

Guidelines for Sponsoring Provisional Wildlife Rehabilitators



Chapter 14 of CPW regulations describe how people can become licensed wildlife rehabilitators. Potential rehabilitators are required to have provisional licenses and work under the sponsorship and supervision of a licensed wildlife rehabilitator. Just as there is more to being a rehabilitator than most people realize, there also is more to being an effective sponsor than many would expect. The following guidelines outline the process for sponsoring a provisional rehabilitator. The guidelines clarify expectations of the sponsor/provisional relationship. This should reduce potential problems and ultimately provide more effective rehabilitation and release of wildlife.

Process overview

- These general steps for prospective sponsors of a provisional wildlife rehabilitator are described in this document:
- Deciding to be a sponsor
- Screening potential provisional licensees
- Clarifying and agreeing to expectations
- Developing a Learning Plan with provisional
- Preparing and inspecting the provisional's facility prior to CPW inspection
- Attending the CPW inspection of the provisional's facility
- Guiding the provisional's learning, providing training and coaching, monitoring progress
- Supervising, monitoring and giving feedback to provisional on animal care and learning
- Communicating with provisional on individual animals, progress, concerns
- Assessing and determining when provisional is ready to apply for a wildlife rehabilitation license and preparing the Request for Provisional Upgrade
- Attending the provisional's facility inspection and interview by the CPW
- Completing or terminating the sponsor/provisional relationship
- Additional information

Deciding to be a sponsor

The sponsor must determine whether his or her knowledge, skill and experience are sufficient to train and supervise others. Acquiring a breadth of experience takes time and experience. Regulations require that a rehabilitator must have a minimum of three years experience with a full Wildlife Rehabilitation license before being qualified to sponsor a provisional.

Sponsorship takes time – regular and focused time, often on a daily basis. During 'busy season,' the sponsor may be in frequent communication with a 'new' provisional. This may be one or several times a day, or only a couple times a week discussing ongoing cases.

Provisionals must notify the sponsor within 24 hours of admission of any new animal. The sponsor also will be monitoring the status of the individual animals and guiding decisions about the animal's care. The provisional's knowledge, skill, and experience, number of animals in care, and health conditions of the animals will influence the frequency and extent of communications.

Sponsors guide the provisional rehabilitator's learning, respond to questions, and monitor animal care at the provisional's rehabilitation facility. This time commitment may reduce the sponsor's availability for direct wildlife care and may limit the number of animals the sponsor can personally rehabilitate.

Teaching and supervising a provisional licensee can be stressful as well as time consuming. Sponsoring adds demands to the rehabilitator's workload. The sponsor must determine how many provisional licensees he or she can effectively supervise. Regulations limit the number of provisionals to three or less per sponsor at any given time. This allows sponsors to provide better training, oversight and assistance to the provisional and still give quality care to the wildlife at their own rehabilitation facilities.



The provisional who is given more frequent coaching, supervision and help is less likely to develop serious problems and surrender the wildlife in their care, and further overload the sponsor.

Screening potential provisional licensees

Wildlife rehabilitators often are eager to recruit new rehabilitators to distribute the workload. Sadly, not everyone expressing interest in rehabilitating wild animals can or should do so. Becoming an effective rehabilitator requires considerable time, commitment, resources, and knowledge. It can be frustrating to recruit people who ultimately are unable to meet the requirements. The sponsor will have spent personal time and resources without achieving his or her desired goal. This frustration can be reduced or avoided.

Sponsors should carefully screen potential new licensees *before* agreeing to sponsor them. Make sure that this person understands the requirements of being a wildlife rehabilitator. Thoroughly describe what is involved in terms of time, money and level of commitment. The booklet, *Wildlife Rehabilitation: Is It For You?* explains much of the work involved in wildlife rehabilitation.

One way to help someone learn about wildlife rehabilitation and to decide if you wish to sponsor him or her, is to require the individual to volunteer *before* agreeing to accept that person as a provisional.

Volunteers begin by learning about rehabilitation objectives, safety procedures, daily activities and so on. Then, the volunteer provides indirect wildlife care. After the volunteer has shown the ability to follow instructions, reliability and so forth, the rehabilitator may choose to increase the volunteer's responsibilities and involvement. He or she may assist in activities such as food preparation, cage cleaning, and release site identification.

Regulations require that any unlicensed individual assisting with direct wildlife care, such as a volunteer, have training in wildlife rehabilitation ethics; wildlife rehabilitation regulations; common wildlife diseases and parasites, including zoonotic diseases; safe capture and handling of the applicable species; diet and nutrition of the applicable species; and the use of written protocols related to any activity the unlicensed person may perform. Further training is required if the unlicensed person will be performing direct animal care tasks in addition to those listed above, such as administering first aid.

The volunteer may then assist with direct animal care, such as capture and handling, conducting an examination, responding appropriately to an animal's care needs, basic first aid, releases, euthanasia decisions, and more.

The licensed wildlife rehabilitator will always directly supervise any unlicensed person working with animals. While unlicensed people may transport wildlife to a licensed wildlife rehabilitator, CPW, animal control agency, local law enforcement agency or licensed DVM, they are not allowed to keep wildlife at their homes.

During the volunteer period, take careful notes. Is the individual on time? Is he or she willing to learn and perform all tasks associated with wildlife rehabilitation? Does he or she observe safety protocols and regulations? Does he or she provide effective care for the animals? Does the individual work well with others, including you? Closely observe the volunteer's performance with a variety of tasks and various levels of difficulty. Assess whether he or she has reasonable expectations about wildlife rehabilitation. If problems arise during the volunteer period, it's likely more serious problems will occur later when the individual is caring for wildlife at their own facility with less direct and frequent supervision.

This volunteer period gives the sponsor and the potential provisional an opportunity to assess their working relationship. It allows the sponsor to gauge the volunteer's fit with the requirements of wildlife rehabilitation. Careful screening helps reduce the frustration that occurs when a provisional quits after the sponsor has spent considerable time and effort in his or her training.

Clarifying and agreeing to expectations in advance

It is important for the sponsor and provisional to discuss and agree on expectations before formally establishing their relationship and sending an application to CPW. The sponsor should spell out what he or she will do. The sponsor will teach rehabilitation basics, discuss a plan to get supplies and cages, refer the provisional to helpful resources, and check out the person's facilities, cages and supplies before the initial CPW inspection. The sponsor will also provide guidance, supervise and monitor the provisional's wildlife care and safety protocols, help determine when animals need to be seen by a veterinarian, give tips on talking with the public and on finding release sites, discuss euthanasia criteria, review individual and general rehabilitation records, and so forth.

The sponsor should visit the location where the provisional plans to keep caging prior to agreeing to be the sponsor and before the applicant prepares cages. This ensures that the applicant has appropriate space for rehabilitation. Discuss and agree upon the provisional's caging, where cages will be kept, and sanitation protocols.

It also is essential for the sponsor to explain what he or she will not do, such as purchase supplies or pay for veterinary bills. Be specific about cages or other supplies that may be loaned.

In turn, the provisional is required to inform the sponsor about every animal that he or she accepts into rehabilitation. The provisional must understand and agree to follow regulations related to rehabilitation and release. He or she must communicate at least three to four times per week about the status, health and development of each animal. In some critical wildlife cases, communication between the provisional and sponsor may occur daily. Sponsors must clarify that the provisional should consult with the veterinarian as needed, arrange for timely euthanasia, and so forth. These decisions often involve communication with the sponsor as well.

Clarify expectations about who may handle, clean, and feed animals in rehabilitation. Since the provisional is in training, he or she is expected to be the caregiver. The provisional should discuss and obtain prior sponsor approval regarding the potential use of unlicensed people who may assist with direct wildlife care. Specific requirements about the use of unlicensed people assisting with animal care have been established in regulation. This discussion should include those regulations, address tasks, training, supervision of the volunteers, responsibilities, written protocols, “acceptable care,” accountability, and so forth.

Expectations regarding the species and numbers of animals that the provisional will rehabilitate must be clearly established. Clarify the range of wildlife situations the provisional will address (e.g., healthy vs. minor illness/injuries vs. major illness/injuries) and the specific husbandry required. Ensure that the provisional understands why it is important to limit the number of animals in their care and agrees to those limits. Discuss options for when requests for wildlife care exceed the resources of the provisional and sponsor. Keep in mind that if the provisional quits, his or her animals likely will be transferred to the sponsor. This can overload the sponsor or others, or, sadly, could even necessitate that the animals be euthanized if a licensed rehabilitator is not available to accept them.

While it is possible for rehabilitators and provisional licensees to understand and agree on these expectations with just a verbal discussion, a written agreement may help clarify and confirm the agreement. Those who have both discussed and documented the expectations seem to have fewer difficulties.

Develop a Learning Plan

Provisional licensees must acquire considerable knowledge and skills to become effective wildlife rehabilitators. In 1996, a national task force of wildlife rehabilitators, including leaders from the National Wildlife Rehabilitators Association (NWRA) and the International Wildlife Rehabilitation Council (IWRC), developed the following list as a starting point:

- A. The purpose, ethics, and standards of wildlife rehabilitation (Minimum Standards of Wildlife Rehabilitation);
- B. Federal, state and local laws, regulations, and ordinances affecting wildlife rehabilitation;

- C. Identification of native wildlife species; D. Natural history and behavior of wildlife;
- E. Humane techniques to prevent and resolve human-wildlife conflicts;
- F. Public contact regarding wildlife;
- G. Safe capture, handling and transport of wildlife;
- H. Identification and general assessment of common wildlife health or behavioral problems;
- I. Intake procedures;
- J. Basic first aid for wildlife;
- K. Nutrition, diet, and feeding methods;
- L. Facilities, appropriate caging, and habitat needs;
- M. Wildlife diseases and parasites, including zoonoses;
- N. Release criteria, considerations, and preparation;
- O. Euthanasia, necropsy and carcass disposal;
- P. Recordkeeping;
- Q. Working with veterinarians;
- R. Basic resources and references;
- S. Managing workload;
- T. Other topics

Regulations require that a Learning Plan with minimum criteria be developed for each provisional. This Learning Plan identifies essential information and learning sources. The plan acts as a road map to ensure key material is covered in a reasonable sequence and timeframe. Plus, the learning plan helps the provisional and the sponsor avoid misunderstandings and future problems. Learning plan templates are available online.

The Learning Plan can help the sponsor monitor and record the status of the provisional's knowledge and skills. The sponsor and provisional should talk regularly to review learning progress and skill development, and identify additional knowledge, skills and experiences that may still be needed. This will help the sponsor determine when the provisional is ready to apply his or her full rehabilitation permit, and prepare the upgrade documentation and request to be submitted to CPW.

While the sponsor is a key resource, there are many sources to learn about wildlife rehabilitation. The provisional can increase his or her wildlife rehabilitation knowledge and skills in other ways. Encourage the new provisional licensee to read publications about wildlife rehabilitation to broaden their understanding of the field and learn new rehabilitation methods. Some of these publications include:

- A. Journal of Wildlife Rehabilitation ([IWRC](#))
- B. Wildlife Rehabilitation Bulletin ([NWRA](#))
- C. NWRA Principles of Wildlife Rehabilitation, 2nd edition
- D. Basic Wildlife Rehabilitation 1AB Manual (IWRC)
- E. Proceedings from wildlife rehabilitation conferences
- F. Wildlife rehabilitation newsletters

There are also several wildlife rehabilitation Web sites, such as:

- A. [International Wildlife Rehabilitation Council \(IWRC\)](#)
- B. [National Wildlife Rehabilitators Association \(NWRA\)](#)
- C. [National Center for Wildlife Health](#)
- D. [Wildlife International](#)
- E. [Humane Society of the United States](#)
- F. ["Useful Sites" by the NWRA](#)

Colorado-based rehabilitation Web sites of interest include:

- A. [Birds of Prey Foundation](#)
- B. [Colorado Council for Wildlife Rehabilitation](#)
- C. [Urban Wildlife Rescue](#)
- D. [WildAgain Wildlife Rehabilitation, Inc.](#)
- E. [Rocky Mountain Raptor Program](#)
- F. [Greenwood Wildlife Rehabilitation Center](#)
- G. [Wild Forever Foundation](#)



Wildlife rehabilitation associations provide access to a wide range of educational opportunities, such as publications and conferences. These associations include the [National Wildlife Rehabilitators Association \(NWRA\)](#), [International Wildlife Rehabilitation Council \(IWRC\)](#) and the [Colorado Council of Wildlife Rehabilitators \(CCWR\)](#).

Sponsors should encourage provisional licensees to join and become active in these organizations. Sponsors should also encourage the provisional to volunteer and talk with additional experienced rehabilitators, veterinarians and others.

In addition to a Learning Plan, it is important for the sponsor and provisional to discuss and agree upon the most effective ways for them to communicate about the provisional's rehabilitation activities. The sponsor also will monitor the provisional's care of wildlife closely, which will include frequent conversations about the animals' health and development and regular examinations of wildlife in the provisional's care. As mentioned previously, it is a good idea to document these understandings to ensure that expectations are clear.

Preparation and trial inspection of the provisional's facility prior to CPW inspection

Wildlife may only be rehabilitated at a CPW inspected and approved facility. Once a licensed rehabilitator agrees to serve as a sponsor, the provisional needs to prepare his or her rehabilitation facility and acquire cages and supplies. The sponsor and other rehabilitators can offer suggestions.

It is possible for a provisional to use the sponsor's rehabilitation facility and cages. This arrangement may be feasible when the sponsor's rehabilitation facility is a rehabilitation center. If the provisional and sponsor plan for the sponsor's facility to meet the caging requirements, the sponsor's facility must be re-inspected by CPW. If the provisional is approved to use his or her sponsor's rehabilitation facility, and has not had a personal rehabilitation facility inspected and approved by CPW, the provisional may *only* rehabilitate wildlife at the sponsor's facility.

Before sending in the provisional application and scheduling a time for CPW inspection, the sponsor should conduct a 'trial facility inspection' using the CPW Facility Inspection Form available online. This trial inspection allows the provisional to ensure that the facility is adequately prepared. This should increase the likelihood of CPW approval.

Apply for provisional wildlife rehabilitation license

Once the sponsor feels that the provisional applicant's facilities are adequate, the person must apply for a provisional license. He or she sends the completed Provisional Wildlife Rehabilitation application and Learning Plan (both co-signed by the sponsor), along with the Consulting Veterinarian Agreement Form to CPW Special Licensing. Those applicants wishing to rehabilitate birds or federally threatened or endangered species must also obtain a US Fish and Wildlife Service Rehabilitation Permit.

The application will be forwarded to the CPW District Wildlife Manager (DWM) responsible for the applicant's area. A day and time will be scheduled for the inspection. The DWM will inspect the applicant's facility within 60 days after the application is received by CPW. The sponsor also must be present at the inspection. The DWM will use the Facility Inspection Form and provide a copy of the completed inspection form to the applicant so that he or she knows the results.

If the facility does not pass inspection, the inspection form will indicate the needed changes. The applicant can make the necessary changes and schedule another inspection.

Decision on the application

If the applicant passed the facility inspection, the DWM forwards the full application packet and inspection form to the Area Wildlife Manager and Regional Wildlife Manager for next level approvals. The approved packet is then sent to Special Licensing for final review, approval, and processing.

If CPW denies the provisional's application for any reason, the applicant has several choices. He or she may correct the condition that caused the denial (e.g., expand and improve caging, arrange for a licensed veterinarian). Or, he or she may decide to not become a wildlife rehabilitator. Applicants with questions about the denial and/or an administrative appeal process should contact Special Licensing at 303-291-7143.

If the provisional wildlife rehabilitator wants to rehabilitate migratory birds, he or she *must* have both a CPW rehabilitation license and a USFWS rehabilitation permit *prior* to rehabilitating migratory birds. A Colorado wildlife rehabilitation or provisional license is required to rehabilitate some bird species that are not protected by the Migratory Bird Treaty Act, such as House Sparrows and English Starlings. However, a CPW rehabilitation license is not required to rehabilitate common "street" pigeons.

Guide the provisional's learning

These learning activities will address what the provisional needs to understand and activities to be performed while rehabilitating wildlife and correlate with the topics in Learning Plan. The provisional and sponsor should discuss, assess and document the provisional's progress on a regular basis. The provisional submits a progress report on the Learning Plan signed by the sponsor with their year-end report to CPW by January 31 each year.

The *Colorado Rehab Study Guide* provides a list of questions and resources. These questions generally correspond to the topics in the Learning Plan. These questions suggest a minimum of information that provisional license holders should know before they are upgraded. The provisional may learn these subjects from a variety of sources, not just the sponsor. These questions are examples of the questions that the DWM may ask during the upgrade interview.

If the provisional plans to use any unlicensed individuals to help with direct animal care, the provisional must have completed training conducted by a fully licensed wildlife rehabilitator on the following: Wildlife rehabilitation ethics; Wildlife Rehabilitation regulations; Common wildlife diseases and parasites, including zoonotic diseases; Safe capture and handling of the applicable species; Diet and nutrition of the applicable species; and the use of written protocols related to any activity the unlicensed person may perform.

If the provisional will be using any unlicensed person helping with direct animal care, the provisional must have completed training on those topics and demonstrated proficiency before involving the unlicensed person. Also, the unlicensed person working with direct animal care must have completed training provided by a fully licensed rehabilitator on those subjects, such as cage cleaning, release, admission and intake, and administering first aid. In many cases, the sponsor will be conducting that training.

Both the wildlife rehabilitators and provisionals must maintain records about the involvement of unlicensed people helping with wildlife (name, contact information, when the training occurred, dates worked, type of activities performed). Copies of these forms are available online. These records accompany the annual license renewal application.

Supervising, monitoring and giving feedback

The provisional rehabilitator is in an intense learning period. The sponsor helps the provisional establish and work within his or her limits. Together, they decide upon types of species, numbers of animals, caging, types of health problems, and so forth. The sponsor provides training and suggestions on many topics. This includes talking with the public about which animals need to be brought into rehabilitation versus those that should not be admitted for care or should be directed elsewhere.

The sponsor gives advice about the animals in the provisional's care. This includes discussion of admission methods, initial examinations, emergency care, veterinary consultations, and quarantines. The sponsor also provides direction about nutrition, diets and feeding methods. He or she ensures that decisions about health, release and euthanasia are made in a timely and appropriate manner.

The sponsor must regularly monitor progress of the animals at the provisional's facility. This may require regular phone conversations and frequent visits to the provisional licensee's facility. The sponsor should check the numbers of animals, their care, health, caging (e.g., cleanliness, location, safety, quarantine, etc.), and rehabilitation records. Regular discussions about husbandry, diet and feeding, medication and health procedures, release, euthanasia decisions, and veterinary care are essential. The sponsor should note how the provisional reacts to time commitments, decision-making, workload, stress and resource levels in regard to wildlife care.

Effective monitoring helps to prevent problems or to resolve them in their early stages. Unaddressed situations may become more difficult for both animals and people. Sponsors should give regular, timely and honest feedback to help the provisional rehabilitator improve. Close and regular monitoring can help the sponsor take action to correct difficulties or to make a decision about whether to continue the sponsoring relationship.

The sponsor regularly reviews and discusses the provisional's rehabilitation records, including the annual rehabilitation records required by CPW. The sponsor must sign the provisional's annual wildlife rehabilitation record that is submitted annually to CPW prior to January 31. If the provisional is rehabilitating migratory birds or other federally protected species, the provisional also submits the required annual records to the USFWS. The provisional also submits a progress report on the Learning Plan signed by the sponsor with their license renewal application submitted by January 31 each year.

Deciding when the provisional is ready for a wildlife rehabilitation license and preparing the referral

Sponsors should have clarified the requirements for becoming a wildlife rehabilitator during early discussions with the provisional licensee. Once the learning goals have been achieved to the satisfaction of the sponsor and provisional, the provisional is ready to apply for a wildlife rehabilitation license. The provisional must have a minimum of one year's experience with all aspects of rehabilitation for the applicable species. The sponsor prepares the Request for Provisional Upgrade form, the completed Learning Plan, and Learning Plan Progress reports to Special Licensing. Examples of completed Request for Provisional Upgrade forms are also provided online. The upgrade documentation describes the thorough documentation of the provisional's knowledge, skill and experience with various aspects of wildlife rehabilitation.

The Request for Provisional Upgrade describes the provisional licensee's demonstrated ability to rehabilitate injured and sick animals as well as work with healthy ones. He or she must be able to identify and resolve common problems quickly and have experience and success with some difficult cases. He or she must also use effective rehabilitation practices and prevent problems from occurring due to poor husbandry, quarantine and/or medical care. He or she must be able to decide when rehabilitation, release or euthanasia is appropriate, and make those decisions in a timely and effective manner.

The provisional requires a breadth of significant rehabilitation experience to demonstrate this level of skill and knowledge. Working with a few healthy wild orphans or rehabilitating wildlife for a couple hours a week is not adequate preparation for a full rehabilitation license in the State of Colorado.

As the basic wildlife rehabilitation curriculum approved by CPW, the provisional's Learning Plan must be completed prior to the second annual license renewal. Additionally, the provisional must read and understand the Zoonoses and Chronic Wasting Disease information available online. While the latter must also be accomplished prior to the second license renewal, it is strongly recommended that this be completed prior to or shortly after the provisional license has been issued.

The provisional may have relied on some of the sponsor's cages during the provisional period. To qualify for a full wildlife rehabilitation license, the person must have the complete range of cages at his or her own facility.

Special Licensing expects the sponsor to thoroughly evaluate the provisional's level of rehabilitation skill, knowledge and experience. The sponsor should describe that information in the Request for Provisional Upgrade when recommending the provisional graduate to a full rehabilitator.

Special Licensing and the DWM will review the Request for Provisional Upgrade to determine if the provisional met the regulatory requirements. If it is unclear that the provisional has met the requirements, the sponsor and provisional will be asked to reassess and resubmit the upgrade request.

After the Request for Provisional Upgrade and completed Learning Plan have been reviewed by Special Licensing and the CPW Regional Office, an upgrade interview will be scheduled with the provisional. The sponsor must attend that upgrade inspection and interview. The interview will review the provisional's learning and experience, and may include a facility inspection if the person has expanded rehabilitation facilities in order to meet the regulatory requirements.

The DWM will ask the provisional a variety of questions during that interview to help assess the person's readiness for the upgrade. The upgrade interview questions will be taken from the *Colorado Rehab Study Guide*.

The DWM will forward his or her decision about the upgrade request to the Area and Regional Wildlife Managers for approval or denial. Upon concurrence, Special Licensing will send the results of the decision to the applicant and sponsor.

Completing or terminating the sponsor/provisional relationship

The official sponsorship concludes when the provisional's application for a full wildlife rehabilitation license is approved by CPW. Many rehabilitators continue close communications with their former sponsors.

However, there are other circumstances that may result in the premature conclusion of the sponsor/provisional relationship. A provisional may decide that he or she no longer wants to be, or can be, a wildlife rehabilitator. Or, the provisional may decide that he or she wants to work with another sponsor. This could be due to a desire to work with other species or learn other skills, because he or she is relocating, or because there are relationship and communication issues.

Conversely, the sponsor may decide that he or she does not want to sponsor that provisional any longer. The sponsor may have problems with the provisional that he or she is unable to resolve effectively. Or, the sponsor may discontinue the sponsorship due to reasons unrelated to the provisional.

The sponsor must notify Special Licensing that the sponsorship relationship is ending within 48 hours. The initial notification may be made via telephone to Special Licensing, but it must be confirmed in writing.

If the sponsorship arrangement is concluded before the provisional obtains a wildlife rehabilitation permit, wild animals in his or her care must be transferred to the sponsor or another rehabilitator permitted for those species within 48 hours. The exception would be if the provisional arranges for another sponsor prior to the conclusion of the sponsorship. The new sponsorship must be approved in writing by CPW before it is considered official and the provisional can maintain wildlife at his or her facility.

Additional information

If you would like to discuss the commitment, activities and responsibilities of sponsoring provisional rehabilitators, please contact Special Licensing Unit at 303-291-7143. It may also be beneficial to talk with other fully licensed Colorado rehabilitators who have experience in sponsoring provisionals.

