



Colorado Veterinary
Medical Association

April 11, 2008

M. D'Ann Murphy
State of Colorado
Department of Regulatory Agencies
Office of Investigations
1560 Broadway #880
Denver, CO 80202

Dear Ms. Murphy:

Thank you for your letter dated February 29, 2008 in which you indicate that the Colorado Board of Veterinary Medicine has received several complaints regarding an unlicensed individual practicing equine dentistry without any supervision of a Colorado veterinarian. You asked the Colorado Veterinary Medical Association (CVMA) to respond to question of "Specifically, can an unlicensed or lay person without direct supervision of a veterinarian perform equine dentistry?"

We appreciate the opportunity to respond to this question. CVMA supports the position statements of the American Association of Equine Practitioners (AAEP) and American Veterinary Medical Association (AVMA) regarding the practice of equine dentistry. These organizations both make clear statements indicating that veterinary dentistry is in the veterinarian's unique scope of practice while recognizing that some veterinary dentistry procedures may be performed by a veterinary technician who is supervised by a veterinarian.

The AAEP and AVMA position statements are included for your reference:

American Association of Equine Practitioners – Position statement on equine dentistry

The practice of equine dentistry is an integral branch of equine veterinary medicine. This discipline encompasses all aspects of diagnosis, treatment, and prophylaxis of any and all equine dental conditions and diseases that affect the oral cavity, mandible and maxilla, teeth and associated structures. As such, it falls within the purview of veterinary medicine.

Any surgical procedure of the head or oral cavity; the administration or prescription of sedatives, tranquilizers, analgesics or anesthetics; procedures which are invasive of the tissues to the oral cavity including, but not limited to, removal of sharp enamel projections, treatment of malocclusions of premolars, molars, and incisors, reshaping of canine teeth, the extraction of the first premolars and deciduous premolars and incisors; treatment, extraction or repair of damaged or diseased teeth; periodontal treatment; and dental radiography are veterinary medical procedures and should be performed by a licensed veterinarian.

191 Yuma Street
Denver, Colorado 80223
303.318.0447 fax 303.318.0450
www.colovma.org
info@colovma.org

In states where the Veterinary Practice Act allows, the AAEP supports the use of licensed veterinary technicians under the employ and supervision of licensed veterinarians for specific and appropriate veterinary dental procedures as enumerated in that state's practice act.

American Veterinary Medical Association – Position statement on veterinary dentistry

The performance of dentistry on animals is part of the practice of veterinary medicine and is regarded as such under state veterinary practice acts. Veterinary dentistry includes the cleaning, adjustment, filing, extraction, or repair of animals' teeth, and all other aspects of oral health care in animals. Veterinary dentistry is a function of veterinary practice because it requires diagnosis and treatment, and, to be fully effective, demands extensive knowledge of anatomy, anesthesiology, pharmacology, physiology, pathology, radiology, neurology, medicine, and surgery that is part of the graduate veterinarian's training.

Supporting Statements

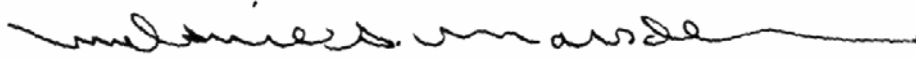
- Veterinary dentistry is an invasive practice that can have a profound impact on animal health.
- Graduate veterinarians receive adequate training in dentistry as part of the core curriculum of colleges of veterinary medicine.
- Veterinarians are uniquely qualified to diagnose, by physical examination and use of diagnostics, to address unexpected conditions or complications discovered during dental examinations and procedures, and to prescribe follow-up care.
- The practice of veterinary dentistry is dependent on correct diagnosis of dental disease as well as the recognition of other serious diseases that can mimic dental problems in animals. These include, but are not limited to, zoonotic (e.g., rabies) and reportable (e.g., vesicular stomatitis) diseases.
- Sedatives, tranquilizers, anesthetics, or analgesics are commonly used during veterinary dental procedures to provide restraint and reduce animal pain and suffering. Federal law restricts such veterinary prescription drugs for use by, or on the order of, a licensed veterinarian to ensure their safe and effective use.
- The field of veterinary dentistry is advanced through the conduct of clinical and experimental dental research. Veterinarians receive and apply this information to benefit their patients.
- Veterinary state boards and state veterinary practice acts exist to establish veterinarian accountability and provide clients with an acceptable standard of care.

Concluding Statements

The practice of veterinary dentistry should, therefore, be performed by veterinarians in accordance with their state veterinary practice acts. As with other areas of veterinary practice, veterinary dentistry requires a veterinarian-client-patient relationship to protect the health, safety, and welfare of animals.

We appreciate the opportunity to comment on this issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Melanie Marsden". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Melanie Marsden DVM
President