

Wildlife Rehabilitation Advisory Committee

June 2, 2018

Snacks and greetings 9:30 am

Meeting called to order 10:05 am

Present: Mick Cope, Facilitator

Rachel Rivera, Jenny Schlieps, Jennifer Convy, Jan White, Kelley Ward, Suzanne West, Alysha Evans, Jasmine Fletcher, Hailie Christenson, Alicia Bye, Patricia Thompson, Jason Capelli (1:45 PM)

Absent: Crystal Buckley, Jade Shaw

Resigned membership: Angela Messmer, Friends of Slim Pickens. Angie would like to be on the committee but cannot work it into her schedule. We all agreed we would miss her and the perspective of her facility.

Introductions

Mick introduced two members attending for the first time - Jasmine Fletcher, A Soft Place to Land, and Rachel Rivera, public representative, Wild Lives Found. Jasmine described her facility and animal specialties which are many small to medium mammal species and deer and elk. Rachel introduced her foundation and its activities including a planned elephant rehabilitation project in Africa. Everyone welcomed them and is glad to have them as members of WRAC.

Check-in

Everyone was happy to be diving into the meeting and going through rules one by one. Rehabilitation facilities are starting to fill up and everyone is busy with baby season!

May 4, 2018 Minutes Review

Some members already commented via email and said thumbs up; received some helpful comments. No other comments at the meeting. No questions regarding the minutes.

Minutes were approved.

Agenda Review

Agenda discussed and all agreed that the majority of the day will be dedicated to working on rules as listed in the Agenda.

Discussed grabbing another WAC if we complete the planned ones.

Ground Rules Review

Ground rules developed by the committee at the May 4, 2018 meeting were posted on the wall (we need another poster with **larger print**). Printed page of Ground Rules was distributed to each member.

Purpose: Ground Rules are for how we function inside *and* outside of this group.

Agreed: All WRAC members will respect the ground rules both in the meetings and between meetings.

Social media: Mick summarized our previous discussion of social media rules.

Agreed: WRAC materials, references, meeting notes, and relevant comments will be posted **only** on the WDFW WRAC web site. Items posted on the WDFW WRAC web site may be re-posted on members' web pages, Face Book pages, and facility web sites. Posting of additional materials or comments that relate to the WRAC on other web sites, Face Book pages, Instagram, etc. is unacceptable because it is difficult to manage the message and conversation. We must be able to manage and monitor what goes on other web pages because public or other rehabilitators not in this room don't have benefit of the detailed discussion, justifications, and facts. Even posting "we are happy to participate on WRAC" is not okay because that implies permission for posting other comments; innocuous comments could start public discussions that we cannot manage and verify. Our desire is to be constructive, not destructive.

No addition to the Ground Rules was offered by the group.

Ground Rules were approved but they are fluid and may be discussed and amended as needed.

Action Item: WDFW is working on providing an email address for public use on WRAC website.

Decision making process

At the last meeting we agreed to strive for consensus but **Sufficient Consensus is our method of decision making**. Mick reviewed what that might mean.

- **Consensus** – all agree they can live with it.
- **Sufficient Consensus** not all 100% of the members have to agree. Try to work through issues, but it is OK to have a small contingent who does not support the decision as long as it isn't going to completely impair the group from moving forward.
- **Members discussed challenges in consensus building, including participation and level of experience.** Everyone recognized the need to allow people to be heard and to encourage questions and discussion.

Satisfactory group size.

- Too small a group should not decide for the whole Committee.
- There are 16 members of WRAC. Sufficient consensus number for WRAC is 80% of **those present** at the meeting, **if** there is a quorum.

The group discussed that large and small rehabbers have different resource needs and abilities to consider when developing recommended rule changes.

Sufficient Consensus Agreements

Agreed: Testing for sufficient consensus is show of hands. If sufficient consensus is not met, proceed with discussion and work on areas of disagreement.

Agreed:

- Quorum for decision making votes is one half of the entire group plus one = 9.
- **Sufficient Consensus** is 80% of quorum;
- Record dissenting opinions.
- Smaller than a quorum carry on with discussion; record all ideas; postpone decision, agreements, and amendments.

Missing members will do homework on relevant materials and read minutes (the minutes may produce consensus without the need for further discussion); revisit at the following meeting with more discussion and final decision.

Agreed: Statements from absent members may be read at the beginning or during the relevant part of the meeting.

WAC Discussion

Group discussed each rule, draft rule changes were documented, to be finalized at a future meeting once we have all context discussions.

WAC 220-450-060 Definitions

TABLED – more efficient to revisit at the end because it ties to so many rules.

WAC 220-450-130 Records retention and reporting requirements

Define and Clarify “Record”

- There are many kinds of records and not solely about the vet visit; that’s the patient record or chart.
- Every facility will record differently, including electronic, hand written, white boards, etc...
- Home facilities summarize veterinary medical visits.
- Consider defining/standardizing acronyms because details on records can be critical (DOAs, died 24 hours, etc.)
- Consider what things should be an enforceable rule vs a guideline; strive for best practices but it everything may not need to be law; include SOPs in WAC?
- Keep record definitions broad; herd health; litters; broods
- Consider making rehabilitation records consistent with veterinary record rules, but specialized for wildlife.
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- Rules should be simple but enforceable

NWRA Minimum Standards Use in WACs

- Should we reference “most current edition” NWRA Standards in the WACs?
- NWRA Standard are intended as guidelines, caution using it wholesale because language is always changing, new editions coming out, and takes time for facilities to change, therefore give time for rehabbers to change such as “within the next 6 months.”
- WDFW would not likely interpret things so strictly.
- Caution - if NWRA Minimum Standards is adopted into law then Enforcement can enforce to the letter and inch.
- NWRA Minimum is different than striving to do the best. All should strive to provide the best above and beyond; Minimum Standards may be an excuse to degrade practice to minimum level of care.

Retention time

- Veterinary records WAC 246-933-320 (7)(e) states “All records shall be legible, readily retrievable and shall be kept for a period of three years following the last treatment or examination.”
- USFWS require the records be kept **on site**.
- Home facilities don’t have and can’t keep every medical record.
- Make rehabilitation records retention consistent with veterinary record requirements but individualize for State’s control of wildlife and wildlife rehabilitation.

- All rehabilitators should keep records for the same amount of time and should strive to be consistent and uniform with records.
- What if vet, particularly pro bono, does not keep the detailed record for the same amount of time or comply with WDFW rules; follow vet's rules?
- We may not want to make the extra hurdle for veterinarians.
- Simplify to encourage new rehabilitators

Records Inspection

- Records can be recorded wrong and takes a long time to get records to where you want them; can't be 100% accurate for every animal; problem is real time – you don't get to review and change the record.
- Record transparency is mandatory for the rights and welfare of animals therefore inspectors should be able to walk in and request records in real time, with discussion on reasonable expectations.
- Records exist for each patient but for not hour by hour, much like a hospital ER room – it's on a board.
- Every hospitalized patient should have a chart ready for inspection; records should be accurate and complete ASAP, should be reviewed and "corrected" no later than the end of the day, and ready for inspection.
- Inspector should not be able to request copies and walk out with them.
- Review and print off a couple records okay; 100 would not be okay.
- Medical records are a property of the vet not the state.
- Difference between privately owned pets and wildlife in the public trust; the state "owns" and manages wildlife therefore inspector may request any wildlife related records at any time.
- Records are inherently different between stand-alone rehabilitators and home rehabilitators. Large facilities have staff to manage records; small rehabilitators do not.
- If animal is in care it should be easy to supply the records even for smaller facilities, medical records or summaries should be on site; smaller home rehabilitators do not have the volume of patients larger ones do so it may take less time
- Train enforcement officers on record procedures and retention, time it takes to complete records, etc. Defined timeline will safeguard both parties.
- Use subject matter experts to evaluate records and to mediate discussion between parties
- Wildlife is a public resource, wildlife rehabilitation is licensed by the state. If we get complaints we must have the ability to document care and verify complaints. If there is no record, we cannot document what happened. If we can't document animals are being cared for we are not doing our job and prove facility conditions to the public. Records should indicate basic care.
- Wildlife Rehabilitation is a regulated industry like other industries licensed by WDFW.
- Larger problems need to be identified, small typos or occasionally forgotten husbandry recordings are not issues

Disease reporting

Updated disease table was distributed to the Committee

Wait for Kristin to be present for more discussion

WAC 220-450-150 Transfer, import, and export of wildlife

Importation – The person in possession of the animal gets the Certificate of Veterinary Inspection and Import Number from WA Dept. of Agriculture

Transfers - This WAC is important for appropriate medical care.

WAC 220-450-160 Possession of dead wildlife and wildlife parts.

See WAC amendments

WAC 220-450-180 Euthanizing protected, threatened, or endangered wildlife and migratory birds.

Discussion points

- Triage - Management and treatment of those animals with a better chance of release must be priority for all patients' welfare
- Not financially or humanely responsible to keep suffering or non-releasable animals alive; quality of life is more important
- More release standards needed and look at 170 Non-releasable animals
- Address euthanasia techniques, controlled substances. Insert the Dept. of Health WAC.

WAC 220-450-190 Disposing of wildlife remains

Include with new and renewed wildlife rehabilitation permit materials how to legally and healthily bury medicated or chemically euthanized carcasses.

Next Meeting Planning

Next Meeting

Friday, June 29, 9:30 – 4:30 Olympia

HOMEWORK

Review Appendix 1 RECORD RETENTION TIMELINE for decision at next meeting

Review the following complete WACs for discussion at next meeting:

Parking Lot Items

- Can Principle Veterinarians have rehabilitation records inspected at their hospitals?
- Check federal rules for feather imping, especially eagles
- Conditions for Education animals on the rehabilitation permit (this will be discussed during review of *WAC 220-450-170 Disposition of nonreleasable and habituated, imprinted, and tamed wildlife.*)

Review Section	
080	<p>Responsibilities of primary permittees and subpermittees.</p> <p>Proposal to split primary and subpermittee WACs Subpermittee definition is different than how this is applied, more detail is needed Concern that process and approval for subpermittee impedes recruitment</p>
090	<p>Permit revocation, modification, suspension</p>
100	<p>Facility requirements and inspections- On-and off-site care.</p> <p>Subpermittee section work may help clarify 2a. minimum standards – set by the Department and national/international standards (actually intended to be guidelines or best practices); how much interpretation is allowed in enforcement; how can we clarify for implementation; adopt current version of minimum standards with grace period for adopting those standards; 2d. what is “in home” care 3. offsite care Minimum Standards used as guidelines.</p>
110	<p>Releasing</p> <p>birds v mammals, migratory birds, ranges for release, pre-release conditions Questions about standards vs WAC – what’s appropriate/best for best practices, standards, processes Cervids, amphibians, reptiles – release issues related to disease transmission</p>
120	<p>Veterinary care</p> <p>Case - issues even with licensed rehabilitation veterinarians if they get a situation out of their depth; unintentional harm or resources, secondary to clinic function, veterinarian did not have the resources or expertise with a particular species and waited too long to move to a suitable facility, ultimately resulting in euthanasia or non-rehab conditions. Define initial care, stabilization, and stabilization for transport</p>

- Subject Matter Review group – review of issues; should it be a continued WRAC; should they be anonymous; WWRA?
- RCW 77.15.290 – No allowance for transfer of wildlife by public; *Rehabilitation CFR Ch.1 21.31 “...any person who finds a sick, injured, or orphaned migratory bird may, without a permit, take possession of the bird in order to immediately transport it to a permitted rehabilitator.*