Facts regarding California Veterinary Medical Association to Opposition to AB 814 (Lowenthal)

AB 814 will permit physical therapists to open their own practices to work on animals without veterinarian supervision

- The CVMA supports existing law that allows both registered veterinary technicians and physical therapists to provide animal physical rehabilitation under the direct supervision of a veterinarian and within the provisions of a premises permit issued by the Veterinary Medical Board (VMB).

- The CVMA believes the consumer is best protected under current California law which allows only licensed veterinarians to independently treat animals and requires veterinary supervision for all other licensees or veterinary assistants.

- A change in statute allowing physical therapists to independently treat animals by referral and without onsite veterinary supervision would jeopardize the health of animals.

- Physical therapists are not formally trained in:
  - the fundamental differences between quadruped animals and biped, upright humans,
  - the signs of pain in animal species,
  - animal behavior as it relates to all species,
  - animal locomotion,
  - recognizing infectious diseases,
  - first aid treatment,
  - emergency life-saving treatment,
  - and much more.

- A certification for physical therapists cannot replace a veterinary education that is required for veterinary licensure. The VMB recognizes veterinary colleges accredited by the American Veterinary Medical Association (AVMA) or colleges that have academic standards equivalent to schools accredited by the AVMA for veterinary licensure. Animal physical therapy certifications program are not accredited by any institution.

- Animal physical rehabilitation is a recognized modality in veterinary medicine and is offered in many veterinary practices in California. There is also a recognized specialty by the American Specialty College in Sports Medicine and Rehabilitation.

- If a physical therapist is allowed to independently treat animals with a human medical education and a certification, what would stop other members of the human medical community from doing the same? And why wouldn’t a veterinarian be able to take certification courses and treat humans if there is no difference? The CVMA believes both of these scenarios are unacceptable and would not provide proper health care for animals or humans.

- Animal rehabilitative services are not a component of the Access to Veterinary Care issue. Access to Veterinary Care involves a segment of animal owners being unable to afford basic veterinary care for their pets- which includes sick animal and emergency care, vaccines and parasite control. It does not involve rehabilitative care for musculoskeletal injuries.
OPPOSED TO 814

Allowing Physical Therapists to Expand Their Practice to Work on Animals is Unsafe

AB 814 will permit physical therapists to open their own practices to work on all species of animals without any veterinary supervision, despite physical therapy licensure having NO animal education component.

Animal Physical Rehabilitation (APR) is the Practice of Veterinary Medicine and should be performed by veterinarians or under the direct supervision of veterinarians, as California law currently allows. California’s Code of Regulations already permits physical therapists to practice on animals under direct veterinary supervision in order to protect animals and consumers.

Physical therapists have no training on animals in their licensing curriculum; they only learn about human beings.

Having an education in human anatomy and physiology does not translate over into having enough of an understanding of all animal species to be able to practice on them without veterinary supervision.

Referral is not equivalent to Indirect Supervision and would allow physical therapists to practice on animals without veterinary supervision.

Physical Therapists have no formal training or aptitude testing in being able to address emergency conditions in animals. Unlike for their human patients, physical therapists cannot call 911 if an animal experiences an emergency while in their care. To “refer” to them without a veterinarian supervising their daily operations puts pets and their owners at risk and is not the equivalent of supervision that occurs in veterinary practices.

Certification is inadequate to permit the unsupervised practice of veterinary medicine

After a mere couple of weeks completing a certification course that focuses on dogs and that involves mainly self-study, AB 814 will allow physical therapists to open their own practice and work on all species of animals without veterinary supervision. Certification programs have no standardization, no aptitude testing, no regulatory oversight, no continuing education requirement, and no authority to “fail” students.

The veterinary profession has adequate training in APR and provides services at hundreds of veterinary hospitals throughout California.

There are currently 13,082 licensed veterinarians in California- all of whom have knowledge, skill, ability and experience in rehabilitating sick or injured animals. Within the population of veterinarians in California, there are nearly 40 veterinary practices throughout the state that center their focus solely on animal rehabilitation. In addition, California is home to 15 veterinarians who specialize in Sports Medicine and Rehabilitation through advanced board diplomacy.

AB 814 is a repeated attempt to expand physical therapist scope of practice to animals. It does not solve a problem, it creates one by putting animals and consumers at risk.