

February 23, 2018



Ethan Mathes, Licensing Manager
Veterinary Medical Board
1747 N Market Blvd.
Sacramento CA 95834

Dear Mr. Mathes:

Re: Proposed Emergency Regulations

Our association has serious concerns regarding the proposed emergency regulations.

Outlined below is a summary of our concerns:

1. The VMB states that it estimated 10,000 VACSPs were likely to be generated in 2016/17 but only 3665 have been issued as of January 2018. CaRVTA always asserted that these estimates were way too high, with a more realistic number being 1 VACSP per premise, if that. The VMB also requested 5.5 positions to handle the larger VACSP program and has since prepared a Budget Change Proposal to make those positions permanent based on the complexity of application review. This means that with a fee of \$50 and a population of permit holders that is significantly less than anticipated, the program is not fiscally solvent and is being subsidized by other licensing fees, e.g., veterinarians, RVTs and premise permits. Since the Board is in such dire straits, why hasn't the Board requested a fee increase for the VACSP program along with all the other fee increases since this program is clearly not generating the income anticipated?
2. RVTs were told that the cost of the California RVT Exam would most likely go down when we transitioned to using the national examination (VTNE) and the California exam became just a law exam. Instead, the VMB is proposing increases in the application *and* exam fees. The higher fees are due in part to the convoluted process that OPES has imposed on the Board for a simple law exam for RVTs. One cost saving measure for the VMB would be to ask the American Association of Veterinary State Boards (AAVSB) to include a few law questions on the VTNE for California RVT candidates and to then create a mail out or electronic law exam similar to the one used for veterinarians. The high costs associated with preparing a law exam for RVTs who work only under supervision of a veterinarian are unwarranted.
3. Application and exam fees were already too high for RVT candidates who usually make a relatively low wage. Prior to the transition to the VTNE in 2014, it cost RVT candidates \$300 to apply for and take the licensing examination. It now costs candidates a total of \$615, a 105% increase. The proposal adds another \$50, raising the fees to candidates by 121% over the prior costs. The Board states in its request that there is no significant impact on licensees or businesses; however, a significant number of RVT graduates already opt out of taking the licensing exams due to cost, which has a significant impact on the potential RVTs and the veterinarians trying to hire them.
4. CaRVTA has alerted the VMB about our concerns over high fees for RVTs and its impact on the profession for years. We included this issue in our most recent Sunset response. The only response we have seen from the VMB is fee increases.
5. ***There are other options than the ones proposed by the VMB. Additional fees should be paid by the hospitals that generate the income, not RVT candidates. Raising the Premise Permit fee by an additional \$12 per year would generate the same amount of revenue as the \$25 increases on RVT application and exam fees.***

We believe that the fee increases on RVT candidates as proposed would be a serious barrier to licensure and *reduce*, not enhance the VMB mission of consumer protection by reducing the number of RVT candidates. The VMB has other options to improve its financial condition, including insuring that all staff positions are being fully productive, reviewing the cost effectiveness of the RVT exam process, and insuring that each program within its jurisdiction is funded appropriately. If fees must be raised, the VMB should raise them for all license categories, including VACSPs and premises that can afford them rather than for RVT candidates who cannot.

Yours truly,

Nancy Ehrlich, RVT
Regulatory/Legislative Advocate, CaRVTA
cc: OAL
Cheryl Waterhouse, Board President