

September 21, 2020

Chair Hank Vaupel
House Health Committee
Anderson House Office Building
Post Office Box 30014
Lansing, MI 48909-7514

Dear Chair Vaupel and Committee Members:

On behalf of the Michigan voters we represent, the undersigned coalition of organizations are writing to express **opposition** to **House Bill 6195** in the Health Committee as currently written and request that those involved in its creation, work with us to remove what we believe would be devastating impacts on Michigan's homeless animals in shelters. A hearing on this bill is scheduled before your committee on Thursday, September 24, 2020.

As you know, **HB 6195** amends the health code by defining a veterinarian-client-patient relationship; complementary, alternative and integrative therapy; an individual who is otherwise qualified by education, training, or experience to perform select acts, tasks or functions and the ability to practice under the supervision of a licensee; and provides a process for an out of state veterinarian to practice in Michigan in the case of a qualified state of emergency.

As **HB 6195** is currently drafted we believe there could be serious detrimental effects on the animals in homeless animal shelters by restricting the delegation of tasks. Fewer than 15% of Michigan's animal shelters have a veterinarian on staff. We also have concerns in making access to veterinarian care more difficult for pet owners.

The following are some of our concerns:

- Implication on shelters due to restricting delegation of tasks which would result in animals not being treated in a timely fashion:
 - Animal shelters and animal protection shelters are required to provide 24/7 care for sick and injured animals but do not have access and/or funding for 24/7 onsite veterinarians.
 - Basic shelter medicine standards require rapid diagnosis and treatment for the sake of individual animals and the health of the herd to prevent the spread of contagious disease.
 - Per standard shelter medicine protocols, all animals MUST be vaccinated on intake to keep shelter animals healthy, avoid mass disease outbreaks and old horrific practices of "depopulation". Vaccinating on intake is one of the most important practices to reducing unnecessary euthanasia in shelters and preventing the spread of contagious diseases.

- Animals who enter shelters sick or become sick while in the shelter without rapid diagnosis and treatment will experience a longer length of stay in shelter. Longer lengths of stay have a well-proven negative domino effect on animals, shelters and their staff -- creating higher costs for care and medical treatment, adding to overcrowding and kennel stress which causes more sickness, and reducing space available for newly incoming homeless animals.
 - Animals come into shelters with injuries, such as from animal cruelty, wounds from other animals and being hit by cars. They require immediate attendance to wounds and pain management to avoid unnecessary suffering.
 - Delays in treatments of injuries and disease not only cause unnecessary suffering but allow the conditions to worsen, requiring more serious and longer treatment.
 - Animals experiencing untreated pain and discomfort are more fractious and dangerous to handle, putting employees and volunteers at greater risk of injury. Shelters are required by basic standards of care, as defined by the American Association of Shelter Veterinarians, and the five freedoms to provide freedom from pain, injury, and disease.
 - More difficult access to rapid care and treatment will lead to unnecessary pain, suffering, death and disease spread. New requirements will function as an unfunded mandate by making veterinary care for shelters much more expensive.
- Michigan's unique animal cruelty law makes it illegal to deprive an animal of needed veterinary care. We should not make it more difficult and expensive to obtain care, thereby causing animal cruelty and violation of the law.
 - The state and the nation are experiencing a shortage of Veterinarians due to the limited number of veterinarian schools and the high cost of tuition. The average school loan debt for veterinarians is \$183k. <https://www.nerdwallet.com/article/loans/student-loans/average-student-loan-debt-veterinarianerinerians>
 - Nonprofits and government agencies suffer from the veterinarian shortage to a greater degree because we are unable afford to pay the most competitive wages and veterinarians with school loan debt cannot afford to take lower paying jobs. It can easily take 12 months or longer to recruit a new veterinarian.
 - Due to the increasing cost both Michigan and the nation are experiencing a crisis related to access to veterinary care. According to 2019 data nearly 40% of Americans don't have \$400 in the bank to spend on an emergency. <https://www.cnbc.com/2019/05/23/millions-of-americans-are-only-400-away-from-financial-hardship.html> This situation will only worsen as we experience the impending economic downturn related to the pandemic.

- Sick and injured owned pets already suffer from lack of treatment because their owners cannot afford to go to the veterinarian. Lack of ability to afford veterinary care is already one of the top reasons for relinquishment to a shelter. Animals are already prematurely euthanized because people cannot afford to provide preventative care and necessary treatment for sickness and injury. We, as a state, cannot afford to make this situation worse -- especially now.
- Due to the pandemic, access to care has been reduced as veterinary clinics have had to change the way business is done to keep their staff and clients safe, and to follow state executive orders and CDC guidelines. Backlogs from the Stay Home order combined with reduced capacity in order to provide more socially distanced care, such as curbside services, has caused excessive delays in both wellness and sick appointments. Spay/Neuter clinics are booking appointments well into November. Owners are frustrated and worried for their animals.
- Making veterinary care and basic wellness, such as vaccinations, more difficult for owned pets and shelters risks creating a new public health crisis. As we have learned, one of our biggest public health threats comes from zoonotic diseases, spread from animals to people. We NEED to keep the pet population healthy for the sake of shelters, animals, loving owners (who need the comfort and company of their furry companions more than ever) and for the health and safety of all communities.
- Delegation of veterinary care to qualified staff is critical to the care of all companion animals. As with human health care, and the use of nurses, nurse practitioners, and physician assistants, we desperately need to find ways to EXPAND access to care, not make it more restrictive. The extreme limitations proposed on telehealth and telemedicine in HB 6195 are in opposite to the trend across the country in both human and veterinary health care. During COVID, some states and their veterinary boards have been loosening unnecessary restrictions on the veterinary community, allowing them to use their sound education, experience and judgment to determine how to best serve their clients and their pet companions.
- With current social distancing rules per the State of Michigan and the CDC, veterinarians and veterinarian techs need to work as far apart as possible. They cannot be in small exam rooms at the same time and they must be separated in treatment and prep rooms. **Direct observable supervision is more difficult than ever right now and increasing the demand for it will threaten the health and safety of veterinary staff and human clients.**

While we oppose HB 4195 as currently proposed, our groups stand firmly ready to offer our collective expertise and assistance to craft amendments that would not bring about the likely

unintentional negative impacts we mention above. Thank you for your time and consideration on this important subject to our groups and our pet-loving community members.

Sincerely,

