



GUIDELINES FOR AUTHORIZED PERSONNEL IN REGULATORY PROGRAMS



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In response to the passage of House Bill (HB) 3569 in the 2013 Texas Legislative Session, the Texas Animal Health Commission (TAHC) adopted rules at its January 2014 meeting related to the creation of “Authorized Personnel” guidelines for veterinarians involved in regulatory programs. As some background information, HB 3569 amended the Texas Agriculture Code to require a veterinarian to be authorized by the TAHC to engage in an activity that is part of a state or federal disease control or eradication program for animals. As you are probably aware, regulatory disease activities have become much more complex in recent years.

Way back in the early 1980s, the TAHC began what it called a brucellosis-approved personnel certification process. That was an educational effort to ensure that all veterinarians involved with brucellosis regulatory work understood the intricacies of the disease pathogenesis, brucellosis testing process, vaccination requirements, zoonotic considerations, lab processes and general program rules. If you worked in a mixed practice in the last 50 years, you basically had no choice but to participate in the brucellosis program to serve your clients that owned cattle.

But things have changed over time. Although we still have a brucellosis program in Texas, it does not dominate a veterinarian’s time like it used to since the state is now considered free of the disease by the U.S. Department of Agriculture. There are new disease programs that have evolved however. In addition to the brucellosis program, the current TAHC disease programs that veterinarians regularly participate in include tuberculosis (Tb), trichomoniasis (Trich), equine piroplasmiasis (EP), equine infectious anemia, chronic wasting disease (CWD), pseudorabies, swine brucellosis and scrapie. Texas veterinarians also issue health certificates by the thousands, test for certification programs and export movement and provide a valuable surveillance service for the

detection of exotic ticks or pests, emerging disease conditions and foreign animal disease surveillance.

Even though the agency had established other regulatory certification statuses for veterinarians over the last few years, by statute it was only allowed to formally manage veterinary involvement in the brucellosis program. That is where HB 3569 came in to play, with the support of the TVMA and veterinarians across the state. It allowed the agency to discontinue calling its veterinary regulatory oversight “brucellosis-approved personnel” and simply rename it as “authorized personnel” without linkage to any specific disease.

To give you a perspective on the scope of involvement by Texas veterinary practitioners in today’s regulatory medicine, there are currently almost 1,900 Texas veterinarians who are “approved” to do brucellosis work by the TAHC. Another 800 are certified by the TAHC to perform Trich testing, and almost 200 are registered simply to perform Tb testing for cervids.

Although the TAHC will continue to work very closely with USDA Veterinary Services and the Texas State Board of Veterinary Medical Examiners regarding veterinary participation in regulatory programs, there are some situations that simply have fallen through the cracks. As an example, emerging disease programs such as Trich and EP are not regulated at all by USDA, and therefore their existing accreditation process does not deal effectively with the intricacies of those programs.

The creation of electronic health certificates and test charts, the number of livestock in Texas and the scope of trade with other countries all have made the regulatory world more complex than ever imagined related to veterinary involvement in Texas disease programs. HB 3569 has enabled the agency to develop a more current and relevant infrastructure of oversight to match the complexities we now face. The new rules will be generally related to training requirements, adherence to program standards such as testing processes, sample submission, form completion and

record-keeping within all TAHC initiatives, not just the brucellosis program.

The agency plan is to “grandfather” the 1,900 or so veterinarians already certified under the “brucellosis-approved” status program into the new general “authorized” designation, with no further training needed by them. The agency will continue to require new veterinary school graduates or veterinarians new to Texas to attend a short training course ensuring their understanding of regulatory programs unique to our state. We have been teaching this concept for many years already to upper-level students from the Texas A&M University College of Veterinary Medicine. This concept could possibly lead to some inclusion of regulatory disease training in the Registered Veterinary Technician (RVT) or Licensed Veterinary Technician (LVT) curriculum once that is fleshed out. There may also be a need in the future for some minimal continuing education requirements for all authorized veterinary personnel to keep up with current events. That decision will only be made through the normal working group concept that allows the agency to listen to and discuss issues with its stakeholder organizations like TVMA in advance of any rulemaking.

I want to thank the members of TVMA and its executive team for the support, advice and guidance provided during the drafting of HB 3569 and now the initial TAHC rules. The commissioners, my staff and I look forward to working with the TVMA membership as this process moves forward. We realize this is not a sprint but a marathon journey toward a more appropriate regulatory infrastructure for veterinarians in these changing times. We are all committed to a transparent, flexible, fair and simple process for veterinarians to participate in. Other states are watching Texas, and I am confident that as we move forward we can create a model program for the Texas veterinarians that those other states can emulate if they so desire. [TVMA](http://www.tvma.org)