

March 3, 2022

Representative Jim Lilly  
Chairman, Rules and Competitiveness Committee  
Anderson House Office Building  
PO Box 30014  
Lansing, MI 48909-7514

RE: Support for HB 5804 Veterinary Telemedicine

Dear Chairman Lilly:

I'm writing on behalf of the American Society for the Prevention of Cruelty to Animals (ASPCA), North America's most longstanding animal welfare organization, and our thousands of Michigan supporters. We write in strong support of HB 5804, legislation that will enable veterinarians and Michigan pet owners to continue to benefit from the safety and convenience of telehealth services for both new and existing patients.

In an era when the benefits of telemedicine technology are widely recognized and promoted, ASPCA supports policies ensuring the broadest possible access to medically appropriate veterinary telemedicine services. Under current Michigan regulations, as adopted by the Board last April, a veterinarian may begin working with a client for care of a patient using telehealth service.

Should this policy be curtailed, both professional and consumer access to the benefits of veterinary virtual care would be unnecessarily restricted at a time when we should be expanding access to care, not contracting available services.

The veterinary industry is facing a critical shortage of professionals in the workforce, and Michigan families are struggling to access care for their pets.<sup>i</sup> According to the [Access to Veterinary Care Project](#), counties across Michigan have low access to veterinary care. Based on data from the Centers for Disease Control, U.S. Census, and the American Veterinary Medical Association, the state of Michigan has a Veterinary Care Accessibility Score of 51 out of 100, with 17 Michigan counties ranking in the bottom 25<sup>th</sup> percentile. As we have seen in human medicine, telemedicine can help bridge gaps in care created by workforce shortages or other barriers to healthcare access.<sup>ii</sup> Human doctors throughout the country establish new doctor-patient relationships over telemedicine, even for infants and nonverbal children.<sup>iii</sup>

Telemedicine is a proven, safe means for delivering care, and highly educated, licensed Michigan veterinarians can be trusted to assess when an animal needs to have an in-person examination and when to ask the client to bring the animal to a clinic. Veterinary professionals such as [The American Association of Veterinary State Boards](#), [Veterinary Innovation Council](#), [Association of Shelter Veterinarians](#), and [the Veterinary Virtual Care Association](#) support enabling veterinarians to diagnose and treat both current and new patients through veterinary telemedicine at the discretion of the individual, licensed veterinarian. Modern telemedicine technology in a connected world offers veterinarians the ability to examine an animal in a home environment for many medically appropriate, common situations, such as triage, quality of life assessment, palliative or hospice care, management and monitoring of chronic conditions, behavioral consultations, nutritional consultations, dermatological conditions, parasites such as fleas, ticks, or ear mites, and more.<sup>iv</sup>

During the COVID-19 pandemic, governments relaxed longstanding state and federal rules restricting telemedicine, and according to the Veterinary Virtual Care Association, no U.S. or Canadian jurisdiction reports problems with harm to pets from telemedicine.<sup>v</sup> Ensuring broad access to telemedicine provides a public benefit

not only for professionals who wish to offer these services to both new and existing patients but also for consumers eager to obtain greater access to veterinary care. The rigorous education and Board-sanctioned requirements that Michigan veterinarians undertake to become licensed in the state prepare them to utilize professional judgement in determining whether the use of telemedicine is appropriate in the care of a particular animal or a particular condition.

Unfortunately, every year thousands of dogs and cats needlessly suffer, experience premature death, or are relinquished to animal shelters due to gaps in veterinary care access. The Access to Veterinary Care Coalition (AVCC), formed in 2016 and committed to better understanding and addressing barriers to veterinary care, conducted a national study that found one in four pet owners face obstacles in accessing veterinary care, with the “overwhelming barrier for all groups of pet owners” being “financial for all types of care (80.0% for preventative care, 73.8% for sick care, and 55.7% for emergency care).”<sup>vi</sup> A 2011 study published in the Journal of the American Veterinary Medical Association found that cost of care was cited frequently as an obstacle to veterinary care.<sup>vii</sup> While finances are a primary obstacle for all pet owners seeking veterinary care, many people live in underserved urban or rural, remote areas with few or no veterinary services available. Especially when combined, these factors can force families to make difficult decisions to forgo basic preventative care, as well as the urgent medical needs of their pets.<sup>viii</sup> Poverty, medical emergencies, lack of mobility, and geographic isolation can force even the most devoted pet owner to make dire choices. Access to telemedicine can help address these challenges and others, such as preventing unnecessary time off work for pet owners and ameliorating difficulties bringing pets to the clinic by individuals, including seniors, disabled individuals, and those without transportation.<sup>ix</sup>

While physical veterinary medical examinations are, of course, sometimes critical, responsible use of telemedicine can bring essential care to more animals. Expanding access to veterinary telemedicine holds great promise for elevating pet wellness across the geographic and economic spectrum. For these reasons, we urge the swift passage of HB 5804 so that Michigan pet owners and veterinary professionals can continue to access veterinary virtual care as needed. Thank you for your time and consideration of our views.

Sincerely,



Senior Manager, State Legislation Government Relations

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<sup>i</sup> CNN. “Covid-19 pandemic magnifies workforce crisis in veterinary field.” 20 June 2021.

<sup>ii</sup> “AVMA is Urged to Address Veterinarian Shortage.” *Today’s Veterinary Business Editorial*. January 2022.

<https://todaysveterinarybusiness.com/avma-veterinary-shortage-letter/>

<sup>iii</sup> Hickman, Renee. “Vet shortages are the latest wrinkle in the pandemic puppy boom.” October 21, 2021. *Fortune*.

<https://fortune.com/2021/10/21/vet-shortages-covid-puppies-dogs-pandemic-pets/>

<sup>iv</sup> “Staffing shortage threatens health of 75 million pets by 2030: Banfield addressed industry-wide shortage at its annual summit.” September 16, 2020. <https://www.veterinarypracticenews.com/75-million-pets-may-lose-access-to-care-by-2030/>

<sup>v</sup> Nesbitt, Thomas S., M.D., M.P.H. “The Role of Telehealth in an Evolving Health Care Environment: Workshop Summary.” 2012 Nov

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<sup>iii</sup> AMA's 2018 "50-state survey: Establishment of a patient-physician relationship via telemedicine," finds that "all states allow a physician to establish a relationship with a new patient over telemedicine." See <https://www.ama-assn.org/system/files/2018-10/ama-chart-telemedicine-patient-physician-relationship.pdf>. See also Curfman MD, MBA, FAAP, et al. "Telehealth: Improving Access to and Quality of Pediatric Health Care." *Pediatrics* Vol. 148. No 3 September 2021. American Academy of Pediatrics. <https://pediatrics.aappublications.org/content/pediatrics/early/2021/08/27/peds.2021-053129.full.pdf>

<sup>iv</sup> Veterinary Virtual Care Association. "Best Practices: Evaluation and Treatment of Patients." June 2020. Accessed online September 10, 2021 at [https://vvca.org/wp-content/uploads/2020/08/BP-Evaluation-and-Treatment\\_min.pdf](https://vvca.org/wp-content/uploads/2020/08/BP-Evaluation-and-Treatment_min.pdf)

<sup>v</sup> Cushing, Mark, J.D. "Incremental Change is a Step Forward: Smart Veterinary Reform Strategies." Veterinary Virtual Care Association 2nd Annual Summit. August 18, 2021

<sup>vi</sup> Access to Veterinary Care Coalition. "Access to Veterinary Care: Barriers, Current Practices, and Public Policy." December 17, 2018. <https://pphe.utk.edu/wp-content/uploads/2020/09/avcc-report.pdf>

<sup>vii</sup> Volk, JO et al, "Executive summary of the Bayer veterinary case usage study." May 15 2011. Vol. 238, No. 10, p. 1275-1282.

<sup>viii</sup> Access to Veterinary Care Coalition, Id.

<sup>ix</sup> Some of these findings have been consistent with research related to human medicine. See COVID-19 Healthcare Coalition Telehealth Impact Study Work Group. "COVID-19 telehealth impact study." Available at <https://c19hcc.org/telehealth>