# **Proposed California Legislation Could Bring Change** to RVT Practice

**S** B 669, introduced by Senator Dave Cortese, is a measure that would permit registered veterinary technicians (RVTs) to act as an agent of a veterinarian as the veterinarian establishes a Veterinarian-Client-Patient Relationship (VCPR) for the specific purposes of administering vaccinations and providing preventative procedures for parasite control.

The CVMA has a "Support, If Amended" position on this bill.

## **A Brief History**

In 2021 and 2022, the CVMA convened a task force of veterinarians and RVTs with specific expertise to address the issue of Access to Veterinary Care, which centers around a significant portion of pet owners facing financial barriers to even the most basic veterinary care for their animals. The task force's work was approved by the CVMA's Board of Governors in 2022 and culminated in a position statement and a list of action items for the CVMA to pursue in an effort to do its part to address the access issue. Both of those resources are available at cyma.net in the Resources section.

The list of action items includes "Expanding the Role of RVTs." This topic was sent to the CVMA's Registered Veterinary Technician Committee in 2022 for analysis and recommendation. The RVT Committee is composed of RVTs in multiple facets of the veterinary profession from across California. The RVT Committee did a deep dive into RVT education, core competencies, skills, and abilities and determined that RVTs possess adequate knowledge and skill to act as an agent of the veterinarian when



the veterinarian establishes a VCPR for the specific purposes of:

- Administering vaccines; and
- Performing preventative procedures for parasite control

In June of 2022, the RVT Committee's determination was presented to the CVMA's House of Delegates (approximately 75 veterinarians and RVTs from throughout California) and Board of Governors. After review and discussion, both bodies strongly supported the RVT Committee's determination, and the Board directed CVMA staff to request rulemaking by the California Veterinary Medical Board (VMB) that would allow RVTs to operate in the above-described agency capacity. The CVMA staff compiled significant supporting data for the request and submitted both the request and the supporting data to the VMB in late 2022.

Upon receipt of the CVMA's proposal, the VMB—which also has its own Access to Veterinary Care subcommittee working on improving consumer access to veterinary care—considered the CVMA's request and the supporting data. Finding the proposal to be well-taken, the VMB then drafted regulatory language that would make such a concept possible within the California Veterinary Medicine Practice Act, and presented that This bill allows an RVT to act as an agent of a veterinarian as the veterinarian establishes a VCPR.

language to its voting board on January 25, 2023. The VMB voting board, which is comprised of veterinarians, an RVT, and public members, unanimously voted to approve the introduction of the proposed regulations into the regulatory process.

#### **From Regulations to Statute**

The early progress of the proposed regulation caught the eye of the state legislature, and rather than wait for the rulemaking process to play out (an average of three years to get a regulation instituted), Senator Cortese saw an opportunity to pick up the language and put it into statute. The statutory lawmaking process is much faster than the regulatory one, meaning that if this bill passes, it will be instituted on January 1, 2024.

#### **Points of Clarification**

This bill allows an RVT to act as an agent of a veterinarian as the veterinarian establishes a VCPR. The VCPR is still established by the supervising veterinarian, and any medication dispensed or prescribed is pursuant to the order of the supervising veterinarian. The bill lays out a clear process by which the supervising veterinarian establishes written protocols for the RVT to follow during an appointment. It also requires a signed agreement between the supervising veterinarian and RVT and medical record documentation of the appointment, among other stipulations. The law is specific to vaccines and parasite procedures and does not extend to other areas of veterinary practice.

### **CVMA Action**

The CVMA reached out to the author's office early on to provide feedback on technical aspects of the bill language and optimal placement within the Veterinary Medicine Practice Act so as to preserve the intent of the original regulatory proposal. The CVMA will remain actively involved in this bill and is pleased to be working closely with the author to ensure that it reflects the extensive work and dialogue that went into creating the proposal.



