

advancing animal welfare and human health while ensuring the vitality of the profession

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September 24, 2010

Department of State
Bureau of Professional and Occupational Affairs
Attn: Teresa Lazo, Assistant Counsel
P.O. Box 2649
Harrisburg, PA 17105-2649

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IRRC
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Re: 16A-5718

Dear Teresa:

On behalf of the Pennsylvania Veterinary Medical Association (PVMA), I thank you for the opportunity to provide comments on regulation, 16A-5718 regarding dental procedures. Our Legislative and Regulatory Affairs Committee reviewed the regulation and PVMA members also had the opportunity to submit comments to our association.

We commend the State Board of Veterinary Medicine on their efforts to clarify what is within the scope of practice for certified veterinary technicians (CVTs), veterinary assistants, and veterinary technician specialists (VTSs) in the area of dental procedures. Across the country, the practice of veterinary medicine related to dental procedures has come under fire so efforts to clarify what is allowed and by whom is laudable. We also appreciate the efforts to replace "non-certified employee" with "veterinary assistant" and bring it into alignment with commonly accepted terminology within veterinary practice.

In relation to the actual scope of practice outlined, according to PVMA member and Professor of Surgery and Dentistry at the University of Pennsylvania's Department of Clinical Studies in the School of Veterinary Medicine, Collin Harvey, BVSc, FRCVS, DipACVS, DipAVDC, the recommended regulations go too far in permitting Veterinary Technician Specialists to perform surgical extractions. He advises that using the VTS qualification as a way of separating who may surgically extract and who may not has no basis in the training requirements of the Academy of Veterinary Dental Technicians (AVDT), the NAVTA-approved dental technician specialist organization. In fact, AVDT trainees are not required to learn how to surgically extract (because it is illegal for a technician to extract teeth in some states), so they are not tested on this during the AVDT examination. Based on Dr. Harvey's expertise and recommendations, we would encourage 'surgical extraction' and 'sectioning of teeth' be removed from the VTS section.

In addition, we are surprised by the minor differences in scope of practice of a CVT and a VA. Our interpretation is that there are 2 differences: 1) that a veterinarian must examine the animal and instruct the VA to continue whereas a veterinarian consults with the CVT and 2) that a CVT can suture the extraction wound. Given the formal and advanced education and certification of a CVT, it is somewhat concerning that more value is not put on these qualifications in relation to the designation of duties.

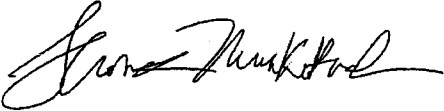
Additionally, we raise the question of whether or not dental charting begin to cross into the area of diagnostics. Our interpretation of charting includes a measurement of the sulcus; identifying fractures, chips, and caries; and grading the extent of calculus formation, gingivitis, and periodontal disease. While a CVT may ably perform these duties under a veterinarian's direct supervision, we are concerned about allowing these judgments to be made by a VA.

In addition, we highly recommend that the term "companion animal" in §31.31 and 31.31A be defined because if "companion animal" remains undefined, it makes interpretation vague and subjective. If the intent was to limit the scope of practice outlined for CVTs, VAs, and VTSs to animals such as dogs, cats, rabbits, pocket pets, and guinea pigs then there is no reason to exclude equines. In many areas of Pennsylvania law in fact, equines are defined

as livestock (Livestock Control Law: Act 156 of 1931, Agricultural Area Security Law: Act 43 of 1981, Humane Society Police Officer Enforcement Chapter of 22 PACS, and Insurance Company Law of 1921: Act 284 of 1921). It makes the most sense to use language that truly reflects the Board's intention such as "small animals" or specifically listed species. Because "small animals" are defined differently in various settings such as research facilities (where a small animal is a rat, mouse, or rabbit vs. dog and cat), confusion about which species should or should not be included would be evaded by specifically listing species of animals.

Thank you again for the opportunity to offer our comments. If there are any questions, please feel free to contact our Executive Director Charlene Wandzilak at 1-888-550-7862 or cwandzilak@pavma.org.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Tom Munkittrick". The signature is fluid and cursive, written over a white background.

Tom Munkittrick, DVM
President
Co-Chair, Legislative and Regulatory Affairs Committee
Liaison, State Board of Veterinary Medicine