patient relationship or as otherwise permitted by law. A veterinarian-client-patient relationship cannot be established solely by telephonic or electronic means.

Telemedicine shall be conducted within an existing veterinarian-client-patient relationship, with the exception for advice given in an “emergency,” as defined under section 4840.5 of the code, until that patient(s) can be seen by or transported to a veterinarian. For purposes of this section, “telemedicine” shall mean the mode of delivering animal health care services via communication technologies to facilitate consultation, treatment, and care management of the patient.

Once a VCPR has been established by a veterinarian, that veterinarian possesses sufficient knowledge, including the knowledge gained from a hands-on examination of the animal, to utilize

Justin Sotelo
Timothy Rodda
August 12, 2020
Page 8

telemedicine to continue treating the patient for the condition under which the VCPR was established (i.e., a medical condition for which APR is warranted) and is authorized to do so under the Act.

Similarly, once a VCPR has been established, the veterinarian possesses sufficient knowledge regarding the animal such that the veterinarian can provide relevant information to a physical therapist with advanced certification in APR and then provide indirect supervision of the physical therapist providing services at an APR premises regulated by the Board. The veterinarian and physical therapist work collaboratively to provide veterinary treatment (by the veterinarian) and APR (by the physical therapist with the required certification) to the animal. The physical therapist maintains treatment records and provides those records, to include a treatment plan, to the veterinarian who established the VCPR and the veterinarian provides indirect supervision for the APR performed by the physical therapist. The veterinarian and the physical therapist have a symbiotic relationship in that each can provide services the other cannot: the veterinarian performs a thorough examination of the animal and determines a diagnosis and the physical therapist establishes a treatment plan and performs modalities not included in the Act consistent with advanced training and experience in physical or corrective treatment, exercise, bodily movement, mobility and wellness, none of which are included in the Act.

For these reasons, direct supervision of a physical therapist by the veterinarian is unnecessary and should not be mandated by the Proposed APR Regulation.

D. Opposition to Proposed Regulation

The Initial Statement of Reasons asserts that the proposed regulatory action will not have a significant adverse economic impact on businesses. However, that statement is simply not true. Should this regulation be enacted, several established APR practices will no longer be allowed to exist and will be forced to close. Veterinary practices are unable to sustain employment of a physical therapist due to the

Justin Sotelo
Timothy Rodda
August 12, 2020
Page 9

expense and the fact that not all animals require such care by a physical therapist.

Should this proposed regulation pass, the public will not be protected because the proposed regulation does not require that veterinarians, RVTs or veterinary assistants receive advanced certification in APR, or any training or certification at all.

Finally, public interest is not served by this proposed regulation. The proposed regulation will limit the availability of APR to consumers and their animals, unfairly affecting the most rural and disadvantaged citizens of this state.

For the reasons set forth above, CAAPT and APTC remain opposed to the proposed regulation and encourage the Board to vote against the proposed regulation. Specifically, the proposed regulation unlawfully enlarges the scope of veterinary practice, does not reflect the common-sense language developed by the Animal Rehabilitation Task Force allowing indirect supervision, does not protect consumers and does not serve the public interest.

Sincerely,



Steven L. Simas
Simas & Associates, Ltd.

SLS:ma

cc: Karen Atlas, President, Animal Physical Therapy Coalition (via email)
Kimberly Kirchmeyer, Director, California Department of Consumer Affairs (via email)
Jessica Sieferman, Executive Officer, California Veterinary Medical Board (via email)
Melissa Armstrong, Senior Paralegal (via email)

karen.atlas805@gmail.com
Thu 8/13/2020 11:27 AM

To:

- Sotelo, Justin@DCA

Romero_oppose_letter_8.13.2020.pdf
527 KB

Please confirm receipt. I have been asked to send this in at the designated time on behalf of this consumer.

Karen

August 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

While I typically write my own letters, this letter truly does hit every point that I wish to make. I would however like to offer a few personal comments based on the fact that I have received the services of a highly skilled & educated animal rehabilitation specialist, who is a licensed physical therapist, for my German Shepherd Toffee who suffered from paralysis on all four of her limbs & again after we were involved in a car accident in which she was injured. I see absolutely no value in a veterinarian's involvement once their referral sent me to this practice. A veterinarian would have added no value to Toffee's rehabilitation, only additional cost & delay. As it is, we need more animal physical therapists, not less. During the 18 months of therapy needed to rehabilitate my girl on two separate occasion, it required a 150-mile round trip weekly because there was no facility any closer to my home. Personally, I have received treatment from both a physical therapist & a chiropractor & both of those disciplines function totally separate from a medical doctor; so why would you create a totally separate type of system for our pets? It makes no sense, to add more regulation for the sake of process without any consideration to the multiple barriers that already exist for pet owners who need these services for their furry family members. Your proposal would unfairly discriminate against those of us who do not live in more affluent areas because these services will become more expensive & will only be provided in areas where the cost of doing business can be recouped.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,



Frances Romero
237 Town Center West #156
Santa Maria, CA 93458
805-720-1120
fromero@solutions-plus.net

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Siefertman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

karen.atlas@yahoo.com
Thu 8/13/2020 11:27 AM

To:

- Sotelo, Justin@DCA

PT letter to CVMA 8-13-2020.docx
15 KB

Please confirm receipt.

----- Forwarded Message -----

From: Carrie Adrian <carrie.adrian@vca.com>
To: Karen Atlas (karen.atlas@yahoo.com) <karen.atlas@yahoo.com>
Sent: Thursday, August 13, 2020, 07:38:02 AM PDT
Subject: FW: California PT letter

From my neurologist that I work with....

From: Amy Komitor <Amy.Komitor@vca.com>
Sent: Thursday, August 13, 2020 08:27
To: Carrie Adrian <Carrie.Adrian@vca.com>
Subject: California PT letter

Karen,

Can you please send my letter in on my behalf at the appropriate time so it will be considered by the CVMB?

Thanks,

Amy Komitor, DVM, DACVIM (Neurology)
VCA Veterinary Specialists of Northern Colorado

August 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: VETERINARY OPPOSITION TO CVMB ANIMAL PHYSICAL
REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am a licensed veterinarian in California and Colorado. I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to inter-professionally collaborate and hinders the consumer's ability to access these professionals.

Allowing the veterinarian to evaluate, diagnose, and determine the best course of treatment is appropriate. If the best course of treatment is to send my patients to an animal physical therapist, then I would like the choice to be able to do that for my patients and clients. It is unreasonable to believe that veterinarians have the same skillset as a PT, much less even want to offer specialty rehab services themselves. It would be the highest standard of professional medical care for me to be able to refer my patients out to the professionals who are competent in this specialty. I have personally seen the differences in outcomes from the services of a licensed physical therapist certified in canine rehabilitation and therefore recognize the important role these professionals play in the care and well-being of our companion animals.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals *after* a veterinarian has established a Veterinary-Client-Patient-Relationship (VCPR), made a diagnosis, and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (after the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the

other states that have gone before us (like Colorado, Nevada and Nebraska). Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

The issue of animal physical rehabilitation has been going on for far too long. A legislative remedy is the clear solution (akin to AB 3013—the Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists.

Sincerely,

Amy Komitor, DVM, DACVIM (Neurology)
VCA Veterinary Specialists of Northern Colorado
201 W. 67th Court
Loveland, Colorado 80538
komitoramy@gmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

karen.atlas@yahoo.com
Thu 8/13/2020 11:25 AM

To:

- Sotelo, Justin@DCA

Please confirm receipt.

----- Forwarded Message -----

From: Theresa Locke <tlocke@pinnaclept.net>
To: "karen.atlas@yahoo.com" <karen.atlas@yahoo.com>
Sent: Wednesday, August 12, 2020, 08:31:54 PM PDT
Subject: Veterinary Board Hearing

To Whom It May Concern:

The Proposal to allow Physical Therapists to work under a Veterinarian as an unlicensed Vet Assistant is ridiculous! A Doctor of Physical Therapy should be treated as a peer, not a subordinate. This is professional infringement and does not take into account the training in Rehabilitation Medicine that a Physical Therapist already possesses.

This does not affect me personally but I would support any PT colleague in opposing this proposal because Physical Therapy is already an established profession. I find it disrespectful that the Vet Medicine community would not acknowledge Physical Therapists and welcome their expertise in a collaborative environment to the well being of animals.

Theresa Locke, DPT

--

Thanks,

Error! Filename not specified.

Theresa M. Locke PT, DPT
Pinnacle Physical Therapy

karen.atlas@yahoo.com
Thu 8/13/2020 11:25 AM

To:

- Sotelo, Justin@DCA

Please confirm receipt.

----- Forwarded Message -----

From: Dr. Rekha Lund <rekhalund@losangelesacupuncture.net>

To: karen.atlas@yahoo.com <karen.atlas@yahoo.com>

Sent: Wednesday, August 12, 2020, 08:57:04 PM PDT

Subject: letter for submission to Veterinary Medical Board please

Dear California Veterinary Medical Board,

Physical therapists are highly educated healthcare professionals. I believe CVMB should provide flexibility to allow the veterinarian to decide the level of supervision when collaborating with a physical therapist to improve inter-professional collaboration, allow consumers to have expanded choice of and access to qualified physical therapists for their pet, and allow properly qualified physical therapists to practice their expertise under more reasonable laws. To address physical therapists as unlicensed assistants under the direct supervision of the veterinarian undermines our expertise and education as experts in the field of movement, biomechanics, and kinesiology.

Thank you for your consideration.

Sincerely,

Dr. Rekha Lund, DAOM, LAc, MPT
Doctor of Acupuncture & Herbal Medicine
Licensed Physical Therapist

karen.atlas@yahoo.com
Thu 8/13/2020 11:24 AM

To:

- Sotelo, Justin@DCA

Please confirm receipt.

----- Forwarded Message -----

From: Joshua Arellano <j.arellanodpt@gmail.com>
To: "karen.atlas@yahoo.com" <karen.atlas@yahoo.com>
Sent: Wednesday, August 12, 2020, 11:45:08 PM PDT
Subject: Animal rehab hearing template

August 13, 2020
Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov
Timothy.Rodda@dca.ca.gov
DCA.DirectorsOffice@dca.ca.gov
PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a licensed physical therapist in California since 2009, I have been monitoring this issue closely for years and have been repeatedly disappointed with the egregious attempts this Board has taken to monopolize this area of animal healthcare. I have successfully practiced with both Doctors of Veterinary medicine and Physical Therapy in a synergistic and beneficial approach to caring for our patients.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to practice my craft under reasonable guidelines.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd. If the CVMB is successful with defining

animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, my job opportunities and ability to earn a living would be dramatically reduced. **This regulation would be a restraint of my trade.**

Other states have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am OPPOSED to this regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before us on this matter.).

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists. Unfortunately, the CVMB opposed that bill largely based on the misrepresentations by members of the veterinary profession who successfully were able to sway Board opinion.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals *after* a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

Dr. Joshua Arellano, PT, DPT, CCRT (eligible)
3836 Hellman Ave
Los Angeles CA 90032
J.arellanodpt@gmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Siefertman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

karen.atlas@yahoo.com
Thu 8/13/2020 11:24 AM

To:

- Sotelo, Justin@DCA

Please confirm receipt.

----- Forwarded Message -----

From: Vicky Boyd <vickylboyd@yahoo.com>

To: karen.atlas@yahoo.com <karen.atlas@yahoo.com>; Krista Niebaum <krista@scoutshouse.com>

Sent: Thursday, August 13, 2020, 12:23:35 AM PDT

Subject: OPPOSITION to Proposed Animal Rehab Regulations

Hi Karen,

Coffee has vet tech appointment tomorrow morning at 9 a.m. Unlikely I can join the call and don't want to forget to send letter below at designated time. Could you please submit on my behalf?

Thank you,

Vicky Boyd & Coffee

August 12, 2020

Dear Mr. Sotelo and Mr. Rodda,

I have reviewed proposed animal physical rehabilitation regulations and vehemently OPPOSE current draft version due to unnecessary rank demotion of licensed Veterinary Physical Therapists. The focus on preceding sentence is LICENSED. To achieve the objective of animal welfare and protection, stands to reason priority should be Gold Standard of pre-requisite education, training and research in order to obtain the license. Working for or under a Veterinarian who holds DVM title but does not possess the sub-skills of physical therapy fails to achieve desired goal.

Example: My dog had (unbeknownst to me at the time) SEVERE botched TPLO surgery performed by renowned international Veterinary Orthopedic Surgeon in Mexico City. Following her surgery she received Rehabilitation at Scout's House (San Mateo). It was my dog's Physical Therapist, Krista Niebaum, who alerted her concerns regarding my dog's healing progression and urged me to seek opinion of Board Certified Orthopedic Surgeon. She was indeed correct, my dog required Revision TPLO surgery. I selected Dr. Ken Bruecker (Ventura, CA), Veterinary Orthopedic Surgeon, double board certified, Diplomate of the American College of Veterinary Sports Medicine and Rehabilitation (ACVSMR). Following Revision Surgery I took my dog to another Rehabilitation Clinic owned by a Veterinarian, thinking DVM title would have upgraded

advantage. Despite the recommended rehabilitation program from my accomplished Revision surgeon, my dog's Veterinary Physical Therapist contradicted his rehabilitation plan for my dog on multiple points, even insisting her injections get administered under skin when he and the drug manufacturer requested intramuscular. I finally tired of being in the middle of the debate, opted out of this clinic and returned to Scout's House with Krista who was in agreement and on board with my dog's Revision Surgeon. With effortless collaboration, Krista executed the rehabilitation program. I wasted high hundreds of dollars going to a Veterinary Physical Therapist, who by the way during our sessions, commented that she had LEARNED physical therapy FROM Krista, as had most of the Veterinarians in our region! That was another clue to return to the Mother Ship of Rehabilitation, Krista.

It is my personal experience of Rehabilitation journey, what is foremost important is 1) skill level of Physical Therapist set by license requirements and 2) COLLABORATION and COHESION between Veterinary Orthopedic Surgeon and Vet Physical Therapist. The Veterinary Orthopedic Surgeon likely will not be the Veterinarian at Rehabilitation Clinic. In order for this "dance" to work, I urge you to let the licensing standards set forth for Vet Physical Therapist set the stage, then let each role (Veterinary Orthopedic Surgeon + Physical Therapist) do what they excel at best. This is the roadmap for best interest of the animal.

The requirement for oversight and regulation is not only agreed with, it is imperative to ensure professional competence and expertise specific to my dog's rehabilitative needs. The person best capable of administering pet physical therapy, is based on their dedicated and intense field of study **specific** to physical therapy. It is my understanding the special interest of Physical Therapy is currently not a "course requirement" offered within DVM program, so the reasoning of having Physical Therapist reporting to Veterinarian is not substantiated. I do agree with policy of Scout's House, initial consultation requires office visit with their Veterinarian to ensure pet is in good health to receive the rehabilitation.

I believe your intentions are in the right place but the provision within, requirement of Physical Therapist to report to Veterinarian needs to be revisited. It is actually adding an unnecessary reporting layer of detriment. My dog's Physical Therapy report received after each session reads like an expert clinician, not at all leagued with a Veterinary Technician (with no disrespect to Veterinary Technicians).

Sincerely,

Vicky Boyd

Gideon Lockspeiser <gideonlockspeiser@me.com>
Thu 8/13/2020 11:23 AM

To:

- Sotelo, Justin@DCA

Cc:

- Gideon Lockspeiser <gideonlockspeiser@me.com>

RE: California Veterinary Board Proposed Animal Rehab Regulations

Mr. Justin Sotelo

Dear Mr. Sotelo,

I am writing to oppose this petition. This would be an unfair ruling that takes away, the freedom of pet owners to take their pets to rehabilitation practitioners. This will result in both lost jobs and services and decreased choices of qualified practitioners. When an animal needs to see a vet, I've never heard of a PT not requesting and/or suggesting that, so that isn't the point of this. Defining PT's as "unlicensed assistant vets", this is basically what they would be, and force them to work only under a vet's supervision is not only monopolizing the system unfairly, but giving supervision to vets that are untrained in these specific professions. This would not happen in other professions. Wouldn't it make more sense for vets and PT's to work as collaborators for the health of an animal, as professionals. Outside of a money grab, apologies, it is as polite as I can be here, how would this help anyone? Why is this constantly coming up, over and over again? I ask that we do what is best for the health of the animal and have what is usually an inter-professional collaboration between both Vets and PT's, not degrade a career as if it is basically "worthless".

Thank you kindly for your time and consideration.

Sincerely,

Gideon Lockspeiser

Nicole Gaich <nicole.gaich@gmail.com>
Thu 8/13/2020 11:21 AM

To:

- Sotelo, Justin@DCA

.....

Dear Justin,

I am writing you this email to say that I am highly against and highly oppose the animal rehabilitation regulations that they are trying to establish.

Without a doubt, I can easily say that without the qualified animal PT's that I have been gifted to work under/with in my career, I would not be able to perform my duties as a certified animal rehabilitation nurse in the state of California.

Being able to learn for highly qualified PT's is the one gift I was given to really understand what I am practicing each and every day. Having a team of veterinarians and PT's working together for the greater good of animals when it comes to rehabilitation is exactly what we need in our field to provide the upmost care for our animals.

This is why we are all here doing what we love...it's for the animals!

Cutting off experience and expertise by not allowing trained certified animal PT's to work with Veterinary professionals is a disservice to the animals that are in need of rehabilitation in my opinion, and I can say that with pride because I was taught by some of the leading animal PT's in this country and without their knowledge, I would not be the rehabilitation nurse I strive to be everyday!

Please don't change the regulations and please continue to have our amazing licensed Animal PT's work together with our Veterinarians. Our animals deserve them just as much as we do!

Save the PT's and the animals!

Cheers and thanks for your time.

Sincerely,

Nicole Gaich CCRVN,RVT
Tahoe Integrative Veterinary Care
Truckee, Ca

Jim Frank <j.frank@impulse.net>
Thu 8/13/2020 11:18 AM

To:

- Sotelo, Justin@DCA

Letter in Opposition of proposed regulation.docx
16 KB

Please see the attached letter of opposition. It has been my experience working with search & rescue canines that the licensed animal physical therapist is a great asset to protecting the working dogs.

Jim Frank

August 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be

competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

James A. Frank
PO Box 6527
805.452.3261
j.frank@impulse.net

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Lisa Reed <arribasb@cox.net>
Thu 8/13/2020 11:18 AM

To:

- Sotelo, Justin@DCA

My name is Elizabeth S Reed. I am a grateful consumer of Animal rehab/PT for my dog. He has had 2 TPLOs and a subsequent removal of one implant. The surgeon we chose for his surgery was excellent – we could not have been more pleased with the skill he brought to the tasks. However, he was not interested or able to provide the rehabilitation part of the treatment needs.

Fortunately, our ‘regular vet’ sent us to a local rehab/animal PT location. The practitioner is a PT, MPT, CCRT. She is a licensed and experienced human physical therapist with advanced training and certification in canine rehabilitation. Initially she was in a back room of a Vet Clinic/Grooming business, and not once, all the many hours I spent with my dog at that location, did I see a Vet or RVT come into the room. I did see a regular rotation of various receptionists, vet assistants and others be sent to the PT area apparently to learn how to go through the motions regardless of capability or experience, but in the hope of the business owner to expand his cash flow.

Our Animal Rehab/PT left that location to her own premises – a beautifully set up, clean, welcoming, fully equipped, safe and animal friendly facility. The staff has been recruited by the Practitioner to have good animal handling skills and the ability and opportunity to learn best practices from a highly skilled and experienced Animal PT and be provided with additional training as available. This move allowed my dog’s second TPLO recovery to be in the new facility. I was so grateful, so impressed, and so positive about the potential for a good outcome, and was not disappointed.

Our regular vet prescribed the PT. The PT noticed, in the course of therapy, an oozing near the site of the TPLO surgery and told us to see out vet. The PT initiated the vet visit.

My dog is a large (85#) rescue who came into the shelter with a microchip that was implanted in March of 2003. He is obviously at least 17 years old. I absolutely believe this dog is alive and well to this day because his PT was so effective it has allowed him to remain active. Yes, he’s slowed down, but just last week we were on the beach and he ran after the flock of birds he saw. It was beautiful, especially considering his size and medical history.

Qualified and licensed human PTs do not require direct supervision by an MD. Qualified and licensed Animal PTs should not be held to a different level. Large animal or small, if a qualified and licensed Vet prescribes a course of Physical Therapy the client should be allowed to choose which Animal PT they want to work with. Mandate that PTs wishing to work on animals be licensed and qualified. Create an oversight commission to handle any consumer complaints and don’t allow any Vet to staff a PT facility with non-certified/trained/licensed office help and call it PT. Do require an initial prescription by a DVM, along with relevant record sharing.

I Strongly **OPPOSE** the California Veterinary Medical Board's proposed regulations that, if passed, would effectively monopolize the specialty field of animal physical therapy/rehabilitation in California.

Elizabeth S Reed

Amy Kramer <AKramer@BeachAnimalRehab.com>
Thu 8/13/2020 11:12 AM

To:

- Sotelo, Justin@DCA

Dear Board Members.docx
13 KB

.....

Amy Kramer, PT, DPT, CCRT
Beach Animal Rehabilitation Center

Dear Board Members,

As a physical therapist licensed in the state of CA and certified in canine rehabilitation since 2006, I fiercely oppose the new language that requires direct supervision of physical therapists by a DVM. I have owned 2 successful rehabilitation clinics that combine the expertise of both professionals along with a team of rehabilitation assistants. I honestly believe in the team approach where both professionals work together for the greater outcome and in the best interest of the patient. However even in my 6000sq ft rehabilitation specialty clinic where the DVM is on-site it is not possible for direct supervision of the physical therapists and truly not necessary. We are talking professionals here, people who have doctoral degrees focused on rehabilitation and restoring function (regardless of the species). Vet techs are considered paraprofessionals and certainly have not had the amount of education of a licensed physical therapist so why should they require **less** supervision? I am sure this board has been made aware of the educational requirements and courses taken by physical therapists at previous hearings and meetings but let me again bring it up. Physical therapists take an **entire semester** on joint congruency, can you imagine? What DVM or vet tech has that much in-depth education on a joint and how to appropriately use your hands to improve the mobility of that joint? What about modalities and appropriate applications, another **entire semester**. Differential diagnosis, pharmacology, radiology, manual therapies, all courses included in a PT doctoral program making them professionally qualified (especially when paired with a canine rehabilitation certification course taught by Veterinarians **AND** Physical therapists) to provide the best care to animals. Furthermore, why did you reject your own task force language from before allowing PTs to practice on animals? It baffles me that your language would basically allow any untrained person off the street to practice under direct supervision of a DVM but you are going to tell a licensed physical therapist that they need additional training AND direct supervision?? Why would you single out a licensed professional like that, it makes no sense and certainly isn't in the best interest of the pet or the consumer.

Amy L Kramer, PT, DPT, CCRT

Beach Animal Rehabilitation Center

Emily Jo McKay <ejsymon@ucdavis.edu>
Thu 8/13/2020 11:10 AM

To:

- Sotelo, Justin@DCA

PT oppose template letter.pdf
124 KB

Consumer oppose template letter_Katy.pdf
122 KB

Consumer oppose template letter_Vivian.pdf
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I am submitting letters in opposition of the current language regarding animal rehabilitation in the state of California.

Thank you.

Emily McKay, PT, DPT, CCRP
Small Animal Physical Therapist
UC Davis Veterinary Teaching Hospital

August 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be

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This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Kathryn Morse
4763 Pinegate Road, Fleming Island, FL, 32003
904-481-7178
Kathrynsymon05@yahoo.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Siefertman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

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Sincerely,

Vivian Dye
2685 San Marin Lane, Sacramento, CA, 95835
936-524-3222
Dvdye123@aol.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Siefertman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
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Sincerely,

Lorie Symon
4333 Arenzano Way, El Dorado Hills, CA, 95762
916-804-5025
jlsymon@prodigy.net

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Siefertman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
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Tina Linderoth
2230 Valley View Parkway Unit #231, El Dorado Hills, CA, 95762
530-306-0280
tmlinderoth@gmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Siefertman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
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Brianna Henggeler
1424 Bristol Ter Apt 315, Lawrence, KS, 66049
816-699-2690
briannahenggeler@gmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Siefertman, Executive Officer, California Veterinary Medical Board
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Sincerely,

Rachel Maass
8279 Avalon Ct., Windsor, CO, 80528
970-412-9296

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Kennon Hudson <kennonm54@gmail.com>
Thu 8/13/2020 11:10 AM

To:

- Sotelo, Justin@DCA

Unfortunately, I've had to use PT with my animals many times! I am adamantly against this new proposal! Thank you very much Kennon Hudson

Mhairi Morrison <mhairi@mhairimorrison.com>
Thu 8/13/2020 11:08 AM

To:

- Sotelo, Justin@DCA

Hi Justin,

I am writing to you because I am strongly opposed to the California Veterinary Board's proposed animal rehab regulations.

I hope this finds you well. I believe in having a choice of a qualified practitioner for my own pet. I demand more access to physical therapists trained on animals. I don't believe that a vet needs to be on site to directly supervise to "increase safety" All providers of animal rehab should meet mandated competency standards to practice animal rehab to ensure consumer and pet safety.

Thank you for your time,

Best,

Mhairi

--

Best Wishes,
Mhairi
Mhairi Morrison
www.mhairimorrison.com

Katrina Olson <olson_kk@hotmail.com>
Thu 8/13/2020 11:06 AM

To:

- Sotelo, Justin@DCA

.....
Good morning,

I am emailing you to oppose the proposed animal rehabilitation regulations. The regulations will create an unnecessarily restrictive environment for qualified animal Physical Therapists to practice in California. This legislation will further limit consumers access to quality care and reduce the necessary collaboration between physical therapists and veterinarians to help pets get the help they need.

I worked at Sage in Campbell, CA for 6 years in their physical rehabilitation department and saw the outstanding benefits a Physical Therapist provided each pet in need. Please consider my opinion in your decision.

Sincerely,

Katrina Olson

G. V. Ayers <gv@gentlerrivers.com>
Thu 8/13/2020 10:59 AM

To:

- VMB@DCA;
- Sotelo, Justin@DCA;
- Rodda, Timothy@DCA

Cc:

- Karen Atlas <karen.atlas@yahoo.com>

APTC Regulation August Comment, GVA.pdf
129 KB

Please see attached written comment.

G. V. Ayers
Gentle Rivers Consulting LLC
3669 Taylor Road # 1344
Loomis, CA 95650
[916.316.7459](tel:916.316.7459)
GV@GentleRivers.com
www.GentleRivers.com

August 13, 2020

VIA EMAIL

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

**Re: Public Hearing Comment on the Proposed Regulatory Action Concerning:
Animal Physical Rehabilitation § 2038.5 (Division 20, Title 16, California
Code of Regulations)**

Dear Mr. Sotelo and Mr. Rodda:

On behalf of the Animal Physical Therapy Coalition (APTC), I am submitting this comment in OPPOSITION to the Veterinary Medical Board's (VMB's) proposed regulation regarding Animal Physical Rehabilitation, adding § 2038.5 to Division 20, Title 16, of the California Code of Regulations.

The APTC is a coalition representing Veterinarians, Physical Therapists, RVT's and consumers. The APTC has been working diligently with the VMB to establish common sense animal rehabilitation regulations and legislation in California.

Many of the objections in this Comment were included in our April 27, 2020 Comment on the proposed Regulation. However, the majority of the objections cited were not touched upon by the Board's Summary of Comments/Statements in OPPOSITION to the regulation prepared for this hearing. Therefore they are again submitted.

The APTC OPPOSES the proposed regulation, and urges that it not be adopted by the VMB or approved by the Office of Administrative Law for a number of policy reasons, including the following:

1. Animal Physical Rehabilitation is not established within the scope of practice of veterinary medicine. The practice of veterinary medicine is described in Business and Professions Code (BPC) § 4826 which states:

- § 4826. A person practices veterinary medicine, surgery, and dentistry, and the various branches thereof, when he or she does any one of the following:
- (a) Represents himself or herself as engaged in the practice of veterinary medicine, veterinary surgery, or veterinary dentistry in any of its branches.
 - (b) Diagnoses or prescribes a drug, medicine, appliance, application, or treatment of whatever nature for the prevention, cure, or relief of a wound, fracture, bodily injury, or disease of animals.
 - (c) Administers a drug, medicine, appliance, application, or treatment of whatever nature for the prevention, cure, or relief of a wound, fracture, bodily injury, or disease of animals, except where the medicine, appliance, application, or treatment is administered by a registered veterinary technician or a veterinary assistant at the direction of and under the direct supervision of a licensed veterinarian subject to Article 2.5 (commencing with Section 4832) or where the drug, including, but not limited to, a drug that is a controlled substance, is administered by a registered veterinary technician or a veterinary assistant pursuant to Section 4836.1. However, no person, other than a licensed veterinarian, may induce anesthesia unless authorized by regulation of the board.
 - (d) Performs a surgical or dental operation upon an animal.
 - (e) Performs any manual procedure for the diagnosis of pregnancy, sterility, or infertility upon livestock or Equidae.
 - (f) Uses any words, letters, or titles in such connection or under such circumstances as to induce the belief that the person using them is engaged in the practice of veterinary medicine, veterinary surgery, or veterinary dentistry. This use shall be prima facie evidence of the intention to represent himself or herself as engaged in the practice of veterinary medicine, veterinary surgery, or veterinary dentistry.

In the *Initial Statement of Reasons*, the VMB states:

The [Veterinary Medicine Practice] Act defines the practice of veterinary medicine to include the administration of a drug, medicine, application, or treatment of whatever nature for the prevention, cure, or relief of a wound, fracture, bodily injury, or disease of animals, except where the medicine, appliance, application, or treatment is administered by an RVT or VA at the direction of and under the direct supervision of a licensed veterinarian (BPC § 4826).

While the VMB makes the assumption that APR is defined within the scope of practice of veterinary medicine, it simply is not the case. The statute defining the scope of practice of veterinary medicine does not describe or mention animal rehabilitation or physical therapy. Physical therapy which is not defined in the Act but is defined in the Physical Therapy Act includes “the art and science of physical or corrective rehabilitation or of physical or corrective treatment of any bodily or mental condition.”¹ The core concepts of corrective rehabilitation and treatment are not contained in Section 4826 of the Veterinary Medicine Act.

¹ Business and Professions Code, Section 2620.

In addition, the Section 4826 specifies modalities of treatment including administration of drugs, medicine and appliances, and treatment, prevention and cure of wounds, fractures, bodily injury or disease of animals. However this law does not authorize veterinarians to practice the modalities of physical therapy which includes:

[U]se of physical, chemical, and other properties of heat, light, water, electricity, sound, massage, and active, passive, and resistive exercise, and shall include physical therapy evaluation, treatment planning, instruction and consultative services.²

The Veterinary Medical Act does not authorize veterinarians to perform physical therapy modalities.

The Act does not include the activities which describe physical therapy within the scope of veterinary medicine, nor does it include the modalities of physical therapy within the modalities which a veterinarian is authorized to perform.

By promulgating the proposed regulations, the VMB is attempting to define and establish a practice within the scope veterinary medicine when the Legislature has not defined it within that scope in statute.

Scope of practice of the licensed professions has always been held within the purview of the Legislature. While the Legislature has seen fit to statutorily authorize the Board of Registered Nursing the sole authority to define and interpret the practice which it regulates (BPC § 2725 (e)), it has not done so with the other professional licensing boards under the Department of Consumer Affairs.

For the Board to establish a definition of Animal Physical Rehabilitation in regulation, it would do so without Legislative authorization, input or oversight. Simply put – the scope of practice for Animal Physical Rehabilitation should be established by legislative action, not by board regulation. Animal physical rehabilitation is an issue that needs a Legislative solution not an administrative agency regulatory solution.

2. The proposed regulation will have significant adverse economic impact on businesses and jobs. The *Initial Statement of Reasons* states in the Business Impact that the proposed regulatory action will not have a significant adverse economic impact on businesses:

This initial determination is based on the fact that APR treatment is currently regulated and enforced by the Board pursuant to the Act, and businesses that provide APR treatment on animals are currently subject to the requirements of that Act.

This is a misleading statement since APR is not currently defined as the practice of veterinary medicine. It is clear that a primary reason that an adequate definition of APR

² Business and Professions Code, Section 2620.

has not been established is because the practice of animal physical therapy crosses over into two professions with separate licensing and regulatory structures (Veterinary Medicine and Physical Therapy). Therefore, if this regulation is adopted to only allow animal physical rehabilitation solely within the veterinary practitioner paradigm, and there are successful, legitimate rehabilitation practices that will certainly be negatively affected, resulting in jobs lost and businesses being lost.

3. The dangers cited by the Board are not based upon fact. *The Initial Statement of Reasons* states in the Economic Impact Analysis:

This regulatory proposal benefits the health, safety, and welfare of California residents and their animals by ensuring that only individuals with the requisite skill sets are authorized to practice APR. The Board has received consumer complaints that individuals not licensed by the Board or supervised by a veterinarian as required by existing law, are practicing APR. This poses a danger to California residents and their animals. The regulatory proposal attempts to lessen this danger and better protect California consumers and their animals.

This is an unwarranted assumption not based upon fact since there were no mandatory educational competency standards added for DVM's or RVT's who practice in the specialty field of animal rehabilitation. True provision of consumer protection would include mandatory educational standards for **all** who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) would be to mandate proper training before being allowed to perform rehab on animals. The proposed regulation does nothing for the protection of the consumer if educational competency standards are not included.

4. Legitimate alternatives are not considered. *The Notice of Proposed Regulatory Action*, and the *Initial Statement of Reasons* for the current regulatory proposal both list in the statement of Consideration of Alternatives:

No reasonable alternative which was considered or that has otherwise been identified and brought to the attention of the Board would be more effective in carrying out the purpose for which the regulation has been proposed. No reasonable alternative which was considered would be as effective and less burdensome to affected private persons than the proposed regulation, or would be more cost-effective to affected private persons, or would be equally effective in implementing the statutory policy or other provision of law.

In enumerating the alternatives considered by the Board and the reasons each were rejected, the alternative recommended by the California Veterinary Medical Board's Animal Physical Rehabilitation Stakeholder's Task Force was not listed or considered. Of course, such an alternative would require legislation rather than administrative regulations, however a Legislative solution is the only other adequate or legitimate alternative.

5. The expertise of physical therapists qualified in animal rehabilitation is ignored. The Consideration of Alternatives contains the following inaccurate statement:

5. Authorizing physical therapists to perform APR with indirect veterinarian supervision; this was rejected because only licensed veterinarians and RVTs possess the knowledge and training to plan and supervise APR for animal patients and ensure proper animal handling, recognize pain and discomfort, and provide emergency care and assistance as needed in the particular field of APR.

This statement is inaccurate because it does not consider the additional training that physical therapists receive specifically during their animal rehabilitation certification coursework. The original Stakeholder's Task Force language was specific to include educational standards to achieve competency so PT's can render safe rehabilitation services on animals while working under indirect veterinary supervision. It appears this Board did not consider that PT's can and do learn these important aspects of animal care. The APTC believes it is inappropriate to reject a legitimate alternative based upon ill-reasoning.

6. The regulations do not place the protection of the public as the VMB's highest priority. As with all regulatory boards under the Department of Consumer Affairs, the VMB is required to place the protection of the public as its highest priority: BPC § 4800.1 states:

§ 4800.1. Protection of the public shall be the highest priority for the Veterinary Medical Board in exercising its licensing, regulatory, and disciplinary functions. Whenever the protection of the public is inconsistent with other interests sought to be promoted, the protection of the public shall be paramount.

There are no documented examples of consumer harm by licensed physical therapists trained in animal physical rehabilitation practicing physical therapy upon animals. There are no examples of consumer harm in California or in any other state that regulates APR. The question then remains, if the VMB is seeking to occupy a scope of practice solely by licensed veterinarians where there are already qualified professionals safely practicing within that space, and there are no examples of consumer harm by those practitioners, what is the purpose behind the proposed regulation? It surely is not the protection of the public.

The APTC urges the Board to withdraw the current regulatory proposal and to seek an alternative solution which will specifically allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals *after* a veterinarian has made a diagnosis and determined that physical rehabilitation would be a safe and beneficial intervention for their animal patients.

There is a huge shortage of animal physical therapists in California. The shortage is not because PT's don't want to practice, but because of the difficulty of getting hired by a veterinarian who is willing to pay a commensurate wage for their expertise.

If the current regulatory language is adopted, the unnecessary and restrictive regulatory burdens placed upon physical therapists to practice animal physical rehabilitation would fall once again into the crosshairs of restraint of trade. Physical Therapy is a profession that is well-equipped and accustomed to inter-professional collaboration. That is how physical therapists are trained to practice. Working collaboratively with doctors is second nature to those trained as physical therapists.

The APTC urges the Board to give greater flexibility to allow the veterinarian to decide the level of supervision to improve inter-professional collaboration, allow consumers to have more choice of and access to qualified physical therapists for their pet, and allow properly qualified physical therapists to practice their expertise under more reasonable laws. California must catch up to our more progressive neighboring states who have already realized the solution to this ongoing problem.

The APTC urges this issue to additionally be considered under the Legislature's Sunset Review Oversight hearings. Although the VMB was up for Sunset Review in 2020, the current COVID-19 Pandemic has dramatically changed the sunset processes, and the sunset date of the Veterinary Medical Board is being extended until 2021 by SB 1474 in the current Legislative Session. Therefore it makes sense to withdraw the current regulatory proposal and defer to the Legislature's Sunset Review Oversight process.

If you have any questions about the Animal Physical Therapy Coalition, or about sensible workable solutions to these issues, please don't hesitate to contact me at gv@gentlerrivers.com or 916.316.7459.

Kindest regards,



G. V. Ayers, Lobbyist
On behalf of the Animal Physical Therapy Coalition

cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Siefertman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members
Karen Atlas, President, Animal Physical Therapy Coalition

Courtney Singh <courtney.singh@kw.com>
Thu 8/13/2020 10:49 AM

To:

- Sotelo, Justin@DCA

Justin, I'm writing to express my opposition to the proposed animal rehabilitation regulations that will create overly restrictive environments for our qualified animal PTs to practice in California. Please consider how this legislation will limit the quality of care the [voiceless] animals will be able to receive, and how it'll affect all the staff involved. Thank you for your time and consideration in this matter.

Cara Samelson <cmsamelson@gmail.com>
Thu 8/13/2020 10:43 AM

- Sotelo, Justin@DCA

.....
Dear Mr. Sotelo,

I strongly oppose the purposed Animal Physical Rehabilitation Regulations. They will create an unnecessarily restrictive environment for qualified animal PTs to practice in California. This legislation will further limit consumers access to quality care and reduces the necessary collaboration between physical therapists and veterinarians to help pets get the help they need.

Sincerely,

Cara Samelson

jssmith15 <jssmith15@verizon.net>
Thu 8/13/2020 10:39 AM

To:

- Sotelo, Justin@DCA

Oppose CVMB Animal PT Rehab Proposal.pdf
75 KB

----- Original message -----

From: Juanita Smith <jssmith15@verizon.net>

Date: 8/11/20 12:31 PM (GMT-08:00)

To: jssmith15@verizon.net

Subject: Opposition of CVMB Animal Physical Therapy Rehab Proposed Regulations

Please find attached my letter.

Sincerely,

Juanita Smith

August 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be

competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Juanita Smith
3105 Cimarron Drive, Santa Ynez, CA 93460
805-688-3977
jssmith15@verizon.net

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Tameka Island <tisland@ccapta.org>
Thu 8/13/2020 10:35 AM

To:

- Sotelo, Justin@DCA

CPTALettertoCVMBAug2020.pdf
217 KB

Mr. Sotelo,

Please accept the California Physical Therapy Association's comments relating to Agenda Item 4, Public Hearing on Proposed Adoption of Section 2038.5, Article 4, Division 20, Title 16, of the CCR, Animal Physical Rehabilitation.

Please feel free to contact me with any questions.

Best regards,

Tameka Island

Executive Associate, Professional Affairs
California Physical Therapy Association
1990 Del Paso Road
Sacramento, CA 95834
(916) 929-2782 | (916) 646-5960 - Fax
ccapta.org



California Physical Therapy Association
 1990 Del Paso Road
 Sacramento CA 95834
 Phone: (916) 929-2782
 Fax: 916-646-5960

August 3, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
 Timothy Rodda, Administration/Licensing Manager
 Veterinary Medical Board
 1747 North Market Blvd., Suite 230
 Sacramento, CA 95834

RE: Proposed Regulatory Action Concerning Animal Physical Rehabilitation §2038.5 (Division 20, Title 16, California Code of Regulations)

Dear Mr. Sotelo and Mr. Rodda:

On behalf of the over 9,000 members of the California Physical Therapy Association (CPTA), I am writing to inform you of our “Opposition” to the Veterinary Medical Board’s (VMB’s) proposed regulation regarding Animal Physical Rehabilitation, adding §2038.5 to Division 20, Title 16, of the California Code of Regulations. CPTA has several concerns with the proposed regulation, and urges that it is not adopted by the VMB for a number of policy reasons, including the following:

Animal Physical Rehabilitation (APR) is not established within the scope of practice of veterinary medicine. In the *Initial Statement of Reasons*, the VMB states:

The Veterinary Medicine Practice Act defines the practice of veterinary medicine to include the administration of a drug, medicine, application, or treatment of whatever nature for the prevention, cure, or relief of a wound, fracture, bodily injury, or disease of animals, except where the medicine, appliance, application, or treatment is administered by an Registered Veterinarian Technician (RVT) at the direction of and under the direct supervision of a licensed veterinarian (BPC §4826).

While the VMB assumes that APR is defined within the scope of practice of veterinary medicine, it simply is not the case. By promulgating the proposed regulations, the VMB is attempting to define and establish a practice within the scope of veterinary medicine when the Legislature has not established it within California statute. Scope of practice of the licensed professions has always been held within the purview of the Legislature. Animal Physical Rehabilitation should be established by legislative action, not by board regulation.

The proposed regulation will have significant adverse economic impact on animal owners, businesses, and jobs. The *Initial Statement of Reasons* states in the Business Impact that the proposed regulatory action will not have a significant adverse economic impact on businesses:

This initial determination is based on the fact that APR treatment is currently regulated and enforced by the Board pursuant to the Act, and businesses that provide APR treatment on animals are currently subject to the requirements of that Act. This is a misleading statement since APR is not currently defined as the practice of veterinary medicine. A primary reason that an adequate definition of APR has not been established is because the practice of animal physical therapy crosses over into two professions with

separate licensing and regulatory structures (Veterinary Medicine and Physical Therapy). Therefore, if this regulation is adopted to only allow animal physical rehabilitation solely within the veterinary practitioner paradigm, established pet owner relationships with legitimate rehabilitation practices will be negatively impacted and or severed creating barriers to medically necessary care.

Legitimate alternatives in practice were not considered. The *Notice of Proposed Regulatory Action*, and the *Initial Statement of Reasons* for the current regulatory proposal both list in the statement of Consideration of Alternatives that no reasonable alternative was considered or that has otherwise been identified and brought to the attention of the Board. In enumerating the alternatives considered by the Board and the reasons each were rejected, the alternative recommended by the California Veterinary Medical Board's Animal Physical Rehabilitation Stakeholder's Task Force were not listed or considered.

Authorizing physical therapists to perform APR with indirect veterinarian supervision was rejected. This was rejected because the VMB believes only licensed veterinarians and Registered Veterinary Technicians (RVT) possess the knowledge and training to plan and supervise APR for animal patients to ensure proper animal handling, recognize pain and discomfort, and provide emergency care and assistance as needed in the particular field of APR. This statement is inaccurate because it does not consider the advanced training that physical therapists receive in APR, specifically during their animal rehabilitation certification coursework. The original Stakeholder's Task Force language was certain to include educational standards to achieve competency allowing PTs to render safe rehabilitation services on animals while working under indirect veterinary supervision.

CPTA urges the Board to withdraw the current regulatory proposal and to seek an alternative solution which will specifically allow qualified and licensed PTs to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian). Further, that PTs are allowed to work on animals after a veterinarian has made a diagnosis and determined that physical rehabilitation would be a safe and medically necessary intervention for the animal patient.

For all the reasons above, CPTA believes the California Veterinary Medical Board should provide flexibility to allow the veterinarian to decide the level of supervision when collaborating with a physical therapist to improve inter-professional collaboration, allow consumers to have expanded choice of and access to qualified physical therapists for their pet, and allow properly qualified physical therapists to practice their expertise under more reasonable laws. California must catch up to our more progressive neighboring states who have already realized the solution to this ongoing problem.

We also urge your closer look at this matter, which we believe provides an opportunity for expanded collaboration between physical therapists and veterinarians ensuring the health and safety of all animals.

If you have any questions or would like further information, feel free to contact our lobbying representatives, Carl London of London & Gonzalez Advocacy at (916) 476-5224.

Sincerely,



Richard S. Katz, PT, DPT, MA
President, California Physical Therapy Association

cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Karen Atlas, President, Animal Physical Therapy Coalition

dfraser@surewest.net
Thu 8/13/2020 10:33 AM

To:

- Sotelo, Justin@DCA

I am opposed to proposed animal rehabilitation regulations that will create an unnecessarily restrictive environment for qualified animal physical therapists to practice in California. This legislation will further limit consumers' access to quality care and reduces the necessary collaboration between physical therapists and vets to help animals get the help they need.

Thank you

Don Fraser

Zane Brown <zanebrown@gmail.com>
Thu 8/13/2020 10:31 AM

To:

- Sotelo, Justin@DCA;
- Rodda, Timothy@DCA

+2 others

.....

Dear Mr. Sotelo and Mr. Rodda,

My name is Zane Brown and I am a animal physical therapy consumer who resides in California. I wanted to briefly share my story with you and briefly discuss why I believe we as consumers should have access to more choices and be able to decide for ourselves.

Prior to finding a qualified animal physical therapist, we searched up and down the state of California for someone to diagnose what was ailing my dog. We spent the better part of a year driving up and the state of California trying to find a qualified professional. We literally went from Northern California (in Davis) to the southern most part, in Laguna Woods.

The most notable attempt to solve his health issues was when we saw two UC Davis veterinarians, one specialized in orthopedics, and one in soft tissue injuries. I spent literally thousands of dollars on many different ideas and diagnostic procedures, and nothing was discovered. We were dismissed by the UC Davis vets and sent home with no cause of his pain and discomfort. We were dismissed like nothing was wrong and I was told to just let him be a regular dog.

It was not until we came to find a certified canine rehabilitation doctor, with many years experience and a lot of education under their belt, where we were able to finally get a diagnosis and begin treatment. It took only an initial consultation and a follow up visit to discover where the source of his pain and affliction was coming from.

With that said, this is why I strongly believe that us consumers, pet parents, deserve to be able to choose who works on our dog.

Thank you for your attention to this matter and for your time.

Sincerely,
-Zane Brown

Carrie Ann Calay <c.a.calay@gmail.com>
Thu 8/13/2020 10:29 AM

To:

- Sotelo, Justin@DCA

To
Members of the Veterinary Medical Board
Department of Consumer Affairs of California

In the course of twelve years of successive VM Boards efforts to control and limit public access to the services of independent qualified educated certified non-veterinarian Animal Physical Therapists, there can hardly be an argument or fact left to debate.

How many of our public dollars have been spent in the effort to put this particular proposed regulation in place?

How many of our public dollars will continue to be spent in the Board's twelve year quest to thwart the obvious will and desires of the people of California, when mutually acceptable shared therapeutic responsibilities have been negotiated in several other states with supposedly competent, wise and educated parties who have succeeded in coming together in good faith and in the spirit of compromise and concern for the animals and consumers?

Actually there IS one new factor to consider. The coronavirus pandemic, wherein only the necessary public business should proceed! It is simply wrong for this Board or any California department to act at this time on anything other than emergency or urgent regular business. Enacting a major change in regulation, such as the Board has been attempting to do for TWELVE years demands strong public input.

This necessary public input is of course, necessarily stifled and disabled due to the extreme stress of the pandemic, of terrible economic hardship for millions, and ongoing stress of exhausting national political distress. Furthermore, given that the coronavirus pandemic has interrupted the VM Board's Sunset Review process as mandated by the CA Legislature, I believe any major policy regulation by the VM Board is highly inappropriate and irregular.

THE ONGOING UNWANTED, HARASSMENT OF INDEPENDENT FULLY QUALIFIED NON-VETERINARIAN ANIMAL CARE PROFESSIONALS MUST END.

PLEASE STOP AND COME TO THE NEGOTIATING TABLE WITH YOUR FELLOW PROFESSIONALS.

CARRIE ANN CALAY >^..^< >^..^< >^..^<
NORTHERN CALIFORNIA

Mary Argo <mary@petchat.net>
Thu 8/13/2020 10:23 AM

To:

- Sotelo, Justin@DCA

Consumer_oppose_template_letter_8.13.2020F.docx 2.pages
847 KB

August 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Mary Argo, PhD

1717 4th Ave Sacramento, CA 95818

916-498-9844

mary@petchat.net

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Robyn Roth <robyn@sugarlandranch.org>
Thu 8/13/2020 10:22 AM

To:

- Sotelo, Justin@DCA;
- Rodda, Timothy@DCA

Cc:

- DCA Director's Office;
- PT@DCA

NV PT oppose SCAN Itr 081320.pdf
785 KB

Good morning Mr. Sotelo and Mr. Rodda,

Attached please find my detailed letter re: strong OPPOSITION to your proposed **animal physical rehabilitation** regulations. If you have any questions, please do not hesitate contacting me, particular to my attached comments or any other questions re: how we have, and continue to successfully operate in Nevada.

Thank you,

Respectfully submitted,

Robyn Roth, PT, APT, MPA



Sugarland Ranch, Inc.
Robyn Roth, PT, APT, MPA
3510 Matterhorn Blvd.
Reno, NV 89506

(775) 970-5350 tel
(775) 970-5183 fax

Email: robbyn@sugarlandranch.org

August 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

Justin.Sotelo@dca.ca.gov
Timothy.Rodda@dca.ca.gov

Other E-Mail Addressees: Kimberly Kirchmeyer, Director: DCA.DirectorsOffice@dca.ca.gov
Jason Kaiser, Executive Officer, Physical Therapy Board of California: PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I'm submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a matter of background, I'm a licensed Physical Therapist in Nevada and California & have been for many years. Since 1998, I've been an animal physical rehabilitation clinician & since 2004, continued working as an *animal physical therapist* in Nevada, under my previous company name of *Animal Rehabilitation of Reno/Tahoe*. Animal Physical Therapy is a term that was developed and approved by both the Nevada State Board of Physical Therapy Examiners as well as the State of Nevada Board of Veterinary Medical Examiners in 2004. I was directly involved, along with a colleague, in these efforts. The following information supports my strong opposition to your current proposed regulations.

Since 2004, Nevada animal physical therapists have worked collaboratively and successfully with licensed Veterinarians and Technicians in the field of animal physical therapy. Given that rehabilitation, since its inception, employs a team approach, it is imperative that a team environment is utilized and fostered to be successful in terms of Patient outcome measures and Patient/Client satisfaction. In Nevada, our 2004 regulations are simple and effective. The standards of practice for physical therapists holding a "certificate" as defined by the State of Nevada Board of Veterinary Medical Examiners in NAC 638.780, lays out specifically step by step how our process successfully works. Briefly the referring Veterinarian evaluates Patients & determines that physical therapy is appropriate & then makes a referral to a licensed animal physical therapist either in a freestanding facility, home based program, or hospital based program. Animal Physical Therapists work with INDIRECT supervision given our additional training in animal related applied sciences and related internships. To date, there has NOT been any Consumer complaints and/or injuries caused by this working paradigm. In fact, what has occurred is that our joint Clients are happy and very satisfied relaying their satisfaction to the referring and/or primary Veterinarian. The latter facilitates Veterinarian satisfaction and in fact, renders their job easier. Our Veterinarians have enjoyed this relationship since the start of our program in Nevada.

When I was practicing as an animal physical therapist, I partnered with boarded Surgeons and in fact operated a satellite clinic at a Specialty hospital. I was able to assist the Surgeon(s) with their caseload by discharging post surgical Patients at their direction. I had multiple opportunities to sit in and observe a variety of surgeries and assist with inpatient rehabilitation when requested. The latter continued my education in veterinary orthopaedics and concurrently provided continual educational opportunities for DVMs and Technicians re: physical therapy.

OPPOSITION - RECEIVED ON & AFTER 8/13/20

Attachment 7



Sugarland Ranch, Inc.
Robyn Roth, PT, APT, MPA
3510 Matterhorn Blvd.
Reno, NV 89506

(775) 970-5350 tel
(775) 970-5183 fax

Email: robyn@sugarlandranch.org

Since I have a strong human rehabilitation background, we were able to facilitate a solid team between Rehabilitation nurses (LVTs/RVTs), boarded surgeons, the primary referring Veterinarian, the animal physical therapist, other staff members and the Client. Our Nevada model has certainly promoted Client involvement and satisfaction. This cohesive rehabilitation team approach was effective and there are no instances of any injury or liability. Liability is addressed in NAC 638.780(b).

There are many different opportunities for partnerships & cohesive collaboration but ONLY if physical therapists properly trained in the animal sciences are allowed to practice in a freestanding capacity under the direction and upon a referral from a licensed Veterinarian.

By relegating licensed physical therapists who have been specifically trained in the animal sciences to be an “unlicensed veterinary assistant” and subjecting them to work ONLY under direct supervision of a Veterinarian most assuredly with less training and experience in physical therapy and rehabilitation, is preposterous. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway for exempting licensed physical therapists with advanced training in animal physical therapy, competition would be substantially compromised along with job opportunities. Further, animal physical therapists’ ability to earn a living would be dramatically reduced for many California physical therapists. There are already established freestanding animal physical therapy private practices that employ qualified individuals, pay their tax burden; this proposed regulation would negatively impact these small businesses.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect Consumers and their animals. However, CVMB’s approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training with animals limits a physical therapist’s ability to practice under reasonable guidelines. Further, any proposed regulatory language MUST include competency requirements for ALL professionals practicing in the field. Unfortunately, Nevada fell short in this area and therefore any licensed Veterinarian or Technicians can practice in this area WITHOUT having the necessary credentials or experience in physical rehabilitation.

Of course there are certification courses available and many DVMs and Technicians do obtain credentialing from these schools, however, there is no requirement to do so. Similar mandates are necessary and should be required parallel to what is proposed for physical therapists. As a regulatory Board within the Department of Consumer Affairs, the CVMB is charged with protecting the Consumer. Specifically, you state in part, that your Mission is “to protect Consumers and animals by regulating Licensees and promote professional standards.” To uphold your Mission, true provision of Consumer protection is to mandate that ALL licensed professionals demonstrate COMPETENCY in this specialty through additional training, not just Physical Therapists.



Sugarland Ranch, Inc.
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(775) 970-5183 fax

Email: robyn@sugarlandranch.org

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included physical therapists.

Unfortunately, the CVMB opposed that bill largely based on the misrepresentations by members of the veterinary profession who successfully were able to sway Board opinion.

I urge you to support alternative regulations that include licensed physical therapists who have undergone the necessary training as legitimate providers of animal physical rehabilitation services.

Specifically, allow qualified and licensed PT's to work under the direction of the Veterinarian in either a freestanding, home based and/or hospital based model. This solution is consistent with the recommendations of the CVMB's Stakeholder's Task Force; consistent with other states such as Nevada; and consistent with the path outlined previously in October, 2015 by the Senior Attorney of the Department of Consumer Affairs.

Summarizing:

- Allows increased choice and safe access for Consumers;
- Allows Veterinarians to collaborate with other licensed and qualified professionals of their choice;
- Allows greater access for animals requiring animal physical therapy;
- Allows for a legitimate comprehensive, interdisciplinary team approach that has ALWAYS been a hallmark of rehabilitation; and
- Allows for Board oversight as was done here in Nevada to protect the Consumer.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved. Finally, all the benefits of such a strong collaboration would NEVER have occurred in Nevada without the work that we accomplished in 2004, we are confident that our California neighbors can do the same. Keep it simple, follow Nevada's lead.

Respectfully submitted,

Robyn Roth, PT, APT, MPA
Email: robyn@sugarlandranch.org

For distribution to:

- Jessica Sieferman, Executive Officer, California Veterinary Medical Board
- California Veterinary Medical Board Members
- Physical Therapy Board of California Members

Joyce Kirstein <joyceakirstein@gmail.com>
Thu 8/13/2020 10:18 AM

To:

- Sotelo, Justin@DCA

I am opposed to proposed animal rehabilitation regulations that will create an unnecessarily restrictive environment for qualified animal physical therapists to practice in California. This legislation will further limit consumers' access to quality care and reduces the necessary collaboration between physical therapists and vets to help animals get the help they need.

Thank you.

Joyce Kirstein

Carmen Kwong <kwongcarmen@yahoo.com>
Thu 8/13/2020 10:17 AM

To:

- Sotelo, Justin@DCA

Cc:

- Rodda, Timothy@DCA;
- DCA Director's Office;
- PT@DCA

August 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov
Timothy.Rodda@dca.ca.gov
DCA.DirectorsOffice@dca.ca.gov
PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including

the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.
Sincerely,

Carmen Kwong
1161 Schooner Street, Foster City, CA 94404
415-609-3909
kwongcarmen@yahoo.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Siefertman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Marilyn Francesco <mafrancesco@hotmail.com>
Thu 8/13/2020 10:12 AM

To:

- Sotelo, Justin@DCA

Consumer_oppose_template_letter_8.13.2020F.docx
19 KB

I oppose!

Marilyn Francesco

August 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be

competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Marilyn Francesco
10580 Castine Ave.
Cupertino, CA 95014
40-730-8755
mafrancesco@hotmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Jill Kuhl <drkuhl@thewholepetvet.com>
Thu 8/13/2020 10:10 AM

To:

- Sotelo, Justin@DCA

Please register my strong opposition to the proposed regulations for animal physical rehabilitation by the California Veterinary Medical Board. The proposed regulations will create an unnecessarily restrictive environment for physical therapists certified in animal rehabilitation to practice in California. The additional training required to obtain certification in animal rehabilitation includes proper education and training to apply our in-depth knowledge and experience of human medicine to our animal patients. Physical therapists have extensive training to perform therapeutic interventions (such as manual therapy, joint mobilizations, joint bracing and splinting, therapeutic modalities, use of adaptive equipment and prescription of exercise). Veterinarians do not have this as part of their general education and training. Collaboration between our two professions is imperative to progress the field of animal physical rehabilitation.

As a physical therapist who has worked with veterinarians for the last 10 years in the field of animal physical rehabilitation, I have observed the lack of available qualified practitioners available in California. There are wait lists months out and clients travelling hours to obtain my services. With the higher demand for rehab services, many veterinary practices currently run rehab programs with a veterinarian doing the initial evaluation and veterinary technicians or unlicensed and uncertified technicians continue to provide the actual therapy. This does not provide quality care to the pet and has turned "rehab" services into laser therapy and underwater treadmill, or other "cookie cutter" treatment plans.

Physical therapists provide invaluable expertise and SAFE interventions to supplement veterinary medical care. We need to work together and this language is counterproductive and offensive to all that physical therapists have contributed to the field of animal physical rehabilitation. Physical rehabilitation is safer than so many animal services that are unsupervised by veterinarians and this language is unnecessary to provide quality care for our patients.

Thank you for registering my opposition.

--

Dr. Kuhl, DPT, MSPT, CCRT, OCS

Doctor/Masters of Physical Therapy

Certified Canine Rehabilitation Therapist

Board Certified Orthopedic Clinical Specialist

drkuhl@thewholepetvet.com

www.thewholepetvet.com

Paul Askounis <paskounis0@hotmail.com>
Thu 8/13/2020 10:09 AM

To:

- Sotelo, Justin@DCA;
- Rodda, Timothy@DCA

Cc:

- DCA Director's Office;
- PT@DCA

August 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical

therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.
Sincerely,

Paul Askounis
10580 Castine Ave
Cupertino, CA 95014
408-730-8755

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Molly McKibben <mollymoreen@gmail.com>
Thu 8/13/2020 10:04 AM

To:

- Sotelo, Justin@DCA

Hello,

I am writing to oppose the proposed animal rehabilitation regulations.

They will create an unnecessarily restrictive environment for qualified animal PTs to practice in California. This legislation will further limit consumers access to quality care and reduces the necessary collaboration between physical therapists and veterinarians to help pets get the help they need.

Thank you,

--

Molly M. McKibben

Charles Hardin <ckhardin@gmail.com>
Thu 8/13/2020 10:00 AM

To:

- Sotelo, Justin@DCA

.....

I am emailing you today to oppose this legislation, as the owner of a dog who is a lifer for PT because both of her CCLs have torn. The Vets all wanted to perform surgery since that is a moneymaker for them, but she has rehabbed for 6 years and is completely mobile.

Anything that can expand access to PT for pets should be done, not limit them or constrain them.

Regards,
Charles Hardin
On behalf of "Sunny

Karma Swanson <shonoff@sbcglobal.net>
Thu 8/13/2020 9:57 AM

To:

- Sotelo, Justin@DCA

On Thursday, August 13, 2020, 08:05:54 AM PDT, Karma Swanson <shonoff@sbcglobal.net> wrote:

August 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov
Timothy.Rodda@dca.ca.gov
DCA.DirectorsOffice@dca.ca.gov
PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal

rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.
Sincerely,

Name: Karma Swanson
Address 15586 Bonanza Ln
Phone 775-530-1901
Email address shonoff@sbcglobal.net

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Siefertman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Nancy Lee <nelee0523@att.net>
Thu 8/13/2020 9:55 AM

To:

- Sotelo, Justin@DCA

Justin Sotelo, Lead Administrative and Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

Dear Mr. Sotelo and Mr. Rodda:

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations. As a licensed physical therapist in California, I have been monitoring this issue closely for years and have been repeatedly disappointed with the egregious attempts this Board has taken to monopolize this area of animal healthcare.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists (PT's) who have completed the necessary training and certification to work on animals limits my ability to practice my craft under reasonable guidelines.

Relegating licensed PT's who have been specifically trained in the evaluation, treatment and handling of animals to being merely an 'unlicensed veterinary assistant' is absurd. Furthermore, requiring PT's to work ONLY under direct supervision of a veterinarian is ridiculous, since the Veterinary curriculum does not include rehabilitation techniques. **Veterinarians are taught rehab techniques by physical therapists in continuing education courses. If anything, PT's should be the ones supervising the veterinarians when performing rehab techniques.** The CVMB is not pushing for this regulation out of concern for the safety and well-being of the animals that need rehabilitation. This is purely a money grab on

their part to prevent qualified professionals whose post graduate education is solely focused on rehabilitation assessment and treatment techniques from practicing their trade and competing with veterinarians for the almighty dollar.

If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and without creating a pathway for exemption of a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, my job opportunities and ability to earn a living would be dramatically reduced. This regulation would be a **restraint of my trade**. A similar attempt by the Vet Board in North Carolina to restrict consumer access to canine dental cleaners was shot down by the NC Supreme Court. Precedence has been set.

The CVMB's purpose is to protect the consumer. This proposed regulation would limit the consumer's choice to have access to the skills of a licensed physical therapist that they trust. Other states have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am OPPOSED to the CVMB's proposed regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before us on this matter).

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists. Unfortunately, the CVMB opposed that bill largely based on the misrepresentations by members of the veterinary profession who successfully were able to sway Board opinion.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the referral of a veterinarian (level of supervision to be determined by the veterinarian) after a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial

intervention for their animal patients. Leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises by referral of a licensed veterinarian, would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015. A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,
Nancy E. Lee, PT, MA, CCRT
9808 Regent St., #3, Los Angeles, CA 90034
nelee0523@att.net

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Board Members

Joan Renne <jrenne17@gmail.com>
Thu 8/13/2020 9:46 AM

To:

- Sotelo, Justin@DCA

.....

I am opposed to proposed animal rehabilitation regulations that will create An unnecessarily restrictive environment for qualified animal physical therapists to practice in California. This legislation will further limit consumers' access to quality care and reduces the necessary collaboration between physical therapists and vets to help animals get the help they need. Thank you. Joan Renne

james syms <jmsyms@gmail.com>
Thu 8/13/2020 9:44 AM

To:

- Sotelo, Justin@DCA

Animal Rehabilitation Letter.docx
148 KB

Please accept the attached document with comments regarding animal physical therapy.

Thank You,

Dr. James M. Syms PT, DSc

Justin Sotelo
Lead Administrative & Policy Analyst
Timothy Redda
Administrative/Licensing Manager
Veterinary Medical Board
1747 N. Market Street Suite, 230
Sacramento, California 95834

August 12th 2020

Opposition to Propose Regulatory Action Regarding Animal Regulation – CCR §2038.5

Dear Mr. Sotelo and Mr. Rodda,

My name is James Syms and am writing you to forward my opposition to the board's proposed regulation on Animal Rehabilitation (CCR 2038.5). I have been a physical therapist for over 30 years and have been actively involved in Physical Therapy Education holding a full-time appointment in an educational program for over 26 years. I have been following and actively participating with this animal physical therapy issue since 2006. I have attended numerous Veterinary Medical Board meetings and provided testimony at many of the meeting in the area of physical therapy education and practice. I was an appointed member of the VMB's Animal Rehabilitation Task Force (ARTF) as the content expert in physical therapy education.

My opposition to CCR 2038.5 is based on the fact that the VMB does not have statutory authority to establish a regulation on this issue as animal physical therapy (or any synonymous term, i.e., animal rehabilitation) is not specifically identified in veterinarian state practice act language (See Business and Profession Code 4826). When the state practice act was established in 1937, physical therapy was not identified as a medical profession. Physical therapy practice act was established by the California Legislature in 1953. So it is impossible in 1937 that the legislature intent would include physical therapy as the practice of veterinary medicine. Numerous legislative opportunities have occurred since 1937 and 1953 for this to be changed, but the legislature has decided that physical therapy is not the practice of veterinary medicine. As recently as 2012, changes to the Veterinary Practice Act have occurred. Most recently, in 2012, Assembly member Ma introduced Assembly Bill 1838 to amended section 4826 of the Business and Profession Code relating to veterinary medicine. If the legislature felt physical therapy was part of veterinary medicine, it could have made that change at that time. Legal constructs prohibit the assumption that an activity may be assumed to be broadly covered in statutory language. Rather, the activity must be specifically identified in statute. In 1937, physical therapy was not included as part of veterinary practice (it couldn't as physical therapy was not identified as a medical practice until 1953). Subsequent to the establishment of the practice of physical therapy in 1953, no legislative action has occurred to change this.

Personally, after toiling with this issue for over nine years, in 2015 I came to the realization that a regulatory solution could not address this this animal physical therapy issue, but would require a statutory action. I actually testified to this fact at a VMB meeting in San

Marcos in 2015. Coincidentally a representative from the Department of Consumer Affairs who was present at the meeting spoke up and concurred with my assessment.

Despite these facts, VMB continues to bring forward regulatory language which is unable to provide any clarification or conclusion to this issue. Unfortunately, the current proposed regulatory language is just another installment of an attempt at creating an unlawful “underground regulation”. Again - It is quite obvious that a regulatory action is inappropriate and is not able to fix the confusion stemming from this issue. In 2016-17 the Senate Business & Profession Committee saw that public comment was not given full consideration by the VMB and were instructed to create a task force on this issue. While the recommendations from the task force were “cherry picked” by the VMB, these recommendations should be considered as a starting point for worthwhile statutory changes. If the Board really wants to find a solution to this issue, it should also consider supporting actions like AB 3013 (in 2018) which addressed this issue.

Please register my opposition to VMB’s proposed regulation – CCR 2038.5.

Sincerely,
Dr. James M. Syms PT, DSc
Physical Therapist, Doctor of Science
Lake Arrowhead, CA

Ray Kuhl <wmrk@comcast.net>
Thu 8/13/2020 9:42 AM

To:

- Sotelo, Justin@DCA

Justin,

I would like to ask that you to oppose the proposed animal rehabilitation regulations that will define Animal Physical Rehabilitation (APR) as the practice of Veterinary Medicine. This will create an unnecessary and restrictive environment for qualified animal Physical Therapists (PT) to practice in California.

This legislation will limit consumer access to quality care and reduce necessary collaboration between physical therapists and veterinarians to help pets get the help they require.

I thank you for your time and consideration on this matter.

Thank You,

Ray Kuhl
San Jose, Ca

Danielle Robbins <amdogpt@gmail.com>
Thu 8/13/2020 9:39 AM

To:

- Sotelo, Justin@DCA

VMB Letter 2020.docx
18 KB

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations. I urge you to put a stop to any regulatory effort that fails to include the qualified and licensed physical therapist as a legitimate provider of animal physical rehabilitation services.

I am in support of language which will allow qualified and licensed physical therapists to work on animals under a level of supervision the primary or referring veterinarian believes is safe and appropriate for that particular animal, after a veterinary medical clearance (VMC) has been obtained. This will ensure that consumers who seek animal rehabilitation will have VMC for their animals as well an established veterinary client patient relationship (VCPR) to promote safety and compliance.

Prior to working with animals with less than direct or immediate supervision, California physical therapists should be required to demonstrate competency that includes a combination of relevant course work and supervised clinical practice. Examine the curricula and requirements from the current US certification programs offered through the Canine Rehabilitation Institute and University of Tennessee in addition to the regulations established in other states such as Colorado, Nebraska, New Hampshire and Nevada as well as the years of success (and consumer safety) afforded to such programs when formulating the requirements for California’s consumers and their pets.

I want to express my concern with the nomenclature previously presented that clarifies what is not considered animal rehabilitation:

"Animal Physical Rehabilitation does not include relaxation, recreational or wellness modalities, including but not limited to, massage, athletic training or exercise”.

This statement leaves an enormous amount of leeway to lay-professionals or unlicensed practitioners to work on animals in California without supervision.

I strongly object to the allowances this gives to certain “practitioners” while licensed, advanced-degreed physical therapists, with specific training in animal rehabilitation, would be subject to more limitations under the direct supervision model proposed by the California Veterinary Medical Association and California Veterinary Medical Board.

This language would essentially enable such professionals as massage therapists, canine/equine body-workers, hydro-therapists, trainers, athletic performance instructors, personal trainers, doggie day care employees and other unlicensed (perhaps uneducated) paraprofessionals the ability to work with animals without restriction. These practitioners’ number in the thousands without any oversight much less from any Board under the Department of Consumer Affairs.

Could any of these practitioners use a laser therapy device, operate an underwater or land treadmill machine at their discretion and or provide other types of exercise legally and competently if they say it’s a “healthy” pet? Who will determine (and how) if pain is present one day if that pain or symptom is a part of day-to-day activities like regular exercise or if it is pathologic? Who is determining the animal is healthy and then categorizing their treatment as “wellness” since chances are these unlicensed practitioners are not working, let alone communicating, with the primary veterinarian, and especially if they are not required to? This, under the proposed language, affords them the ability to essentially, as stated before, work on animals without restriction or qualification.

Examine the course content of some popular (but inherently unregulated) online and in-person animal massage therapy and animal hydrotherapy programs. The lessons included gait analysis, lameness, orthopedic injuries and their treatment, mobility aides, protocols for water activities, etc. It is short-sighted for the CVMB to think that these people then go out and do “wellness” type of services or modalities.

These inconsistencies and incongruence in the current definition and description of Animal Physical Rehabilitation – specifically the potential over-regulation of qualified & licensed physical therapists along with under-regulation of other paraprofessionals is unacceptable. The language should not restrict (by direct supervision) those from working with animals in a capacity that is appropriate to their level of education, experience, training and scope of practice while looking the other way at others who are not bound by any type of regulation or oversight.

Respectfully,

Danielle Robbins, MSPT, CCRT, ANT-C
 11009 Viacha Drive, SD, CA 92124
 AmDogPT@gmail.com

Hilary Wheeler <drwheeler@thewholepetvet.com>
Thu 8/13/2020 9:39 AM

To:

- Sotelo, Justin@DCA

As a veterinarian of 22 years and a CCRT through the CRI course, I strongly **oppose** the regulations being placed on licensed PT/CCRT professionals in their ability to provide animal rehabilitation services to patients in need of care. Veterinary technicians, despite their basic medical knowledge (only if they have obtained licensure as a licensed and registered veterinary technician), should **not** be allowed to provide rehab services to patients without direct supervision of a licensed rehab certified veterinarian or a licensed, rehab certified physical therapist. Technicians simply do not have the education, knowledge and expertise to safely provide rehabilitation services to patients without direct supervision by a veterinarian or rehab-certified PT.

Physical therapists have a strong background in anatomy and physiology which, following certification for animal rehabilitation, allows them to safely and effectively provide rehabilitation services to animal patients. Their educational background prepares them to address any urgent concerns that may arise and provide a direct referral to a local veterinarian if/when needed.

I myself completed internships with two different PTs/CCRTs during my own training to become a CCRT (Certified Canine Rehabilitation Therapist). Their vast knowledge of PT techniques, anatomy and physiology was evident in their ability to teach me novel techniques to apply to animals in delivering rehabilitation therapies.

Please vote **NO** on this proposed regulation and put an end to this ridiculous measure.

--

Warm Regards,

Dr. Hilary Wheeler
The Whole Pet Vet Hospital and Wellness Center
www.TheWholePetVet.com

Nonoguchi, Stacy <SNonoguchi@mednet.ucla.edu>
Thu 8/13/2020 9:39 AM

To:

- Sotelo, Justin@DCA

Cc:

- Rodda, Timothy@DCA;
- DCA Director's Office;
- PT@DC

August 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov
Timothy.Rodda@dca.ca.gov
DCA.DirectorsOffice@dca.ca.gov
PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including

the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I STRONGLY urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California. Sincerely,

Stacy Nonoguchi
1241 Amherst Ave, Apt 1. 90025
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snoguchi@mednet.ucla.edu

Stacy Nonoguchi, RTC, CTRS
Recreation Therapist
Marilyn Hilton MS Achievement Center
UCLA Dept of Neurology
1000 Veteran Ave, Ste 11-62
Los Angeles, CA 90049-7147

dyllanchapman@aol.com
Thu 8/13/2020 9:38 AM

To:

- Sotelo, Justin@DCA

August 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov
Timothy.Rodda@dca.ca.gov
DCA.DirectorsOffice@dca.ca.gov
PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical

therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.
Sincerely,

Diana Chapman
561 Kirk Avenue, Sunnyvale, CA 94085
702-575-1473
dyllanchapman@aol.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Erin Bukofsky <erinhbee@gmail.com>
Thu 8/13/2020 9:36 AM

To:

- Sotelo, Justin@DCA

August 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov
Timothy.Rodda@dca.ca.gov
DCA.DirectorsOffice@dca.ca.gov
PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a licensed physical therapist in California, I have been monitoring this issue closely for years and have been repeatedly disappointed with the egregious attempts this Board has taken to monopolize this area of animal healthcare.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to practice my craft under reasonable guidelines.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, my job opportunities and ability to earn a living would be dramatically reduced. **This regulation would be a restraint of my trade.**

Other states have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am OPPOSED to this regulation as written and urge that it be withdrawn and replaced with

legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before us on this matter.).

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists. Unfortunately, the CVMB opposed that bill largely based on the misrepresentations by members of the veterinary profession who successfully were able to sway Board opinion.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals *after* a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

Erin Bukofsky, PT, DPT, CCRT
Doctor of Physical Therapy
Certified Canine Rehabilitation Therapist
18837 Hawthorne Blvd, CA, 90504
ebukofsky@beachanimalrehab.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Siefertman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

debbie fitz <frogbunch@gmail.com>
Thu 8/13/2020 9:32 AM

To:

- Sotelo, Justin@DCA

Let this letter serve as my opposition to the proposed 2038.5.

Respectfully, Deb Fitz

Debbie Kuhl <kuhlnurse@aol.com>
Thu 8/13/2020 9:27 AM

To:

- Sotelo, Justin@DCA

Dear Sir,

I oppose the proposed animal rehabilitation regulations! They will create an unnecessarily restrictive environment for qualified animal PT's to practice in California. This legislation will further limit consumers access to quality care and reduces the necessary collaboration between physical therapists and veterinarians to help pets get the help they need!

Thank you for your time.

Debbie Kuhl

Christine Talbott <talbott707@gmail.com>
Thu 8/13/2020 9:26 AM

To:

- Sotelo, Justin@DCA;
- Rodda, Timothy@DCA

+2 others

August 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov
Timothy.Rodda@dca.ca.gov
DCA.DirectorsOffice@dca.ca.gov
PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

On a personal note, I have a dog that four years ago suffered nerve damage to her back right leg. Three different vets said there was nothing more they could do for her. I did take her to physical therapy and in the beginning I had to carry her there. Now she is using that leg at 80+% and is happy and comfortable. She will always have small setbacks, but the PT's are there to help get her back. I am very grateful to them.

Please understand how valuable licensed PT's are. I was able to find PT's that connect with my dog and keep her strong. Please keep PT's accessible to more animals!!!! Please don't make it more expensive and difficult for animals to find the help they need.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Christine Talbott
16 Middlebury Lane
650.941.5745
talbotcm@aol.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Amie Hesbach <amiehesbach@gmail.com>
Thu 8/13/2020 9:25 AM

To:

- Sotelo, Justin@DCA;
- Rodda, Timothy@DCA

+2 others
Hesbach Letter.docx
17 KB

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August 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834
E-Mail Addresses:

Justin.Sotelo@dca.ca.gov
Timothy.Rodda@dca.ca.gov
DCA.DirectorsOffice@dca.ca.gov
PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a licensed physical therapist, I have been monitoring this issue closely for years and have been repeatedly disappointed with the egregious attempts this Board has taken to monopolize this area of animal healthcare.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my ability to practice my craft under reasonable guidelines.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, my job opportunities and ability to earn a living would be dramatically reduced. This regulation would be a restraint of my trade.

August 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

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I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals *after* a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

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Sincerely,

Amie Lamoreaux Hesbach, PT, MS, DPT, CCRP, CCRT

Den Haag, Netherlands

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

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Sincerely,

Amie Lamoreaux Hesbach, PT, MS, DPT, CCRP, CCRT

Den Haag, Netherlands

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Amie Lamoreaux Hesbach, PT, DPT, MS, NCPT, CCRP, CCRT, CKTP

Confidence in Movement - Body in Balance - Power in Knowledge

EmpowerPhysio: Educational, Mentoring, & Coaching Services for Pet Parents & Animal Physical Therapy & Rehabilitation Professionals

Doctor of Physical Therapy
Nationally Certified Pilates Trainer
Certified Canine Rehabilitation Practitioner
Certified Canine Rehabilitation Therapist
Certified KinesioTaping Practitioner

Karina Garibay <garibaykarina02@gmail.com>
Thu 8/13/2020 9:22 AM

To:

- Sotelo, Justin@DCA

I would like to oppose animal rehabilitation regulations proposed by CVMB.

Katie Kuhl <kvkuhl@gmail.com>
Thu 8/13/2020 9:20 AM

To:

- Sotelo, Justin@DCA

.....
Me. Sotelo,

I am writing to oppose the proposed animal rehabilitation regulations. They will create an unnecessarily restrictive environment for qualified animal PTs to practice in California. This legislation will further limit consumers access to quality care and reduces the necessary collaboration between physical therapists and veterinarians to help pets get the help they need.

Thank you,

Katie Kuhl

From: Beth Williams <k9wellnesscenter@gmail.com>
Sent: Thursday, August 13, 2020 9:13 AM
To: justin.sotelo@dca.ca.com; Rodda, Timothy@DCA <Timothy.Rodda@dca.ca.gov>; DCA Director's Office <DCA.DirectorsOffice@dca.ca.gov>; PT@DCA <PT@dca.ca.gov>
Subject: opposal to restriction of rehabilitation services by P.T.'s

August 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board, Sacramento, CA

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov
Timothy.Rodda@dca.ca.gov
DCA.DirectorsOffice@dca.ca.gov
PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo, Mr. Rodda, and board members-

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a licensed physical therapist for humans (35 years) and animals (16 years) in Nevada, I was fortunate to work with the Nevada Veterinary Board in creating a legal pathway for the provision of rehabilitation services by licensed physical therapists with additional training in the veterinary field. Yes, the emerging specialty field of animal physical rehabilitation requires oversight and regulation to protect the consumer and their animals. But the California Veterinary Medical Board's current approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone necessary training does not serve the public interest. In Nevada, there have been NO complaints registered with the board regarding therapy services by physical therapists since licensing of A.P.T.s (animal physical therapists) began in 2004. I successfully practice upon written referral from veterinarians, in a free standing therapy facility. I am in close contact with the general practice and specialist veterinarians involved in our patient's care, and as required by law I provide a report to them within 2 days of treatment visits.

Designating licensed physical therapists who have been additionally trained to treat animals as 'unlicensed veterinary assistants' and subjecting them to work ONLY under direct supervision and for a veterinarian is unnecessary and demeaning. As health care professionals we are trained to work in collaboration with physicians/surgeons, nurses, and other therapists, are well aware of our scope of practice and how to best utilize our expertise within a team approach. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine without a pathway of exemption for qualified physical therapists to work under more reasonable guidelines, the veterinary field and more importantly their clients and patients lose the opportunity to collaborate with professionals who bring a unique skill set to collaborative patient care.

Other states, including Nevada, Colorado and Nebraska, have successfully regulated this field in much more appropriate ways that serve the consumer, pets, and professionals alike. I am opposed to this regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals. The issue of animal physical rehabilitation in California has been going on for far too long. Unfortunately, the CVMB opposed the solution proposed in AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and properly included physical therapists.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the referring veterinarian) and allow them to work on animals *after* a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

An appropriate legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.
Sincerely,

Beth Williams, P.T. (NV #361), A.P.T. (NV #002)
K9 Wellness Center

mgreenbergdvm <mgreenberg.dvm@gmail.com>
Thu 8/13/2020 9:17 AM

To:

- Sotelo, Justin@DCA

Marissa Greenberg, DVM
1691 Mirasol Way
Atascadero, CA 93422

August 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

Re: Veterinary Opposition to Proposed Animal Rehabilitation Regulations

Dear Mr. Sotelo and Mr. Rodda,

I am writing in regards to the proposed regulatory action concerning Animal Physical Rehabilitation Section 2038.5. I am an active member of the CVMA, and a practicing associate small animal veterinarian at VCA South County Animal Hospital in Arroyo Grande, CA. I am in opposition of the proposed regulatory action regarding physical rehabilitation in our state, as it will severely limit the access that owners and their pets have to gain life changing physical rehabilitation care. This regulation would also negatively affect the way I wish to practice as a veterinarian; it will limit my ability to inter-professionally collaborate with qualified licensed animal physical therapists and it will restrict me from deciding the level of supervision I want to provide for these professionals. I don't believe direct supervision should be mandated for qualified animal PT's, and I would like to have the choice to decide what level of supervision (whether that be direct or indirect) is appropriate and safe. I have first hand experience with physical rehab from multiple sides, both as an owner of a dog needing this level of care, and as a veterinarian working alongside a licensed physical therapist with certification in canine rehabilitation.

The proposed regulations are asserting that a veterinarian is more knowledgeable and experienced in rehab than an appropriately certified licensed physical therapist. As a 2006 graduate of Washington State University, I personally received no training in rehab, and I know I am not alone in saying that I would not be qualified to provide this level of care. Instead, someone who's total educational focus has been on rehab and is licensed to work on people, and has the additional training in canines, should be allowed to do so-their knowledge of the subject far outweighs most veterinarians when they come out of school. Working alongside Karen Atlas, I have seen her depth and breadth of knowledge in the area that she is trained, as well as her attention to safety for every patient, and a thorough understanding of the case from the referring DVM. Her communications with each and every DVM is thorough and intense, helping to assure the safety of the rehab plan for each and every patient.

As a pet owner, my own eyes were opened about the benefits of rehab therapy when my own dog needed it after spinal cord surgery. Because I was not exposed to it in my schooling, it was a field I knew very little about. I credit rehab therapy with helping my own dog make an amazing recovery and maintain a high quality of life. Having access to an expert like Karen Atlas made all the difference in the world to me as a pet owner, but also helped me to understand how my other patients could benefit from this sort of service. It made me much more likely to refer patients for care. As it is, I personally travelled 110 miles one way for my dog to benefit from these services because they are not available any closer to my home. The proposed regulations would limit these services even more, preventing dogs like my very own, and my patients, from receiving these life altering benefits. This would be a shame, when this is already a service that is very limited in many areas, like mine. Each week that I was there with my own dog, I was able to witness the benefits to many more patients with a variety of underlying medical conditions. The care taken to provide each one a customized rehab plan was exquisitely done by a highly trained staff. And getting to know some of the other pet owners, I realized they all felt the same way I did about the importance and the impact that this kind of care had on their pets lives. To take this away from caring pet owners and for putting unnecessary burdens and restraining the trade for professionals like Karen Atlas, who are exceptionally qualified, and more qualified than most DVM's, would be debilitating to so many pets and their owners.

I urge you to consider rejecting the proposed changes, and instead look to codify the VMB's Stakeholder's Task Force language as it relates to physical therapists working on animals. The solution is a legislative remedy akin to AB 3013 (the Animal Physical Rehabilitation Bill of 2018).. Allowing the veterinarian to decide the level of supervision (whether it be direct or indirect) for a properly qualified licensed animal PT , and requiring a referral from a pet's primary DVM, provides for a high level of very safe care and allows this service to reach more pets and their owners. There is no need to limit an already limited service even more. To add an additional layer of consumer protection, it would be logical to allow qualified animal PT's to carry their own animal rehabilitation premise permits so that the Veterinary Medical Board can have further oversight of these practices. I am happy to speak with you further on this topic and hope that you will reconsider.

Sincerely,

Error! Filename not specified.

Marissa Greenberg, DVM

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Siefertman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Adam Perry <adam.r.perry@gmail.com>
Thu 8/13/2020 9:12 AM

To:

- Sotelo, Justin@DCA;
- Rodda, Timothy@DCA

Cc:

- DCA Director's Office;
- PT@DCA

August 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

Dear Mr. Sotelo and Mr. Rodda,

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It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists.

This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation.

Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to

perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Adam Perry
1185 Keeler Ave. Berkeley CA 94708
617-319-5656
adam.r.perry@gmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Robyn Wyzinski <robynwyzinski@gmail.com>
Thu 8/13/2020 9:10 AM

- ~~S~~otelo, Justin@DCA
- ~~C~~aren.atlas@yahoo.com

I am thankful to your medical community and the group who have been working toward a best practice policy to ensure our animal and human clients are not only protected but also given the highest quality of care.

Over the last couple of years I have had an opportunity to work with several equine veterinary orthopedic surgeons. These California State Board of Veterinary Medicine recognized Sports Medicine Specialists have embraced the addition of skilled physical therapy to improve patient outcomes as occurs in human sports medicine. I have also had an opportunity to teach with and for veterinarians as a RACE approved CE provider. Through these collaborations, I have witnessed the common denominator of veterinary and physical therapy practice of safe and best practice for optimizing return to sport outcomes. Skilled physical therapists are now frequently consulting with veterinarians as both knowledgeable about research literature on the crossover between human rehabilitation models and how this can improve veterinary care.

In human medicine the collaboration between surgeons and therapists is a close relationship where the therapist can be in the field with the patient to safely support a rehabilitation program. An ongoing dialogue with a physician/surgeon is closely maintained. In this model, the team is able to provide safe and effective rehabilitation without the need for both highly skilled professions to be physically present for every rehabilitation session. The veterinarian and doctor of physical therapy can work in a distance dialogue via email, video calls, or onsite meetings to discuss cases and patient progression without the need for a coordination of client, veterinarian, and doctor of physical therapy to be at the same location.

It is very important that the highly skilled professionals are the only ones providing these types of rehabilitative services. Physical therapists, in this role, should be at minimum Doctors of Physical Therapy by education and have a certification from a Veterinary Medical School such as the University of Tennessee or Florida Programs for Equine Rehabilitation to ensure appropriate education.

It is in the best interest of clients, veterinarians and therapists that we work in a collaborative effort while protecting our patients from the unskilled practitioners that frequently 'self identify' as animal rehabilitation providers.

Thank you for your attention to this important matter,

Robyn Wyzinski, PT, DPT, CERP
Doctor of Physical Therapy
Certified Equine Rehabilitation Practitioner (University of Tennessee Veterinary Medical School)

Thea Montella <cavallinodue@gmail.com>
Thu 8/13/2020 9:06 AM

To:

- Sotelo, Justin@DCA

.....

>

> To the Members of the Veterinary Board:

>

> I am writing in strong opposition to the adoption of Section 2038.5 Article 4 Division 20 Title 6 of the California Code of Regulations. This proposal severely limits the rights and access of animal owners to qualified practitioners and restricts the ability of licensed and trained animal rehabilitation professionals to practice in their field.

>

> There is no mandate that a physician be at the elbow of every sports and physical therapist, chiropractor and bodyworker and it is preposterous to insist that this be the case for animal clients.

>

> This proposal is at best misdirected and at worst a monopolization of the animal rehabilitation field. It would limit the scope of quality care and place undue hardship on practitioners, veterinarians, consumers and their animals.

>

> Thank you!

>

> Sincerely,

> Thea B. Montella

> CESMT

Jennifer Benton PT <beinginbalancept@gmail.com>
Thu 8/13/2020 9:06 AM

To:

- Sotelo, Justin@DCA

81320.pdf
75 KB

Please see attached concerns.

Jennifer Benton, PT, CCRT

Being In Balance Physical Therapy

August 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

DCA.DirectorsOffice@dca.ca.gov

PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION
PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

As a licensed physical therapist in California, I have been monitoring this issue closely for years and have been repeatedly disappointed with the egregious attempts this Board has taken to monopolize this area of animal healthcare.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have

undergone the necessary training on animals limits my ability to practice my craft under reasonable guidelines.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, my job opportunities and ability to earn a living would be dramatically reduced. **This regulation would be a restraint of my trade.**

Other states have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am OPPOSED to this regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before us on this matter.).

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists. Unfortunately, the CVMB opposed that bill largely based on the misrepresentations by members of the veterinary profession who successfully were able to sway Board opinion.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. Specifically, allow qualified and licensed PT's to work under the direct OR indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals *after* a veterinarian has made a diagnosis and determined that rehab would be a safe and

beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own APR premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

Jennifer M. Benton, PT, CCRT

1185 Keeler Ave. Berkeley, Ca. 94708

beinginbalancept@gmail.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs

Jessica Sieferman, Executive Officer, California Veterinary Medical Board

California Veterinary Medical Board Members

Jason Kaiser, Executive Officer, Physical Therapy Board of California

Physical Therapy Board of California Members

Alice Wight <wight.alice@yahoo.com>
Thu 8/13/2020 9:05 AM

To:

- Sotelo, Justin@DCA

Cc:

- Rodda, Timothy@DCA;
- DCA Director's Office;
- PT@DCA

August 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 23
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov
Timothy.Rodda@dca.ca.gov
DCA.DirectorsOffice@dca.ca.gov
PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

Alice Wight

1013 Woodborough Court, San Jose, CA 95116
408-438-1513
Wight.alice@yahoo.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Siefertman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Shauna Slobodian <shauna@pawsitivelyfit.ca>
Thu 8/13/2020 9:03 AM

To:

- Sotelo, Justin@DCA;
- Rodda, Timothy@DCA

+2 others
CVMBT opposition letter.pdf
142 KB

Good Day,

Please see attached letter of opposition to proposed changes to Animal Rehabilitation Regulations.

Kind regards.

--

Shauna Slobodian, RPT, Diploma Canine Rehabilitation

August 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHABILITATION PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations. As a physical therapist and member of the Animal Rehab Division of the Canadian Physiotherapy Association, I have been monitoring this issue closely for years and have been repeatedly disappointed with the dishonorable attempts the California Veterinary Medical Board (CVMB) has taken to monopolize this area of animal healthcare.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits the ability of physical therapists to legally practice under reasonable guidelines.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, public access will be hindered to a service that currently being provided by physical therapists, and business continuity will be prohibited. Additionally, this regulation would be a restraint of physical therapist trade.

Other states have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am OPPOSED to this regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before us on this matter).

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists. Unfortunately, the CVMB opposed that bill largely based on the misrepresentations by members of the veterinary profession who successfully were able to sway Board

opinion. It appears that the Veterinary Medical Boards (in Canada as well as California) function to protect their own interests! The check and balance needs to come from above! A monopoly does not serve or protect the public.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. California physical therapists are asking for qualified and licensed PT's to work under the direct or indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals after a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

Shauna Slobodian,
874 Rowantree Cres.,
Kingston, On, Canada
K7P 1P5

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Sieferman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

Melissa Armstrong <marmstrong@simasgovlaw.com>
Thu 8/13/2020 9:02 AM

To:

- Sotelo, Justin@DCA;
- Rodda, Timothy@DCA

Cc:

- Sieferman, Jessica@DCA

+2 others
20.08-12.LTR.VMB.2038.5.Opp.FINAL.pdf
801 KB

Dear Mr. Sotelo and Mr. Rodda:

Please see the attached public comments/correspondence in the above-referenced matter. This is the same correspondence sent to you yesterday afternoon, but we are resubmitting during the public comments submission window for today's meet. Please do not hesitate to contact us with any questions or comments. Thank you.

Melissa Armstrong
Senior Paralegal
805-547-9300 | 916-789-9800
marmstrong@simasgovlaw.com

Sacramento | San Luis Obispo | San Diego | San Jose



Steven L. Simas
Daniel J. Tatick
Ryan M. Keever
Sasha G. Aguilar

August 12, 2020

Justin Sotelo
Lead Administrative & Policy Analyst
Timothy Rodda
Administration/Licensing Manager
Veterinary Medical Board
1747 N. Market Street, Suite 230
Sacramento, California 95834

VIA EMAIL AND US MAIL

Justin.Sotelo@dca.ca.gov

Timothy.Rodda@dca.ca.gov

**Re: *Opposition to Proposed Regulatory Action*
Animal Rehabilitation
California Code of Regulations Section 2038.5**

Dr. Mr. Sotelo and Mr. Rodda:

Our law firm represents the California Association of Animal Physical Therapists (“CAAPT”) and the Animal Physical Therapy Coalition (“APTC”).

As you know, APTC is a grassroots coalition representing veterinarians, physical therapists, RVTs and consumers. APTC has been working diligently with the Veterinary Medical Board (“Board”) to establish common sense animal rehabilitation regulations and legislation in California.

CAAPT is a grassroots association/coalition of licensed physical therapy professionals who seek to play a leading role in defining appropriate legislative/regulatory language in California.

On behalf of our client groups, we are writing to state opposition to the adoption of the Board’s proposed regulation on Animal Physical Rehabilitation, California Code of Regulations, title 16, section 2038.5 (“Proposed APR Regulation”). As you have already received comments directly from our client groups, this letter will focus on the legal defects and deficiencies in this regulation and process.

Justin Sotelo
Timothy Rodda
August 12, 2020
Page 2

A. The Board's Animal Rehabilitation Regulation Unlawfully Enlarges the Scope of Veterinary Practice Defined by Statute

Examining the California Veterinary Medicine Practice Act ("Act") confirms that the Proposed APR Regulation oversteps the Board's regulatory authority in three ways. First, the Act does not authorize veterinarians to practice physical therapy, as the Legislature has confirmed. Second, the Proposed APR Regulation violates the Administrative Procedure Act as exceeding the Board's scope and legal authority. And third, the Proposed APR Regulation represents an improper attempt for the Board to increase its scope of veterinary practice without proper legislation.

1. The Veterinary Scope of Practice Does Not Include Physical Therapy

Business and Professions Code section 4826 defines the scope of veterinary practice under California law:

A person practices veterinary medicine, surgery, and dentistry, and the various branches thereof, when he or she does any one of the following:

- (a) Represents himself or herself as engaged in the practice of veterinary medicine, veterinary surgery, or veterinary dentistry in any of its branches.
- (b) Diagnoses or prescribes a drug, medicine, appliance, application, or treatment of whatever nature for the prevention, cure, or relief of a wound, fracture, bodily injury, or disease of animals.
- (c) Administers a drug, medicine, appliance, application, or treatment of whatever nature for the prevention, cure, or relief of a wound, fracture, bodily injury, or disease of animals, except where the medicine, appliance,

Justin Sotelo
Timothy Rodda
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Page 3

- application, or treatment is administered by a registered veterinary technician or a veterinary assistant at the direction of and under the direct supervision of a licensed veterinarian subject to Article 2.5 (commencing with Section 4832) or where the drug, including, but not limited to, a drug that is a controlled substance, is administered by a registered veterinary technician or a veterinary assistant pursuant to Section 4836.1. However, no person, other than a licensed veterinarian, may induce anesthesia unless authorized by regulation of the board.
- (d) Performs a surgical or dental operation upon an animal.
 - (e) Performs any manual procedure for the diagnosis of pregnancy, sterility, or infertility upon livestock or Equidae.
 - (f) Uses any words, letters, or titles in such connection or under such circumstances as to induce the belief that the person using them is engaged in the practice of veterinary medicine, veterinary surgery, or veterinary dentistry. This use shall be prima facie evidence of the intention to represent himself or herself as engaged in the practice of veterinary medicine, veterinary surgery, or veterinary dentistry.

(Amended by Stats. 2012, Ch. 239, Sec. 1. (AB 1839)
Effective January 1, 2013.)

Nowhere in this statute defining the scope of veterinary practice, the violation of which can be a misdemeanor,¹ is any mention of animal rehabilitation or physical therapy. Physical therapy is defined as “the art and science of physical or corrective rehabilitation or of physical or corrective treatment of any bodily or mental condition.”² Corrective rehabilitation or treatment is missing from the Act.

¹ Business & Professions Code section 4831.

² Business and Professions Code section 2620(a).

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Further, while section 4826 even articulates the veterinarian's modes of treatment such as drugs, administration of medicine and appliances, and treatment, prevention and cure of wounds, fractures, bodily injury, or disease of animals, it falls short of authorizing veterinarians to practice physical therapy or to provide physical therapy modalities. Physical therapy modalities include:

...use of the physical, chemical, and other properties of heat, light, water, electricity, sound, massage, and active, passive, and resistive exercise, and shall include physical therapy evaluation, treatment planning, instruction and consultative services.³

Section 4826 does not come close to authorizing veterinarians to perform physical therapy on their patients and it is clearly outside the scope of lawful veterinary practice.

When courts construe statutes and the legislative intent behind them, they look at what the statute enumerates and will not *read into it* as the Board is trying to do in enacting the Proposed APR Regulation. Pursuant to the doctrine of *expressio unius est exclusio alterius*, the enumeration of acts within the operation or exception of a statute will preclude the inclusion by implication other acts not specified.⁴ Based upon the language of section 4826, animal rehabilitation is not expressly authorized as part of veterinary practice. Thus, we do not believe a court will read animal rehabilitation or physical therapy into this section, especially when the Legislature was clear in defining the scope of veterinary practice.⁵⁶

³ Business and Professions Code section 2620(a).

⁴ *Henderson v. Mann Theaters Corp.* (1976) 65 Cal.App.3d 397, 403.

⁵ *Phillippe v. Shappell Industries* (1987) 43 Cal.3d 1247, 1265.

⁶ Further, the U.S. Supreme Court has made clear in *North Carolina State Board of Dental Examiners v. Federal Trade Commission* (2015) ___ U.S. ___, 135 S.Ct. 1101, that injunctive relief may be proper and Board members may even be liable when the Board's action such as the Proposed APR Regulation unfairly restricts competition.

Justin Sotelo
Timothy Rodda
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2. The Proposed APR Regulation Violates the Administrative Procedure Act

As the Board knows, its regulations must meet the established requirements of the Administrative Procedure Act and be approved by the Office of Administrative Law (“OAL”). In this case, the Proposed APR Regulation fails to comply with the Administrative Procedure Act.

Government Code section 11349.1 requires OAL to review all regulations and determine whether they comply with statutory standards set forth in Government Code section 11349. The Proposed APR Regulation fails to comply with the requirements of “consistency.”

Government Code section 11349(d) provides that “consistency” means the regulation is in harmony with, and not in conflict with or contradictory to, any existing statutes, court decisions, or other provisions of law. Courts have held that “[a]dministrative regulations that alter or amend the statute or enlarge or impair its scope are void and courts not only may, but it is their obligation to strike down such regulations.”⁷ Because the Proposed APR regulation will enlarge the scope of the Act, namely Business and Professions Code section 4826, it will not pass muster either by OAL or in any subsequent judicial review. And courts do not have to defer to the Board’s interpretation. Rather, they exercise their own independent judgment.⁸ Neither a reviewing court nor OAL will find any reference to APR in the Act, thus, the Proposed APR Regulation fails the consistency requirement of the Administrative Procedure Act.

B. The Board’s Stakeholder’s Task Force Recommendation

At the February 2, 2017 Animal Rehabilitation Task Force meeting, the Task Force approved the following language:

California licensed physical therapists with advanced certification in Animal Physical Rehabilitation (with such

⁷*Aguilar v. Superior Court* (2009) 170 Cal.App.4th 313, 323.

⁸ *Samantha C. v. State Department of Developmental Services* (2010) 185 Cal.App.4th 1462, 1481–1483, citing *Murphy v. Kenneth Cole Productions, Inc.* (2007) 40 Cal.4th 1094, 1105, fn. 7.

Justin Sotelo
Timothy Rodda
August 12, 2020
Page 6

certification to be defined by the Veterinary Medical Board and Physical Therapy Board working cooperatively) may provide animal physical rehabilitation under the degree of supervision to be determined by the veterinarian who has established a veterinarian-client-patient relationship, on a veterinary premises or an Animal Physical Rehabilitation premises (as defined in regulation by the Veterinary Medical Board and the Physical Therapy Board working cooperatively), or a range setting.⁹

This common-sense language does not conflict with the Act. A veterinarian-client-patient relationship (“VCPR”) must be established, which is vital and allows the veterinarian to manage the care provided to the animal.¹⁰ The veterinarian and physical therapist work together.

This language protects the public because in addition to the veterinarian establishing a VCPR, the physical therapist must obtain *advanced* certification in Animal Physical Rehabilitation (“APR”). The advanced training/certification would include courses that are approved by the Registry for Approved Continuing Education (RACE). The public is further protected by the Board’s oversight of an APR premises license, for which the requirements are to be determined and defined by the Board working cooperatively with the Physical Therapy Board. The Board will ensure protection of the public by developing appropriate minimum standards for an APR premises.

C. Direct Supervision Not Necessary When VCPR Established

California Code of Regulations, title 16, section 2032.1(b), requires the following elements to establish a veterinarian-client-patient relationship:

- (1) The client has authorized the veterinarian to assume responsibility for making medical judgments regarding the

⁹ April 19-20, 2017 Veterinary Medical Board Meeting Minutes at page 11
<https://www.vmb.ca.gov/meetings/minutes/20170419_vmb.pdf> (as of August 11, 2020).

¹⁰ See California Code of Regulations, title 16, section 2032.1.

Justin Sotelo
Timothy Rodda
August 12, 2020
Page 7

health of the animal, including the need for medical treatment,

(2) The veterinarian has sufficient knowledge of the animal(s) to initiate at least a general or preliminary diagnosis of the medical condition of the animal(s). This means that the veterinarian is personally acquainted with the care of the animal(s) by virtue of an examination of the animal or by medically appropriate and timely visits to the premises where the animals are kept, and

(3) The veterinarian has assumed responsibility for making medical judgments regarding the health of the animal and has communicated with the client a course of treatment appropriate to the circumstance.

California Code of Regulations, title 16, sections 2032.1(e) and (f), state:

No person may practice veterinary medicine in this state except within the context of a veterinarian-client-patient relationship or as otherwise permitted by law. A veterinarian-client-patient relationship cannot be established solely by telephonic or electronic means.

Telemedicine shall be conducted within an existing veterinarian-client-patient relationship, with the exception for advice given in an “emergency,” as defined under section 4840.5 of the code, until that patient(s) can be seen by or transported to a veterinarian. For purposes of this section, “telemedicine” shall mean the mode of delivering animal health care services via communication technologies to facilitate consultation, treatment, and care management of the patient.

Once a VCPR has been established by a veterinarian, that veterinarian possesses sufficient knowledge, including the knowledge gained from a hands-on examination of the animal, to utilize

Justin Sotelo
Timothy Rodda
August 12, 2020
Page 8

telemedicine to continue treating the patient for the condition under which the VCPR was established (i.e., a medical condition for which APR is warranted) and is authorized to do so under the Act.

Similarly, once a VCPR has been established, the veterinarian possesses sufficient knowledge regarding the animal such that the veterinarian can provide relevant information to a physical therapist with advanced certification in APR and then provide indirect supervision of the physical therapist providing services at an APR premises regulated by the Board. The veterinarian and physical therapist work collaboratively to provide veterinary treatment (by the veterinarian) and APR (by the physical therapist with the required certification) to the animal. The physical therapist maintains treatment records and provides those records, to include a treatment plan, to the veterinarian who established the VCPR and the veterinarian provides indirect supervision for the APR performed by the physical therapist. The veterinarian and the physical therapist have a symbiotic relationship in that each can provide services the other cannot: the veterinarian performs a thorough examination of the animal and determines a diagnosis and the physical therapist establishes a treatment plan and performs modalities not included in the Act consistent with advanced training and experience in physical or corrective treatment, exercise, bodily movement, mobility and wellness, none of which are included in the Act.

For these reasons, direct supervision of a physical therapist by the veterinarian is unnecessary and should not be mandated by the Proposed APR Regulation.

D. Opposition to Proposed Regulation

The Initial Statement of Reasons asserts that the proposed regulatory action will not have a significant adverse economic impact on businesses. However, that statement is simply not true. Should this regulation be enacted, several established APR practices will no longer be allowed to exist and will be forced to close. Veterinary practices are unable to sustain employment of a physical therapist due to the

Justin Sotelo
Timothy Rodda
August 12, 2020
Page 9

expense and the fact that not all animals require such care by a physical therapist.

Should this proposed regulation pass, the public will not be protected because the proposed regulation does not require that veterinarians, RVTs or veterinary assistants receive advanced certification in APR, or any training or certification at all.

Finally, public interest is not served by this proposed regulation. The proposed regulation will limit the availability of APR to consumers and their animals, unfairly affecting the most rural and disadvantaged citizens of this state.

For the reasons set forth above, CAAPT and APTC remain opposed to the proposed regulation and encourage the Board to vote against the proposed regulation. Specifically, the proposed regulation unlawfully enlarges the scope of veterinary practice, does not reflect the common-sense language developed by the Animal Rehabilitation Task Force allowing indirect supervision, does not protect consumers and does not serve the public interest.

Sincerely,



Steven L. Simas
Simas & Associates, Ltd.

SLS:ma

cc: Karen Atlas, President, Animal Physical Therapy Coalition (via email)
Kimberly Kirchmeyer, Director, California Department of Consumer Affairs (via email)
Jessica Sieferman, Executive Officer, California Veterinary Medical Board (via email)
Melissa Armstrong, Senior Paralegal (via email)

H [REDACTED]
Thu 8/13/2020 9:02 AM

To:

- Sotelo, Justin@DCA

Cc:

- Rodda, Timothy@DCA;
- DCA Director's Office;
- PT@DCA

August 13, 2020

Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

E-Mail Addresses:

Justin.Sotelo@dca.ca.gov
Timothy.Rodda@dca.ca.gov
DCA.DirectorsOffice@dca.ca.gov
PT@dca.ca.gov

RE: OPPOSITION OF CVMB ANIMAL PHYSICAL REHAB PROPOSED REGULATIONS

Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits my choice of and access to these qualified and licensed animal care providers.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd.

Though much of the language adopted into this proposed regulation is reasonable and was a product of the CVMB's Animal Physical Rehabilitation Stakeholder's Task Force (APRSTF), the proposed language essentially monopolizes the market on animal health care by not including the licensed physical therapists. This negatively impacts me as a consumer. I want MORE choice of and access to a licensed PT for my animal, not less.

True provision of consumer protection would include mandatory educational standards for all who practice in the specialty niche of animal rehabilitation. Since the specialty of animal rehabilitation is not currently taught and tested for in veterinary or vet tech schools, the only way to ensure competency of all those who practice (veterinarian, registered vet tech, or physical therapist) is to mandate proper training before being allowed to perform rehab on my pet. The proposed regulation does nothing for me or my pet's safety or protection.

So not only do I OPPOSE these regulations because it takes away my choice of and access to a qualified animal physical therapist, but I oppose it because it does not ensure educational competency of the practitioners who would be allowed to practice on my animal.

Consumers have spoken loud and clear on this issue for years. We want increased access to animal physical therapists in California so more rural areas will be better served, costs for services can be competitive, and we can have more choice of qualified practitioners. We do not want to see this area of animal rehab monopolized by the veterinary profession.

This has been going on for far too long. The solution to properly include physical therapists was AB 3013 (Animal Physical Rehabilitation Bill of 2018) and would have codified the APRSTF language.

I urge you to put a stop to the regulatory efforts and instead pursue the proper legislative remedy so more animals can get the care they need, where they need it in California.

Sincerely,

H [REDACTED]
[REDACTED]
[REDACTED]

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Siefertman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

jeaninefreeberg@yahoo.com
Thu 8/13/2020 9:01 AM

To:

- Sotelo, Justin@DCA;
- Rodda, Timothy@DCA

+2 others

.....
Dear Mr. Sotelo and Mr. Rodda,

I am submitting this letter to OPPOSE the proposed animal physical rehabilitation regulations. As a physical therapist, I have been monitoring this issue closely for years and have been repeatedly disappointed with the dishonorable attempts the California Veterinary Medical Board (CVMB) has taken to monopolize this area of animal healthcare.

It is clear that the emerging specialty field of animal physical rehabilitation needs oversight and regulation to protect the consumer and their animals. However, the California Veterinary Medical Board's approach to pursue regulatory language without including an exemption for licensed physical therapists who have undergone the necessary training on animals limits the ability of physical therapists to legally practice under reasonable guidelines.

By relegating licensed physical therapists who have been specifically trained on animals to being merely an 'unlicensed veterinary assistant' and subjecting them to work ONLY under direct supervision and for a veterinarian is absurd. If the CVMB is successful with defining animal rehabilitation as the practice of veterinary medicine and not create a pathway of exemption for a licensed physical therapist with advanced training on animals to work under more reasonable guidelines, public access will be hindered to a service that currently being provided by physical therapists, and business continuity will be prohibited. Additionally, this regulation would be a restraint of physical therapist trade.

Other states have successfully regulated this field (i.e. Nevada, Colorado and Nebraska) in much more appropriate ways that serve the consumer, pets, and professionals alike. I am OPPOSED to this regulation as written and urge that it be withdrawn and replaced with legislation that provides a more sensible solution which includes licensed physical therapists who have undergone the appropriate training specifically on animals (just as the other states have done that have gone before us on this matter).

The issue of animal physical rehabilitation has been going on for far too long. The solution was AB 3013 (Animal Physical Rehabilitation Bill of 2018) which would have codified the legislatively-mandated CVMB's Animal Physical Rehabilitation Stakeholder's Task Force language and would have properly included the physical therapists. Unfortunately, the CVMB opposed that bill largely based on the misrepresentations by members of the veterinary profession who successfully were able to sway Board opinion. It appears that the Veterinary Medical Boards (in Canada as well as California) function to protect their own interests! The check and balance needs to come from above! A monopoly does not serve or protect the public.

I urge you to put a stop to any regulatory effort that fails to include the licensed physical therapist as a legitimate provider of animal physical rehabilitation services. California physical

therapists are asking for qualified and licensed PT's to work under the direct or indirect supervision of a veterinarian (level of supervision to be determined by the veterinarian) and allow them to work on animals after a veterinarian has made a diagnosis and determined that rehab would be a safe and beneficial intervention for their animal patients. By leaving the decision up to the veterinarian and allowing qualified PT's to practice on their own premises under INDIRECT supervision (with the veterinarian's consent and order to treat), would allow increased safe access for consumers, allow veterinarians to collaborate with other licensed professionals of their choice, and allow for Board oversight to protect the consumer. This approach is consistent with the CVMB's Stakeholder's Task Force recommendations and is consistent with the other states that have gone before us. Exempting properly qualified and licensed PT's from the Veterinary Practice Act is also consistent with the pathway outlined previously by the Senior Attorney of the Department of Consumer Affairs during the CVMB's meeting in October 2015.

A legislative remedy (akin to AB 3013) is the clear solution to solve this ongoing debate for the benefit of the consumer, the animals, and all the professionals involved.

Sincerely,

NAME: Jeanine Freeberg

ADDRESS: 10501 S. St. Louis Avenue
Chicago, IL 60655

PHONE: (773)531-4350

E-Mail ADDRESS: jeaninefreeberg@yahoo.com

Cc: Kimberly Kirchmeyer, Director, California Department of Consumer Affairs
Jessica Siefertman, Executive Officer, California Veterinary Medical Board
California Veterinary Medical Board Members
Jason Kaiser, Executive Officer, Physical Therapy Board of California
Physical Therapy Board of California Members

VMB@DCA
Thu 8/13/2020 8:59 AM

- ~~S~~otelo, Justin@DCA

Timothy Rodda
 Administration/Licensing Manager
 Veterinary Medical Board
 Department of Consumer Affairs
 1747 N. Market Blvd, Suite 230
 Sacramento, CA 95834
 Direct: (916)318-6369
 Fax: (916)928-6849

Join Our Email List! | VMB Customer Satisfaction Survey

-----Original Message-----

From: Chris Kohler <chris5400@earthlink.net>
 Sent: Thursday, August 13, 2020 8:55 AM
 To: VMB@DCA <VMB@dca.ca.gov>
 Subject: PossibleActiononAmendmentsstoSection2035,Article4,

.....
 To Whom It May Concern:

I strongly disagree with any steps to limit access to care for dogs. Physical therapy has been a big part of my dogs' health regimen. This has been in both veterinarian based and home based care. After a year of 20k worth of expenses for my two dogs in just this past year alone, this seem clearly a power grab to limit access to physical therapy and to increase profits for vets. Here in Los Angeles there has been severe consolidation by VCA management. This has caused prices to climb both for visits and prescriptions. And yet, services have not improved. In fact, it is more difficult than ever to get quality rehab and care for pets. This has also happened with laboratory work now more expensive than human tests. We are now limiting care like so many households, based solely on cost.

After more than a year of physical therapy at a local clinic, even with vets on site, the only interaction with a vet regarding our dogs' care was to say hello in the hall. Don't let this power grab by vets do what they did for teeth cleaning and force more financial burden on pet owners. Especially at this time we can't afford increased costs that bring poorer service and limited access. From our perspective, there is no reason for any medical changes. Technicians are trained to perform manual massage and therapy and should continue to be able to do that without a vet as a requirement in the room.

Please put the needs of our pets above increased profits for vet management groups.

Sincerely,

Chris and Nan Kohler

**TITLE 16. PROFESSIONAL AND VOCATIONAL REGULATIONS
DIVISION 20. VETERINARY MEDICAL BOARD**

**NOTICE OF PROPOSED REGULATORY ACTION CONCERNING:
Animal Physical Rehabilitation, § 2038.5**

NOTICE IS HEREBY GIVEN that the Veterinary Medical Board (Board) is proposing to take the action described in the Informative Digest.

PUBLIC HEARING

The Board has not scheduled a public hearing on this proposed action. However, the Board will hold a hearing if it receives a written request, addressed to the individuals listed under “Contact Person” in this notice, for a public hearing from any interested person, or his or her authorized representative, no later than 15 days prior to the close of the written comment period.

WRITTEN COMMENT PERIOD

Written comments, including those sent by mail, facsimile, or e-mail to the addresses listed under “Contact Person” in this Notice, must be **received by the Board at its office no later than April 27, 2020**, or must be received by the Board at the hearing, should one be scheduled.

AVAILABILITY OF MODIFICATIONS

The Board, upon its own motion or at the request of any interested party, may thereafter adopt the proposals substantially as described below or may modify such proposals if such modifications are sufficiently related to the original text. With the exception of technical or grammatical changes, the full text of any modified proposal will be available for 15 days prior to its adoption from the person designated in this Notice as the Contact Person and will be mailed to those persons who submit written or oral testimony related to this proposal or who have requested notification of any changes to the proposal.

AUTHORITY AND REFERENCE

Pursuant to the authority vested by sections 4808 and 4836 of the Business and Professions Code (BPC), and to implement, interpret, or make specific sections 4825, 4826, 4836, and 4883 of the BPC, the Board is considering adopting section 2038.5 of article 4 of division 20 of title 16 of the California Code of Regulations (CCR) as follows:

INFORMATIVE DIGEST

BPC section 4808 authorizes the Board to adopt, amend, or repeal rules and regulations that are reasonably necessary to carry into effect the Veterinary Medicine Practice Act (Act). BPC section 4836, subdivision (a) requires the Board to adopt regulations establishing animal health care tasks and an appropriate degree of supervision required for those tasks that may be performed only by a registered veterinary technician (RVT) or a licensed veterinarian. BPC section 4836, subdivision (b) authorizes the Board to establish animal health care tasks that may be performed by a veterinary assistant (VA), and requires the Board to establish an appropriate degree of supervision by an RVT or a licensed veterinarian over a VA for any tasks

established by regulation and the degree of supervision for any of those tasks must be higher than, or equal to, the degree of supervision required when an RVT performs the task.

Animal physical rehabilitation (APR) has become a rapidly expanding veterinary specialty, with some individuals who may or may not be licensed to practice physical therapy on humans, expanding their practice to animals. However, the Act requires a person who practices veterinary medicine or any branch thereof on animals to hold a valid, unexpired, and unrevoked license issued by the Board (BPC § 4825). The Act defines the practice of veterinary medicine to include the administration of a drug, medicine, application, or treatment of whatever nature for the prevention, cure, or relief of a wound, fracture, bodily injury, or disease of animals, except where the medicine, appliance, application, or treatment is administered by an RVT or VA at the direction of and under the direct supervision of a licensed veterinarian (BPC § 4826). As each animal family and breed have different physicalities, the provision of APR must be performed in accordance with those physicalities, taking into consideration each animal's medical needs.

To protect the health, safety, and welfare of consumers and their animals, the proposal would define the practice of APR and provide the circumstances under which a person may perform APR on animals.

The Board is proposing the following changes:

Adopt CCR, Title 16, Section 2038.5 – Animal Physical Rehabilitation

Subsection (a)

The proposed regulation would set out APR as the proper term for corrective physical treatment on an animal.

Subsection (a)(1)

The proposed regulation would define APR to mean the treatment of injury or illness to address pain and improve function by means of corrective treatment.

Subsection (a)(2)

The proposed regulation would provide that APR does not include relaxation, recreational or wellness modalities, including but not limited to, massage, athletic training, or exercise.

Subsection (b)

The proposed regulation would require a veterinarian to establish a valid veterinarian-client-patient relationship (VCPR), as defined, before performing or authorizing APR.

Subsection (c)

The proposed regulation would authorize RVTs to perform APR under the degree of supervision to be determined by the veterinarian who has established the VCPR.

Subsection (d)

The proposed regulation would authorize VAs to perform APR under the direct supervision of a

veterinarian. The proposed regulation would also specify that if a VA is performing APR on an animal patient in a range setting, the supervising veterinarian would be required to be in the general vicinity of the treatment area.

Subsection (e)

The proposed regulation would specify that it does not restrict or amend the existing regulation regarding the performance of musculoskeletal manipulation (MSM) on an animal patient.

POLICY STATEMENT OVERVIEW

The policy behind the proposed regulatory adoption is consistent with the Board’s mission of protecting the public and their animals. The proposal is intended to address the growing practice of APR performed by individuals who are not licensed by the Board. Currently, licensed physical therapists and unlicensed individuals are practicing APR on animals. However, licensed physical therapists are only licensed by the Physical Therapy Board of California to perform physical therapy on humans, not animals, and persons not licensed by the Board to perform veterinary medicine on animals are considered veterinary assistants, who are not licensed or registered with the Board. The proposal would establish a clear definition of APR in the Board’s regulations, clarify who may perform APR, and clarify the circumstances under which a person may perform APR.

ANTICIPATED BENEFITS OF PROPOSED REGULATORY ACTION

The Board anticipates that consumers and their animals would benefit from the proposal as they would have information as to who is authorized to perform APR on their animals and which state agency oversees and enforces laws regarding APR treatment on animals. The Board also anticipates that veterinarians, RVTs, VAs, and licensed physical therapists will benefit from clarified terms regarding APR.

CONSISTENCY AND COMPATIBILITY WITH EXISTING STATE REGULATIONS

During the process of developing the regulation, the Board has conducted a search of any similar regulations on this topic and has concluded that the regulation is neither inconsistent nor incompatible with existing state regulation.

FISCAL IMPACT ESTIMATES

Fiscal Impact on Public Agencies Including Costs or Savings to State Agencies:

The Board currently enforces the unlicensed and/or unsupervised practice of veterinary medicine on animals, so the Board does not expect a significant increase in investigative or prosecution expenses as a result of the regulation.

Costs/Savings in Federal Funding to the State: None

Nondiscretionary Costs/Savings to Local Agencies: None

Local Mandate: None

Cost to Any Local Agency or School District for Which Government Code Sections 17500 -

17630 Require Reimbursement: None

Business Impact:

The Board has made an initial determination that the proposed regulatory action would have no significant statewide adverse economic impact directly affecting business, including the ability of California businesses to compete with businesses in other states, because APR treatment is currently regulated and enforced by the Board pursuant to the Act, and any businesses that provide APR treatment are currently subject to the requirements of that Act.

Cost Impact on Representative Private Person or Business:

The Board is not aware of any cost impacts that a representative private person or business would necessarily incur in reasonable compliance with the proposed action, as the provision of APR treatment on animals by representative private persons or businesses is currently regulated and enforced by the Board pursuant to the Act.

Effect on Housing Costs: None

EFFECT ON SMALL BUSINESS

The Board has determined that this regulatory proposal would not affect small businesses; small businesses that offer APR treatment must currently comply with the Act and the licensure and/or veterinarian supervision requirements for providing veterinary medicine services, and this regulation does not change those licensure requirements.

RESULTS OF ECONOMIC IMPACT ASSESSMENT/ANALYSIS:

Impact on Jobs/Businesses:

The Board has made an initial determination that the proposed regulatory action may have an impact on the creation of jobs or new businesses if such jobs or new businesses intended to offer APR treatment on animals without Board licensure or veterinarian supervision; however, those jobs or new businesses are currently subject to the licensure and/or supervision requirements of the Act. The Board has made an initial determination that the proposed regulatory action will not have any impact on the elimination of jobs or existing businesses that offer APR treatment or the expansion of businesses in the State of California unless those businesses are currently offering APR treatment, or intend to expand to offer APR without Board licensure or veterinarian supervision as required under the Act.

Benefits of Regulation:

The Board has determined that this regulatory proposal would:

- The Board anticipates that consumers and their animals would benefit from the proposal as they would have information as to who is authorized to practice APR on their animals and which state agency oversees and enforces laws regarding APR treatment. The Board also anticipates that veterinarians, RVTs, VAs, and licensed physical therapists will benefit from clarified terms regarding APR.

- The proposal would not have a significant impact on worker safety because the proposal does not concern worker safety, but instead clarifies existing law regarding the provision of APR by veterinarians, RVTs, and VAs.
- The proposal would not have an impact on the state's environment because the proposal does not concern the environment, but instead clarifies existing law regarding the provision of APR by veterinarians, RVTs, and VAs.

CONSIDERATION OF ALTERNATIVES

The Board must determine that no reasonable alternative it considered to the regulation or that has otherwise been identified and brought to its attention would be more effective in carrying out the purpose for which the action is proposed, would be as effective and less burdensome to affected private persons than the proposal described in this Notice, or would be more cost-effective to affected private persons and equally effective in implementing the statutory policy or other provision of law.

To date, the following options were considered by the Board and rejected:

1. Defining APR to include therapeutic massage and active, passive, and resistive exercise. The Board initially included these actions in its 2015 animal rehabilitation rulemaking, but struck these terms from the definition of APR following opposition in public comment that massage and exercise are not the practice of veterinary medicine. Opposition to the inclusion of "manual therapy" in the definition was also raised as it might conflict with the Board's existing regulation authorizing chiropractic treatment. Accordingly, "manual therapy" was stricken from the definition, and the Board added a provision clarifying that this proposal would not affect the existing chiropractic regulation, CCR, title 16, section 2038.
2. Providing a list all of the actions to be performed by a veterinarian prior to performing APR. The list of actions was stricken as it was determined to be duplicative since the veterinarian is required by regulation to establish a VCPR that lists the same actions.
3. Authorizing a California licensed physical therapist to perform APR under direct supervision of a veterinarian. In its 2015 animal rehabilitation rulemaking, the Board provided authority for a physical therapist to perform APR under the direct supervision of a veterinarian; subsequently, the term "physical therapist" was removed and replaced with "veterinary assistant," to be consistent with the use of terms for unlicensed/unregistered individuals under the Act.
4. Requiring RVTs and VAs to receive specialized training and education in APR; this was rejected as unnecessary since the proposal requires RVTs and VAs providing APR to have direct veterinarian supervision.
5. Authorizing physical therapists to perform APR with indirect veterinarian supervision; this was rejected because only licensed veterinarians and RVTs possess the knowledge and training to plan and supervise APR for animal patients and ensure proper animal handling, recognize pain and discomfort, and provide emergency care and assistance as needed in the particular field of APR.

INITIAL STATEMENT OF REASONS AND INFORMATION

The Board has prepared an initial statement of the reasons for the proposed action and has available all the information upon which the proposal is based.

TEXT OF PROPOSAL

Copies of the exact language of the proposed regulations, and any document incorporated by reference, and of the initial statement of reasons, and all of the information upon which the proposal is based, may be obtained upon request from the Board at 1747 North Market Blvd., Suite 230, Sacramento, California 95834.

AVAILABILITY AND LOCATION OF THE FINAL STATEMENT OF REASONS AND RULEMAKING FILE

All the information upon which the proposed regulations are based is contained in the rulemaking file, which is available for public inspection by contacting the person named below.

You may obtain a copy of the final statement of reasons once it has been prepared, by making a written request to the Contact Person named below or by accessing the website listed below.

CONTACT PERSON

Inquiries or comments concerning the proposed rulemaking action may be addressed to:

Name:	Justin Sotelo, Lead Administrative & Policy Analyst
Address:	Veterinary Medical Board 1747 North Market Blvd., Suite 230 Sacramento, CA 95834
Telephone No.:	916-515-5238
Fax No.:	916-928-6849
E-Mail Address:	Justin.Sotelo@dca.ca.gov

The backup contact person is:

Name:	Timothy Rodda, Administration/Licensing Manager
Address:	Veterinary Medical Board 1747 North Market Blvd., Suite 230 Sacramento, CA 95834
Telephone No.:	916-515-5227
Fax No.:	916-928-6849
E-Mail Address:	Timothy.Rodda@dca.ca.gov

WEBSITE ACCESS: Materials regarding this proposal can be found at www.vmb.ca.gov.

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

PROPOSED LANGUAGE

Proposed amendments to the regulatory language are shown in single underline for new text and ~~single strikethrough~~ for deleted text.

Adopt Section 2038.5 to Article 4 of Division 20 of Title 16 of the California Code of Regulations to read as follows:

2038.5. Animal Physical Rehabilitation.

(a) Animal Physical Rehabilitation (APR):

(1) is defined as the treatment of injury or illness to address pain and improve function by means of physical corrective treatment.

(2) does not include relaxation, recreational or wellness modalities, including but not limited to, massage, athletic training, or exercise.

(b) Prior to performing or authorizing APR, a veterinarian shall establish a valid veterinarian-client-patient relationship as defined in Sections 2032.1 or 2032.15.

(c) R.V.T.s may perform APR under the degree of supervision to be determined by the veterinarian who has established the veterinarian-client-patient relationship.

(d) Veterinary assistants may perform APR under the direct supervision of a veterinarian. If at the time the veterinary assistant is performing APR on an animal patient in a range setting, the supervising veterinarian shall be in the general vicinity of the treatment area.

(e) Nothing in this section shall be construed to restrict or amend Section 2038 regarding the performance of MSM.

Note: Authority cited: Sections 4808 and 4836, Business and Professions Code.

Reference: Sections 4825, 4826, 4836, and 4883, Business and Professions Code.

**Title 16. Professional and Vocational Regulations
Division 20. Veterinary Medical Board
Article 4**

Initial Statement of Reasons

Hearing Date: No hearing has been scheduled for the proposed action.

Subject Matter of Proposed Regulations: Animal Physical Rehabilitation

Sections Affected: California Code of Regulations (CCR), Title 16, Division 20, Article 4, Section 2038.5

Background and Problem Statement:

Business and Professions Code (BPC) section 4800.1 mandates that the protection of the public shall be the highest priority of the Veterinary Medical Board (Board) in exercising its licensing, regulatory, and disciplinary functions. Whenever the protection of the public is inconsistent with other interests sought to be promoted, the protection of the public shall be paramount. The Board enforces the Veterinary Medicine Practice Act (Act) and oversees veterinary licensees, veterinary technician registrants, and veterinary assistant controlled substance permit holders.

BPC section 4808 authorizes the Board to adopt, amend, or repeal rules and regulations that are reasonably necessary to carry into effect the Act. BPC section 4836, subdivision (a) requires the Board to adopt regulations establishing animal health care tasks and an appropriate degree of supervision required for tasks that may be performed only by a registered veterinary technician (RVT) or a licensed veterinarian. BPC section 4836, subdivision (b) authorizes the Board to establish animal health care tasks that may be performed by a veterinary assistant (VA), and requires the Board to establish an appropriate degree of supervision by an RVT or a licensed veterinarian over a VA for any tasks established by regulation and the degree of supervision for any of those tasks must be higher than, or equal to, the degree of supervision required when an RVT performs the task.

Animal physical rehabilitation (APR) has become a rapidly expanding veterinary specialty, with some individuals, who are only licensed to practice physical therapy on humans, expanding their practice to animals. However, the Act requires a person who practices veterinary medicine or any branch thereof on animals to hold a valid, unexpired, and unrevoked license issued by Board (BPC § 4825). The Act defines the practice of veterinary medicine to include the administration of a drug, medicine, application, or treatment of whatever nature for the prevention, cure, or relief of a wound, fracture, bodily injury, or disease of animals, except where the medicine, appliance, application, or treatment is administered by an RVT or VA at the direction of and under the direct supervision of a licensed veterinarian (BPC § 4826). As each animal family and breed have different physicalities, the provision of APR must be performed in accordance with those physicalities, taking into consideration each animal's medical needs.

The proposal is intended to address the growing practice of APR performed by individuals who are not licensed by the Board. Currently, licensed physical therapists and unlicensed individuals are unlawfully practicing APR on animals. However, licensed physical therapists are only licensed by the Physical Therapy Board of California to perform physical therapy treatment on humans, not animals, and persons not licensed by the Board to perform veterinary medicine on animals are considered veterinary assistants, who are not licensed or registered with the Board.

When the Board was reviewing the original animal rehabilitation proposal, the Board had received 10 complaints between 2013 and 2016 from consumers, licensees, professional organizations, and other regulatory boards. As a consumer protection agency, the Board determined that it must try and prevent harm before it happens, in addition to addressing the harm that has already happened. For these reasons, the proposal establishes a clear definition of APR in the Board's regulations, clarifies who may perform APR, and clarifies the circumstances under which a person may perform APR.

SPECIFIC PURPOSE, ANTICIPATED BENEFIT, AND RATIONALE:

Adopt Section 2038.5 of Article 4 of Division 20 of Title 16 of the CCR: Animal Physical Rehabilitation:

Section 2038.5, subsection (a)

Purpose: The purpose of this subsection is to set out APR as the term for the treatments being regulated in this proposal.

Anticipated Benefit: The Board anticipates consumers and their animals will benefit from understanding what APR is and that the Board is the entity that oversees and enforces laws regarding APR treatment. The Board also anticipates veterinarians, RVTs, VAs, licensed physical therapists and chiropractors, animal trainers, and individuals who provide care to animals will benefit from clarifying what is APR.

Rationale: Since 2011, the Board has been reviewing the practice issues of APR. In July 2015, the Board submitted an animal rehabilitation rulemaking to address the various issues involved in APR, including whether a physical therapist could provide animal rehabilitation. Following the Board's consideration of public comments regarding its animal rehabilitation rulemaking, on October 28, 2015, the Board submitted a notice of decision not to proceed with rulemaking action to the Office of Administrative Law (OAL). At the October 20-21, 2015 Board meeting, the Board also voted to delegate to the Board's Multidisciplinary Advisory Committee (MDC) the tasks of redefining animal rehabilitation, addressing whether minimum education requirements for individuals who perform animal rehabilitation is necessary, addressing the levels of veterinarian supervision, addressing the requirement for a premises permit where veterinary medicine is being practiced, and resolving the issue of physical therapists providing animal rehabilitation on animal patients.

After the Board's Sunset Review Hearing in March 2016, the Legislature recommended that the Board establish a task force of stakeholders to address concerns regarding APR. At the Board's April 20, 2016 meeting, the Board established a list of stakeholders, including veterinarians, RVTs, animal rehabilitation and related animal industry professionals, consumers, and representatives from the Legislature, to include in an APR Task Force that would meet at least two times and submit a recommendation to the Board by January 1, 2017.

The Task Force held three public meetings: June 20, 2016, October 4, 2016, and February 2, 2017. At these meetings were members of the Board, Board staff, members of the public, and representation from various stakeholders. At the conclusion of their meetings, the Task Force submitted their findings to the Board and provided their recommendations on how to resolve the APR practice issues.

At the April 19-20 and July 26-27, 2017 meetings, the Board further deliberated on the issues, and at the October 18-19, 2017 meeting, the Board adopted the proposed language and directed Board staff to proceed with developing the regulatory package.

To determine the most appropriate phrase to advise the public and practitioners of what activities the term encompassed, the Board considered using the term “animal rehabilitation.” Public comment noted the existence of the statutory term “wildlife rehabilitation” and the potential need to differentiate the term “animal rehabilitation” from “wildlife rehabilitation.” Government Code section 8670.61.5 defines “wildlife rehabilitation” to mean those actions necessary to fully mitigate for the damage from a spill caused to wildlife, fisheries, wildlife habitat, and fisheries habitat and is overseen by the Department of Fish and Game. As the Board does not oversee wildlife rehabilitation, the proposal was revised from “animal rehabilitation” to “animal physical rehabilitation” to better differentiate the activities regulated by this proposal from “wildlife rehabilitation” activities regulated by the Department of Fish and Game.

The Board approved the proposal with subsection (a)(1) and (2), without an introductory phrase for subsection (a). The Executive Officer has made a minor, technical revision, as delegated by the Board at its October 18-19, 2017 meeting, to make subsection (a) the term “animal physical rehabilitation” with paragraphs (1) providing the definition of the APR and (2) providing excluded activities to improve clarity of the proposal.

Section 2038.5, subsection (a)(1)

Purpose: The purpose of this subsection is to define APR to provide clarity about what treatments on an animal patient are subject to the requirements of the regulation.

Anticipated Benefit: The Board anticipates consumers and their animals will benefit from the proposal as they will have information as to who is authorized to practice APR on their animals and which state agency oversees and enforces laws regarding APR treatment. The Board also anticipates veterinarians, RVTs, VAs, licensed physical therapists and chiropractors, animal trainers, and individuals who provide care to animals will benefit from clarified terms regarding APR.

Rationale: As more animals are receiving APR from individuals who are not licensed with the Board, the proposal is necessary to clarify what constitutes APR for purposes of enforcement and consumer protection. The Board deliberated extensively on what types of treatment should fall under the definition of APR such that the practice of those treatments would fall under the Board’s purview. In its 2015 rulemaking, the Board defined “animal rehabilitation” to mean “the use of the physical, chemical, and other properties of thermal, magnetic, biofeedback technology, hydrotherapy (such as underwater treadmills), electricity, sound, therapeutic massage, manual therapy, and active, passive, and resistive exercise for the prevention, cure, or relief of a wound, fracture, bodily injury, or disease of animals. APR includes evaluation, treatment, instruction, and consultative services.”

The Board received public comment objecting to the inclusion of massage and exercise as constituting APR, as these activities are not the practice of veterinary medicine. For example, including “exercise” in the definition of APR would require even horse trainers to be supervised by a veterinarian to warm up horses before a race. In addition, the Board received objections to including manual therapy in the definition as it would require chiropractors to comply with this

regulation, even though they are already subject to the terms of the musculoskeletal manipulation (MSM) regulation, CCR, title 16, section 2038.

For these reasons, the Board narrowed the definition of APR to apply to the treatment of an injury or illness, and to address pain and improve function by means of physical corrective treatment. With this definition, the regulation more closely aligns with the statutory definition of the practice of veterinary medicine in BPC section 4826, which includes the administration of treatment of whatever nature for the prevention, cure, or relief of a wound, fracture, bodily injury, or disease of animals.

Section 2038.5, subsection (a)(2)

Purpose: The purpose of this subsection is to clarify which actions performed on an animal are exempt from the regulation.

Anticipated Benefit: The Board anticipates that consumers and their animals would benefit from the proposal as they would have information as to what actions are not part of APR and subject to Board oversight and enforcement. The Board also anticipates that veterinarians, RVTs, VAs, licensed physical therapists and chiropractors, animal trainers, and individuals who provide care to animals will benefit from clarified exemptions from APR.

Rationale: This subsection is necessary to clarify what actions performed on an animal are exempt from the definition of APR and, therefore, not subject to Board oversight and enforcement. The Board deliberated extensively on what types of treatment should fall under the definition of APR such that the practice of those treatments would fall under the Board's purview. In its 2015 rulemaking, the Board defined "animal rehabilitation" to mean "the use of the physical, chemical, and other properties of thermal, magnetic, biofeedback technology, hydrotherapy (such as underwater treadmills), electricity, sound, therapeutic massage, manual therapy, and active, passive, and resistive exercise for the prevention, cure, or relief of a wound, fracture, bodily injury, or disease of animals. APR includes evaluation, treatment, instruction, and consultative services."

The Board received public comment objecting to the inclusion of massage and exercise as these activities are not the practice of veterinary medicine. For example, including "exercise" in the definition of APR would require even horse trainers to be supervised by a veterinarian to warm up horses before a race. In addition, the Board received objection to including manual therapy in the definition as it would require chiropractors to comply with this regulation, even though they are already subject to the terms of the musculoskeletal manipulation regulation, CCR, title 16, section 2038. For these reasons, the Board narrows the definition of APR and in this subsection, specifies that APR does not include relaxation, recreational or wellness modalities, including but not limited to massage, athletic training, or exercise.

Section 2038.5, subsection (b)

Purpose: The purpose of this subsection is to reiterate the existing requirement that a veterinarian shall establish a valid veterinarian-client-patient relationship (VCPR) prior to performing or authorizing APR. The purpose of requiring a valid VCPR prior to the provision of any APR treatment is to ensure that the animal patient is healthy enough to receive APR treatment.

Anticipated Benefit: The Board anticipates consumers and their animals will benefit from veterinarians examining the animal patient to determine whether the animal's condition is medically appropriate for APR. The Board also anticipates veterinarians, RVTs, VAs, and licensed physical therapists will benefit from clarified terms regarding APR.

Rationale: The proposal is necessary to properly establish the animal patient's wound, injury, or disease and the appropriate treatment for the animal's condition, and identify any medical issues that may be complicated by or are sensitive to the physical corrective treatment. The proposal requires a veterinarian to establish a VCPR with the animal patient prior to performing or authorizing the performance of APR. Initially, the Board's animal rehabilitation rulemaking would have listed all of the requirements otherwise required to establish a VCPR, including the veterinarian having sufficient knowledge of the animal to make a diagnosis of the medical condition of the animal (16 CCR § 2032.1, subs. (b)(2)), assuming responsibility for making clinical judgments regarding the health of the animal and the need for medical treatment, including a determination that the provision of APR would not be harmful to the animal patient (16 CCR § 2032.1, subs. (b)(3)), and discussing with the owner of the animal, or his or her authorized representative, a course of treatment (*id.*). To make the regulation more accessible to the public, the current proposal includes a cross-reference to the existing VCPR regulations, CCR, title 16, sections 2032.1 and 2032.15.

The 2015 rulemaking also would have required the veterinarian to ensure that accurate and complete records of APR treatments are maintained in the patient's veterinary medical records. Maintaining accurate and complete records are already required by statute and regulation (see BPC § 4855 and 16 CCR § 2032.3), so this provision was stricken from the current proposal as duplicative.

Section 2038.5, subsection (c)

Purpose: This subsection would clarify the ability of RVTs to perform APR and the degree of veterinarian supervision required.

Anticipated Benefit: The Board anticipates consumers and their animals will benefit from the proposal as they would have information as to who is authorized to practice APR on their animals. Consumers and their animals will also benefit from the ability of individuals other than a veterinarian to perform APR, increasing the number of individuals who could provide APR.

Rationale: BPC section 4836 requires the Board to develop animal health care tasks and the appropriate degree of veterinarian supervision for tasks that may be performed by RVTs and licensed veterinarians. CCR, title 16, section 2036, subsection (d) provides that unless otherwise limited by subsections (a) through (c), an RVT may perform animal health care tasks under the direct or indirect supervision of a licensed veterinarian. Direct supervision requires the veterinarian to be physically present at the location where animal health care tasks are performed and the animal has been examined by a veterinarian, as specified (16 CCR § 2034, subs. (e)). Indirect supervision provides that the veterinarian is not physically present at the location, but has given either written or oral instructions for the treatment of the animal patient (16 CCR § 2034, subs. (f)).

As this proposal is aimed at a specific method of treatment on animals, APR, the Board determined it necessary to specify that RVTs are authorized to perform this animal health care task under the degree of supervision to be determined by the veterinarian who has established the VCPR. The Board deliberated whether to make the RVT supervision requirement direct or

indirect, whether the RVT would need specialized training under indirect supervision, or whether the veterinarian should be able to determine the level of supervision needed for a particular RVT. Stakeholders provided their opinions about the level of supervision required over an RVT, and noted that RVTs have been able to perform APR under indirect supervision for years, so it is unnecessary to require direct supervision. However, APR is a specialized treatment, which may or may not be appropriate to be provided by an RVT who is not well-trained in APR to perform under indirect supervision merely because regulations had allowed such practice. As such, the Board determined it best to leave the supervision level up to the supervising veterinarian to determine the RVT's ability to properly perform APR on the animal patient.

The proposal clarifies the veterinarian with the VCPR with the animal patient is the person who must determine whether the RVT is able to perform APR on the animal patient. This provision is necessary to clarify the veterinarian who has personally examined the animal, has assumed responsibility for it, and who has determined the diagnosis and treatment plan, is the best person to determine whether the RVT is capable of performing APR specific to the treatment plan, to best ensure the health, safety, and welfare of the public's animals.

Section 2038.5, subsection (d)

Purpose: The purpose of this subsection is to address whether an individual, who is not licensed by the Board and who may or may not be licensed by the Physical Therapy Board of California, may perform APR and clarify the circumstances under which an individual not licensed by or registered with the Board, may provide APR.

Anticipated Benefit: The Board anticipates consumers and their animals will benefit from the proposal as they will have information as to who is authorized to practice APR on their animals and which state agency oversees and enforces laws regarding APR treatment on animals. The Board also anticipates veterinarians, RVTs, VAs, and licensed physical therapists will benefit from clarified terms regarding APR.

Rationale: As previously noted, VAs are not licensed or registered with the Board, but the Act authorizes VAs to perform some health care tasks. BPC section 4836, subdivision (b) authorizes the Board to adopt regulations establishing which animal health care tasks may be performed by a VA, and the Board is required to establish the appropriate degree of supervision by an RVT or a licensed veterinarian over a VA for any health care tasks established by regulations and the degree of supervision for any of those tasks must be higher than, or equal to, the degree of supervision required when an RVT performs the task. CCR, title 16, section 2034, subsection (e) provides that direct supervision means that the supervisor is physically present at the location where the animal health care tasks are to be performed and is quickly available, and the animal has been examined by a veterinarian at such time as good veterinary medical practice requires consistent with the particular delegated animal health care task. CCR, title 16, section 2034, subsection (f) defines indirect supervision to mean the supervisor is not physically present at the location where animal health care tasks are to be performed, but the supervisor has given either written or oral instructions for treatment of the animal patient.

CCR, title 16, section 2036.5 provides the animal health care tasks that may be performed by VAs. Notably, subsection (b) of that section requires that the degree of supervision by a licensed veterinarian over a VA must be higher than or equal to the degree of supervision required when an RVT performs the same task and must be consistent with standards of good veterinary medical practice.

Physical therapists are individuals licensed by the Physical Therapy Board of California and are only authorized to perform physical therapy on humans. Physical therapists are not specifically regulated under the Act; therefore, physical therapists performing veterinary medicine health care tasks on animals are considered VAs.

The Board received public comment from animal owners who had taken their animals to receive APR in an unsupervised environment. Those comments argued that veterinarian supervision is critical to animal care and successful recovery. The comments stated that it is not safe for animals to be treated in an unsupervised environment since: (1) urgent care for the animal would not be available if there was an emergency; (2) immediate adjustments to appropriate medications could not be made; (3) medical questions could not be answered at the time of APR treatment; (4) additional testing (e.g., radiographs) or diagnoses of a new medical condition could not be made at the time of APR treatment; (5) a treatment plan and decisions to adjust the plan could not be discussed before the APR is implemented; and (6) advanced pain management strategies, including stem cell, joint injections, and extracorporeal shockwave, would not be available to treat the animal patient. As the Board is charged with protecting the state's consumers and their animals, and with the supervision concerns raised by the public during the Board's deliberations and through complaints submitted to the Board, the Board determined that APR should not be performed by individuals who are not licensed or registered by the Board, unless they are directly supervised by a veterinarian.

Under this proposal, RVTs, in accordance with their level of experience and skill, would be authorized to perform APR under indirect veterinarian supervision. CCR, title 16, section 2036.5 requires the degree of supervision of a VA to be equal to or less than the degree of supervision of an RVT. Given the supervision concerns raised regarding unlicensed and unsupervised individuals performing APR and the emergency complications that have resulted, the Board has determined a VA should not be able to perform APR under any degree of supervision less than direct supervision for the protection of the animal patient.

However, the Board noted the particular difficulties of veterinary practice in a range setting (veterinary services provided outside of a veterinary premises), where veterinarians may be on the property but not standing directly next to the RVT or VA performing the animal health care tasks. In addition, the Board noted that for MSM, the veterinarian must be in the general vicinity of the treatment area when MSM is being performed. Thus, the proposal provides for supervised VA performance of APR in a range setting and authorizes the supervising veterinarian to be in the general vicinity of the treatment area.

Section 2038.5, subsection (e)

Purpose: The purpose of this subsection is to provide clarity that the regulatory proposal does not affect the provisions for MSM in CCR, title 16, section 2038.

Anticipated Benefit: The Board anticipates consumers and their animals will benefit from the proposal as they would have clarity that the APR proposal does not affect the practice of MSM. The Board also anticipates veterinarians, RVTs, VAs, licensed physical therapists, and chiropractors will benefit from the clarified terms regarding APR and MSM.

Rationale: CCR, title 16, section 2038 authorizes a licensed chiropractor to perform MSM on an animal patient under a veterinarian's direct supervision after the veterinarian has satisfied several requirements, including, among other things, examining the patient, making a diagnosis of the animal's medical condition, and assuming responsibility for making clinical judgments

regarding the health of the animal and the need for medical treatment. During the 2015 rulemaking process, the Board received public comment on the need to clarify that the APR proposal would not affect the MSM regulation. The confusion partly stemmed from the Board's extensive definition in the prior rulemaking for animal rehabilitation, which included manual therapy, a practice commonly used by chiropractors. This proposal is necessary to clearly differentiate APR from MSM, so that practitioners of MSM are not affected by this proposal.

Underlying Data

- October 20-21, 2015 Board Meeting Agenda; Relevant Meeting Materials; and Meeting Minutes
- October 28, 2015 Notice of Decision not to Proceed with Rulemaking Action from the Board to the Office of Administrative Law (OAL) regarding Animal Rehabilitation
- January 19, 2016 MDC Meeting Agenda; Relevant Meeting Materials; and Meeting Minutes
- April 19, 2016 MDC Meeting Agenda; Relevant Meeting Materials; and Meeting Minutes
- April 20-21, 2016 Board Meeting Agenda; and Meeting Minutes
- June 20, 2016 Board, Animal Rehabilitation Task Force (ARTF) Meeting Agenda; Relevant Meeting Materials; and Meeting Minutes
- October 4, 2016 ARTF Meeting Agenda; Relevant Meeting Materials; and Meeting Minutes
- February 2, 2017 ARTF Meeting Agenda; and Relevant Meeting Materials
- April 19-20, 2017 Board Meeting Agenda; Relevant Meeting Materials; and Meeting Minutes
- July 26-27, 2017 Board Meeting Agenda; Relevant Meeting Materials; and Meeting Minutes
- October 18-19, 2017 Board Meeting Agenda; Relevant Meeting Materials; and Meeting Minutes

Business Impact

The proposed regulatory action will not have a significant adverse economic impact on businesses. This initial determination is based on the fact that APR treatment is currently regulated and enforced by the Board pursuant to the Act, and businesses that provide APR treatment on animals are currently subject to the requirements of that Act.

Economic Impact Analysis

It is predicted that this regulatory proposal will have the following effects:

- This regulatory proposal will not eliminate jobs in the State of California, because APR is currently regulated as the practice of veterinary medicine and enforced by the Board pursuant to the Act, and this proposal does not change those licensure and/or veterinarian supervision requirements.
- The regulatory proposal may create jobs within the State of California because veterinary premises may expand their current services to include APR treatment as clarified in this proposal
- This regulatory proposal will not eliminate businesses in the State of California unless those businesses are offering unlicensed and/or unsupervised APR treatment and are currently operating unlawfully under the Act; the proposal clarifies what is APR and who can practice APR.
- The regulatory proposal may give rise to increased demand for APR in compliance with the regulation, leading to the creation of businesses.

- This regulatory proposal will not affect the expansion of businesses providing APR treatment on animals within the State of California unless the expansion of business was planned on the basis of performing unlicensed/unsupervised APR treatment under existing law. However, the regulatory proposal may give rise to increased demand for APR treatment in compliance with the proposed regulation, leading to the expansion of businesses providing lawful APR treatment on animals.
- This regulatory proposal benefits the health, safety, and welfare of California residents and their animals by ensuring that only individuals with the requisite skill sets are authorized to practice APR. The Board has received consumer complaints that individuals not licensed by the Board or supervised by a veterinarian as required by existing law, are practicing APR. This poses a danger to California residents and their animals. The regulatory proposal attempts to lessen this danger and better protect California consumers and their animals.
- This regulatory proposal does not affect worker safety because it only clarifies existing law requiring Board licensure or veterinarian supervision to perform or authorize APR treatment.
- This regulatory proposal will not have any impact on the State's environment. The regulatory proposal pertains to APR, which has no bearing on the quality of the State's air, water, or other environmental factors.

Requirements for Specific Technologies or Equipment

This regulation does not mandate the use of specific technologies or equipment.

Consideration of Alternatives

No reasonable alternative which was considered or that has otherwise been identified and brought to the attention of the Board would be more effective in carrying out the purpose for which the regulation has been proposed. No reasonable alternative which was considered would be as effective and less burdensome to affected private persons than the proposed regulation, or would be more cost-effective to affected private persons, or would be equally effective in implementing the statutory policy or other provision of law.

Set forth below are the alternatives that were considered and the reasons each were rejected:

1. Defining APR to include therapeutic massage and active, passive, and resistive exercise. The Board initially included these actions in its 2015 animal rehabilitation rulemaking, but struck these terms from the definition of APR following opposition in public comment that massage and exercise are not the practice of veterinary medicine. Opposition to the inclusion of "manual therapy" in the definition was also raised as it might conflict with the Board's existing regulation authorizing chiropractic treatment. Accordingly, "manual therapy" was stricken from the definition, and the Board added a provision clarifying this proposal would not affect the existing chiropractic regulation, CCR, title 16, section 2038.
2. Providing a list all of the actions to be performed by a veterinarian prior to performing APR. The list of actions was stricken as it was determined to be duplicative since the veterinarian is required by regulation to establish a VCPR that lists the same actions.
3. Authorizing a California licensed physical therapist to perform APR under direct supervision of a veterinarian. In its 2015 animal rehabilitation rulemaking, the Board provided authority for a physical therapist to perform APR under the direct supervision of a veterinarian; subsequently, the term "physical therapist" was removed and replaced

with “veterinary assistant,” to be consistent with the use of terms for unlicensed/unregistered individuals under the Act.

4. Requiring RVTs and VAs to receive specialized training and education in APR; this was rejected as unnecessary since the proposal requires RVTs and VAs providing APR to have direct veterinarian supervision.
5. Authorizing physical therapists to perform APR with indirect veterinarian supervision; this was rejected because only licensed veterinarians and RVTs possess the knowledge and training to plan and supervise APR for animal patients and ensure proper animal handling, recognize pain and discomfort, and provide emergency care and assistance as needed in the particular field of APR.

NOTICE OF PUBLIC HEARING

NOTICE IS HEREBY GIVEN that the Veterinary Medical Board (Board) will hold a public hearing on the proposed regulatory action to adopt Section 2038.5 of Article 4, Division 20, Title 16 of the California Code of Regulations, related to Animal Physical Rehabilitation. Any interested person may present statements or arguments orally during the public hearing to be held by teleconference with no physical public locations on **August 13, 2020, starting at 9:00 a.m.** Additionally, any interested person may present statements or arguments in writing via email to justin.sotelo@dca.ca.gov or fax at (916) 928-6849 relevant to the action proposed, **from 9:00 a.m. to 12:00 p.m. on August 13, 2020.**

Important Notice to the Public: The Board will hold a public hearing via WebEx Events. To participate in the WebEx Events public hearing, please log on to this website the day of the public hearing:

<https://dca-ca.webex.com/dca-ca/onstage/g.php?MTID=efb1a2354468eba6704c95c492f3bd655>

Instructions to connect to the public hearing can be found at the end of this Notice.

The public hearing is accessible to the physically disabled. A person who needs disability-related accommodations or modifications to participate in the public hearing may make a request by contacting the Board at (916) 515-5220, email: vmb@dca.ca.gov, or send a written request to the Veterinary Medical Board, 1747 N. Market St., Suite 230, Sacramento, CA 95834. Providing your request at least five (5) business days prior to the public hearing will help ensure availability of the requested accommodations. TDD Line: (916) 326-2297

Any responses to comments directly concerning the proposed regulatory language will be considered and responded to in the Final Statement of Reasons.



HOW TO – Join – DCA WebEx Event

The following contains instructions to join a WebEx event hosted by the Department of Consumer Affairs (DCA).

NOTE: The preferred audio connection to our event is via telephone conference and not the microphone and speakers on your computer. Further guidance relevant to the audio connection will be outlined below.

1. Navigate to the WebEx event link provided by the DCA entity (an example link is provided below for reference) via an internet browser.

Example link:

<https://dca-ca.webex.com/dca-ca/onstage/g.php?MTID=eb0a73a251f0201d9d5ef3aaa9e978bb5>

Event Information: 3/26

Event status: Started

Date and time: Thursday, March 26, 2020 10:30 am
Pacific Daylight Time (San Francisco, GMT-07:00)
[Change time zone](#)

Duration: 1 hour

Description:

By joining this event, you are accepting the Cisco Webex [Terms of Service](#) and [Privacy Statement](#).

Join Event Now

To join this event, provide the following information.

First name:

Last name:

Email address:

Event password:

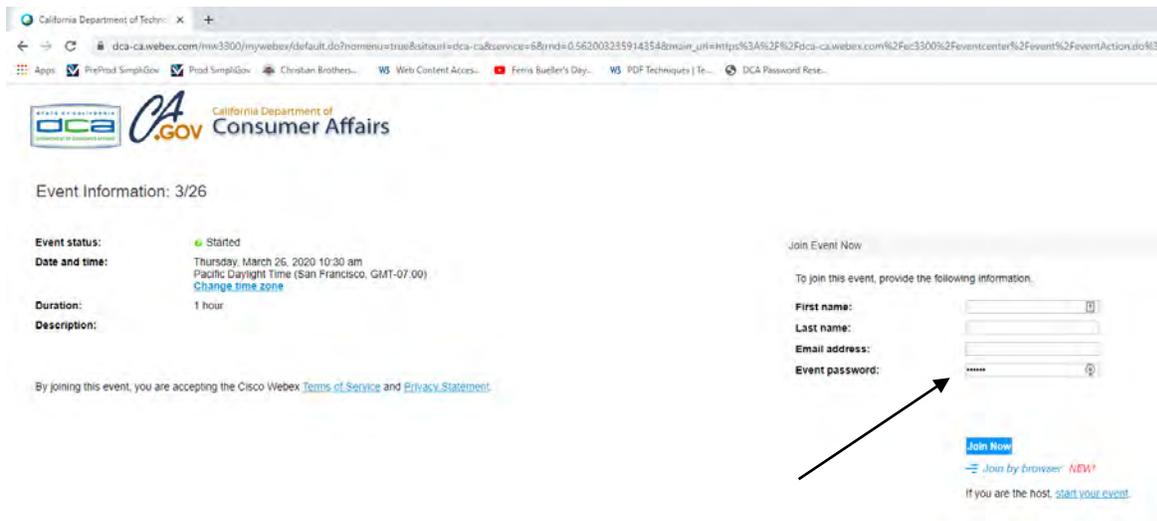
[Join Now](#)

[Join by browser](#) **NEW!**

If you are the host, [start your event](#).

2. The details of the event are presented on the left of the screen and the required information for you to complete is on the right.
NOTE: If there is a potential that you will participate in this event during a Public Comment period, you must identify yourself in a manner that the event Host can then identify your line and unmute it so the event participants can hear your public comment. The 'First name', 'Last name' and 'Email address' fields do not need to reflect your identity. The department will use the name or moniker you provide here to identify your communication line should you participate during public comment.

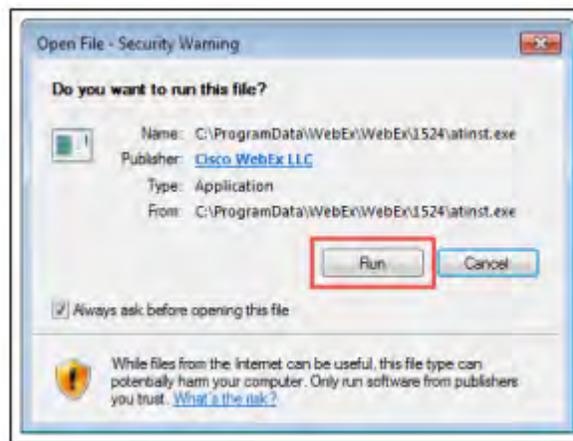
HOW TO – Join – DCA WebEx Event



3. Click the 'Join Now' button.

NOTE: The event password will be entered automatically. If you alter the password by accident, close the browser and click the event link provided again.

4. If you do not have the WebEx applet installed for your browser, a new window may open, so make sure your pop-up blocker is disabled. You may see a window asking you to open or run new software. Click 'Run'.



Depending on your computer's settings, you may be blocked from running the necessary software. If this is the case, click 'Cancel' and return to the browser tab that looks like the window below. You can bypass the above process.

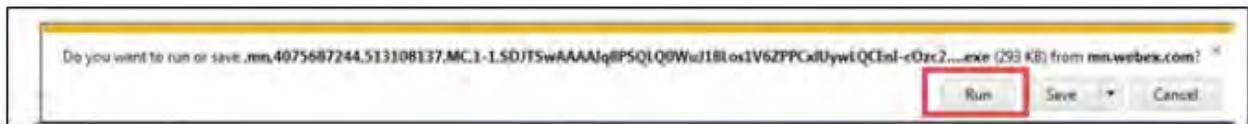
HOW TO – Join – DCA WebEx Event

Starting Webex...



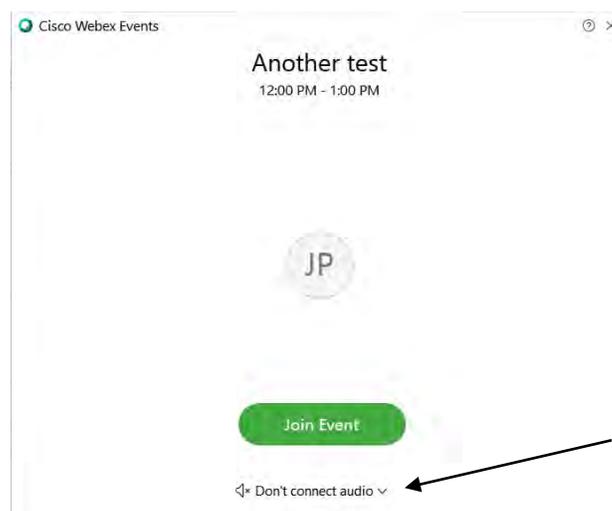
Still having trouble? [Run a temporary application](#) to join this meeting immediately.

5. To bypass step 4, click 'Run a temporary application'.
6. A dialog box will appear at the bottom of the page, click 'Run'.



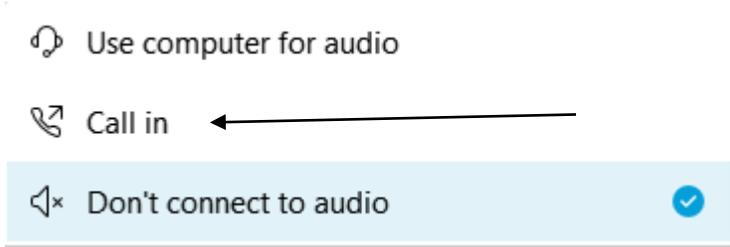
The temporary software will run, and the meeting window will open.

7. Click the audio menu below the green 'Join Event' button.

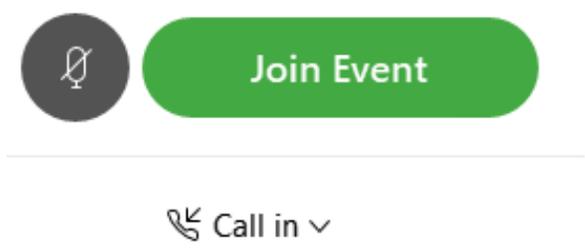


8. When the audio menu appears click 'Call in'.

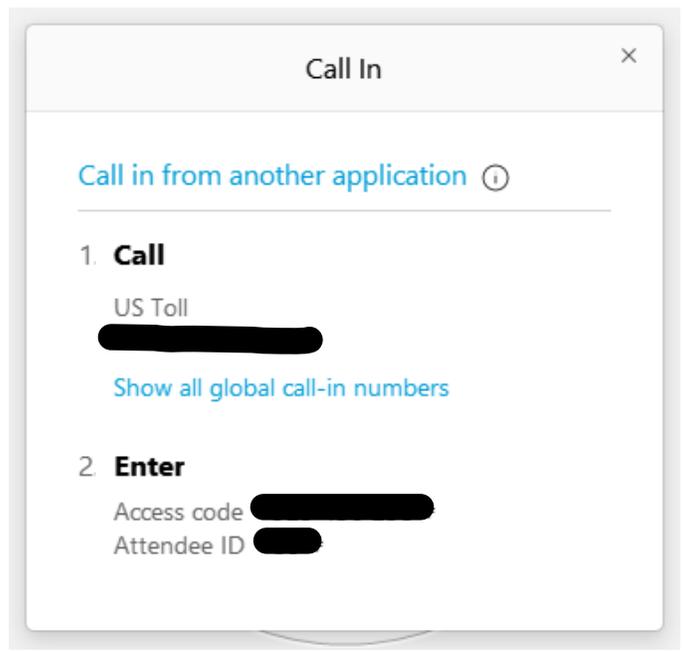
HOW TO – Join – DCA WebEx Event



9. Click 'Join Event'. The audio conference call in information will be available after you join the Event.



10. Call into the audio conference with the details provided.

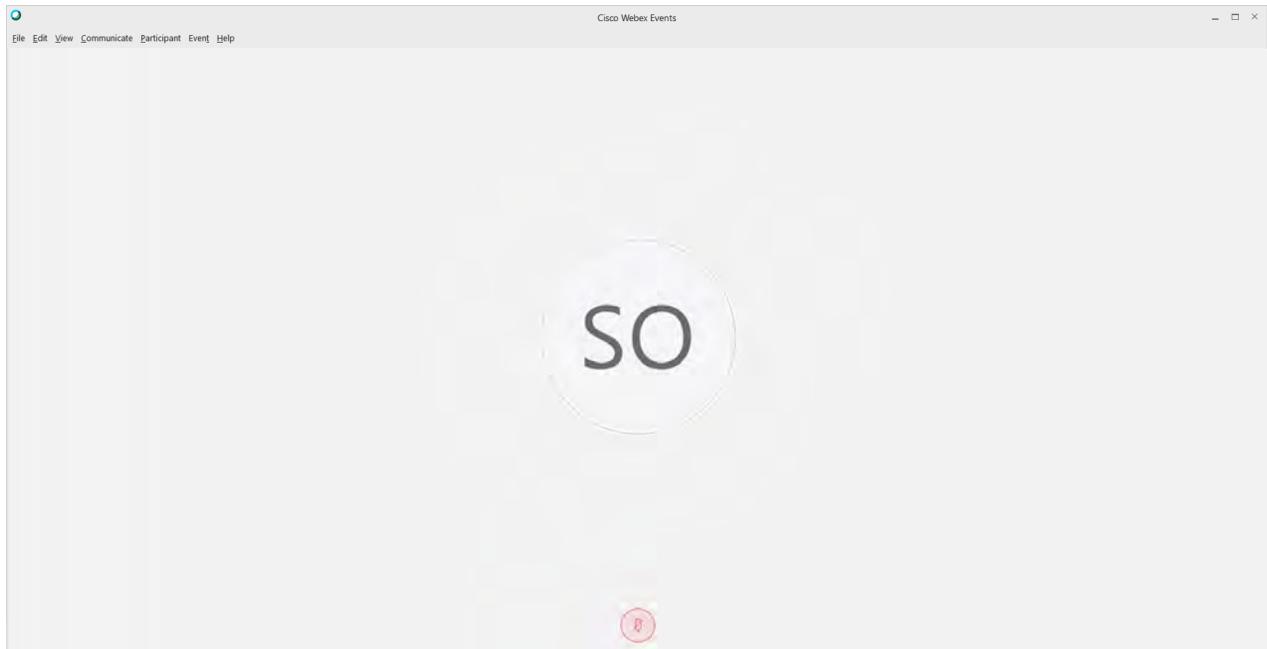


NOTE: The audio conference is the preferred method. Using your computer's microphone and speakers is not recommended.

HOW TO – Join – DCA WebEx Event

Once you successfully call into the audio conference with the information provided, your screen will look like the screen below and you have joined the event.

Congratulations!

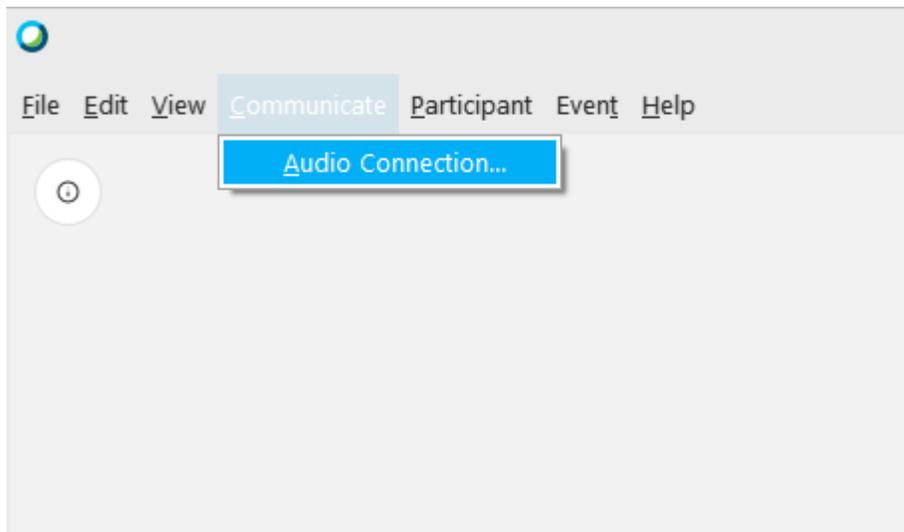


NOTE: Your audio line is muted and can only be unmuted by the event host.

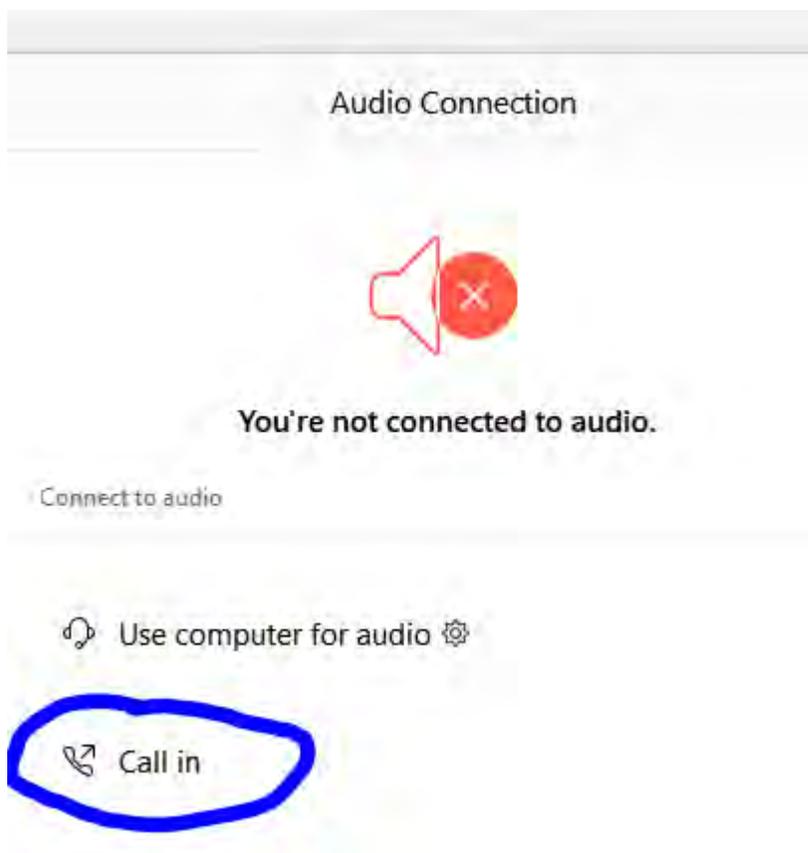
If you join the meeting using your computer's microphone and audio, or you didn't connect audio at all, you can still set that up while you are in the meeting.

Select 'Communicate' and 'Audio Connection' from top left of your screen.

HOW TO – Join – DCA WebEx Event



The 'Call In' information can be displayed by selecting 'Call in' then 'View'



You will then be presented the dial in information for you to call in from any phone.

HOW TO – Join – DCA WebEx Event

Participating During a Public Comment Period

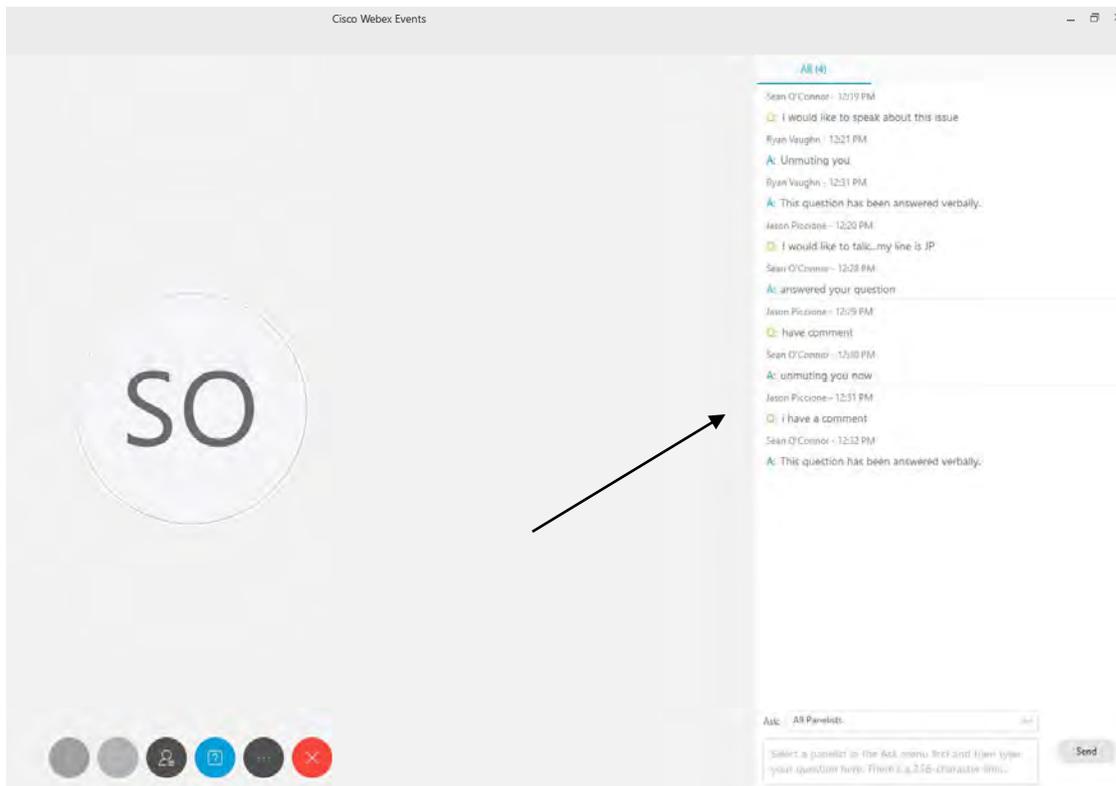
At certain times during the event, the facilitator may call for public comment. If you would like to make a public comment, click on the 'Q and A' button near the bottom, center of your WebEx session.



This will bring up the 'Q and A' chat box.

NOTE: The 'Q and A' button will only be available when the event host opens it during a public comment period.

HOW TO – Join – DCA WebEx Event



To request time to speak during a public comment period, make sure the 'Ask' menu is set to 'All panelists' and type 'I would like to make a public comment'.

Attendee lines will be unmuted in the order the requests were received, and you will be allowed to present public comment.

NOTE: Your line will be muted at the end of the allotted public comment duration. You will be notified when you have 10 seconds remaining.

RECEIVED

OCT 16 2020

V.B./RVTC

JS

Juanita Smith

3105 Cimarron Drive, Santa Ynez, CA 93460 + 805-688-3977 + sar64@sbcscar.net

October 09, 2020

Via Email and USPS

California Veterinary Medical Board
1747 N. Market Blvd. #230
Sacramento, CA 95834

Re: Opposition of the Veterinary Medical Board's proposed regulations on Animal Rehabilitation

Dear California Veterinary Medical Board members and staff,

My name is Juanita Smith and I am writing this letter to strongly oppose the California Veterinary Medical Board's proposed regulations on Animal Rehabilitation. This regulation will be considered at the Board's public meeting on October 22-23, 2020.

I am currently an active member of the County of Santa Barbara Sheriff's Department Search and Rescue Team (SBCSAR) and have been for the past 20 years. I currently hold the positions of Incident Commander and Search Dog Handler on the team.

I am also an active member of the California Rescue Dog Association (CARDA) and have been since 2001. CARDA is a volunteer group whose mission is to train, certify and deploy highly-qualified search dog teams to assist law enforcement and other public safety agencies in the search for lost and missing persons. CARDA is the largest and most geographically dispersed of the three search dog groups in California that are direct resources for the State of California Office of Emergency Services (CalOES) Law Enforcement Division.

In addition, I provided thirty-two years of service to the Santa Barbara City Police Department, holding various positions such as Patrol Apprehension Canine Handler, Field Training Officer, Tactical Planning Officer, Department Training Officer and Background and Recruitment Officer. I was promoted to the position of Sergeant in 2002 and held that position until my retirement in August of 2019.

I have had dogs all my life and started handling working dogs in 1991. I first met Karen Atlas (a licensed physical therapists trained and certified as a canine rehabilitation therapist) when I was referred to her by the San Roque Pet Hospital (Santa Barbara, CA) for treatment of a ligament injury to my certified search dog *Blaze*. This was back in April of 2009 and *Blaze* was only 6 years old. His return to active duty was totally dependent on his ability to heal from this injury. Karen was extremely thorough in her examination and we worked out a treatment plan for *Blaze* that included cold laser therapy, underwater

time under these conditions without needing a break. The working conditions were very stressful on the dog's minds and bodies.

Karen and Dr. Otto came to the rescue. They offered the services of ARC, along with their entire support staff, free of charge to any dog teams working the mudslides. Dr. Otto, in combination with other veterinarians from one of our local specialty hospitals (Advanced Veterinary Specialists) provided physical examinations and treated minor injuries while Karen provided caring and relaxing body work and cold laser therapy to help with recovery. After treatment, these dogs were ready for another day of deployment and were able to perform at a higher level than if they had they not received this care.

The bottom line is that without Karen and other licensed and certified animal rehabilitation therapists like Karen, I would not have been able to provide the services I have provided to the State of California for the past 19 years. I continue to provide those services to this date. It is my understanding that if the proposed regulations are passed, this will negatively impact Atlas Rehabilitation for Canines with the consequences either being unnecessary fee hikes to require them to stay in compliance or cause them to close their doors completely. Either option is unacceptable.

The impact of the CVMB's proposed regulations will negatively affect the State of California and further reduce access to needed rehab services for the working dogs who serve our state in law enforcement and in disaster relief. The proposed regulations do not at all meet the stated objective of protecting the consumers. The regulations fail to require any educational requirements for veterinarians or RVT's so how can the consumer feel assured that they are being protected from bad actors in the industry?

It appears that the CVMB has justified this regulation by determining that animal rehabilitation is a high risk service for some patient populations like geriatric patients with co-morbidities. What I fear is being overlooked by this Board is that there are many other types of patient populations that are benefitting from animal rehabilitation services than just geriatric dogs with co-morbidities. There are many other dogs that need these services that do not have the same risk level, so why is it not acceptable to have the veterinarian decide if their animal patients could safely benefit from animal rehabilitation instead of making an all-encompassing regulation that all animal rehabilitation must be under direct supervision?

I would like to know specifically how the CVMB plans to reconcile this issue since this regulation will decrease choice and access to these much needed services in all areas of California and does not include any provisions to protect the consumers from bad actors within the veterinary industry.

For the reasons above, I strongly urge the CVMB to withdraw these regulations which will provide less access to care for consumers, financially harm legitimate animal rehabilitation businesses, increase costs to consumers, and fail to increase any competency or accountability by veterinarians or RVT in animal rehabilitation.



October 11, 2020

VIA Email and USPS

Jessica Sieferman, Executive Officer
Justin Sotelo, Lead Administrative & Policy Analyst
Timothy Rodda, Administration/Licensing Manager
Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834

RE: SUBSTANTIVE QUESTIONS RELATING TO PROPOSED ANIMAL REHABILITATION REGULATIONS

Dear California Veterinary Medical Board members and staff,

The purpose of this letter is to seek further clarification and answers that we feel have been inadequately addressed during the August 13, 2020 public hearing relating to the concerns of the proposed animal rehabilitation regulations. We are hopeful that the California Veterinary Medical Board (“Board”) will deem these questions substantive and provide evidence-based answers with documented references. Each question is highlighted in red for ease of reference.

QUESTIONS RELATING TO THE DEFINITION OF ANIMAL PHYSICAL REHAB/PHYSICAL THERAPY

There have been many legal discussions in both the Stakeholder’s Task Force meetings and in Board meetings questioning the definition of animal physical rehabilitation (“APR”). In 2003, the Board’s Multidisciplinary Advisory Committee recommended a proposal that used the verbatim definition of physical therapy as already codified in statute. There is no question that the language and the intent encompasses the practice of physical therapy (“PT”), on animals. We also know from previous meetings that APR is not yet defined as the practice of veterinary medicine. That has yet to be determined in statute and it ought not be assumed. More accurately, this specialty falls between two Boards, namely this Board and the Physical Therapy Board of California (PTBC).

Please refer to the below two video links:

[Dr. Mark Nunez--"If" APR is veterinary medicine](#)

[Dr. James Syms and Noreen Marks, JD](#)

This regulation is attempting to establish a scope of practice without legislative approval. Scope of practice definitions are to be addressed by the impartial Legislature and should not be put in the hands of regulatory boards who may hold bias.

Questions to the Board: **The Board used this same failed approach by attempting to define and regulate APR in 2015. Why does this Board continue to seek resolution of this issue only through regulation when clearly it has been recommended by legal counsel that a legislative statute is necessary to achieve a proper remedy? This effort appears to usurp the Legislature. Does the Board believe that the Legislative charge during the 2016 Sunset Review was to only consider regulations and specifically not pursue a legislative statute to remedy this issue?**

Questions to the Board: **Since the APR issue has this degree of controversy, what is preventing the Board from asking the Legislature for help in coming to a reasonable and proper solution for all Stakeholder's involved? This issue has been going on for over 12 years without resolution and many of the responses made by the Board stated the reason for not including qualified PTs into the regulations is because they do not have statutory authority over PTs. Is the Board willing to ask the Legislature for assistance so they can seek and gain authority over PTs so this ongoing problem can be rightfully solved in the best interest of all the Stakeholder's?**

QUESTIONS RELATING TO VETERINARIAN CONCERNS

Many veterinarians have spoken in opposition to this regulation. Many California veterinarians and registered veterinary technicians ("RVT," individually, and "RVTs," collectively) have rejected their own trade association's position on this issue. They have voiced their desire to have a model more like Nevada, Colorado or Nebraska.

The below links represent just a few of the letters sent in by veterinarians opposing these regulations.

[Dr. Kenneth Bruecker letter](#)

[Dr. Ilana Strubel](#)—Rehabilitation Veterinarian

[Dr. Lisa Woolf](#)—Rehabilitation Veterinarian

[Dr. William Otto](#)

[Dr. Andy Miller](#)

[Dr. Hillary Conant](#)

Please refer to the below video link of Dr. Kenneth Bruecker as he testifies before the Board's APR Stakeholder's Task Force. Dr. Bruecker was identified as a leading expert in veterinary orthopedics and rehabilitation and was an invited guest of the Chief Consultant to the Senate Committee on Business and Professions to provide his expert testimony.

[Dr. Kenneth Bruecker--video testimony at APR Stakeholder's Task Force](#)

Questions to the Board: Does the Board believe that licensed veterinarians in California are capable of deciding for themselves whether the degree of supervision should be direct or indirect for rehabilitation services (like it is for other states like Nevada, Colorado, or Nebraska)?

Does the Board believe that their veterinary licensees are capable of and can use their professional judgment to determine the level of risk a patient has in receiving certain rehabilitative treatments?

Question to the Board: How, specifically, will the Board address the concerns of the many veterinarians who are asking for the flexibility to decide for themselves whether direct or indirect supervision is appropriate for a qualified physical therapist with whom they wish to collaborate at another facility?

QUESTIONS RELATING TO CONSUMER CONCERNS ABOUT ACCESS ISSUES

Many California consumers state that they must drive many hours to have access to a qualified PT for their animals. Letters and public testimony were provided both during the open public comment period (from March 13 through April 27, 2020) and at the virtual public hearing held on August 13, 2020. Board members continue with the narrative that access is not an issue, yet consumers testify the opposite is true with their direct experience. This regulation will put further restrictions on their access to services.

Refer to the letter below from a veterinarian confirming access issues. We encourage the Board to look back to review all the consumer letters and public hearing testimonies for further evidence that they are asking for more access to rehab services by a qualified PT, not less.

[Dr. Marissa Greenberg--confirms lack of access and her need to travel hours for PT services for her own dog](#)

Questions to the Board: How, specifically, will the Board address the voices of all concerned consumers who already have limited access to qualified PTs for their animals?

Please refer to the below video link that discusses the concerns for access to services and the impact this regulation will have for the rural areas of California if direct supervision is mandated for PTs rendering animal rehab services.

[Rural setting impact](#)

While there may be more facilities available to consumers in the more urban parts of California, there are many rural parts of the state that are not afforded choice and access to rehabilitation services for their animals.

Question to the Board: **How, specifically, will the Board address the animal rehab needs of the rural communities both for small/companion animals and large animals, since those areas are already underserved?**

Questions to the Board: **Is there any concern by the Board that animals may not receive the care they need, where they need it, if this regulation goes into effect? And if there is concern, what will the Board do about it?**

Many in California state that they cannot get their pet into rehabilitation because of long waiting lists. Those clients then have to decide whether to euthanize instead of trying rehabilitation. Letters were sent in during the public comment period by veterinarians confirming this is happening. Refer to below link to a letter submitted by a Rehabilitation Veterinarian, Dr. Heidi Hutmaker.

Dr. Heidi Hutmaker—Rehabilitation Veterinarian

This regulation would further limit access to animal rehab services which would not afford animals in need an opportunity to improve and live longer through proven rehabilitation techniques; it instead forces clients to make potentially premature decisions leading to an early end of life for their pet.

Question to the Board: **With already such limited choice and access to rehabilitation care as it is, how will this regulation help these clients and patients in need who have to make difficult, literally life or death decisions for their animal?**

Historically, the Board seems to only consider the large ranches and racetracks when discussing the range setting. There are small, private ranches with just one or two horses on site that the Board has failed to consider. Once the horse has been initially examined by the veterinarian to determine the diagnosis and appropriateness for rehabilitation, it is unnecessary to have the veterinarian directly supervise the PT at every visit. If successful, this regulation would require the veterinarian to be “in the general vicinity” at every visit.

Questions to the Board: **What does “in the general vicinity” really mean? Does the veterinarian need to be somewhere on the ranch? Is there a specific distance? How will the Board address all the need for the horses that require rehabilitative care (individual horses, not necessarily the large ranches or racetracks that the Board continues to discuss in meetings)?**

There have been inconsistencies in Board discussions related specifically to this issue, and the Board has yet to define this with clarity.

Questions to the Board: Will the Board require both a veterinarian and a PT be present on every visit to each location in the range setting even if there is only one horse that needs rehab treatment and there is no other reason for the veterinarian to be there? If so, then the price for an equine rehabilitation visit would be out of reach for many, resulting in fewer animals getting the care they need. How, specifically, will the Board reconcile this issue?

Questions to the Board: Will it be acceptable for the veterinarian to be a “phone call away” for the large animal setting? If so, why is a “phone call away” not an acceptable approach for small animals (like it is in other states like Nevada, Colorado or Nebraska)?

The “range setting” proposal is described in Board discussion as a “clarification.” However, it appears to be a legitimate exemption for this certain circumstance. The nomenclature of “clarification” vs “exemption” appears to be used as a convenience during Board discussions.

Question to the Board: How is the “range setting” proposal described as a “clarification” rather than an “exemption?”

Questions to the Board: The “range setting” appears to be a legitimate exemption from the direct supervision requirement based on very specific circumstances for large animals. Why not allow an exemption to include other specific circumstances, like animal rehabilitation services, so consumer needs could still be met and the veterinarian could still retain control? Would the Board consider an exemption specifically for rehab services to be rendered under the direct or indirect supervision of a veterinarian for small animals (level of supervision to be determined by the veterinarian on record)?

The regulatory proposal for range settings establishes a separate level of supervision for large animals than the supervision level required for smaller animals.

Question to the Board: How is the Board able to justify having one level of supervision for large animals and another level of supervision for small animals?

Surely large animals are not “safer” to be around, and if a horse goes down, it cannot be trailered to a veterinarian in case of emergency. Conversely, small animals can be easily transported in case of an emergency. There are rehabilitation-only facilities located within miles or even blocks of a veterinary clinic.

Question for the Board: Will the Board consider a provision to allow for a small animal rehabilitation facility to operate under the degree of supervision determined by the veterinarian on record (direct or indirect) if there is a veterinary clinic “in the general vicinity” (in case of emergency)?

With the advancement of telecommunication, it is very reasonable to allow for indirect supervision. We do not believe this alternative has been adequately considered by the Board.

QUESTIONS RELATING TO LACK OF TRAINING AND COMPETENCY FOR VETERINARIANS AND RVTs IN THE SPECIALTY FIELD OF ANIMAL REHABILITATION

There are currently veterinary practices in California offering rehabilitation, but without trained, competent veterinarians or staff.

Please consider the consumer letter submitted by Amy Watkins to the Board opposing this regulatory proposal. She expressed her personal experience with unqualified veterinarians offering rehabilitation services in her area. Her testimony reveals that her UC Davis veterinarian called her nearby Fresno facility to verify the qualifications of the veterinarian to perform animal rehabilitation after tibial plateau leveling osteotomy (TPLO) surgery. Ms. Watkins was advised by her UC Davis veterinarian not to go to that facility because, though they did offer rehab services, they were not qualified. As a result, she needed to drive 3.5 hours each way to the nearest facility to obtain services by a qualified PT. Refer to the link below for access to Ms. Watkins letter.

[Amy Watkins--Consumer letter describes her experience with 1\) lack of access to APR services and 2\) unqualified veterinary clinics offering APR](#)

Question to the Board: **How will this regulation protect the consumer from unqualified veterinary licensees offering rehab services?**

At the August 13, 2020 regulatory hearing, Board Member Dr. Cheryl Waterhouse continued with the narrative that veterinarians are trained adequately in rehabilitation to be able to render safe services. However, she failed to back up her claims about education and instead just stated, "UC Davis has a whole department in Physical Rehabilitation..." Dr. Waterhouse confounds two different ideas to insert what many may consider an answer that reveals a special interest. Refer to video link here: [Dr Cheryl Waterhouse answers a question raised by Alana Yanez using misleading information](#)

Having a department at a university and providing mandatory coursework to teach a specialty at the university are two very different things. In fact, on June 20, 2016, at the Board's APR Stakeholder's Task Force meeting, Dr. Po Yen Chou representing UC Davis described the coursework in detail. He detailed two hours of mandatory education in rehabilitation that included one hour of musculoskeletal disease and one hour of oncology. The remainder of the education in rehabilitation consisted of electives and 'clubs'. Dr. Chou pointed out that the program lacks didactic teaching and rather relies on "out-of-class conversations" as their primary means to educate on this area of practice. Additionally, rehabilitation is combined with all aspects of the Integrative Medicine track (which includes rehabilitation, chiropractic, acupuncture, etc.). (Video link provided below)

While we understand that it is impossible to cover all areas of veterinary medicine and healthcare in depth in a 4 year program, we in turn also believe it is simultaneously impossible and unrealistic to expect veterinary graduates (or any practicing veterinarian) to also cover the

type of curricula obtained by the doctorate or master level physical therapist without attending physical therapy school.

Dr. Chou emphasized that the rehabilitation taught in veterinary school is targeted on how to *diagnose and refer rehabilitation cases*, not how to specifically treat, since not all the treatments and modalities are included in the instruction.

Notably, at the subsequent Stakeholder's Task Force meeting on October 4, 2016, Dr. Chou was asked if he would ever refer his patients for rehabilitation to a recent graduate from the UC Davis School of Veterinary Medicine. He responded: "NO." This suggests that students are not coming out of veterinary school competent in the specialty field of rehabilitation. We believe it is telling of the rehabilitation education level even from the #1 school in the nation. The currently proposed language fails to address lack of education of Veterinarians or RVTs.

Refer to the video link below for excerpts on the veterinary education discussions that were had during the APR Stakeholder's Task Force meetings. Full-length video access can be found on vmb.ca.gov should anyone question the context of the video excerpts below.

[Veterinary Education--Dr. Po Yen Chou of UC Davis](#)

[Dr. Janet Van Dyke--No didactic training in veterinary school curricula](#)

Simply saying that "complaints can be made and then the veterinary licensee can be disciplined" is not consistent with the Board's rationale of "protecting the public from potential harm." The Board has justified this regulation in the Initial Statement of Reasons to specifically "protect consumers from potential harm."

Question to the Board: **How will this regulation "protect consumers from potential harm" from bad actors/unqualified veterinary providers if additional education is not mandated for a profession that does not adequately include animal rehabilitation didactic learning and testing as a requirement to graduate?**

QUESTIONS RELATING TO THE ARGUMENT THAT DIRECT SUPERVISION IS NECESSARY BECAUSE "ANIMALS CAN'T TALK"

It has been argued by this Board that direct supervision is necessary because "animals can't talk." We have tried to counter this narrative several times in the past over the years, but we feel our message fails to be understood. The Board appears to be unaware that physical therapists are trained to work with non-verbal clients. Licensed PTs are taught how to work with non-verbal babies, children or those affected by brain trauma. But perhaps more notably, our Coalition does recognize the lack of *animal-specific training*, which is why we support a mandate that PTs complete specific training on animals before being allowed to practice under indirect supervision of a veterinarian. This training would include animal behavior and pain recognition. To suggest that a PT cannot learn animal-specific pain responses and behavior is short-sighted and ought not be used as a justification to mandate direct supervision of another qualified licensed professional.

Below is a screen shot of the Board's response to this issue on page 10 of the [August 2020 Board materials](#).

Further, the human medical model does not apply easily to treatment of animals as animals are unable to converse about their treatment plan or effectively communicate pain or discomfort from treatment. Providing APR under indirect supervision and without the presence of a licensed veterinarian places the animal patient in potential danger if the physical therapist is not well-versed in complications and side-effects of APR for the specific animal patient.

Questions to the Board. Does the Board believe that licensed physical therapists have the ability to learn animal specific behaviors and responses to pain with additional coursework? If so, why is it not an acceptable solution to have an educational mandate for PTs by statute (to allow the Board to have authority over licensed PTs) to take animal specific courses to include pain behaviors and responses? And if the Board does not believe that licensed PTs have the ability to learn animal specific behaviors and pain responses by taking additional coursework, then why not?

Similarly, does the Board believe PTs are capable of learning complications and side-effects of APR on an animal patient? If so, why is it not acceptable that an educational mandate be added for PTs by statute (to allow the Board to have authority over licensed PTs) which would allow for an indirect supervision model (akin to the other states like Nevada, Colorado or Nebraska)?

QUESTIONS RELATING TO BUSINESS ECONOMICS/LOSS OF JOBS

There are existing practices operating under current law. Current law states that the veterinarian can determine the level of supervision (whether direct or indirect) for veterinary assistants per California Code of Regulations, title 16, section 2036.5. Further, the [Board materials from August 2020](#), state the following on page 7 to further clarify:

“animal rehabilitation physical therapists that are not licensed veterinarians or RVTs are considered veterinary assistants and may perform auxiliary animal health care tasks under the direct or indirect supervision of a licensed veterinarian or the direct supervision of an RVT. (CCR, tit. 16, § 2036.5.)”

Auxiliary animal healthcare tasks are not defined, so it seems reasonable that animal rehabilitation would fall into the auxiliary animal healthcare tasks category (as opposed to the RVT-protected healthcare tasks that are clearly delineated because of the higher risk level associated with those tasks). There is nothing in statute or regulations that would indicate or even suggest that APR would be considered anything else besides auxiliary animal healthcare tasks.

Therefore, the Board will now be changing an indirect or direct supervision model to mandate direct supervision only. This will change the current construct and model of California businesses to the point of forcing closure of small businesses and will contribute to loss of jobs. Clearly there are businesses operating within the California Veterinary Medicine Practice Act's language of auxiliary animal health care tasks. This fact has been clearly reported at public hearings and in letters to the Board submitted during the public comment period. Refer to below links for letters submitted to the Board by a practice who employs an indirect supervision business model. Also, please review the verbal testimony offered by other rehabilitation facility owners at the public hearing on August 13, 2020 to hear how these regulations would negatively affect their businesses as well.

[Lisa Stahr Scout's House--15 years proven success with indirect supervision model](#)
[Dr. Leigh Stevens Scouts House](#)

Question to the Board: **Since the Board is now changing an indirect or direct supervision model to mandate direct supervision only, how is the Board justifying that there will be no significant economic or small business impact when clearly there are businesses that are operating under current law that may suffer closure if this new regulation is successful?** This was asked of Jessica Sieferman, the Executive Officer of the Board, in an email correspondence in mid-September 2020. Ms. Sieferman replied that she could not answer this question and advised us to instead address this question directly to the Board.

QUESTIONS RELATING TO CURRENT BOARD POSITION THAT APR IS *NOT* CONSIDERED AN AUXILIARY HEALTHCARE TASK BECAUSE IT IS "HIGHER RISK"

There has been significant confusion recently surrounding the current interpretation of the Veterinary Practice Act. It has been stated in email correspondence with Ms. Sieferman, that AR is now actually "*not* considered an auxiliary healthcare task because it is higher risk". In the same email correspondence with Ms. Sieferman, she replied that the Board previously determined that categorization prior to her employment, but she could not provide any evidence to state when that was decided, by whom that was decided, or how that was decided. Furthermore, we have not found this categorization addressed in any Board transcript, nor have we been able to find any definition of auxiliary healthcare tasks.

The [August 2020 Board memo and materials](#) certainly would suggest that APR is considered an auxiliary health care task. See the following screen shot from page 7 of Board materials. This was written to make a "correction" to the petition that was submitted by our Coalition. (Note: Board correction wasn't necessary since the statement provided was indeed accurate.)

- *“Highly trained, certified, and qualified animal rehabilitation physical therapists (PTs) would be required to work in a veterinarian's office, only under direct supervision from an on-site veterinarian who may or may not be qualified to render physical rehab services themselves.”*
- **Correction:**
RVTs may perform specified animal health care tasks under the indirect/direct supervision of a licensed veterinarian. (CCR, tit. 16, § [2036](#).) The Board considers any individual who is not an RVT or a licensed veterinarian a veterinary assistant. (CCR, tit.16, § [2034](#), subs. (c).)

Accordingly, animal rehabilitation physical therapists that are not licensed veterinarians or RVTs are considered veterinary assistants and may perform auxiliary animal health care tasks under the direct or indirect supervision of a licensed veterinarian or the direct supervision of an RVT. (CCR, tit. 16, § [2036.5](#).)

Questions to the Board: **What is the Board’s position on whether APR is or is not considered an auxiliary healthcare task? What evidence was used to determine that APR is or is not considered an auxiliary healthcare task? If the Board is now taking a position that APR is not considered an auxiliary healthcare task, why did the Board state above that “animal rehabilitation physical therapists that are not licensed veterinarians or RVTs are considered veterinary assistants and may perform auxiliary animal health care tasks under the direct or indirect supervision of a licensed veterinarian or the direct supervision of an RVT (CCR, tit. 16, § 2036.5.)”?** Certainly this response provided by the Board clearly implies that APR actually is considered auxiliary healthcare tasks. However, recent email correspondence with Ms. Sieferman indicates that APR is now not considered auxiliary healthcare tasks. **Who decided that APR is not an auxiliary healthcare task? When was it decided that APR is not an auxiliary healthcare task? How was it decided that APR is not an auxiliary healthcare task? Can the Board please provide any and all transcripts in the many meetings over the past decade that discuss that APR is not considered an auxiliary healthcare task because of the higher risk to the animal patient? Who, how and when was it determined that APR is considered a high risk service? Can the Board provide the evidence and meeting transcripts that would support that the Board previously categorized APR as a higher risk and therefore would not fall under the category of auxiliary animal healthcare tasks?**

QUESTIONS RELATING TO WORKING/SERVICE DOG HANDLERS

Search and Rescue canine handlers have submitted letters to the Board opposing this regulation. They are seeking greater access and choice of rehabilitation for their working dogs who serve California. This regulation may force closure of businesses that are currently operating to serve these populations.

Please refer to the following letter submitted by Trish Moutard, RVT, who is also a Search and Rescue dog handler for the state of California.

Trish Moutard RVT Search and Rescue Dog owner

Question to the Board: **How will the Board address working dog handlers (like Search and Rescue, military dogs, law enforcement canines, equine for mounted police, etc.) that need and are specifically asking for more access to qualified animal PTs?**

Similarly, consumers have provided public comment specifically about their need and desire for more access to rehab services for their athletic, sporting dogs. Those patient populations do not seem to be addressed by the Board in any meeting or regulatory proposal despite the consumers voicing their concern. Below is just one of the letters that was submitted by a RVT, sporting dog owner, but there are others to refer to as well within the Board materials.

Teresa Fleckenstein RVT sporting dog owner

Question to the Board: **How will the Board address the consumers who have young, athletic, sporting dogs (i.e., NOT geriatric, and not with multiple co-morbidities) that are asking for more access and choice of qualified PTs?**

The only small animal patient population that the Board seems to discuss is geriatric dogs with co-morbidities and is justifying a blanket direct supervision model based largely on just that one population of animals.

At the August 13, 2020 Board hearing on the APR regulatory proposal, Board Member Dr. Cheryl Waterhouse said she just visited one clinic and noted that most of the patients were geriatric with co-morbidities. Unfortunately, she failed to report on the clinics that see more athletic, performance and otherwise healthy companion dogs. She also owns her own rehabilitation clinic which could be viewed as a clear conflict of interest in determining appropriate and reasonable regulations. It appears that the clinics who offer services to non-geriatric patient populations have not been considered.

Questions to the Board: **Has the Board considered other patient populations that do not have the same risk level as compared to that of a geriatric dog with co-morbidities?** Some rehab clinics specialize in sports and performance dogs and there are no safety concerns that would necessitate direct supervision for rehab services. These are dogs that have been seen previously by a veterinarian who provided medical clearance to engage in rehab safely. **How will the Board address the negative impact on the APR practices that serve the low to no-risk patient populations such as sporting and working dogs?**

QUESTIONS RELATING TO THE BOARD'S POSITION ON RACE-APPROVED COURSEWORK

Question to the Board: **Does the Board believe that accreditation by Registry of Approved Continuing Education (RACE) coursework (a program approved by the American Association of Veterinary State Boards (AAVSB) is acceptable to satisfy continuing education license requirements for veterinarians and RVTs?**

This is a legitimate and important question to which we are seeking a clear answer and a confirmed Board position.

At the August 13, 2020 regulatory hearing, the Board continued with the narrative that licensed PTs are only human-trained. Board Member Dr. Cheryl Waterhouse made misleading statements about the coursework offered by the Canine Rehabilitation Institute. Furthermore, she inaccurately describes that “everyone passes...no one fails.” This was fact checked and is false. Of course every student doesn’t just pass the course; they need to earn a passing score. Dr. Waterhouse also continues with the narrative that “there are no accredited programs for animal rehabilitation” leading listeners to believe that the coursework offered by rehabilitation certification programs are not satisfactory or acceptable because they are not ‘accredited’. What she fails to mention is that all the coursework offered by the rehabilitation certification programs are already approved by RACE. We have taken issue with the lack of transparency that makes her statements very misleading. We remain concerned that the Board fails to be influenced by the fact-based evidence that has been offered time and time again and instead relies on misleading statements made by Board Members. To reiterate, the animal rehabilitation certification course work is already approved by RACE, which is the industry standard for veterinary continuing education.

Question to the Board: **If RACE accreditation is not acceptable as approved coursework, then how will the Board plan to restructure the entire veterinary continuing education framework since it does not currently adequately satisfy the Board’s standards?**

QUESTIONS RELATING TO CONFLICTING OR CONFUSING STATEMENTS MADE IN THE AUGUST 7, 2020 MEMO SENT OUT PRIOR TO THE PUBLIC HEARING

In the August 7, 2020 memo, it stated as a ‘correction’ to the APTC’s petition language (which was accurate and did not need ‘correcting’) the following response relating to access of care. Below is a screen shot from page 8.

○ **Correction:**

As explained above, the Board’s proposed regulation does not place additional restrictions on the ability of consumers to access animal physical rehabilitation services. Rather, the proposal increases consumer access to APR by authorizing the performance of APR by physical therapists, who otherwise are licensed by the Physical Therapy Board of California only to practice on humans. Thus, the Board’s proposed regulation does not negatively impact existing access and should not increase costs to services already being lawfully provided.

Questions to the Board: **How does the Board believe that the regulatory proposal INCREASES consumer access to APR by PTs (as indicated above)?**

This was asked of Ms. Sieferman in recent email correspondences in September 2020, in which she replied that she could not answer this question and advised instead to ask the Board for a response.

If physical therapists are already considered unlicensed veterinary assistants in the eyes of the Board currently (by definition according to the Board since PTs are not veterinary licensees), how does this regulation serve to “increase consumer access to APR by authorizing the performance of APR by PTs”?

The Board is taking a model which already provides for direct OR indirect supervision and instead is mandating direct supervision only.

Question to the Board: **How does mandating direct supervision (and taking away the indirect option) increase consumer access?** Again, this was asked in email correspondence to Ms. Siefertman, in which she replied that she could not answer this question and that this should be directed to the Board instead.

Below is a screen shot from page 6 of the August 7, 2020 memo. It states that “The Board’s regulatory proposal is the “only law that would allow physical therapists, who are licensed under the Physical Therapy Practice Act, to practice APR.” This appears to be a disingenuous statement, as it has already been determined that the Board currently categorizes licensed PTs as unlicensed veterinary assistants who may practice under the direct (or indirect supervision) of a veterinarian (for auxiliary animal health care tasks).

The Board does not have statutory authority to create a new license type or certificate for physical therapists that potentially would establish educational, experience, and safety standards for obtaining that license. To provide increased consumer access to APR, the Board is establishing the ability for physical therapists to provide APR under the supervision of a veterinarian. The Board’s regulatory proposal is the only law that would allow physical therapists, who are licensed under the Physical Therapy Practice Act, to practice APR.

Questions to the Board: **Can the Board explain why this regulatory proposal is the “only law that would allow physical therapists to practice APR” when PTs are being categorized as unlicensed veterinary assistants currently and can practice under the direct (or indirect supervision) of a veterinarian (for auxiliary animal health care tasks) regardless of these regulations? If the Board does not have statutory authority for PTs, why isn’t the Board seeking statutory authority through Legislative statute so this issue can be properly addressed?**

QUESTIONS RELATING TO NATIONWIDE EFFORT SPEARHEADED BY THE CDC

Question to the Board: **Does the Board support the Center for Disease Control (CDC)’s “One Health Initiative?” Click here to view initiative: [CDC's "One Health Initiative"](#)**

The federal CDC’s One Health Initiative is a collaborative, multisectoral, and transdisciplinary approach which works at the local, regional, national, and global levels with the goal of

achieving optimal health outcomes recognizing the interconnection between people, animals, plants and their shared environment.

Question to the Board: **If the Board supports this initiative, how will the Board address the fact that they are preventing non-veterinarian, qualified and licensed professionals to practice animal rehabilitation when they have been shown to be qualified and safe practitioners?**

QUESTIONS RELATING TO REJECTING FACTS AND DISREGARDING PUBLIC INPUT

Stifling or disregarding public input and rejecting facts has been a common theme for a decade on this particular issue.

On January 19, 2016, Dr. Richard Sullivan asked then-Executive Officer, Annemarie DelMugnaio, for content to the complaints during the Board's Multi-Disciplinary Committee meeting. She reported that there are "spreadsheets" that have been collected for each discipline and that with Breeze that content can be gleaned. (refer to the below video link) Conversely, the current Executive Officer, Ms. Siefertman stated on August 13, 2020 at the public hearing that there is not a way to determine content to complaints. Refer to the video link below that identifies the complaint data discrepancies over the years.

Complaint data discrepancies

There are gross discrepancies in complaint data information between the different Executive Officers during their tenures. When a new regulation that will structure and change the way this area of practice will be regulated, there should be clarity first. This issue has been investigated and discussed for over 12 years.

The Board has not taken the time to determine the safety of qualified PTs practicing on animals despite being asked time and time again for evidence by both the concerned public and Board members themselves. Instead, the Board has *ignored* the facts presented that demonstrate the safety of qualified PTs as evidenced by the other state Board authorities who have indirect supervision models already in place (like Nevada, Colorado and Nebraska). There have been over 73 aggregate years of no complaints of harm or negligence against a qualified PT in this state or any other state in the US. This is fact-based evidence from the VMB's own Stakeholder's Task Force materials.

Question to the Board: **What will it take for the narrative to change from "PTs need direct supervision for the safety of the animals/clients," to using fact-based evidence to determine instead that "PTs with additional training specifically on animals are safe in an indirect supervision model after a veterinarian has made the determination that APR is appropriate?"**

It has been entertained and justified by this Board that since chiropractors are named in the Veterinary Medicine Practice Act and under direct supervision for musculoskeletal manipulation

(MSM) that somehow a licensed PT fully trained and certified in animal rehabilitation should be under those same provisions. It should be noted that the Board overstepped its authority with the chiropractic language and usurped the Legislature in this circumstance. One regulatory Board cannot have purview over another licensed professional from a different Board. Refer to video link below.

MSM and chiropractic language

There have been inconsistencies noted in how public input is considered by the Board. A strict deadline for public input was offered earlier in the year (despite the onset of the COVID-19 global pandemic) when the Board announced that the 45-day public comment period would be from March 13 through April 27, 2020. The APTC asked Justin Sotelo (Board Lead Administrative & Policy Analyst) specifically to consider an extension to the open public comment period given the timing of the global pandemic.

In email correspondence, Mr. Sotelo replied to our Coalition stating that the Board was not anticipating expanding the public comment period beyond the stated timeframe noted above.

We couldn't help but to notice that 54 of the 59 comments for *support* were accepted outside any of the stated or published public comment time periods (the 54 of the 59 support comments were accepted between the dates of August 10 through August 12 which were never identified as an open public comment time period). The inconsistencies of how public comment has been handled by this Board to date is notable. Historically, during Ms. DelMugnaio's tenure as Executive Officer, our Coalition repeatedly sent in our concerns only to get a response that our comments were not received in time for consideration (or at all?) or were submitted outside of public comment period so they were not accepted. We are asking for consistency and fairness for both sides. The acceptance of the support comments outside of the public comment period are not consistent with our past experience when we have attempted to do the same.

Questions to the Board: **Why did the Board accept public comments for support if they were outside the published public comment period? If the Board was planning to accept public comment at all times, why was our Coalition told that the Board was not anticipating expanding the public comment period given the COVID-19 global pandemic? Why was our Coalition not informed that public comment period was going to be open during August 10-12?**

Ms. Sieferman, in email correspondence in September 2020, stated that "Under current law, APR performed by an RVT requires direct or indirect veterinarian supervision, as determined by the supervising veterinarian. APR performed by a VA requires direct veterinarian supervision."

Questions to the Board: **This is a new interpretation of current law and one that is different than previously outlined in the Board memo and materials from August 2020. Where in current statute or regulations is the language that reflects this sentiment**

specifically about APR? If this is already current law, what is the purpose of the proposed regulation?

LEGAL QUESTION FOR THE LICENSEE BOARD MEMBERS

Individual immunity is not granted for California regulatory board members, so each licensee who has special interest in this regulation would be in the crosshairs of an anti-trust lawsuit with potential for treble damages.

Question to the Board: Do the licensee Board members understand the potential legal consequences that come with advancing regulations that effectively monopolize an area of animal healthcare that other licensed practitioners are qualified to perform?

QUESTIONS CONCERNING SUPPORT LETTERS THAT WERE SUBMITTED TO THE BOARD

Although there were questions raised about documents sent in by those opposing the regulations within the August 2020 Board memo and materials, there were not any questions contesting the documents sent in by those supporting the regulations. Therefore, we would like to raise the following questions and inaccuracies noted in many of the support letters.

The August 2020 Board materials stated: “Finally, proponents stated that the proposal is reasonable, preserves animal safety, and has been through three different deliberative vetting processes (including the Task Force).”

While it is true, proponents did say those things, there are confounding issues that do not make those statements true. What is not being refuted or even mentioned by Board members or staff are:

1. There haven't been any complaints of safety issues to begin with relating to qualified PT professionals rendering rehab treatment on animals. (And if there have been, zero proof has been offered when asked.).

Question to the Board: What kind of animal safety is being preserved?

2. “3 different deliberative vetting processes (including the Task Force).” What fails to be recognized here is that the only true vetting process was the Stakeholder’s Task Force, and all the language regarding PTs was unilaterally rejected by the Board itself after blatant misrepresentations were made by the veterinary and veterinary technician trade associations.

Question to the Board: What “vetting processes” are being referred to if only the special interest veterinary licensees (which makes up a majority) on the Board are making all the decisions during every step?

3. Supporters wrote that “PTs believe that 40 hours of ‘dog therapy’ courses are enough to practice.” This is patently false. Our Coalition has never supported this, and it is an example of some of the misinformation that has been spread by supporters of this regulation to solicit a response.

Question to the Board: Misinformation was being used to solicit support letters.
Has the Board recognized that many of the support letters were sent in based on misleading and egregious use of misinformation?

4. Supporters of this regulation bring up the number of other types of specialists in the veterinary profession and compare those numbers to that of rehabilitation veterinary professionals. Furthermore, they seem to consistently propagate an untrue narrative about the reality of waitlists and access issues for rehab services. Specifically, Dr. Jon Klingborg, the past Vice President of the Board’s Animal Physical Rehabilitation Stakeholder’s Task Force, stated the following on page 2 in his letter to the Board dated April 26, 2020 in support of the proposed regulatory language:

“Access Issues? It has been stated that there is an Access issue that unfairly disadvantages animal owners seeking APR services (when APR is restricted to DVM supervision only.) The reality is that in California there are more Veterinary practitioners* of Animal Physical Therapy than there are Veterinary Ophthalmologists, Cardiologists or Neurologists. Clients aren’t waiting for weeks to see a qualified veterinarian for APR services. (*Practitioners= Board Certified Specialists and/or DVMs with a certificate in Animal Physical Rehabilitation.) There has never been any proof offered that there is an ‘access’ issue.”

It is notable that he states that “clients aren’t waiting for weeks to see a qualified veterinarian for APR services”, and that “there has never been any proof offered that there is an ‘access’ issue.” We know the opposite is true as evidenced by the thousands of petition signatures, letters, and public testimony offered in a variety of forums. We question why Dr. Klingborg has refused to acknowledge the facts provided by consumers, DVMs, PTs, and RVTs from all areas of California, and instead, chooses to propagate misinformation. The facts have been testified before him in multiple committees, task force and Board meetings over the 12 years this Board has deliberated on this issue, so it is puzzling why he is misrepresenting the realities and truth in his most recent support letter to the Board.

The proposed regulation is specifically about animal rehabilitation, and it is well known that existing clinics have such long waiting lists that many patients are not able to be seen for months, causing owners to then be faced with choosing euthanasia instead of rehabilitation (please refer back to [Dr. Heidi Hutmaker’s letter](#)). A veterinary ophthalmologist, cardiologist or neurologist isn’t going to be able to provide treatment for the consumer’s animal rehabilitation needs. A statistic about access to another professional veterinary specialty has absolutely no relevance; yet this statistic is used to justify that somehow there is plenty of access to and choice of APR services. We know through written and verbal testimony in multiple forums that

access *is, in fact*, an issue. (please refer back to [Dr. Marissa Greenberg's letter](#), [Amy Watkins letter](#) for recent examples). The persistence to ignore facts and instead propagate misinformation is troubling. This actually demonstrates how out of touch this Board is with how rehabilitation is accessed in the “real world” in California. It also points to another instance whereby the facts are being ignored and/or altered to support what appears to many as a special interest agenda.

Rehabilitation is often sought multiple times per week and requiring people to drive hours for each appointment is unreasonable.

Questions to the Board: **Why does the Board rely on irrelevant statistics about other specialties to suggest that access to rehabilitation is not an issue? Has the Board recognized and acknowledged the thousands of letters and petition signatures or listened to the hundreds of comments made by consumers, veterinarians, PTs and RVTs that APR is not easily accessible in all parts of the state, including the rural communities? Does the Board still believe that access is not an issue in California? How many concerned Californians need to oppose these regulations for their voices to matter?**

2016 SUNSET REVIEW HEARING RELATING TO ANIMAL REHABILITATION

There is continued concern that the Board has been unable to set aside bias that was perceived in the past and reported on during the 2016 Sunset Review (see video link below).

Sunset Review 2016 Animal Rehabilitation

Furthermore, it is well-recognized that both the Nevada and Colorado model have worked well. Below is a letter from the past legal counsel for the Nevada Board of Veterinary Medical Examiners, Louis Ling, JD, identifying how well the Nevada model works. As well, below is a video excerpt from the APR Stakeholder’s Task Force meeting whereby Dr. Janet Van Dyke reported how well the Colorado model works.

Louis Ling, JD: Nevada model works well

Dr. Janet Van Dyke: Colorado model described. Shown to work well.

Kurt Heppler, JD, legal counsel to the Board discusses the charge from the Legislature at the time of the Sunset Review. Jason Kaiser (Executive Officer, Physical Therapy Board of California (“PTBC”)) also identifies how language has been successfully shared across two Boards (namely, the California Board of Chiropractic Examiners and PTBC in his case). Mr. Kaiser reflects on the successful collaborative relationship between the two Boards using common language. Refer to video link below.

Kurt Heppler and Jason Kaiser

A consumer past-member of the Board and the Board's own Stakeholder's Task Force also voiced her concerns and questions the Board's ability to put aside their special interests when determining ARP regulations. See below link for a letter submitted by Dr. Lee Heller.

[Dr. Lee Heller, JD Past public member of CVMB](#)

Again, it is the Animal Physical Therapy Coalition's hope that the Board will reconsider the current regulatory proposal, abandon the language and pursue the more appropriate solution through a legislative remedy akin to AB 3013 (The Animal Physical Rehabilitation Act of 2018) which would serve to codify the Board's own Animal Physical Rehabilitation Stakeholder's Task Force recommendation.

We look forward to the Board's response to our substantive questions.

Sincerely,



Karen Atlas, PT, MPT, CCRT

President: Animal Physical Therapy Coalition

President: California Association of Animal Physical Therapists

Past-Member: California Veterinary Medical Board's Animal Physical Rehabilitation Stakeholder's Task Force

cc: Kimberly Kirchmeyer, Director, Department of Consumer Affairs
Assemblymember Evan Low, Chair, Assembly Committee on Business and Professions
Senator Steven Glazer, Chair, Senate Committee on Business, Professions, and Economic Development
Vincent Chee, Consultant, Assembly Committee on Business and Professions
Elissa Silva, Consultant, Senate Committee on Business, Professions, and Economic Development



May 16, 2018

Honorable Assembly Member Lorena Gonzalez Fletcher
California State Assembly
Chair, Assembly Appropriations Committee
State Capitol Room 2114
Sacramento, CA 95814

Re: Assembly Bill 3013—Veterinary Medicine; Animal Physical Rehabilitation

Dear Assembly Member Gonzalez Fletcher,

The Animal Physical Therapy Coalition (sponsor of AB 3013), is writing this letter to clarify the misrepresentations made in the California Veterinary Medical Board’s (CVMB) opposition letter dated April 24, 2018. For ease of understanding, statements made below in quotations in bold were taken directly from their opposition letter, while the text in red clarifies the inaccuracies in their statements.

“It is unprecedented to compel two Department of Consumer Affairs’ boards to work together”

Department of Consumer Affairs (DCA) Boards are accustomed to working together with professions that have crossover. The California Veterinary Medical Board (CVMB), in fact, works together with the California State Board of Pharmacy as evidenced by Sections 4041 and 4067(d) in the Veterinary Medicine Practice Act. Two further examples of Board collaboration can be referenced within the Physical Therapy Practice Act and include Sections 2620.3. and 2620.5 whereby the Physical Therapy Board of California (PTBC) works together with the Medical Board of California and the California State Board of Pharmacy.

“to create a new occupation when the proposed certification program has no accredited education, rigorous testing, nor licensure, which are essential for animal safety and to provide public protection and recourse.”

AB 3013 does not create a new occupation or a certification program. It would provide oversight of and create a pathway for already licensed professionals to practice once competency standards are met. Those competency standards would be determined by the Veterinary Medical Board and the Physical Therapy Board in what would be defined as a ‘certification’. It is important to note, however, that a new certification *program* is not being created. This approach has been successful in other states. After contacting the board authorities in the states with an indirect supervision model as the one proposed in AB 3013, no reports of harm or negligence have been made against a qualified physical therapist and no issues were raised regarding implementation of state law in those states. There is no objective evidence

to suggest that animal safety is being compromised after 73+ years of exposure to this model in other states.

“AB 3013, even with proposed amendments, undermines the entire Department of Consumer Affairs by requiring two separate boards, each with their own set of expertise and scopes of practice, to regulate a licensee without either having complete authority over that license.”

The Physical Therapy Board would retain complete authority over the physical therapist’s license. The Veterinary Medical Board would gain authority over both the Animal Physical Rehabilitation (APR) facility premise permit and the Animal Physical Rehabilitation Certification.

“During numerous public hearings, there were fewer than ten physical therapists that testified for this proposed legislation. We believe that it is inappropriate to require major changes in two different practice acts for a handful of people while undermining consumer protection.”

There were many physical therapists working with animals in California who either spoke out anonymously for fear of retribution or wrote letters to the Veterinary Medical Board. The Veterinary Medical Board received letters, calls, and emails from physical therapists at both the 2015 public hearing when the Board attempted to put PTs under direct supervision and at the April 19, 2017 meeting in Oakland to provide comment on the VMB’s Animal Rehabilitation Task Force recommended language. It should also be noted that the Physical Therapy Practice Act is not being changed in any way under AB 3013.

More to the point, the issue is about serving the consumer and increasing choice for quality pet care. Thousands of consumers spoke out by petition, phone calls, public testimony, and letters to voice their desire for increasing access and choice of animal physical rehabilitation providers.

Finally, many veterinarians have spoken in support of AB 3013. Current law prohibits veterinarians to refer to offsite non-veterinarian practitioners for their animal patients. Veterinarians would appreciate the authority to refer their animal patients to licensed physical therapists trained in animal rehabilitation. The proposed changes benefit veterinary professionals and consumers, not just “a handful of people.”

“The Board already has a definition of ‘indirect supervision’ in regulations 2034; the amendments in this bill are using this terminology incorrectly because there is no veterinary supervision.”

The definition of “indirect supervision” per regulations 2034 is: "Indirect Supervision" means: (1) that the supervisor is not physically present at the location where animal health care job tasks are to be performed, but has given either written or oral instructions (‘direct orders’) for treatment of the animal patient; and (2) the animal has been examined by a veterinarian at such times as good veterinary medical practice requires, consistent with the particular delegated animal health care task and the animal is not anesthetized as defined in Section 2032.4.”

By this definition, it is clear that there is veterinary supervision even when the veterinarian is not on the premise.

Further definition of “indirect supervision” was added to the bill to provide even greater clarification as follows:

“(7) “Indirect supervision” means both of the following:

(A) Determining the competency of a supervised physical therapist to perform delegated animal physical rehabilitation tasks and supervise an animal physical rehabilitation assistant.

(B) The animal has been examined by the supervising veterinarian within the period of time consistent with standards of good veterinary medical practice and the particular delegated animal physical rehabilitation task.”

“Even worse, there would be a veterinary premises permit posting in the waiting room of this facility that states that the premises is under the authority of the Veterinary Medical Board which further gives the public the false impression that there is veterinary oversight at the facility when there is none. With this scenario, the Board is now enabling the false impression of veterinary oversight and confusing the public.”

On the contrary, by allowing the Veterinary Medical Board to inspect premises, AB 3013 imposes veterinary oversight. Per AB 3013: “(3) The board may inspect an animal rehabilitation facility for safety and compliance with this chapter.”

“When a consumer files a complaint against a physical therapist for doing animal physical rehabilitation (APR), under the proposed amendments of the BPC section 4828.5(i) the Board ‘shall have the authority to discipline a supervised physical therapist, up to revocation of the supervised physical therapist’s certificate.’ and (i) ‘The [veterinary medical] board shall report final disciplinary actions against a supervised physical therapist pursuant to subdivision (i) of this section to the Physical Therapy Board of California (PTB).’ There are two major problems with this proposed language. First, the physical therapist is not supervised by a veterinarian, and secondly, the PTB has absolutely no knowledge or expertise in the science of veterinary medicine or the standard of practice in veterinary medicine in order to hold the APR licensee accountable to discipline.”

In fact, the physical therapist is supervised by the veterinarian under the indirect supervision model by definition.

Accountability is built in to AB 3013 as follows. The Veterinary Medical Board would have the authority to revoke the supervised physical therapist’s certificate under the standard of practice for veterinary medicine, thus prohibiting further practice on animals (as is its current purview for other areas of veterinary practice). The case would then be passed onto the Physical Therapy Board, where discipline of the licensee would be based on their assessment of possible unprofessional conduct. The Physical Therapy Board does not need to know the standard of practice of veterinary medicine in order to hold the PT licensee accountable under standards for unprofessional conduct and has the authority to prohibit further practice on human patients. The APR licensee would thus actually practice with double accountability and jeopardy.

“In our April 2, 2018 letter of opposition to the Assembly Business and Professions Committee, we also expressed other major issues with this legislation even prior to these proposed amendments. There are a number of areas in the Veterinary Medical Practice Act (VMPA) that would have to be changed to accommodate this proposed legislation that would undermine and weaken existing law. The veterinary premises permit requirements would have to be changed and allow a non-licensed person to be the licensee manager of the premises. If the premises manager is not licensed, the Board does not have disciplinary authority over them; the Board would have to refer the case to the PTB who again has no knowledge of the standard of practice in veterinary medicine.”

Under AB 3013, the physical therapist practicing APR already has a professional license—and the Physical Therapy Board has final authority over that license.

The Veterinary Medical Board would have authority over both the Animal Physical Rehabilitation premise permit and the Animal Physical Rehabilitation Certification, both of which could be revoked by the Veterinary Medical Board to prohibit further practice.

To reiterate, the Physical Therapy Board would discipline based on unprofessional conduct, while the Veterinary Medical Board would discipline based on the inadequate practice of veterinary medicine.

“The Board would have to change the standard of practice as it relates to establishing a veterinarian-client-patient-relationship (VCPR), which is a contract between the pet owner and the veterinarian to diagnose and treat the patient. The present standard requires that when a veterinarian refers an animal patient to another veterinarian facility, the veterinarian at the new facility establishes a new VCPR.”

There is nothing in statute to indicate that a veterinarian-client-patient-relationship (VCPR) is lost when transfer of care is made. The original VCPR remains intact.

“Since there is no veterinarian at the “animal physical therapist facility” the original veterinarian still has the VCPR but has no oversight or control of the management of the care of that patient.”

The original veterinarian has the VCPR, as well as oversight/control of the management of the care of the patient because the referral would state specifically what the referring veterinarian is ordering.

“This will be a major problem with enforcing complaint and the Board’s ability to ascertain liability when an injury occurs to an animal.”

Liability is addressed in AB 3013, making clear where it would be assigned:

“(h) A supervised physical therapist or an animal physical rehabilitation assistant shall be solely liable for any delegated animal physical rehabilitation tasks and the veterinarian that referred the animal for animal physical rehabilitation shall not be liable for any animal physical rehabilitation provided by the supervised physical therapist or animal physical rehabilitation assistant.”

It is our hope that the California State Legislature will carefully analyze this bill based on the facts, and by both merit and consumer demand, allow passage of this very important piece of legislation.

Sincerely,



Karen Atlas, PT, MPT, CCRT

President: Animal Physical Therapy Coalition/California Association of Animal Physical Therapists

Cc: Members of the Assembly Appropriations Committee
Honorable Kansen Chu, California State Assembly
DCA Legislative Unit, Department of Consumer Affairs
Stacy DeFoe, California Physical Therapy Association

Veterinary Medical Board

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April 24, 2018

Honorable Assembly Member Lorena S. Gonzalez Fletcher
California State Assembly
Chair, Assembly Appropriations Committee
State Capitol Room 2114
Sacramento, CA 95814

Re: Assembly Bill 3013 - Veterinary Medicine: Animal Physical Rehabilitation

Dear Assembly Member Gonzalez Fletcher,

The Veterinary Medical Board (Board) is writing this letter to oppose AB 3013 (Chu, 2018) and its proposed amendments.

It is unprecedented to compel two Department of Consumer Affairs' boards to work together to create a new occupation when the proposed certification program has no accredited education, rigorous testing, nor licensure, which are essential for animal safety and to provide public protection and recourse.

AB 3013, even with the proposed amendments, undermines the entire Department of Consumer Affairs by requiring two separate boards, each with their own set of expertise and scopes of practice, to regulate a licensee without either having complete authority over that license. During numerous public hearings, there were fewer than ten physical therapists that testified for this proposed legislation. We believe that it is inappropriate to require major changes in two different practice acts for a handful of people while undermining consumer protection.

The Board already has a definition of "indirect supervision" in regulations 2034; the amendments in this bill are using this terminology incorrectly because there is no veterinary supervision. Even worse, there would be a veterinary premises permit posted in the waiting room of this facility that states that the premises is under the authority of the Veterinary Medical Board which further gives the public the false impression that there is veterinary oversight at the facility when there is none. With this scenario, the Board is now enabling the false impression of veterinary oversight and confusing the public.

When a consumer files a complaint against a physical therapist for doing animal physical rehabilitation (APR), under the proposed amendments of BPC section 4828.5(i) the Board "shall have the authority to discipline a supervised physical therapist, up to revocation of the supervised physical therapist's certificate." and (j) "The [veterinary medical] board shall report final disciplinary actions against a supervised physical therapist pursuant to subdivision (i) of this section to the Physical Therapy Board of California (PTB)." There are two major problems with this proposed language. First, the physical therapist is not supervised by a veterinarian, and secondly, the PTB has absolutely no knowledge or expertise in the science of veterinary medicine

or the standard of practice in veterinary medicine in order to hold the APR licensee accountable to discipline.

In our April 2, 2018 letter of opposition to the Assembly Business and Professions Committee, we also expressed other major issues with this legislation even prior to these proposed amendments. There are a number of areas in the Veterinary Medical Practice Act (VMPA) that would have to be changed to accommodate this proposed legislation that would undermine and weaken existing law. The veterinary premises permit requirements would have to be changed and allow a non-licensed person to be the licensee manager of the premises. If the premises manager is not licensed, the Board does not have disciplinary authority over them; the Board would have to refer the case to the PTB who again has no knowledge of the standard of practice in veterinary medicine. Accordingly, how would the Board justify requiring a veterinary licensee manager at one premises where veterinary medicine is practiced, and not require it at another premises where veterinary medicine is practiced.

The Board would have to change the standard of practice as it relates to establishing a veterinarian-client-patient-relationship (VCPR), which is a contract between the pet owner and the veterinarian to diagnose and treat the patient. The present standard requires that when a veterinarian refers an animal patient to another veterinary facility, the veterinarian at the new facility establishes a new VCPR. Since there is no veterinarian at the "animal physical therapist facility" the original veterinarian still has the VCPR but has no oversight or control of the management of the care of that patient. This will be a major problem with enforcing complaint and the Board's ability to ascertain liability when an injury occurs to an animal.

For these reasons and many others, the Veterinary Medical Board opposes AB 3013 (Chu 2018) with or without the amendments. This legislation is not in the best interest of the consumer and more importantly it is not in the best interest of the animal patient.

Sincerely,



Cheryl Waterhouse, DVM, President
Veterinary Medical Board

Richard J Sullivan, DVM, Vice-President
Veterinary Medical Board

Cc: Members of the Assembly Appropriations Committee
Honorable Kansen Chu, California State Assembly
DCA Legislative Unit, Department of Consumer Affairs
Valerie Fenstermaker, California Veterinary Medical Association