

## **More Information on Chapter 14 Regulation Changes Unlicensed People Assisting Rehabilitators with Wildlife**

Rehabilitation busy season is starting to wind down for most rehabilitators. Hopefully you can all take some well-deserved time to rest and appreciate your work helping wildlife and the public who asks for your help! Since the changes in rehabilitation regulations that were approved in March and May were implemented during busy season, I wanted to explain more about the section that expands how unlicensed people may help rehabilitators with wildlife when people have more time available. The 'less-busy season' is also a good time to review, revise, and/or prepare materials used by the unlicensed people helping rehabilitators with wildlife – whether these are regulatory requirements or just part of your good rehabilitation practices.

The Division has had some questions about rehabilitation regulations affecting the use of unlicensed people helping with direct animal care that became effective as of July 1, 2009. It was clear from the testimony at the Wildlife Commission meeting in March, 2009, that some rehabilitators, particularly larger rehabilitation centers, needed help beyond what the individual licensed wildlife rehabilitators could provide in order to care for the caseload of animals in rehabilitation. The Commission and Division understood those requests and agreed to make changes that would allow the use of unlicensed people to help with animal care working with the rehabilitator at her/his facility.

### **Reasons for training**

Any unlicensed people working with wildlife must have some basic training before starting to work with wildlife. As rehabilitators know, working with wildlife is not easy. It requires some basic knowledge and skill. The people involved need to know that rehabilitation includes respecting a wild animal's *wildness*, and not treating it like a pet. People also need to understand the zoonotic disease and physical injury risks that are always present when working with wild animals that are temporarily in captivity. It means the animal is in temporary care until it can develop to an age or recover from injuries that it can survive independently. And if it is unable to recover that the animal is euthanized.

Licensed rehabilitators know these concepts as part of the Rehabilitator's Code of Ethics and state rehabilitation regulations. But new, unlicensed people are unlikely to know these basic concepts when they start. Not knowing these things means that they may want to treat wild animals as pets and habituate them, or not appreciate the dangers of handling wildlife. A clear understanding needs to be established in advance that when wildlife that is unable to recover and be able to survive must be euthanized. Otherwise, the need to euthanize may result in conflict with the rehabilitator, or the volunteer quitting after the rehabilitator has spent considerable time training him or her. While many rehabilitators have already been providing such basic information to volunteers or staff, some were not. The Division believes that requiring unlicensed people working with animals to be familiar with the Code of Ethics and Regulations is essential for everyone involved. Copies of the Code of Ethics and Chapter 14 are available at <http://wildlife.state.co.us/RulesRegs/SpecialLicenses/WildlifeRehabilitationInformation/WildlifeRehabilitationDocumentsandApplications.htm>. If you do not have internet access at home or work, local libraries generally have such services available.

Training on wildlife diseases and parasites is required. Anyone working with wildlife needs to know that diseases or parasites can be transmitted between animals – and how to prevent and control them. They also need to know that some of the diseases and parasites can be

transmitted from wildlife to people. Again, this is basic information that many rehabilitators have already covered with their unlicensed people and should not be additional work. Information on this is also on the website above.

The regulations also require training on safe capture and handling of the species with which the unlicensed people will be working. The Division knows that most rehabilitators already want to make sure that anyone helping them with wildlife knows how to do so safely. The Division also knows that there have been times when rehabilitators, particularly those working with large volumes of animals, have allowed unlicensed people to handle animals for which they do not have demonstrated and confirmed skills. This can result in injuries to wild animals and to people – and have many consequences, including euthanasia of the animal, the unlicensed person quitting, and more. The Division believes that safe capture and handling is essential training that most rehabilitators have already been doing. Adding this requirement to regulation should not increase the rehabilitator's workload.

Since most unlicensed people who work directly with wildlife are involved with feeding animals, the regulations also require basic training on diet and nutrition. Other training is required for tasks the unlicensed person may be performing, such as first aid, admitting animals to rehabilitation, and release.

### **Training content**

Rehabilitators have continued to be concerned about the minimum training requirements. The Special Licensing website describes the minimum of what should be included. Again, the Division believes that these are items that most rehabilitators are already covering in their training for unlicensed people and most should not be a new task. Just go to the Special Licensing website above and check the Training section in the Requirements for Unlicensed Individuals Assisting with Animal Care for specifics.

### **Written protocols**

Rehabilitators also have asked about the new regulatory requirement for written protocols. This was another item that the Division believed was needed to allow unlicensed people to work at the rehabilitator's facility when the rehabilitator was absent for a short time. Rehabilitation has many requirements and activities. It is all too easy for anyone, especially a less knowledgeable and experienced unlicensed person, to forget basics or be overwhelmed when lots of things are happening at once, many decisions are needed, and feeling stressed. Written resources provide a guide for decisions and actions.

Written protocols are now required by regulation if the rehabilitator is not onsite when the unlicensed individual is working with animals. If the rehabilitator is *always* present when unlicensed people are working with animals, written protocols are not required. While the rehabilitator is expected to be onsite and supervising unlicensed people working with animals, the Division wanted to ensure that the unlicensed people had a phone number where the rehabilitator could be reached as well as written protocols to rely on if the rehabilitator was away for a short time. More information on the written protocols is available on the website listed above.

### **Recordkeeping for people helping rehabilitators**

Chapter 14 regulations have required that rehabilitators maintain records of the people working

with wildlife since 1995. The change in 2009 is that the records must be submitted to the Division with the rehabilitator's annual rehabilitation report by January, 31, and the rehabilitator must maintain a copy of these records for 3 years. Electronic forms are available at the website above to make this easier.

If you have any questions on the use of unlicensed people assisting rehabilitators at their rehabilitation facility or other regulatory items, please let me know.

I want to thank you all once again for the tremendous dedication and support you have given the Division of Wildlife and, more importantly, the wildlife of the State of Colorado.

CPW Special Licensing  
(303) 291-7143  
[Wildlife.SpecialLicensing@state.co.us](mailto:Wildlife.SpecialLicensing@state.co.us)