

Veterinary Students in Private Practices: What They May Do

By Grant Miller, DVM, CVMA Director of Regulatory Affairs

Veterinary students often spend time in private veterinary practices as part of a distributive formal curriculum, through employment, or by volunteering. The law draws distinctions as to what veterinary tasks students are permitted to perform on patients in private practices. This article will categorize these distinctions and the laws that apply to each.

Category One: First or second-year students from AVMA-accredited veterinary schools or students from non-AVMA accredited veterinary schools

This most restrictive category applies to first and second-year students from schools accredited by the American Veterinary Medical Association (AVMA) and to all students from non-AVMA accredited schools. These students are considered to be veterinary assistants and are able to perform auxiliary health care tasks pursuant to California Code of Regulations, title 16 (CCR 16), section 2036.5. The degree of supervision over these students may be either direct or indirect when they are performing auxiliary health care tasks, but may never be less than the degree of supervision attending to a registered veterinary technician (RVT) performing the same tasks in the practice. The law also allows veterinary assistants who possess a Veterinary Assistant Controlled Substance Permit, and therefore students with the same, to administer controlled substances under the direct or indirect supervision of a supervising veterinarian. Students in this category are not allowed to perform tasks reserved for RVTs, as described in Category Two below.

Category Two: Third or fourth-year veterinary students from AVMA-accredited schools employed or volunteering at a private practice

For veterinary students who are participating at a private practice outside of a school-approved externship or formal curriculum, CCR 16, section 2027 states that a junior (third-year) or senior (fourth-year) student from an AVMA-accredited school may perform job tasks reserved for RVTs provided that the degree of veterinary supervision over the student is identical to that specified for RVTs. "RVT job tasks" are listed in CCR 16, section 2036 and include performing the following under direct veterinary supervision: inducing anesthesia; applying casts and splints; performing dental extractions; suturing

cutaneous, subcutaneous, gingival, or oral mucous membrane tissues; and creating a relief hole in the skin to facilitate placement of an intravenous catheter. Those tasks also include the administration of controlled substances under indirect veterinary supervision. They exclude, however, surgery, diagnosing, and prescribing. Those exclusions would therefore also apply to third or fourth-year students in this scenario pursuant to CCR 16, section 2027.

Category Three: Students from AVMA-accredited schools in approved externships or clinical rotations as part of a formal curriculum

To gain practical experience, veterinary students at the end of their third year will complete 12 months of "clinical rotations," usually in their school's veterinary hospital and at private veterinary practices. If a student is participating at a private practice as part of a formal curriculum (such as during a school-approved externship or as part of a distributive teaching model), California



Business and Professions Code section 4830(a)(4) applies. That provision states that veterinary licensure is not required for the following:

A student of a veterinary medical program accredited by the American Veterinary Medical Association Council on Education who participates as part of his or her formal curriculum in the diagnosis and treatment with direct supervision, or in surgery with immediate supervision, provided all of the following requirements are met:

- (A) The clinical training site has been approved by the university where the student is enrolled.
- (B) The student has prior training in diagnosis, treatment, and surgery as part of the formal curriculum.

- (C) The student is being supervised by a California-licensed veterinarian in good standing.

Students in this scenario may also perform the auxiliary health care functions and RVT functions listed in Categories One and Two, respectively, and therefore are given greater latitude to hone their veterinary skills before becoming licensed veterinarians.

Knowing which type of student is coming to the practice is important to determine what the student may do while at the practice. Understanding the applicable laws in each category will ensure compliance and reduce the chance of issues arising during this important stage of the student's educational experience. ■

This article is for informational and general educational purposes only. It is not intended to take the place of legal advice nor should it be considered as a legal interpretation. Although significant effort has been made to ensure the accuracy and completeness of the information at the time of publication, the CVMA shall not be responsible for any errors or omissions, or any agency's interpretation, application, or enforcement of the information presented herein.



Visit cvma-inline.net
or call 800.655.2862.

What is the CVMA InLine Program?