

February 22, 2026

Dear Members of the Senate Ag Committee,

When money changes hands, public accountability matters!

My name is Dr. Katy Wallace. I am a licensed veterinarian, owner and founder of Sage Country Veterinary Service in Burns, Oregon. I practice in rural eastern Oregon.

Pregnancy diagnosis in cattle is a **medical diagnostic act** under Oregon law. It requires interpretation of anatomy, assessment of fetal viability, and recognition of reproductive disease. On a farm call for preg check it's not simply about pregnancy diagnosis, there are conversations about vaccine protocols, preg rates, nutrition and treatments for conditions like cancer eye, culling recommendations - it is simply the practice of veterinary medicine, and a way to maintain the client patient relationship (VCPR) legally required for prescribing rights.

However, veterinary medicine has long recognized **delegation within a VCPR** as an appropriate and safe way to extend access to care. I am requesting that rather than be adopted as written, **Senate Bill 1539-A be amended**, to allow **certified veterinary technicians** to perform bovine pregnancy diagnosis **only under direct veterinary oversight and within a valid veterinary-client-patient relationship**.

Certified Veterinary Technicians:

- Are formally educated in anatomy, physiology, and clinical technique
- Are credentialed, can be regulated, and discipline-eligible through the Oregon Veterinary Exam Board
- Work under veterinary supervision
- Do not independently diagnose, prescribe, or treat

This makes CVTs fundamentally different from lay technicians or unlicensed palpators.

Rural Oregon does face access challenges. It is a practical and safe workforce solution to allow **CVTs to perform pregnancy diagnosis under veterinary direction**. This approach **supports rural veterinary practices**, rather than undermining them, by keeping pregnancy diagnosis within the veterinary team.

- Expands service capacity
- Improves scheduling flexibility for producers
- Preserves medical oversight
- Maintains accountability and licensure standards

Any allowance for CVTs should include **clear statutory guardrails**, including:

1. Pregnancy diagnosis may only be performed:

- By a licensed veterinarian **or**
  - By a **certified veterinary technician acting under delegation**
2. A valid **veterinary-client-patient relationship** must exist.
  3. The supervising veterinarian must:
    - Be responsible for diagnosis interpretation
    - Make treatment and prescribing decisions
    - Maintain medical records
    - Assume professional liability
  4. **Independent or for-hire pregnancy diagnosis outside veterinary supervision should remain prohibited.**

This preserves:

- Animal welfare
- Food safety
- Drug stewardship
- Clear accountability

It is critical for food safety and drug stewardship to remain protected and pregnancy diagnosis is frequently linked to

- Extra-label drug use under AMDUCA
- Estrus synchronization protocols
- Prostaglandin and GnRH use

CVTs cannot prescribe or initiate treatment independently. Keeping pregnancy diagnosis within a veterinary-directed framework ensures:

- Proper withdrawal times
- Residue avoidance
- Regulatory compliance

### **These safeguards are essential in food-animal medicine, why this matters**

Allowing unsupervised, non-credentialed individuals to diagnose pregnancy for income:

- Erodes the veterinary practice act
- Increases liability and welfare risk
- Undermines rural veterinary sustainability

Allowing **certified veterinary technicians under veterinary supervision**, by contrast:

- Strengthens the workforce
- Preserves professional standards
- Improves access without sacrificing safety

In closing, pregnancy diagnosis in cattle should remain a veterinary medical service. However, **certified veterinary technicians working under a licensed veterinarian within a VCPR provide a safe, effective, and practical path forward.**

I respectfully urge the Committee to amend Senate Bill 1539-A accordingly and to reject language that would allow unsupervised, non-credentialed pregnancy diagnosis for compensation.

Thank you for your time and consideration. I am happy to answer any questions.

Dr. Katy

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