

Informational Statement Form (R117-23)

The following statement is submitted for adopted amendments to Nevada Administrative Code (NAC) Chapter 638.

1. A clear and concise explanation of the need for the adopted regulation.

The purpose of R117-23 is to streamline, clarify, and update various regulations that were a result of a comprehensive review of the regulations contained in NAC chapter 638.

Section 1 updates the fee schedule. There are moderate fee increases to license renewals and applications, however, most fees for individual license applications and renewals have not been updated since the 1990's. Facility fees were increased fees for veterinary owned facilities from \$50 to \$200 and \$25 to \$50 for mobile facilities. Non-profit facility fees were reduced in 2010. The Board did make the change from annual to biannual renewal in 2023, which did increase the amount due at the time of renewal, but remained the same amount that would be paid over two years of annual renewals, thus did not constitute a true increase in cost.

The Board strives to operate in such a way as to reflect sound and responsible business practices that do not overburden the licensees or applicants. However, these fees are a necessary increase to maintain the operations of the Board. Additionally, due to the consistent growth within the sector, consumer complaints, and additional services the Board would like to offer to streamline operations and reduce wait times, hiring additional staff has become necessary.

Section 2 increases the maximum amount a contract may be approved by the Executive Director to an amount that better reflects the current costs of professional services.

Section 3 specifies the elements of the considerations that must be considered when determining the amount of such a fine to give better flexibility and discretion to the Board when evaluating an administrative fine.

Section 4 clarifies the ability of a veterinarian to discontinue services if subject to verbal or physical threats of violence and would not violate the ethical obligations of a veterinarian to a patient.

Section 5 updates the requirements for providing medical records to an owner in an emergency and during regular (nonemergent) treatment to better reflect the availability of records and how medical records can be better utilized during an emergency.

Sections 7-12 updates the requirements of a veterinary technician in training (VTIT) who is seeking an extension to create clearer guidelines and expectations for how and under

what circumstances a VTIT may seek and receive an extension. Section 8 provides for updated protocols for euthanasia technicians and the drugs that may be legally possessed under their licensure to perform their duties while minimizing suffering and pain. Section 13 allows for the administration of supplemental oxygen to an animal during transport to a veterinary facility as needed. Section 14 makes an update to language that was missed during a previous regulation update that established the renewal date of licenses as June 30.

Section 15-16 is meant to simplify regulations regarding euthanasia technician training by removing unnecessary language.

Section 17 establishes a specific and clear requirement for licensure by endorsement by the Veterinary Board. Section 18 defines the term 'owner' to clarify what individuals and organizations can be considered owners of a pet to clarify the term for use in other sections.

Section 18 is meant to retain the definition of 'informed consent' from a section that is otherwise being removed in

Section 19 is the result of the review required per Executive Order 2023-003 by which the Board undertook a comprehensive review of NAC 638 and found 19 paragraphs for removal from the chapter.

2. A description of how public comment was solicited, a summary of public response, and an explanation how other interested persons may obtain a copy of the summary.

Copies of the proposed regulations, notices of workshop and notices of intent to act upon the regulation were sent by U.S. mail and email to persons that had specifically requested such notice, posted online at nvvetboard.nv.gov, notice.nv.gov, the physical locations listed below.

Additionally, copies of the proposed regulations, notices of workshop, and notice of intent to act upon the regulation were emailed to each licensee and registrant that holds an active or inactive license in Nevada as well as posted online at nvvetboard.nv.gov, notice.nv.gov, the physical locations listed below.

The notice of intent to act was posted online at nvvetboard.nv.gov, notice.nv.gov, the physical locations listed below.

Grant Sawyer Building
555 E. Washington Blvd., Suite 4900
Las Vegas, Nevada 89101

Sierra View Library
4001 S. Virginia St.
Reno, NV 89502

Legislative Building
401 South Carson Street
Carson City, Nevada 89710

Clark County Library
1401 E. Flamingo Rd.
Las Vegas, NV 89119

A workshop was held at the quarterly meeting of the Board on October 12, 2023, in Las Vegas, Nevada. The meeting was held in-person and through videoconference. Attached hereto are the minutes summarizing the discussions held regarding the proposed amendments. Thereafter, December 15, 2023, Executive Director Jennifer Pedigo issued a Notice of Intent to Act Upon a Regulation, and a Public Hearing was held January 18, 2024, which incorporated in the proposed amendments the suggestions of the parties attending the October 12th workshop. Thereafter, the Board held an additional Public Hearing on February 8, 2024, to solicit additional comment on the regulation.

(a) Attended each workshop/hearing:

- October 12, 2023: 44
- January 18, 2024: 8
- February 8, 2024: 2

(b) Testified at each workshop/hearing:

- October 12, 2023: 1
- January 18, 2024: 1
- February 8, 2024: 0

(c) Submitted to the agency written comments:

Written comments are included under 'Exhibit B' that were provided prior to the October 12, 2023 workshop. No other written comments were submitted in response to the additional meetings of the Board.

3. A list of names and contact information, including telephone number, business address, business telephone number, electronic mail address, and name of entity or organization represented, for each person identified above in #3, as provided to the agency.

Please refer to the attached documents listed under Exhibit A.

4. A description of how comment was solicited from affected businesses, a summary of their response, and an explanation how other interested persons may obtain a copy of the summary.

Please refer to the response to question number 2.

5. If the regulation was adopted without changing any part of the proposed regulation, a summary of the reasons for adopting the regulation without change.

The permanent regulation was adopted on February 8, 2024, and included the changes suggested at the October, 2023 workshop as well as the changes proposed in the January, 2024 hearing.

6. The estimated economic effect of the adopted regulation on the businesses which it is to regulate and on the public. These must be stated separately, and each case must include:

- (a) Both adverse and beneficial effects; and**
- (b) Both immediate and long-term effects.**

(a) Both adverse and beneficial effects

Adverse effects: There is a moderate fee increase that the Board is proposing for licensees and applicants. Additionally, the fee schedule has been updated to reflect the biannual renewal schedule but does not increase the total fee that would have been paid over that time for renewals.

Beneficial effects: The majority of the fee increase have not been increased since the late 1990's. The increase would allow the office to hire additional staff to reduce wait times, increase public and sector outreach, increase the ability of the Board to offer additional services to the licensing space that would also support the central mission of the Board, which is to protect the public. Additional supportive services that the Board would like to offer would also serve to support retention of licensees throughout their career and retain vital workforce numbers throughout Nevada. The overall effect of these changes will clarify and ensure effective governance of the Board and its provisions within NAC 638. Additionally, the updates made to licensure by endorsement, the provision of medical records, and euthanasia drug protocols will enhance and improve the practice of veterinary medicine for the public and the licensees.

(b) Both immediate and long-term effects.

Immediate effects: The immediate effect will be a more accessible administrative chapter that will be better suited towards the public and licensees who refer to the chapter regularly for guidance in the practice of veterinary medicine. Staff would be able to better and more quickly respond to the public and licensees with questions and concerns, and more quickly process and license applicants.

Long-Term: The long-term effect is that by making the updates to the regulations the chapter will be more accessible and thereby ensure that the public and licensees are more information about their rights and responsibilities that are contained therein. By updating the licensure by endorsement, it should allow for the greater mobility of licensure in Nevada and serve to support and enhance the overall image of its governance structure. The office would be able to better support licensees and retain veterinary licensees throughout the length of a career and support and reduce burnout and turnover.

7. The estimated cost to the agency for enforcement of the adopted regulation.

There is no additional cost to the agency for enforcement of this regulation.

8. A description of any regulations of other state or government agencies which the proposed regulation overlaps or duplicates and a statement explaining why the duplication or overlapping is necessary. If the regulation overlaps or duplicates a federal regulation, the name of the regulating federal agency.

There are no other state or government agency regulations that the proposed regulation duplicates.

9. If the regulation includes provisions that are more stringent than a federal regulation which regulates the same activity, a summary of such provisions.

There are no federal regulations that apply.

10. If the regulation provides a new fee or increases an existing fee, the total annual amount the agency expects to collect and the manner in which the money will be used.

Please refer to 'Exhibit C'.

Exhibit A

Regulation Workshop 10-12-2023					Service Type	Start Date and Time	End Date and Time	Duration
Attendee								
1	+1(775) 271-1716 - PIOCHE NV	Toll	10/12/2023 9:23	10/12/2023 9:27	5m			
2	+1(386) 785-4758 - ROBERT LOOSE	Toll	10/12/2023 9:28	10/12/2023 11:38	131m			
3	+1(702) 262-7072 - LAS VEGAS VETER	Toll	10/12/2023 9:28	10/12/2023 10:31	63m			
4	+1(702) 461-1471 - PENNELL,JON	Toll	10/12/2023 11:22	10/12/2023 11:23	2m			
5	+1(702) 624-2556 - KAC CONSULTING	Toll	10/12/2023 13:40	10/12/2023 13:41	1m			
6	+1(757) 373-4449 - KAREN KOLBER	Toll	10/12/2023 9:36	10/12/2023 11:10	95m			
	+1(757) 373-4449 - KAREN KOLBER	Toll	10/12/2023 11:20	10/12/2023 11:39	19m			
7	+1(775) 781-5810 - LANGTIMM LAWREN	Toll	10/12/2023 9:35	10/12/2023 9:38	3m			
8	Abney Brown - abneybrown@yahoo.com	Video	10/12/2023 9:33	10/12/2023 9:41	8m			
	Abney Brown - abneybrown@yahoo.com	Video	10/12/2023 9:41	10/12/2023 10:18	37m			
	Abney Brown - abneybrown@yahoo.com	Video	10/12/2023 10:18	10/12/2023 11:38	81m			
9	Amanda Estrada - +1 (267) 915-9340	VoIP	10/12/2023 9:41	10/12/2023 10:33	52m			
	Amanda Estrada - +1 (267) 915-9340	Video	10/12/2023 9:41	10/12/2023 10:33	53m			
	Amanda Estrada - amandae.36@gmail.com	Video	10/12/2023 9:26	10/12/2023 9:42	17m			
	Amanda Estrada - amandae.36@gmail.com	Video	10/12/2023 9:43	10/12/2023 10:26	44m			
10	Beth Venit - evenit@aavsb.org	Video	10/12/2023 9:34	10/12/2023 9:37	3m			
	Beth Venit - evenit@aavsb.org	Video	10/12/2023 9:47	10/12/2023 9:51	4m			
11	Brenda Borelli - vegasdobes@aol.com	VoIP	10/12/2023 9:32	10/12/2023 13:58	266m			
	Brenda Borelli - vegasdobes@aol.com	Video	10/12/2023 9:32	10/12/2023 13:58	221m			
12	Christine Bewley - +1 (267) 944-9082	VoIP	10/12/2023 13:04	10/12/2023 13:59	55m			
	Christine Bewley - +1 (267) 944-9082	Video	10/12/2023 13:04	10/12/2023 13:59	55m			
13	Daniel Gutman - daniel@vetama.com	VoIP	10/12/2023 9:32	10/12/2023 11:41	129m			
	Daniel Gutman - daniel@vetama.com	Video	10/12/2023 9:32	10/12/2023 11:41	129m			
14	David Kowalek (he/ them) - davekowalek@gmail.com	VoIP	10/12/2023 9:39	10/12/2023 11:55	136m			
	David Kowalek (he/ them) - davekowalek@gmail.com	Video	10/12/2023 9:39	10/12/2023 11:55	121m			
15	Dennis Wilson - drwilsondvm@yahoo.com	VoIP	10/12/2023 9:27	10/12/2023 11:40	133m			
	Dennis Wilson - drwilsondvm@yahoo.com	Video	10/12/2023 9:27	10/12/2023 11:40	133m			
16	Dr Collins - admin@myriverside.vet	VoIP	10/12/2023 9:35	10/12/2023 10:58	84m			
	Dr Collins - admin@myriverside.vet	VoIP	10/12/2023 10:59	10/12/2023 12:10	72m			
	Dr Collins - admin@myriverside.vet	Video	10/12/2023 9:35	10/12/2023 10:58	84m			
	Dr Collins - admin@myriverside.vet	Video	10/12/2023 10:59	10/12/2023 12:10	42m			
17	Dr D - +1 (267) 662-7911	VoIP	10/12/2023 9:29	10/12/2023 9:51	23m			
	Dr D - +1 (267) 662-7911	VoIP	10/12/2023 11:03	10/12/2023 11:10	7m			
	Dr D - +1 (267) 662-7911	VoIP	10/12/2023 11:30	10/12/2023 11:32	2m			
	Dr D - +1 (267) 662-7911	VoIP	10/12/2023 12:19	10/12/2023 12:26	7m			
	Dr D - +1 (267) 662-7911	VoIP	10/12/2023 12:34	10/12/2023 12:48	15m			
	Dr D - +1 (267) 662-7911	VoIP	10/12/2023 12:49	10/12/2023 12:49	1m			

	Dr D - +1 (267) 662-7911	VoIP	10/12/2023 12:53	10/12/2023 13:01	8m
	Dr D - +1 (267) 662-7911	VoIP	10/12/2023 13:14	10/12/2023 13:36	23m
	Dr D - +1 (267) 662-7911	Video	10/12/2023 9:29	10/12/2023 9:51	23m
	Dr D - +1 (267) 662-7911	Video	10/12/2023 11:03	10/12/2023 11:10	7m
	Dr D - +1 (267) 662-7911	Video	10/12/2023 11:30	10/12/2023 11:32	2m
	Dr D - +1 (267) 662-7911	Video	10/12/2023 12:19	10/12/2023 12:26	1m
	Dr D - +1 (267) 662-7911	Video	10/12/2023 12:34	10/12/2023 12:48	15m
	Dr D - +1 (267) 662-7911	Video	10/12/2023 12:49	10/12/2023 12:49	1m
	Dr D - +1 (267) 662-7911	Video	10/12/2023 12:53	10/12/2023 13:01	8m
	Dr D - +1 (267) 662-7911	Video	10/12/2023 13:14	10/12/2023 13:36	23m
18	Estreya - +1 (267) 998-4991	VoIP	10/12/2023 9:30	10/12/2023 11:39	128m
	Estreya - +1 (267) 998-4991	Video	10/12/2023 9:30	10/12/2023 11:39	129m
19	Jared Russman - jlrussman23@gmail.com	VoIP	10/12/2023 9:31	10/12/2023 11:39	128m
	Jared Russman - jlrussman23@gmail.com	Video	10/12/2023 9:31	10/12/2023 11:39	128m
20	Jon Pennell - jonrpenn@gmail.com	VoIP	10/12/2023 11:23	10/12/2023 11:41	19m
	Jon Pennell - jonrpenn@gmail.com	Video	10/12/2023 11:23	10/12/2023 11:41	17m
21	JUSTIN DIETZ - +1(301) 467-8537	VoIP	10/12/2023 9:34	10/12/2023 9:46	13m
	JUSTIN DIETZ - +1(301) 467-8537	VoIP	10/12/2023 9:48	10/12/2023 9:51	3m
22	KAREN - karen@ffinc.org	Video	10/12/2023 9:33	10/12/2023 9:36	4m
	KAREN - karen@ffinc.org	Video	10/12/2023 10:35	10/12/2023 10:36	2m
23	Lauren - laurenralston3@gmail.com	VoIP	10/12/2023 12:07	10/12/2023 13:37	90m
	Lauren - laurenralston3@gmail.com	Video	10/12/2023 12:07	10/12/2023 13:37	72m
24	Lauren Cumings - Lcumingsvett@yahoo.com	VoIP	10/12/2023 9:37	10/12/2023 11:40	123m
	Lauren Cumings - Lcumingsvett@yahoo.com	VoIP	10/12/2023 12:00	10/12/2023 14:23	144m
	Lauren Cumings - Lcumingsvett@yahoo.com	Video	10/12/2023 9:31	10/12/2023 15:31	295m
	Lauren Cumings - Lcumingsvett@yahoo.com	Video	10/12/2023 9:37	10/12/2023 11:40	123m
	Lauren Cumings - Lcumingsvett@yahoo.com	Video	10/12/2023 12:00	10/12/2023 14:23	116m
25	Liz Brickley - +1 (267) 704-2402	Video	10/12/2023 9:43	10/12/2023 9:46	4m
	LIZ BRICKLEY - +1(216) 956-9438	VoIP	10/12/2023 9:43	10/12/2023 9:46	4m
	Liz Brickley - lizbrickley@gmail.com	Video	10/12/2023 9:39	10/12/2023 9:43	4m
26	Marilyn Mazy - mmazy94@yahoo.com	VoIP	10/12/2023 12:34	10/12/2023 14:19	104m
	Marilyn Mazy - mmazy94@yahoo.com	Video	10/12/2023 12:34	10/12/2023 14:19	105m
27	Marissa Lucido - lucido.marissa@gmail.com	VoIP	10/12/2023 12:49	10/12/2023 14:15	86m
	Marissa Lucido - lucido.marissa@gmail.com	Video	10/12/2023 12:49	10/12/2023 14:15	87m
28	Melissa M - halesrus3@yahoo.com	VoIP	10/12/2023 9:30	10/12/2023 11:39	129m
	Melissa M - halesrus3@yahoo.com	VoIP	10/12/2023 12:11	10/12/2023 12:26	16m
	Melissa M - halesrus3@yahoo.com	VoIP	10/12/2023 12:28	10/12/2023 14:23	115m
	Melissa M - halesrus3@yahoo.com	Video	10/12/2023 9:30	10/12/2023 11:39	130m
	Melissa M - halesrus3@yahoo.com	Video	10/12/2023 12:11	10/12/2023 12:26	1m

	Melissa M - halesrus3@yahoo.com	Video	10/12/2023 12:28	10/12/2023 14:23	113m
29	Raffael - +1 (267) 915-5673	VoIP	10/12/2023 10:58	10/12/2023 11:39	42m
	Raffael - +1 (267) 915-5673	VoIP	10/12/2023 12:30	10/12/2023 12:46	17m
	Raffael - +1 (267) 915-5673	Video	10/12/2023 10:58	10/12/2023 11:39	42m
	Raffael - +1 (267) 915-5673	Video	10/12/2023 12:30	10/12/2023 12:46	17m
	Raffael - +1 (267) 949-2517	VoIP	10/12/2023 12:45	10/12/2023 13:32	47m
	Raffael - +1 (267) 949-2517	Video	10/12/2023 12:45	10/12/2023 13:32	47m
30	Rebecca Goff - rgoff@humanesociety.org	VoIP	10/12/2023 9:26	10/12/2023 15:26	360m
	Rebecca Goff - rgoff@humanesociety.org	VoIP	10/12/2023 15:27	10/12/2023 15:40	13m
	Rebecca Goff - rgoff@humanesociety.org	Video	10/12/2023 9:26	10/12/2023 15:26	295m
	Rebecca Goff - rgoff@humanesociety.org	Video	10/12/2023 15:27	10/12/2023 15:40	14m
31	Robby Rodowick - rrodowick@yahoo.com	VoIP	10/12/2023 9:33	10/12/2023 13:15	221m
	Robby Rodowick - rrodowick@yahoo.com	VoIP	10/12/2023 13:15	10/12/2023 14:48	93m
	Robby Rodowick - rrodowick@yahoo.com	Video	10/12/2023 9:33	10/12/2023 13:15	177m
	Robby Rodowick - rrodowick@yahoo.com	Video	10/12/2023 13:15	10/12/2023 14:48	74m
32	Savannah Mello - savannahmello@gmail.com	VoIP	10/12/2023 12:37	10/12/2023 14:02	85m
	Savannah Mello - savannahmello@gmail.com	Video	10/12/2023 12:37	10/12/2023 14:02	86m
33	Sean Brickley - lizbrickley@gmail.com	VoIP	10/12/2023 9:46	10/12/2023 15:05	320m
	Sean Brickley - lizbrickley@gmail.com	Video	10/12/2023 9:46	10/12/2023 15:05	255m
34	Vicky - oxpictus14900@gmail.com	VoIP	10/12/2023 11:36	10/12/2023 11:39	3m
	Vicky - oxpictus14900@gmail.com	VoIP	10/12/2023 11:54	10/12/2023 13:36	102m
	Vicky - oxpictus14900@gmail.com	Video	10/12/2023 11:36	10/12/2023 11:39	3m
	Vicky - oxpictus14900@gmail.com	Video	10/12/2023 11:54	10/12/2023 13:36	71m
35	Dennis Olsen, dennis.olsen@csn.edu	In-Person	10/12/2023		
36	AJ Schaffer yswimmer29@yahoo.com	In-Person	10/12/2023		
37	Faith Adkisson 7117 Longhorn Cattle St. NV	In-Person	10/12/2023		
38	Jacqueline Lainez 520 N. Wallace St.	In-Person	10/12/2023		
39	Adriana King ammadrid86@gmail.com	In-Person	10/12/2023		
40	Kaylynn Wuiff haywuiff@gmail.com	In-Person	10/12/2023		
41	Karyme Martinez martinezkarme90@gmail.com	In-Person	10/12/2023		
42	Teagan Miles luckybennybunny@yahoo.com	In-Person	10/12/2023		
43	Lauren Rock laruenrock29@live.ca	In-Person	10/12/2023		
44	Michelle Wagner, nevadavma@sbcglobal.net	In-Person	10/12/2023	Nevada Veterinary Medical Association	

Regulation Adoption Hearing 1-18-2024

Caller		Service Type	Start Date and Time	End Date and Time	Duration
1	Patricia Weckerly - p.weckerly@gmail.com	VoIP	1/18/2024 9:04	1/18/2024 10:02	58m
2	DAHL TIMOTHY - +1(949) 579-0208	VoIP	1/18/2024 10:43	1/18/2024 10:54	11m
3	Rebecca Goff - rgoff@humanesociety.org	VoIP	1/18/2024 12:09	1/18/2024 13:28	80m
4	Timothy Dahl - timdah1@gmail.com	Video	1/18/2024 10:43	1/18/2024 10:54	11m
5	Rene Yurshunas rene_j_yurushunas@yahoo.com	In-Person	1/18/2024		
6	Sean and Liz Brickley lizbrickley@gmail.com				
7	Jen Vittori jmhylin@hotmail.com				
8	Michelle Wagner nevadavma@sbcglobal.net				

Exhibit B

Board Meeting Oct 12th

Erika Fauth <erikacfauth@gmail.com>

Tue 10/10/2023 9:14 AM

To: Jennifer Pedigo <vetbdinfo@vetboard.nv.gov>

Jennifer,

I am unable to attend the meeting on October 12th as I will be working that day, but I wanted to send a letter in favor of veterinarian ambulances/transport services (please see below).

To Whom It May Concern:

VETAMA has been helping with our lack of adequate animal transport service for the past few months and truly without them, I can only imagine the amount of animals that would not make it to an emergency/critical care facility for appropriate treatment. They have experience and offer knowledgeable care during a very crucial time. I hope that the board can see that Las Vegas needs this type of service I hope to see it flourish and become something even bigger and better as a service to our community.

Thank you for your consideration,

Dr. Erika Fauth

--

Erika C. Fauth, DVM
Associate Emergency Veterinarian
Veterinary Emergency & Critical Care
8650 W. Tropicana Ave
Suite B-107
Las Vegas, NV 89147

Rodan + Fields Independent Consultant
efauth.myrandf.com
(717)968-4125

Concerns and Recommendations Regarding Proposed Legislation for LVTs Practicing Animal Rehabilitation

Juleanne Crumley <jcrumley5203@gmail.com

10 October 2023

Nevada Board of Veterinary Medical Examiners 4600 Kietzke Lane Building 0, Suite 265 Reno, NV 89502

Dear Members of the Veterinary Board of Medical Examiners,

I hope this letter finds you in good health. As a dedicated animal physical therapist specializing in rehabilitation, I am writing to express my concerns regarding the proposed legislation that may impact the practice of veterinary technicians (LVTs) engaging in animal rehabilitation with indirect supervision. I believe that, while this initiative may have the potential to benefit animals, it is crucial to establish clear guidelines and educational requirements to ensure their safety and well-being.

I understand that the intention behind this legislation is to expand the services available to animals and to utilize the skills of LVTs effectively. However, I urge the Veterinary Board to consider the following recommendations before implementing this proposed legislation:

Further Education Requirement: In order to perform animal rehabilitation effectively and safely, LVTs should be required to obtain additional education beyond their initial veterinary technician training. This education should be specific to animal rehabilitation and may include programs like Certified Canine Rehabilitation Practitioner (CCRP) from institutions such as Northeast Seminars and the University of Tennessee, Certified Canine Rehabilitation Veterinary Nurse (CCRVN) from the Canine Rehabilitation Institute, or Certified Canine Athlete Trainer (CCAT) from the NCSU VetCe program. These specialized programs provide comprehensive knowledge and hands-on training specific to animal rehabilitation, ensuring a higher standard of care.

Change in Terminology: Consider changing the term "animal physical therapy" to "animal rehabilitation" to prevent any potential conflicts with human physical therapy regulations. This change will clearly distinguish the practice and reduce confusion or complications.

Complete Referral and Diagnosis: To ensure the safety and appropriateness of rehabilitation for each patient, a complete referral from a veterinarian should be required. This referral should include a diagnosis and specific treatment parameters, allowing for targeted rehabilitation efforts. The LVT should only proceed with rehabilitation based on this referral.

Mandatory Veterinarian Involvement: A mandatory requirement should be established, ensuring that a veterinarian must see the animal within 30 days of the initiation of animal

rehabilitation. This provision will enable ongoing veterinary oversight and allow for adjustments in the rehabilitation plan if necessary. Veterinarians possess the expertise to diagnose and treat underlying medical conditions, which is critical for a comprehensive rehabilitation approach.

Differential Diagnosis Training: To provide safe and effective animal rehabilitation, LVTs should receive training in differential diagnosis. This training will enable them to recognize potential complications or new issues that may arise during rehabilitation, allowing for timely intervention and coordination with the supervising veterinarian.

These recommendations aim to strike a balance between expanding the scope of practice for LVTs in animal rehabilitation and maintaining the highest standards of care and safety for our animal patients. It is my sincere hope that the Veterinary Board of Medical Examiners will take these considerations into account when finalizing the proposed legislation.

I am available to discuss these recommendations further, participate in discussions, or provide additional information as needed. Your dedication to ensuring the welfare of animals is greatly appreciated, and I believe that together, we can establish a framework that benefits both animals and the professionals who care for them.

Thank you for your time and consideration.

Sincerely,
Jules

Juleanne Crumley, PT, APT, CCRP NV 1835, NVAPT 010, Certified Canine Rehabilitation Practitioner

Further Concerns and Recommendations Regarding Passed Legislation for Laser Treatments completed by Veterinary Assistants

Juleanne Crumley <jcrumley5203@gmail.com>

10 October 2023

Nevada Board of Veterinary Medical Examiners
4600 Kietzke Lane Building O, Suite 265
Reno, NV 89502

Dear Members of the Board of Veterinary Medical Examiners,

I hope this letter finds you well. I would like to bring to your attention additional concerns related to the use of laser therapy by veterinary assistants.

As a dedicated animal physical therapist with extensive experience in both human and canine rehabilitation, I believe it is essential to ensure that laser therapy, a valuable modality in rehabilitation, is administered safely and effectively. Veterinary assistants, if allowed to perform laser treatments, should be subject to specific educational requirements to guarantee the well-being of animals under their care.

In addition to the recommendations I previously outlined, I strongly encourage the Veterinary Board to consider the following requirements for veterinary assistants administering laser therapy:

Education and Training: Veterinary assistants should be required to complete a formal education and training program specific to laser therapy. This program should cover indications, contraindications, anatomy, proper dosing, and informed consent procedures for laser therapy. A comprehensive understanding of these aspects is crucial to ensure safe and effective treatment.

Troubleshooting Skills: Veterinary assistants should be trained in troubleshooting laser equipment in case of malfunctions or technical issues. This knowledge is essential to prevent harm to animals and ensure that laser treatments are administered without interruption.

By incorporating these additional requirements, we can ensure that laser therapy is administered by veterinary assistants with the necessary knowledge and skills to do so safely and effectively, further benefiting the animals we care for.

I appreciate your attention to these matters, and I remain committed to collaborating with the Veterinary Board to establish regulations that prioritize the welfare of our animal patients while providing opportunities for dedicated professionals in the field of animal rehabilitation.

Thank you for your time and consideration.

Sincerely,

Jules

Juleanne Crumley, PT, APT, CCRP
NVPT 1835, NVAPT 010, Certified Canine Rehabilitation Practitioner

To whom it may concern,

My name is Michael Valle, I am an emergency veterinarian that has been working at Veterinary Emergency and Critical Care (VECC) in Las Vegas, Nevada for the past year. Unfortunately, I am unable to attend the meeting on October 12th, but I am writing this letter in support of Lauren Rock, Bristina Stanfield and Vetama. During my time at VECC I've had the pleasure of working with many talented veterinary nurses including both Lauren and Bristina. I've witnessed first hand how dedicated they are to providing the highest level of veterinary care to patients in the Las Vegas area both at VECC and with Vetama.

Before Vetama arrived in our area, owners would be in charge of transporting unstable patients to and from different veterinary practices, often times to VECC for continued care. When a patient is unstable and requires advanced care, VECC is the best place for them to be. The biggest obstacle has been getting patients to our hospital as safely as possible. Vetama has begun to tackle that issue and I strongly believe Lauren and Bristina have changed veterinary medicine in our city for the better by offering a transportation service.

I have witnessed them both, as well as their employees Renae Hart and Janet Cuik providing emergency transportation of unstable patients at all hours of the day and night. They work tirelessly to provide emergency services as effectively and efficiently as possible and this has led to lives being saved. I believe that the services that Vetama offer are vital and should be considered a standard in veterinary medicine. I hope to one day see veterinary ambulances across the country providing emergency services and stabilization to patients that need it the most.

Ambulances have provided emergency transport and services in the United States since 1865. It is about time veterinary medicine caught up and offered these services to our animal companions. I believe no two people are better suited to bring this service to our area than Lauren and Bristina. If you would like to speak with me in regards to this matter my contact information has been provided below.

Thank you for your time,

Michael Valle, DVM

mvalle@vecc24.com

914-558-0493

Jennifer Pedigo

From: Peron Graeber <peron.graeber@gmail.com>
Sent: Thursday, October 12, 2023 8:42 AM
To: therockwildlifefoundation@gmail.com; Jennifer Pedigo
Subject: Vetama Veterinary Ambulance Services

Follow Up Flag: Flag for follow up
Flag Status: Flagged

To whom it may concern,

I am writing to you to give my support of The Rock Wildlife Foundation and Sanctuary and Vetama Veterinary Ambulance services. I am an ECC veterinary resident at Veterinary Emergency + Critical Care/ Las Vegas Veterinary Specialty hospital. I believe that Vetama Veterinary Ambulance services are providing a much needed service to the community. Oxygen transport can be crucial in critical respiratory patients. As a veterinarian working in emergency medicine, their service has been crucial in allowing myself, the other emergency doctors and the LVTs to be better prepared for what is about to come through the door. Their service has helped to cut down the time it would normally take to emergently intubate, sedate and overall save the lives of the patients who come through our doors.

Without the services provided by The Rock Wildlife Foundation and Vetama, many lives of our veterinary patients could be impacted negatively.

I am happy to answer any questions about my personal experiences with this service.
Feel free to contact me anytime.

Margaret (Peron) Graeber, DVM
(720)651-2730
peron.graeber@gmail.com
Veterinary Emergency and Critical Care

From: LINDA WEATHERTON <sweetrok@aol.com>
Sent: Wednesday, October 11, 2023 9:51 PM
To: Jennifer Pedigo
Cc: Lauren (icu Nurse); bristina.stanfield@gmail.com
Subject: Animal Transportation for board meeting 10/12

Follow Up Flag: Flag for follow up
Flag Status: Flagged

To the Nevada Veterinary Board:

In regards to Section 12. NAC. Ch. 638: Animal Transportation

It is my feeling that having a transportation service in the city of Las Vegas is desperately needed and has already been utilized by many hospitals. Our goal is to provide optimum patient care. This often times requires transport of a patient to a facility that can offer more treatment modalities.

Many patients require oxygen transport to a tertiary facility that can supply more advanced care such as high flow oxygen and mechanical ventilation. Without the aid of a transport service- most patient will not make it to a tertiary hospital. It also puts undo emotional strain on owners who are trying to transport dyspneic patients elsewhere.

In my opinion, support of such a service should be considered and the state work with such a business entity to expand that service.

I feel that the updated definition of "animal transportation services" is fair in that oxygen delivery to a patient is the primary reason for most transports. I don't feel supplying oxygen therapy should prohibit a licensed veterinary technician from engaging in that service and having to risk their LVT license.

I am happy to discuss further.

Thank you.

Linda Weatherotn, DVM, DACVECC
702.262.7070
lweatherton@lvsc.com

Jennifer Pedigo

From: Amanda Patanaphan <apatnap@gmail.com>
Sent: Thursday, October 12, 2023 4:15 PM
To: therockwildlifeoundation@gmail.com; Jennifer Pedigo
Subject: Vetama Veterinary Ambulance

Follow Up Flag: Flag for follow up
Flag Status: Flagged

Good evening,

I hope this email finds you well. I wanted to submit to you my excellent experience with Vetama Veterinary Ambulance. I unfortunately and rather unexpectedly had to use their services at approximately 4:30 am on Monday (October 9) when my 100 lb dog Nox's health took such a turn that he could no longer walk or go to the bathroom. Vetama was prompt and affordable, and was able to assist Nox in getting to the emergency health clinic before it closed at 6 am. I unfortunately live by myself and am unable to pick Nox up myself. Because of Vetama's services, I was able to get Nox to the emergency clinic for a little relief before I held him for the last time. Vetama was a lifesaver when I needed it most. I hope that this will assist your consideration and I thank you again Vetama for being there when Nox and I needed you most.

Thank you,

Amanda Patanaphan

Dear Nevada State Veterinary Board Members,

We are very excited to see these new changes being presented for consideration by the board to broaden the scope of practice for our Licensed Veterinary Technicians and Veterinary Assistants.

We are in favor of our LVT's to be able to perform internal anal glands under immediate, direct, or indirect supervision as well as under the "off site supervision" with a current VCPR. We are not in favor of assistants performing anal glands at this time. If the ability for LVT's to perform anal glands internally is granted to immediate, direct, or indirect supervision, does each animal need written orders for LVT's to perform this task when the DVM is off site? Can this be a hospital wide policy?

Thank you for your consideration and any response you may have to our questions.

Sincerely,

Katie Roberts, DVM
Kristin Adams, LVT
Desirae Johnson, LVT

Exhibit C

**Small Business Impact Statement Regarding a Regulation Proposed by the Nevada
State Board of Veterinary Medical Examiners
R116-23 and R117-23**

Pursuant to NRS 233B.0608, the Nevada State Board of Veterinary Medical Examiners is required to determine whether a proposed regulation is likely to: (a) Impose a direct and significant economic burden upon a small business; or (b) Directly restrict the formation, operation, or expansion of a small business.

The Nevada State Board of Veterinary Medical Examiners, through its staff and legal counsel, have carefully examined the proposed amendments and have determined that they are no likely to (1) impose a direct and significant economic burden upon small business or (2) directly restrict the formation, operation, and expansion of small businesses.

1:

A) A description of the manner in which comment was solicited from affected small business:

- The Board conducted a workshop on October 12, 2023, to solicit public comments. The proposed laws were posted and distributed to interested parties on the Board's mailing list in conformation with Open Meeting Law.
- On 9/27/2023 an email soliciting comments from 276 veterinary facilities and 2,697 licensees was sent requesting general comments and comments regarding any impact on small business to be submitted to the Board's office or during the forthcoming workshop.

B) A summary of their response:

The Board did not receive comment regarding any impact on small business.

C) An explanation of the manner in which other interested persons may obtain a copy of the summary.

Parties interested in obtaining a copy of the summary of proposed regulations, or that wish to view the text of the proposed regulations may either access the information on the Board's website at www.nvvetboard.nv.gov or by contacting the Board office at (775) 688-1788. Any notice of regulation workshops or hearings are also posted to <https://notice.nv.gov>.

2: The manner in which the analysis was conducted:

Please refer to question 'A'.

**3: The estimated economic effect of the proposed regulation on the small businesses, which it is to regulate, including without limitation:
(Both adverse and beneficial effects; and both direct and indirect effects)**

From the input received from facilities, licensees and the public, the Board does not anticipate any adverse economic impact from the proposed amendments and additions to NAC 638 on Nevada veterinary practices. It is never the goal of this agency to increase fees and has avoided doing so for an extended amount of time, but there is need to do so at this time. Beneficially, the Board will utilize the increase in fees to bring various

changes needed to streamline and increase the efficiency of the agency as well as reduce wait times and processing of consumer complaints. The immediate effect will be processing applicant licensure quickly and increasing the ease with which documentation can be processed from outside institutions. Long term, the Board foresees an increase in qualified licensees that will be able to ensure continued high-quality care in Nevada in line with the rising need for veterinary care by the public.

Directly, the regulations will increase license mobility and reduce the wait time for potential licensees to enter Nevada to work. Indirectly, this should help increase the number of qualified veterinary licensees in practice and help alleviate the burnout and understaffing that is escalating in veterinary medicine.

4: A description of the methods that the agency considered to reduce the impact of the proposed regulation on small businesses and a statement regarding whether the agency actually used any of those methods.

From the comments received from the public, the Board does not anticipate any significant adverse economic impact on small business; therefore, methods were considered to reduce the impact of R116-23 and R117-23.

5: The estimated cost to the agency for enforcement of the proposed regulation.

None

6: If the proposed regulation provides a new fee or increases an existing fee, the total annual amount the agency expects to collect and the manner in which the money will be used.

With the overall changes that are proposed, the agency expects to collect approximately \$150,000 in revenue biannually (\$75,000 annually). The funds would be utilized to hire a new part-time investigator and an additional office administrative position or promote the Board's current part-time investigator to full-time depending on availability of staffing.

7: If the proposed regulation includes provisions which duplicate or are more stringent than federal, state, or local standards regulating the same activity, an explanation of why such duplicative or more stringent provisions are necessary.

The Board is not aware of any similar regulations of the same activity in which the Federal regulation is more stringent.

8: The reasons for the conclusions of the agency regarding the impact of a regulation on small businesses.

Please see the answer to question number 3.

I certify that to the best of my knowledge or belief, a concerted effort was made to determine the impact of the proposed regulation on small business and the information contained in this statement was prepared properly and is accurate.

Signed:



Jennifer Pedigo, Executive Director