



Associated Bodywork & Massage Professionals

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September 4, 2015

California Veterinary Medical Board
ATT: Elizabeth Bynum
1747 N. Market Blvd., Ste. 230
Sacramento, CA 95834

Via Email: Elizabeth.Bynum@dca.ca.gov

RE: Public Comment: Proposed 16 CCR 2038.5, Animal Rehabilitation

Dear Board Members,

Associated Bodywork & Massage Professionals (ABMP) is the nation's largest professional association for massage therapists, with over 80,000 members, including practitioners of animal massage. We thank you for the opportunity to comment on the proposed adoption of 16 CCR 2038.5, which would define "animal rehabilitation" (AR) and limit who may perform AR treatments in California.

16 CCR 2038.5 proposes to restrict the practice of animal massage "for the prevention, cure, or relief of a wound, fracture, bodily injury, or disease of animals" to licensed veterinarians and licensed physical therapists and registered veterinary technicians working under the direct supervision of a veterinarian. Professional massage therapists – including massage therapists who have been specifically trained in the practice of animal massage – would be prevented from performing animal massage in California.

We respectfully submit that this severe restriction fails to address or rectify any real safety issue or other legitimate concern. ABMP requires that our animal massage practitioner members must have completed at least 100 hours of education in the field of animal massage. According to our records, not one professional negligence insurance claim has been submitted against any of our animal massage practitioner members in the past 15 years. The practice of animal massage by trained, professional therapists is simply not a safety risk to animals, and the evidence does not indicate any need for the professional restriction of animal massage as proposed in 16 CCR 2038.5. The proposal is a solution without a problem, and it would effectively destroy a legitimate profession that has been practiced safely in California for decades.

We respectfully suggest that the Board adopt the approach taken by states such as Colorado, which allows the practice of animal massage without a license if the person performing the animal massage:

- (A) Does not prescribe drugs, perform surgery, or diagnose medical conditions; and
- (B) Has earned a degree or certificate in animal massage from a school approved by [appropriate State agency], an out-of-state school offering an animal massage program with an accreditation recognized by the United States department of education, or a school that is exempt under [applicable statute].

Colo. Rev. Stat § 12-35.5-110(1)(f). This approach ensures that practitioners of animal massage have been adequately trained and are not practicing beyond their expertise. It protects animal safety without imposing unnecessary and damaging professional restrictions.

Thank you for your consideration of ABMP's comments. If you have any questions please do not hesitate to contact me at 800-458-2267 extension 645 or jean@abmp.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Jean Robinson". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Jean Robinson
Government Relations Director