



AKVMA
Office of the Executive
Director
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May 24, 2021

Sher Zinn
Regulations Specialist
Division of Corporations
Business and Professional Licensing
P.O. Box 110806
Juneau AK 99811-0806

Re: Section 12AAC 68.215. Veterinarian-client-patient-relationship

Dear Ms. Zinn,

On behalf of the Alaska State Veterinary Medical Association (AKVMA), I would like to thank the board of veterinary medical examiners and commend all the hard work that has been put into a very thorough and comprehensive definition of the veterinarian-client-patient relationship (VCPR) as defined in section 12 AAC 68.215 of the veterinary professional regulations. In addition, the AKVMA thanks you for the opportunity to provide comments on the proposed regulations. We are requesting some additional language be included in the regulations to ensure clarity of the regulations for a VCPR.

In the first paragraph of the definition of a VCPR, it states that the veterinarian or “an associate of the veterinarian” can establish a VCPR. We suggest clarification that the associate is another veterinarian in the veterinarian’s practice by rewording the sentence as follows: “A veterinarian-client-patient relationship exists if the licensed veterinarian or an associate veterinarian in the same veterinary practice of the licensed veterinarian with access to the medical records:”. Without clarification, it lends to some ambiguity as to whether a non-veterinarian or veterinarian outside the practice could establish a VCPR on behalf of a veterinarian or whether the associate has access to the patient’s medical records.

In section e, the inclusion of the emergency clause for our remote patients allows practitioners to help some of the most isolated and vulnerable patients while protecting the critical importance of a physical exam. The paragraph goes on to require that the veterinarian be a licensed Alaskan veterinarian which means one that is inherently familiar with the challenges of serving the rural bush communities. This is a critical component of paragraph e and we are very supportive of these efforts. At the conclusion of clause e however, it would be beneficial to reiterate that all the other requirements listed in establishing a VCPR are still applicable i.e., in the emergency clause the exemption is only for the initial physical exam. It is important to establish a precedence that medical

records must be maintained and that the other requirements of the state of Alaska's VCPR should still be strictly adhered to.

Again, thank you for the opportunity to provide comments to the proposed regulations. AKVMA appreciates the diligence and great work that has been put forth by the Board of Veterinary Examiners.

Sincerely,

A handwritten signature in black ink, appearing to read "McKayla Dick". The signature is written in a cursive style with a large, sweeping initial "M".

Dr. McKayla Dick
President of the Alaska State Veterinary Medical Association