

Description of Requirements and Conditions for Unlicensed Individuals Assisting Rehabilitators with Wildlife Care

CPW Chapter 14 Regulations allow fully-licensed Wildlife Rehabilitators and Provisional Wildlife Rehabilitators to use unlicensed individuals to help with wildlife care as long as certain requirements and conditions are met (Regulation #1401A.6.)

The fully-licensed Wildlife Rehabilitators and Provisional Wildlife Rehabilitators are responsible for the animal care activities and any violations by the unlicensed individuals. If the use of unlicensed people results in unacceptable wildlife care, CPW may take action to correct the problem, including restricting the future use of unlicensed individuals.

Who are Unlicensed Individuals Assisting with Animal Care?

These individuals may be volunteers, staff, interns, externs, or others who help the wildlife rehabilitation license holder at the CPW approved rehabilitation facility. An “unlicensed individual,” as the term is used in the regulations, refers to any person who has completed training provided by a fully-licensed Wildlife Rehabilitator and has been added to that Wildlife Rehabilitator’s on-site list of currently-approved unlicensed individuals to assist with wildlife care at the rehabilitator’s CPW approved rehabilitation facility. At a minimum, training for unlicensed individuals must include, but is not limited to, the following:

- Ethics of rehabilitation
- Rehabilitation regulations
- Safe capture and handling of the applicable species
- Diet and nutrition of the applicable species
- Common wildlife diseases and parasites, including zoonotic diseases
- Any other training necessary for the activity to be animal care performed, such as transportation, release, first aid or administering medications (emergency only).

Additionally, these individuals are not permitted to engage in certain animal care activities, including the following:

- Not allowed to supervise any other unlicensed individual.
- Not allowed to provide care for any skunk or bat.
- Not allowed to provide medical care or euthanize any animal, except, when directed by a fully-licensed Wildlife Rehabilitator or a veterinarian, an unlicensed individual may provide emergency first aid, emergency stabilization care, continuation of prescribed treatment or emergency euthanasia.

What Recordkeeping is Required for Rehabilitators Using Unlicensed Individuals to Assist with Animal Care?

Rehabilitators must maintain current records of the unlicensed people assisting with wildlife and submit those records with the annual rehabilitation license renewal. For each unlicensed individual, the records must include:

- Name
- Address
- Phone
- Record of rehabilitation training and dates completed
- Dates, times, and activities worked

The required reporting forms are provided on CPW's website.

What Training is REQUIRED by Regulation *Prior* to the Unlicensed Individual Assisting with Animal Care?

Rehabilitators already provide orientations about rehabilitation and instruction on specific tasks to unlicensed people who will be helping them with animal care at their facility. This has not changed. Rather, when the Wildlife Commission changed the rehabilitation regulations related to the use of unlicensed people helping with animal care in May, 2009, they expanded and clarified the requirements to include specific training and other things. While rehabilitators are required to train on the topics listed below, the training is not intended to be limited to these topics or activities.

Training can be delivered in different ways. Some rehabilitators who involve just one or two unlicensed people with animal care may ask the person to read some reference materials and then provide training one-on-one, whether it is demonstration, practice or whatever. Other rehabilitators who use more unlicensed people may find it more efficient and effective to conduct more formal training sessions with handouts for small groups and then follow-up with individual coaching, demonstration, and skill building on specific subjects to provide the 'hands-on' practice and feedback. The training builds the skills to help the unlicensed individuals be able to use the protocols and accomplish the work whether the rehabilitator is onsite or absent.

The following describes some expectations of format and minimum content.

Ethics of rehabilitation (*Required*)

At a minimum, this includes reading the *Wildlife Rehabilitator's Code of Ethics* and discussing the items with the fully-licensed Wildlife Rehabilitator.

Note: Even though an unlicensed person may be trained on an activity, it is still the responsibility of the rehabilitator to decide if the person will be allowed to carry out that activity and to ensure that the activity performed in an acceptable manner. Thus, the rehabilitator is expected to regularly assess the unlicensed person's performance and either allow or restrict future activities.

Rehabilitation regulations (*Required*)

At a minimum, this includes reading the complete set of Chapter 14 regulations, including the accompanying Basis and Purpose, and discussing it with the fully-licensed Wildlife Rehabilitator. Based on where the rehabilitation facility is located, the name and contact information for the responsible CPW District Wildlife Manager should be provided. A rehabilitation facility that uses several unlicensed individuals per month should have the name and contact information of the District Wildlife Manager posted onsite. Unlicensed individuals who will be working with migratory birds or other protected species are required to be familiar with US Fish and Wildlife Service regulations governing rehabilitation.

The expected content knowledge and skill resulting from the required training on this topic includes, but is not limited to:

- | Types of rehabilitation licenses
- | Examples of facility requirements
- | Examples of what unlicensed individuals can do to assist rehabilitators
- | Examples of reasons that an animal may be euthanized
- | Examples of species that rehabilitator is allowed to rehabilitate
- | Recordkeeping requirements, including data for annual and daily records

Common wildlife diseases and parasites, including zoonotic diseases (*Required*)

At a minimum, this includes familiarity with common wildlife diseases and parasites, including zoonotic diseases, with an emphasis on those relevant to the species the unlicensed individuals will be working at the rehabilitation facility.

A useful overview of zoonotic diseases is available on the CPW website. However, this does not include information on non-zoonotic diseases and parasites. Additional reading material on wildlife diseases is therefore encouraged and should be used. Additional people with expertise may serve as key resources.

The expected content knowledge and skill resulting from the required training on this topic includes but is not limited to:

- | Common diseases and parasites that could occur with the wildlife species at the rehabilitator's facility
- | Diseases and parasites that could occur with the wildlife species at the rehabilitator's facility that could be transmitted to people
- | Common disease transmission methods
- | Common parasite transmission methods
- | Quarantine methods and times for the wildlife species at the rehabilitator's facility
- | Methods to prevent and control transmission of diseases and parasites within the rehabilitation facility
- | Methods to prevent transmission of diseases and parasites to people

Safe capture and handling of the applicable species (*Required*)

This is a critical topic since the safety of the animal and people are essential. At a minimum, this includes hands-on demonstrations of safely and effectively capturing and handling various applicable species and age animals, personal coaching, practice, and feedback by the fully-licensed Wildlife Rehabilitator. The capture and handling demonstrations and practice should be conducted over several sessions and working with multiple animals, not just a single session. The rehabilitator should frequently monitor the unlicensed person and provide regular coaching and feedback.

Since different types of animals require different types of capture and handling, the training should be specific to the types of animals being rehabilitated. For example, training for handling passerines is different from raptors, waterfowl, and sea and shore birds. Training also should be specific to lagomorphs, rodents, raccoons, opossums, canides, ungulates, felines, turtles, snakes, and so forth.

While reading materials and video may be used to supplement this section, it is essential and expected that the fully-licensed rehabilitator provide practice, coaching, frequent oversight and monitoring, and regular feedback. Additional people with expertise and experience with the species may serve as key resources.

The expected content knowledge and skill resulting from the required training on this topic includes but is not limited to:

- | Birds being rehabilitated at the facility – specified types of species, various ages and health conditions
- | Mammals being rehabilitated at the facility – specified types of species, various ages and health conditions
- | Techniques to minimize escapes during capture and handling
- | Methods to minimize stress by reducing need to capture and handle, but also while actually capturing and handling animals
- | Techniques to minimize injuries to wildlife and people
- | Actions needed if an animal is injured
- | Actions needed if a person is potentially exposed to harm (disease) or injured (bite, scratched, punctured, fell, etc.), such as cleaning a wound, contact physician, contact local or state dept of health

Diet and nutrition of the applicable species (*Required*)

Rehabilitators who use unlicensed people to assist with wildlife care often involve them with feeding wildlife, particularly juvenile animals.

While reading materials and video may be used to supplement this section, it is essential and expected that the fully-licensed rehabilitator provide basic information about diets that are used and the reasons for them, methods to prepare and store food, methods to clean feeding utensils, amounts to feed each animal, and potential problems.

Training should be as specific as possible to the types of animals and ages with which the person will be working. For example, unlicensed people that are trained to feed passerines are not considered trained for raptors or waterfowl. People trained in feeding rodents (e.g., squirrels,

muskrats) should not assumed to have the knowledge and skill for feeding lagamorphs (e.g., cottontails). Also, training for people who provide food for self-feeding and recovering adult animals is different from feeding neonate or juvenile animals.

The fully-licensed rehabilitator should demonstrate proper feeding technique and how to prevent and correct potential problems, such as aspiration, overfeeding, 'escapes' during feeding – and practice these techniques with the unlicensed individual. The feeding demonstrations and practice should be conducted over several sessions and working with multiple animals, not just a single session.

The rehabilitator should frequently supervise and monitor the unlicensed person, and provide regular coaching and feedback. Additional people with expertise and experience with the species may serve as key resources.

The expected content knowledge and skill resulting from the required training on this topic includes but is not limited to:

- | Diet for juvenile and adult animals, and the differences
- | Method to prepare food/formula
- | Amount of food required per feeding
- | Safe and effective feeding methods
- | Signs of feeding or diet related problems, including aspiration, stool problems, and nutritional disorders

Use of written protocols for wildlife care activities related to any activity that the unlicensed person may perform (*Required*)

Written protocols must be available to guide the unlicensed person's activities on a specific task. After reading the protocols (in addition to training by and discussion with the wildlife rehabilitator), the unlicensed person should be able to demonstrate being able to quickly find the needed information and effectively use the protocols with the animal care activity. This should be completed prior to the licensed rehabilitator leaving the unlicensed person to work without direct supervision.

The expected content knowledge and skill resulting from the required training on this topic includes but is not limited to:

- | Location of the written protocols
- | Ability to quickly find information on topics, especially urgent topics
- | Description of actions in case of urgent need or decisions
- | Admission
- | Immediate health problem with an animal (injury, aspiration, etc.)
- | Injury or urgent health problem for a person
- | Knowing when to contact the rehabilitator or veterinarian
- | Ability to effectively recognize and identify problems and possible solutions – at least temporary actions – until the rehabilitator is available
- | Contact info for rehabilitator and 'back-up' in case rehabilitator is not immediately available

Unlicensed Individuals are ALSO Required to have Training on Other Animal Care Activities That They Perform

The following list describes examples of training for other areas with which the unlicensed individual might assist that are beyond the minimum requirements specified in regulation. The following training and duties for unlicensed individuals only happen after they have successfully completed the required training listed above. Transporting animals is considered to require less knowledge and skill than those involving release, first aid, and euthanasia. It is recommended that the unlicensed people have demonstrated proficiency and responsibility with more basic activities before being trained or given responsibilities with regard to release, first aid, administering medications, euthanasia, and other more advanced activities.

Transportation to veterinarian, release site, another licensed rehabilitator, or Division facility

Unlicensed individuals are allowed transport wildlife under certain conditions and to certain locations. The rehabilitator should explain and demonstrate proper and safe transport methods, as well as the use of the form authorizing transportation.

The expected content knowledge and skill resulting from the required training on this topic includes but is not limited to:

- | Cages that are appropriate and safe for transport
- | Minimize animal's stress (e.g., keep cages stable and covered, maintain quiet, no strong scents in vehicle, including smoking, keep cages away from predators, including pets)
- | Minimize time of transport (e.g., know location and how to get there, reduce extraneous stops)
- | Do not allow animals to overheat
- | The animal should not be displayed or shown to people other than caregivers
- | The animal should not be handled unless required for the treatment or transfer
- | Required forms

Cleaning cages and other materials

Licensed wildlife rehabilitators may use unlicensed individuals to help with cage cleaning and maintenance. Rehabilitators may involve unlicensed individuals with other cleaning activities, such as feeding utensils, water and food containers, animal bedding, and other materials that have had direct contact with animals. There will be times when the unlicensed individual can perform the cleaning activities without contact with the animals and the training would be helpful but not required. However, if cage cleaning involves handling or moving animals, the unlicensed person would be required to have training. The training should include demonstrations, practice, oversight and monitoring, and feedback.

The expected content knowledge and skill resulting from the required training on this topic includes but is not limited to:

- | Information on risks associated with cleaning cages and other materials in direct contact with wildlife, such as injury, exposure to parasites and/or disease.
- | Methods to safely clean cages and other materials (bedding, water containers, etc.) to

- ensure effective sanitation of cages, bedding, etc.
- Ways to minimize the animal's stress during the process
- Method to reduce chances of escape during cage cleaning
- Ways to reduce risks to animals and humans during cleaning or use of cleaning products
- Safe handling, use and storage of cleaning products, especially since such products may be toxic to animals and humans

Release

Release of healthy wild animals able to survive in the wild is a primary goal of wildlife rehabilitation. While the licensed rehabilitator will determine when the animal is ready for release and the day, time and location of the release, the regulations allow licensed wildlife rehabilitators to use unlicensed individuals to help release wildlife back to natural habitat (e.g., transport to release location, setting the animal free). This is a significant activity and requires understanding of proper release methods and regulatory requirements. The training should include demonstrations with the licensed rehabilitator, oversight and monitoring, and feedback.

The expected content knowledge and skill resulting from the required training on this topic includes but is not limited to:

- Regulations affecting release
- Criteria for release sites based on species, habitat, etc.
- Release protocols, including approval of the release by the rehabilitator
- Requirements for an effective release
- Habitat
- Appropriate time of day

Admission and intake

Admitting animals for rehabilitation is a critical first step and often involves direct contact with the animal. The person may take possession and transfer the animal from the rescuer's container to a better cage, and identify the species. Depending on the person's knowledge and skill, and assigned responsibilities, an unlicensed person may be asked to help make a quick assessment and begin first aid, such as placing the animal on heat, as well as ask for immediate rehabilitator or veterinary consultation.

The person receiving the animal also collects essential information from the rescuer or person delivering the animal, including contact information, the source location of the animal, reason for and date of rescue, any care the rescuer may have provided, possible injuries to people, and so forth. That person also explains the rehabilitation process, informs the rescuer/transporter of potential risks, and other things, such as how to prevent future problems (e.g., rabbits injured by cats, birds that hit windows, kidnapped fawns).

Since this is a more advanced skill, the training for this would be more involved and involve more topics. The training would likely include reading, discussion, demonstration, supervision and coaching, as well as continued and regular oversight. These demonstrations and practice should be conducted over several sessions and many different species and ages of animals.

The expected content knowledge and skill resulting from the required training on this topic depends on specifics of what the unlicensed person will be doing during admission and intake, but may include but is not limited to:

- a. Collecting and maintaining initial records
- b. Identifying the animal
- c. Initiating basic first aid, such as placing the animal on heat
- d. Safely transferring the animal to a new cage
- e. Placing the animal in quarantine area
- f. Initiating parasite and disease prevention
- g. Decision on consulting with veterinarian

First aid and administering medical care as directed (*EMERGENCY ONLY*)

Fully-licensed wildlife rehabilitators assess the animal's health when it is admitted to rehabilitation and on a daily basis thereafter. The rehabilitator also provides first aid, consults with veterinarians, and administers treatment as directed by veterinarians. Some unlicensed individuals may assist the rehabilitator with the assessment, first aid and administering treatment directed by the rehabilitator or veterinarian.

Providing first aid and monitoring an animal's health requires more advanced skill than other activities, the fully licensed wildlife rehabilitator is expected to carefully evaluate, select and monitor any unlicensed person assisting with any medical assessment or treatment.

The training for this would involve reading, discussion, demonstration, supervision and coaching while the unlicensed person assists with first aid and administers medical treatment as directed, as well as continued and regular oversight. These demonstrations and practice should be conducted over several sessions and working with multiple animals, not just a single session or species.

The rehabilitator should frequently supervise and monitor the unlicensed person, and provide regular coaching and feedback. Additional people with expertise and experience with the species may serve as key resources.

The expected content knowledge and skill resulting from the required training on this topic includes but is not limited to:

- | Recognition that wildlife in rehabilitation may arrive with or develop serious health conditions while in rehabilitation
- | Understand protocols established by rehabilitator and veterinarian, including authority for decisions and when to seek rehabilitator and veterinarian assistance
- | Familiarity with safe capture and handling methods
- | Familiarity with risks of handling injured or ill animals, and how to minimize them
- |

Euthanasia (*EMERGENCY ONLY*)

Fully-licensed wildlife rehabilitators make decisions about euthanizing wildlife with input from veterinarians and others. There may be times when an unlicensed individual may assist the rehabilitator with the euthanasia procedure. Or, in a rare circumstance, the licensed wildlife rehabilitator may request and authorize a trained and designated unlicensed person to euthanize a specific animal during the rehabilitator's absence.

Making a euthanasia decision and properly carrying it out require considerable knowledge, skill, and responsible behavior as well as trust by the rehabilitator. Only a limited number of experienced and carefully evaluated unlicensed people would be considered to be involved in the euthanasia of wildlife. The fully licensed wildlife rehabilitator is expected to carefully evaluate, select and monitor any unlicensed person involved with euthanizing wildlife.

Since this is a more advanced skill, the training for this would be more involved and involve more topics. The training for this would involve reading, discussion, demonstration, supervision and coaching while the unlicensed person discusses decisions related to euthanasia and conducts several euthanasia procedures, evaluation of the decision and processes, and the unlicensed person's performance and reaction, as well as continued and regular oversight.

These demonstrations and practice should be conducted over several sessions and working with multiple animals of different species and ages, not just a single session or species.

The rehabilitator should frequently supervise and monitor the unlicensed person, and provide regular coaching and feedback. Additional people with expertise and experience with the species may serve as key resources.

The expected content knowledge and skill resulting from the required training on this topic includes but is not limited to:

- Reasons euthanasia is considered.
- Process of making euthanasia decisions, including approvals.
- Euthanasia criteria; may vary by species, age animals, policy, and other factors.
- Euthanasia methods appropriate for the species, age, and size animal.
- Safe, effective and humane euthanasia procedures
- Safety for humans during euthanasia procedures
- Safe carcass disposal methods.
- Safe disposal of equipment or products
- Recordkeeping.