



March 1, 2021

Ms. Lorelei Walker  
Program Manager  
Veterinary Board of Governors  
Washington State Department of Health  
P O Box 47852  
Olympia, WA 98504-7852

Dear Ms. Walker,

The National Association of Veterinary Technicians in America (NAVTA) expresses its concern and opposition to the current proposal by Cascade Veterinary Clinics to establish an apprenticeship program for Licensed Veterinary Technicians.

As you are aware, legislation was passed to remove the on-the-job (OTJ) pathway to licensure in Washington. The Washington State Veterinary Medical Association (WSVMA) agreed that the removal of the OTJ pathway was necessary in the veterinary technology profession because of the profession's rapid advancement that demands ever-increasing levels of education and knowledge to keep up with the demands of the role.

At one time, many professions, including physicians, were trained through apprenticeship and the OTJ pathway. This changed over time as it was realized that a formal education provided a better base of knowledge, and a better base of "why," for physicians to be able to treat their patients. This same thought process has applied to nurses, veterinarians, and now veterinary technicians.

NAVTA has been working to elevate the status of the veterinary technician to match the skillset obtained through formal education. With that, NAVTA's goal is to establish standard, minimum criteria across the country. This minimum standard includes two aspects: (1) graduation from an AVMA-accredited program to provide graduates with the necessary base knowledge, and (2) passing the Veterinary Technician National Exam (VTNE) to demonstrate graduates possess that knowledge. Given the expected skill set of today's credentialed veterinary technician, we feel this is the only way to ensure public health and safety for our pet population and, in some instances, the public.

NAVTA is well aware of the technician shortage that is being seen across the United States. We feel strongly that elevating the profession is the answer to both bringing more individuals into our profession and, more importantly, keeping them in the profession. Recent studies have shown that Veterinary Technicians leave the profession primarily because of low wages and lack of respect. Reintroducing a pathway that does *not* meet the same educational criteria as currently exists acts to perpetuate the current issues we already face.

In addition to lacking AVMA accreditation, the Cascade Veterinary Clinics proposal is deficient in other areas that concern NAVTA. Specifically:

- The Cascade Veterinary Clinics proposal and supplemental documentation purport they are in alignment with the Committee on Veterinary Technician Education & Activities (CVTEA). NAVTA disagrees with this assertion. The CVTEA requires that all graduates are taught and are deemed competent in over 300 [Essential Skills](#). The outline provided in the Cascade Veterinary Clinics proposal does not align clearly enough with those skills.
- While the Washington State Apprenticeship and Training Council has expertise in administering apprenticeships, they do not possess expertise in the field of veterinary medicine. From the proposal, it appears Cascade Veterinary Clinics will be developing at least some of its own curriculum content. Part of being an AVMA-accredited program means that the program curriculum and facilities are reviewed regularly by an objective outside party. There is no clear explanation of who, if anyone, would review or oversee the Cascade Veterinary Clinics content.

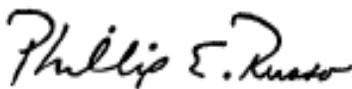
The rationale for establishing this apprentice program is that it will help relieve the shortage of veterinary technicians in Washington. However, the proposal itself states there can be only one (1) apprentice for each journey-level employee (here, a veterinarian or licensed veterinary technician). This will hardly alleviate or positively impact the overall state shortage in any meaningful way.

It is also stated in a letter from Cascade Veterinary Clinics that they have the capacity to employ 15 veterinarians and hope to have 15 licensed veterinary technicians. Even at full capacity, this is only 30 apprentices at any one time and, again, hardly alleviates the shortage issue. Making matters worse for Cascade Veterinary Clinics is the reality that at this time they only have six (6) licensed veterinary technicians, which reduces the number of possible apprentices to a current maximum of 21. Again, this will hardly alleviate or positively impact the overall state shortage in any meaningful way.

NAVTA respectfully suggests that Cascade Veterinary Clinics use the time and money needed to start this new apprenticeship program to establish a pathway for their veterinary assistants to attend an established online Veterinary Technician program, just as other veterinary practice groups have done. While this will not solve the statewide shortage either, it will help alleviate Cascade Veterinary Clinic's shortage and elevate the role of the licensed veterinary technician in the process.

NAVTA strongly opposes the current proposal by Cascade Veterinary Clinics and requests that it be rejected by the Veterinary Board of Governors. NAVTA further requests that any future plan, by Cascade Veterinary Clinics or any other entity, be required to meet *all* CVTEA requirements and that the program be reviewed with the rigor of an AVMA-accredited program.

Sincerely,



Phillip E. Russo  
Executive Director