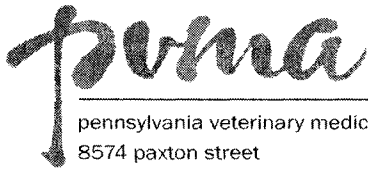


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advancing animal welfare and human health while ensuring the vitality of the profession

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Tom Garg, VMD  
Co-chair, Legislative and Regulatory Affairs Committee  
Pennsylvania Veterinary Medical Association  
8574 Paxton Street  
Hummelstown, PA 17036

November 23, 2011

Michelle Roberts  
Board Administrator  
State Board of Veterinary Medicine  
P.O. Box 2649  
Harrisburg, PA 17105-2649

Re: Proposed Rulemaking: 16A-5725: NOTICE OF ANIMAL SUPERVISION

Dear Sirs,

The Pennsylvania Veterinary Medical Association has reviewed the proposed rulemaking. We have polled our leadership and our membership. It is our understanding that the intent of the regulation is to ensure that clients are aware of any time during which their pet will be left unattended. As an organization, we are very supportive of this goal. We understand the trust that the public puts in us as a profession and the obligations that come with that trust. We believe in the importance of open and transparent communication.

Although we are supportive of the intent of the regulation, a significant proportion of our membership is uncomfortable with the regulation as written. Rather than simply requiring veterinarians to make clients aware of any time during which their pet will be unattended, the regulation requires veterinarians to provide notice to clients of the level of supervision that will be provided at all times. This goes far beyond the stated intent of the regulation. For example, if a client were to drop a pet off at 7:00am and the doctor was not scheduled to arrive until 9:00am, it would be necessary to provide notification to the client to that effect. In these situations where the pet will never be left alone, many feel that the regulation would impose an unnecessary regulatory burden.

As an organization, we would encourage the board to rewrite the rule in order to more narrowly define those situations in which notification is necessary. We would be happy to continue to work with the board toward that end.

We thank the board for their continuing efforts to improve the practice of veterinary medicine.

Sincerely,

*Tom Garg, VMD*

Tom Garg, VMD  
Co-Chair, Legislative and Regulatory Affairs Committee

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