

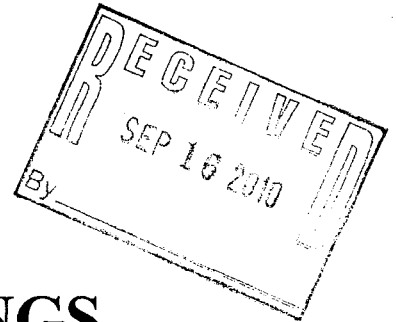


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# PROPOSED RULEMAKINGS

## STATE BOARD OF VETERINARY MEDICINE

[49 PA. CODE. CH. 31]

**Dental Procedures**

[40 Pa.B. 4970]

[Saturday, August 28, 2010]

Comments on above proposal by Barbra Karner, VMD, Medical Director, Vet Tech Institute, Pittsburgh, PA:

I agree that more clarity is needed to differentiate what procedures untrained vs. trained vs. advanced trained personnel can perform on an animal, especially in the area of dentistry. I do not have any issues with the section regarding VTS permissible procedures. However, if you are going to establish levels of function in a veterinary hospital for veterinary assistants (with little or no training) and technicians, I disagree with the allowable procedures for a veterinary assistant. I feel that veterinary assistants should be restricted to scaling, polishing and fluoride application. How can a veterinary assistant without training in anatomy properly perform charting or dental radiographs? Extraction of loose teeth seems benign enough for an assistant, however, an elevator in the wrong hands can create significant complications and should not be used by untrained persons. Also, more clarification should be placed somewhere on anesthesia. I understand that there is verbiage on anesthesia use and monitoring, but specific wording should be included as it pertains to dentistry. Who would be monitoring the anesthesia while the assistant is performing this procedure? Is an untrained assistant qualified to monitor the patient on his or her own? If this is to be done under direct veterinary supervision, how likely is it that the veterinarian is closely monitoring the animal? In my opinion, it should be clearly stated that during said procedure a veterinarian or CVT must be monitoring the patient.

This clarification is necessary to protect the interest of the public. When an animal is presented for what can be a complicated procedure, one should be able to expect that a qualified person will be performing such a task, not someone with no formal training. I realize there are many areas of veterinary medicine that could use additional clarification such as this. However, if we are to increase



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the standard of veterinary care in this state, we need to start somewhere. The line between veterinary assistants and certified veterinary technicians needs to be further defined than what is currently considered acceptable. In my experience, many veterinarians are expecting this to happen at some point and are encouraging their personnel to acquire proper certifications. The public often does not realize that persons without formal training are performing procedures on their pets, which are increasingly considered members of the family. Increase reliance on trained personnel makes good business sense and will only increase the standard of care for our patients.

Respectfully Submitted,



Barbra Karner, VMD  
Medical Director  
Vet Tech Institute

