



September 11, 2017

Maureen K. Ohlhausen
Acting Chairman
Federal Trade Commission – Economic Liberty Task Force
400 7th Street SW
Washington, DC 20024
Subject: License Portability

Dear Chairwoman Ohlhausen:

On behalf of the American Veterinary Medical Association (AVMA), this letter is being submitted to the Federal Trade Commission (FTC) and its Economic Liberty Task Force as the agency considers initiatives to enhance occupational license portability.

Over 100,000 veterinarians are working across the United States, not only providing patient care in private and corporate practice, but also employed in government, industry, academia, and uniformed services. Veterinarians must be able to effectively and efficiently serve the needs of animal health and public health across the country.

Licensing of veterinarians is under the purview of individual state boards of veterinary medicine and these boards must be able to maintain autonomy as they oversee veterinarians practicing within their jurisdiction. The AVMA's Model Veterinary Practice Act, intended to serve as a model set of guiding principles for those preparing or revising a practice act under the codes and laws of an individual state, includes a section on license by endorsement. Such endorsement allows the state's veterinary licensing board to issue a license by endorsement to a qualified applicant who meets certain requirements. AVMA also has a policy encouraging interstate recognition of licenses issued to veterinarians and credentials issued to veterinary technicians officially responding to state-declared emergencies.

We attended the roundtable discussion on July 27, 2017, and appreciated hearing from colleagues in the medical community. Many of the challenges outlined are ones faced by the veterinary profession. While not currently in place, consideration of whether and how an interstate compact might be appropriate for veterinarians is ongoing. Representatives from the National Center for Interstate Compacts will be addressing the audience of state veterinary medical board representatives during their annual meeting in September. In addition, the American Association of Veterinary State Boards recently introduced a new program, the Veterinary Application for Uniform Licensure Transfer (VAULT), which is intended to increase the efficiency of the licensure process and reduce the redundancy and time required to transfer credentials to a new state in support of licensure application.

The AVMA, founded in 1863, is one of the oldest and largest veterinary medical organizations in the world. More than 89,000 member veterinarians worldwide are engaged in a wide variety of professional activities and dedicated to the art and science of veterinary medicine. We thank the

FTC for the opportunity to comment on this issue and we would like to be involved as policies impacting the veterinary profession are considered. For questions regarding our comments, please contact Dr. Ashley Morgan (202-289-3210; amorgan@avma.org).

Sincerely,

Kent McClure, DVM, JD
Chief Governmental Relations Officer