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HOUSE OF REPRESENTATIVES  
COMMONWEALTH OF PENNSYLVANIA  
HARRISBURG

2863.

October 18, 2010

Mr. Kim Kaufman, Executive Director  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

RE: State Board of Veterinary Medicine  
Proposed Regulation 16A-5718: Dentistry Procedures

Dear Mr. Kaufman:

On behalf of the House Professional Licensure Committee, we are submitting the following comments on proposed Regulation 16A-5718: Dental Procedures from the State Board of Veterinary Medicine:


1. The Committee recommends that the caption of §31.31, Animal technicians, in the table of contents for Chapter 31 be changed to "Scope of practice". Act 167 of 2002 deleted the definition of "animal health technician" from the Veterinary Medicine Practice Act, Act 326 of 1974 although some statutory references remain.
2. The Committee questions why the series of terms certified veterinary technician (CVT), veterinary technician specialist (VTS) and veterinary assistant (VA) in the descriptions in several of the section names is not consistent when it came to developing §31.31a(a) Certified veterinary technicians: §31.31a(b) Veterinary Assistant and §31.31a (c) Veterinary technician specialist (VTS). Because a VTS can provide additional ancillary dental services to both a CVT and VA, it would be logical to preserve the series by reversing subsections (b) and (c). A VA provides less dental service than either the CVT or VTS.
3. The Committee requests that the Board differentiate more specifically the education/training and experience for a CVT, VTS and VA in performing the described dental services.
4. The Committee questions whether the dental services ascribed to each of them is appropriate; for example, should veterinary assistants be performing veterinary dental

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services other than cleaning? Should veterinary technician specialists be performing surgical extractions?

5. The Committee recommends that the term "companion animal" which is used in §§31.31 and 31.31a either be defined or explained. §31.31(a) states that the intended scope of this subsection is both large and small animal practices; however, equines are excluded. A definition or explanation of "companion animal" will eliminate vagueness, ambiguity and confusion.

Sincerely,

  
Michael P. McGeenan  
Chairman, House Professional Licensure Committee

  
Julie Harhart  
Republican Chairman