



## NATIONAL ASSOCIATION OF FEDERAL VETERINARIANS

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Subject: LICENSE PORTABILITY

Maureen K. Ohlhausen  
Acting Chairman  
Federal Trade Commission  
Economic Liberty Task

**July 17, 2017**  
**Washington, DC**

Dear Ms. Ohlhausen,

The National Association of Federal Veterinarians (NAFV) wishes to support a policy of veterinary medical license portability across the United States and its territories.

NAFV is the recognized representative organization for veterinarians employed by the Federal Government, NAFV emphasizes professionalism and expertise in Federal Service and promotes continuing education, teamwork, and standards of excellence. We are an advocate for member veterinarians in the Federal Service.

Countrywide veterinary practice licensure would simplify emergency responses in which Federal veterinarians might be called upon to participate. The Federal agency which manages animal disease outbreaks, along with their state government partners and private practitioners from that state, will not together have the required personnel in a state when a significant animal disease outbreak occurs. Responding to an outbreak will necessitate additional personnel, such as state government veterinarians and private practitioners from other states. In the case of a disease outbreak, the processes of “federalizing” these out-of-state veterinarians, allowing them to practice in another state, is long and arduous. License portability would be far preferable. Amassing the necessary number of veterinary professionals becomes a far more difficult challenge in the face of a natural disaster. In this case, the necessary work would fall under “medical management”, and the agency referred to above does not have the authority to “federalize” veterinarians to allow them to move from one state to another to assist in disaster response. In sum, veterinary license portability is a critical tool which will be needed to manage animal disease outbreaks and natural disasters in the future.

In addition, Federal agencies which employ veterinarians have a fundamental interest in a mobile workforce, whether this be in the public health, regulatory, and military fields, or any of the multitude of other agencies which employ Federal veterinarians. It is critical for these agencies to move resources to where the work is located. Especially under regular conditions mobility is crucial for Federal veterinarians and the public they serve. Adding the option of countrywide

veterinary practice licensure would aid in filling some rural, hard to fill Federal veterinary positions.

Federal veterinarians in the majority of cases (and with approval), may do clinical practice when not conducting their regular Federal business, as there is rarely a conflict of interest. In many cases, part-time clinical practice in the private sector is an important economic consideration for a Federal family. In other cases, this part-time practice is sought to maintain professional knowledge and skills current. In addition, other family members of mobile Federal employees who are also veterinarians may wish to practice veterinary medicine in states where the Federal spouse is assigned.

Many Federal agencies currently are suffering from a shortage of veterinarians. This trend is expected to worsen due to: 1) a high attrition rate due to the average age of the current workforce, and 2) the economic advantage to entering the private practice of pet medicine over public practice. It is critical to Federal Agencies' missions to incentivize veterinarians to enter Federal service with as broad a range of professional options that increase the flexibility and desirability of working for the US Government.

Other medical fields have attempted to reduce the restrictions on cross-state practice. Current models of broader licensing, like the Interstate Medical Licensure Compact (IMLC), do not offer a solution for mobile Federal veterinarians. These compacts require that the veterinarian have a State of Principal Licensure (SPL) for a percentage of practice, Federal tax purposes, and physical residence. All these requirements limit a veterinarian's mobility and necessarily would conflict with the goal of Federal agencies for a mobile workforce.

While the Nurse Licensure Compact (NLC) is less restrictive, it applies to few states - less than the half - as is the case with the IMLC above. It too is a model which we cannot ascribe to.

Guidance from the American Veterinary Medical Association (AVMA) is limited to their policy currently under review: "Licensure, Liability and Workers Compensation Coverage for Veterinarians and Veterinary Technicians Responding to Declared Emergencies Out of State". This is intended to address the surge needs during a declared animal health emergency; while the adoption of this model may be important, its use would be very infrequent and would not address NAFV's interests for their members under regular working conditions. Additional guidance from the AVMA in the way of a Model Veterinary Practice Act, also is not easily applicable to part-time work a mobile Federal veterinarian might want, and we do not know how many states have adopted the model act.

Veterinary Practice License Portability would be a great improvement over the current situation for Federal veterinarians and we would support its implementation.

Sincerely,

/s/

John Shaw, DVM

Executive Vice President