



**Maryland
Department of Agriculture**

Office of Marketing, Animal Industries and Consumer Services

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*State Board of Veterinary
Medical Examiners*

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Maryland Department of Agriculture

Legislative Comment

Date: March 29th, 2024

BILL NUMBER: HB 1097

SHORT TITLE: State Board of Veterinary Medical Examiners - Veterinary Technicians and Veterinary Assistants

MDA POSITION: SUPPORT WITH AMENDMENTS

The State Board of Veterinary Medical Examiners (SBVME) supports the amended language of Section 1 in the proposed HB1097. The Board greatly appreciates the clear definitions for each degree of supervision, which is an area in need of clarification. The Board also appreciates the bill's added definition of veterinarian assistants and its description of the specific healthcare tasks that may be delegated to veterinary assistants and veterinary technicians under specified levels of supervision. The bill's sponsor has worked with all parties to fine tune these duties in a way that will elevate the profession of Registered Veterinary Technician and support hospital operations.

During the discussions, the bill's sponsor confirmed that Section 2, regarding an alternative licensing pathway, was intended to be removed during the amendment process in the House Subcommittee. Unfortunately, this amendment did not make it into the final draft of the Bill before it crossed over.

The SBVME's current regulations in COMAR 15.14.13.03B (discussed below), already offer an alternative pathway for practicing veterinary assistants who have not graduated (or are not candidates for graduation) from a veterinary technology program approved by the AVMA to become RVTs. The SBVME's existing similar pathway for veterinary assistants to become licensed is based on clinical experience. Veterinary assistants who have not graduated from an accredited Veterinary Technology program can apply to become RVTs by submitting the following:

- a. A transcript showing they have received any associate degree including the following courses:
 - i. Biology I;
 - ii. Biology II;
 - iii. Microbiology;
 - iv. Chemistry;

- v. Anatomy and Physiology I; and
- vi. Anatomy and Physiology II. (Does not require a full Veterinary Technicians/Technology Degree)
- b. Proof of 10,000 hours of work experience as a technician. (4.5-5 years working full time)
- c. A Skills Assessment completed by a Licensed veterinarian (Similar to the recommendations from a practicing veterinary practitioner)
- d. 24 hours of Veterinary Technician Continuing Education
- e. Proof of 24 hours of experience at an emergency facility.

The pathway currently described in Section 2 of HB1097 would put a significant burden on the State Board of Veterinary Medical Examiners staff and likely be used very infrequently in the limited amount of time that it would be in effect. The Board would need to draft new regulations creating the pathway, submit work orders through the Department of Information Technology (DoIT) for creating the alternative pathway, and go through the testing and evaluation process of the new application. This would require several months' worth of work assigned to a minimal staff with an already increasing workload, including the need to adjust the existing regulations that would be required in Section 1 of HB1097. It would also require significant effort and work orders to close this pathway in 2027 when the pathway is set to expire.

The Board also believes that despite the significant effort that would be required to implement the pathway it would impact very few constituents. The alternative pathway would require a person to have been previously licensed and/or credentialed in another jurisdiction and then move to Maryland and work under a Maryland Veterinarian's supervision as an assistant for 2 years before they could get a letter of recommendation submitted for their application to become a Registered Veterinary Technician. We believe that there would be very few individuals that would qualify for this pathway. Many states do not license individuals through alternative pathways so those individuals would already be required to have graduated from a Veterinary Technology program and may use that path. Of those that do come from states with alternative pathways, many would have the 5 years of required experience from the state they are relocating from and opt to be Registered in Maryland through the existing pathway, rather than wait two years working as an assistant to be able to get the letter of recommendation.

In summary, the State Board of Veterinary Medical Examiner's hopes for a favorable report to HB 1097 with an amendment to remove Section 2 requiring a temporary alternative pathway be created.

Sincerely,

A handwritten signature in black ink, appearing to read "Nathaniel Boan". The signature is written in a cursive style with a large initial "N" and a long, sweeping underline.

Nathaniel Boan
Executive Director
Maryland State Board of Veterinary Medical Examiners

