



STATEMENT OF CONSIDERATION  
Relating to 201 KAR 016:530

BOARDS AND COMMISSIONS  
Kentucky Board of Veterinary Examiners  
(Not Amended After Comments)

I. The public hearing on 201 KAR 016:530, scheduled for November 22, 2024, at 1:00 p.m. at the offices of the Kentucky Board of Veterinary Examiners (KBVE) was canceled; however, written comments were received during the public comment period, which closed November 30, 2024.

II. The following people submitted written comments:

<u>Name and Title</u>	<u>Agency/Organization/Entity/Other</u>
Joanne M. Hughes, DVM	LexVet Mobile Surgery

III. The following people from the promulgating administrative body responded to the written comments:

<u>Name and Title</u>
John C. Park, DVM, KBVE Chair
Michelle M. Shane, KBVE Executive Director

IV. Summary of Comments and Responses

(1) Subject Matter: National exam required to qualify for licensure

(a) Comment: Dr. Hughes – Post-1990, the VTNE is required, and pre-1990 the ATNE or a jurisdictional competency exam are sufficient. However, there is a subset of technicians licensed in California who are specifically excluded based on these requirements. Until 2014, California did not accept the VTNE for licensure - the test was deemed too easy to pass, so the California RVT exam was required.

(b) Response: The KBVE is unfamiliar with the California exam or its equivalency to the Veterinary Technician National Exam (VTNE), the qualifying exam for veterinary technicians in Kentucky. For exams taken pre-1990, the regulation allows for passage of the Animal Technician National Exam (ATNE) if taken during the years 1986 – 1989; or a jurisdictional level competency exam if taken prior to 1986. This leaves a limited window of four (4) years during which an RVT from California may not qualify for licensure in Kentucky without taking the VTNE. It should be noted that national professional exams do not test on education, rather they test on an analysis of entry-level job skills requirements for the profession. The VTNE is created using an assessment of job skills required in the national job market for veterinary technicians, which may vary from those specific to California. Kentucky requires that individuals who did not pass the ATNE in the limited four-year window (1986 – 1989) take and pass the VTNE to qualify for licensure in Kentucky. There is no limit on the number of years past graduation from an accredited school that individuals may take the VTNE, so this option is open to anyone who wishes to become licensed as a veterinary technician in Kentucky. As a result of this comment, no changes were made to the regulation.

(2) Subject Matter: Veterinary technician shortage

(a) Comment: Dr. Hughes – Endorsement candidates from California who completed the California state exam pre-1990 should be awarded a veterinary technician license in Kentucky if they successfully completed the CA exam in lieu of the VTNE required by the KBVE. This will help address the veterinary technician shortage.

(b) Response: KBVE determined that standardized requirements for all LVTs in Kentucky are essential to ensure proper training and competency of individuals licensed to practice, and to ensure both public and employer confidence in the skills and abilities of LVTs in Kentucky. Allowing a loophole to licensure for RVTs seeking endorsement licensure from one state does not support this determination. As a result of this comment, no changes were made to the regulation. Further, veterinary assistants may work in Kentucky under the employment of a licensed veterinarian and are not required to earn or maintain a license with KBVE, so these provisions do not prevent individuals from moving to and working in Kentucky pursuant to KRS 321.443.

Summary of Statement of Consideration and  
Action Taken by Promulgating Administrative Body

The public hearing on this administrative regulation was canceled; however, one written comment was received. The Kentucky Board of Veterinary Examiners responded to the comment as noted above and will not be amending the administrative regulation.