Concerns about the proposed midlevel practitioner (MLP)

Better alternatives. Investing in the comprehensive integration and advancement of credentialed veterinary technicians, technologists, and veterinary technician specialists within veterinarian-led teams offers a more sustainable and effective path forward. This includes, as some colleges and schools are already doing, prioritizing attention to the collaborative role of each member of the team during training of veterinarians and veterinary technicians/veterinary technologists, as well as exploring opportunities to support clinical experiential learning for prospective veterinary technician specialists at colleges/schools of veterinary medicine.

Furthermore, with the anticipated increase in new veterinarians due to program expansions and the creation of new schools, we believe the primary focus needs to be on maintaining high educational standards. This focus ensures the next generation of veterinarians is well-equipped to transition effectively from students to professionals, provide high-quality veterinary services, and contribute positively to society.

While educational institutions can pursue multiple initiatives simultaneously, it is essential to recognize the collective effort required to support the planned expansion of veterinary medical education. This expansion must not compromise the quality of education, the student experience, or the competence of veterinarians. The future of veterinary services and the public's trust in the veterinary profession depend on the quality and competence of its veterinarians.

Not needed. No comprehensive market analysis supports the need for an MLP. Descriptions of a veterinary MLP overlap the education, training, and responsibilities of veterinarians, veterinary technicians, veterinary technologists, and veterinary technician specialists – there is no gap to be filled.

Waning market demand. As the effects of the COVID-19 pandemic wane, veterinary practices across North America are returning to, or in some cases falling below, pre-pandemic levels of demand, undermining claims of the necessity or sustainability of an MLP in a veterinarian-led team. The proposed MLP is a solution in search of a problem — one we believe would jeopardize the care that our patients deserve and our clients expect.

False promises about access to care. Veterinarians, and the AVMA on their behalf, care deeply about ensuring access to veterinary care. Because we are committed to finding the right solutions, we believe claims suggesting an MLP would improve access to veterinary care are misguided. These claims overlook the real barriers many owners face and fail to address the fact that a significant percentage of animal owners don’t seek veterinary care because they don’t recognize its value. Those who seek care deserve nothing less than dependable, quality veterinary services. While expanding access to veterinary care is a goal we strongly support, creating an MLP is not the right solution.

False promises about quality and cost of care. Some proponents of the MLP argue the position would reduce the cost of care. However, individuals who lack the appropriate education are more likely to make mistakes, leading to misdiagnoses, ineffective treatment plans, and repeat visits, which will lead to additional suffering for the animal and increased costs for the client. Even if introducing an MLP reduces labor costs, there is no evidence to support a reduction in labor costs will be passed onto clients as lower fees.

Inadequate education. Key constituent groups have long agreed that a minimum of four academic years is essential to properly educate individuals to diagnose, prognose, and treat animals, including prescribing medications, performing surgeries, and communicating effectively with their owners, caretakers, and the public. A comprehensive education spans both basic and clinical sciences, and is coupled with rigorous practical training, ensuring that graduates possess a deep understanding of disease from molecular to population levels, and the ability to share that knowledge with colleagues and clients. They also develop the critical thinking and professional skills needed to competently address familiar and novel challenges.

We continue to have robust discussions as a profession to ensure veterinarians are educated and prepared to consistently meet these expectations. Proposed MLP degree programs, such as the "Veterinary Professional Associate" program at Colorado State University College of Veterinary Medicine and Biomedical Sciences, seek to bypass this thorough preparation by immersing students directly into clinical decision-making without first grounding them in essential basic science knowledge and vital communication skills. This approach jeopardizes the quality of veterinary services; animal health, welfare, and safety; the safety of animal-derived products; and public health. An inability to anticipate, prevent, respond, and communicate competently on animal health-related issues because of insufficient foundational knowledge undermines the public's trust in the veterinary profession.

Misleading claims about scope of practice and career prospects. The services that could be delivered by an MLP would be limited under current state and federal law. Graduates of proposed programs would be practicing veterinary medicine **without** a license, and they would not be authorized to prescribe under the jurisdiction's veterinary practice and pharmacy acts, nor the Federal Food, Drug, and Cosmetic Act, as highlighted by the Food and Drug Administration's September 4th "Dear Veterinarian" letter.[1] Even if employment prospects for MLPs are limited to shelters, the shelter would need a veterinarian on staff, and often onsite, to supervise the MLP, so the MLP's value, beyond what services a credentialed veterinary technician can already deliver, is uncertain. Prospective students who take on student debt deserve realistic expectations of employment opportunities.

No independent oversight of quality. Unlike for AVMA COE-accredited programs in veterinary medicine or CVTEA-accredited programs in veterinary technology, no programmatic accreditation or national licensing exam exists for an MLP degree program to assure students, the profession, prospective employers, and the public that its graduates have received a quality education and are competent.

[1] https://www.fda.gov/animal-veterinary/product-safety-information/veterinarian-client-patient-relationships-prescribingdispensing-animal-drugs-and-telemedicine

Misleading comparisons. Analogies are consistently drawn between the MLP and physician assistants (PAs) or advanced practice registered nurses (APRNs); however, human medicine and veterinary medicine are NOT the same. In addition to individual patients, veterinarians are responsible for food safety and public health. Accordingly, there are differences in how the activities of veterinary professionals are regulated (e.g., prescribing, disease control, animal movement). Furthermore, proposed training plans for a veterinary MLP are not comparable to the training a PA or APRN receives.

Liability minefield. Graduates of proposed MLP programs would be focused on delivering services (e.g., anesthesia, spays, neuters, dentals) that are identical to those most frequently associated with companion animal claims reported to the AVMA Professional Liability Insurance Trust (PLIT) and, as such, they would be highly vulnerable to board complaints and malpractice claims. Furthermore, the veterinarian supervising the activities of the MLP would, under current proposals, be responsible for all the MLP's acts and omissions. Three out of four veterinarians report not wanting or needing this proposed MLP position and among the reasons they cite is the considerable liability associated with hiring a person with inadequate training. These veterinarians would rather focus on better leveraging veterinary technicians, who are long-trusted members of the veterinarian-led team, and improving practice productivity.

Widespread professional disapproval. Respondents to a survey conducted by the American Association of Veterinary State Boards (AAVSB) did not support a midlevel position.[2] Likewise, respondents to a recent survey conducted by Veterinary Management Groups (VMG), the professional membership organization for practice owners, were overwhelmingly against the idea of an MLP. Both the AAVSB and the VMG reported survey respondents prefer a focus on increased utilization of veterinary technicians.[3] In addition, many reputable national organizations, including the AVMA, American Association of Equine Practitioners, American Association of Bovine Practitioners, American Association of Swine Veterinarians, American College of Veterinary Surgeons, and the American Veterinary Dental College, oppose the MLP. In Colorado, where planning for such a position is underway, the Colorado Veterinary Medical Association is staunchly opposed.

In summary, the MLP position is not needed, not appropriate, and not in the interests of quality of veterinary services; animal health, welfare, and safety; public confidence and trust; the safety of animal-derived products; and public health. Better alternatives are available, let's pursue them together.

[2] American Association of the Veterinary State Boards, *AAVSB releases Conclusions of the North American Veterinary Team Delegation*, June 26, 2024. https://www.aavsb.org/news/article/178

[3] AAVSB, VMG surveys find lack of support for midlevel practitioner | American Veterinary Medical Association (avma.org)