



Initiative 145 (Veterinary Professional Associates):

The Initiative is not “internally inconsistent”:

1. The initiative does not require a VPA to obtain a “credential” of any sort. “Credentialing” is not a “key component” of the initiative.

The provision at issue only addresses the powers of the Board of Veterinary Medicine – conferring upon the Board “the power to” recognize a credentialing organization for purposes of credentialing VPAs in Colorado if it so chooses; it also states that any such credentialing organization – in the discretion of the Board – may require completion of a university-approved program and passing an exam. New C.R.S. 12-315-106(5)(j). The Board need not do any of this. And the initiative does not require any of this.

2. The only qualifications for registration as a VPA stated in the initiative are that the individual “(a) be at least 18 years of age and (b) hold a master’s degree in veterinary clinical care or the equivalent as determined by the Board.” New C.R.S. 12-315-203.7(2).

3. The only requirement for renewal, reinstatement, or reactivation of a VPA registration is that the VPA “continues to meet the requirements for registration under this part 2” (which would include credentialing only if the Board exercises its discretion to adopt a credentialing requirement). C.R.S. 12-315-206(3).

The “credentialing scheme” is not a “separate subject.”

1. The “subject” of the measure is to establish the position, qualifications, and regulation of Veterinary Professional Associates in Colorado. In doing this, we wish to confer upon the professionally qualified Board of Veterinary Medicine the power to regulate VPAs, including the power and discretion to adopt a credentialing program if (and only if) it sees fit to do so – we are not requiring that it do so. Conferral of this regulatory discretion is “necessarily or properly connected” to the establishment of the VPA position.

The titles are not incomplete or misleading:

1. OK to add “or the equivalent” or “or the equivalent as determined by the Board of Veterinary Medicine.”
2. Unnecessary but OK with us to add.
3. Unnecessary but OK with us to add.
4. Unnecessary but OK with us to add.
5. Unnecessary but OK with us to add.