

Overview of Written Protocols for Wildlife Rehabilitators who Use Unlicensed People to Assist with Wildlife Care

Colorado Parks and Wildlife (CPW) regulations governing wildlife rehabilitation (Chapter 14) require that a licensed rehabilitator supervise unlicensed individuals assisting with direct animal care. The regulations also provide limited exceptions to this “direct, onsite supervision” rule when the rehabilitator is absent from the facility for short periods of time. One of these exceptions requires that written protocols be available onsite for activities performed by unlicensed people who assist with animal care at the licensed rehabilitators approved facility during the rehabilitator’s brief absence. The following clarifies CPW’s expectations about these protocols.

What does CPW mean by ‘written protocols’? How do they differ from simple written instructions?

By **written rehabilitation protocols**, CPW means a description of what it takes to accomplish a task related to rehabilitating wildlife. It generally includes procedures or steps to achieve desired results, as well as general guidelines and resources. The protocols may focus on a particular and rather narrow task, such as how to clean and disinfect a cage or feeding utensils. More extensive protocols may include a series and sequence of more complex and sensitive tasks, such as preparing diets and feeding animals, or even admitting an animal to rehabilitation (e.g., collecting essential information from the rescuer or transporter, capturing the animal in the rescuer’s transport container and transferring it in a rehabilitation cage, putting the animal in a quiet place, and initiating first aid as directed by a veterinarian).

The rehabilitator often will provide specific **written instructions** related to specific tasks and animals to supplement the protocols. Brief written instructions for the unlicensed person helping with animal care may be needed for situations when the rehabilitator is onsite but delegating tasks to the person, such as feeding several juvenile animals. More detailed written instructions would be used to supplement the protocols for situations when the rehabilitator is absent for several hours.

Written Protocols (Required by regulation)	Written Instructions
<ul style="list-style-type: none"> - General guidelines / objective of the task - Detailed description of required steps - Tools / equipment needed – how to use - Description of desired outcome of the task - Troubleshooting guide for problems - Other onsite resources to use (books, etc.) - Specific names and phone numbers of licensed rehabilitators to call with questions and/or problems for those species 	<ul style="list-style-type: none"> - Very specific directions for specific animals requiring care during the absence period - Specific feeding amounts and time schedule per animal - Specific medications per animal (dosage and frequency) - Required: Specific names and phone numbers of licensed rehabilitators to call with questions and/or problems for those species

What should be included in the written protocols?

These protocols begin with a title that identifies the task to be performed. It includes the steps to complete the task effectively and completely. It includes how to assess if the task is completed. Good protocols also describe potential problems or difficulties that could occur, how to prevent them and ways to resolve them if they should occur. The content of the protocols will vary by rehabilitator, but should generally be developed taking into account the following:

- Who will use the protocols? Keep your audience / user in mind. This could include licensed as well as unlicensed individuals.
- Are the protocols and information in a format that is easy to read, understand and use?
- Can someone effectively, safely, and efficiently perform the activity after reading the protocols?
- Can someone easily find a topic or subject? Are they organized? Is there a table of contents and/or index? Tabbed?
- In an emergency situation, how quickly can someone find and understand what action needs to be taken or who to call for help and assistance?
- Are they written in technical jargon, or in more simple and easier to understand language and phrases?
- Have the protocols been tested? Are they effective? What criteria were used to evaluate the protocols?
- Do the protocols include information on resolving problems or trouble-shooting when problems occur? What about contacts for help? Current phone numbers?
- Do the protocols identify or designate authorities for decisions, problem-solving, etc.? Other resources?
- Do the protocols indicate the conditions or requirements the person needs to have met prior to using them? For example, do the protocols indicate that the person needs to have some type of prior training? A licensed rehabilitator on site? Pre-exposure vaccines? Etc.
- Do the protocols explain what supplies and equipment to use? Where supplies are kept? How to use supplies and equipment effectively and safely? How to clean them effectively?
- Do the protocols explain activities related to cage construction, use, cleaning, and maintenance?

Bottomline: can a new person or casual volunteer read the protocols and immediately, effectively and safely accomplish the work by using the protocols – and not have someone nearby to clarify or answer questions?

Other than meeting a new regulatory requirement, what value does the rehabilitator receive from establishing these protocols?

Many animal care facilities, whether focused on wild animals or domestics (animal shelters, rescue groups, etc.), have found it beneficial to provide written protocols to volunteers and others assisting with animal care. The benefits are generally seen to include the following:

- Providing a checklist of daily activities to ensure proper husbandry, such as making sure that the animals get the appropriate number of feedings of the correct diets, cages are cleaned, medications are given, etc.
- Documenting and communicating procedures, policies, etc. so that everyone working with the animals provides consistent care and reduces duplication or conflicting practices.

- Supplementing daily instruction and guidance so that volunteers, seasonal staff and others know what, how and when to perform certain activities, such as cleaning cages, feeding healthy orphans, finding appropriate release sites, talking with the public about wildlife, and so forth without having the rehabilitator needing to provide constant and repetitive direction.
- Explaining procedures and changes to ensure everyone involved understands and follows standard practices.
- Ensuring consistent following of safety procedures, problem-identification, and problem/incident reporting procedures for the benefit of animals and people.
- Communicating changes, in new policies, practices or procedures.
- Reducing problems with rehabilitation operations, animal care, and compliance.

This requirement seems excessive for a small, home-based rehabilitator. Are there differences in the required protocols for small home-based rehabilitators versus those rehabilitators who handle much larger caseloads, either at home or centers?

Written protocols need to be much more thorough and detailed when there are more people involved and activities are more varied, such as at larger rehabilitation centers with many animals and multiple caregivers. More detailed protocols are needed when the activities include higher potential risks for animals or people, a broader range of activities with more species, health conditions, and various ages of animals.

People developing and using the protocols also need to give closer attention to details and overall effectiveness if there is a history or expectation of problems with the animals, people, facility, release, or regulations.

However, even for the rehabilitator who only handles a smaller caseload, they must have a set of written protocols **if** 1.) they are going to enlist the help of an unlicensed person, including a spouse, friend or neighbor to assist in certain animal care activities, **AND** 2.) they will have the unlicensed individual performing animal care tasks while the rehabilitator is not present to provide direct supervision. Remember, the unlicensed people assisting with animal care must also have completed training on specified subjects.

Who should prepare the protocols?

Rehabilitators who are knowledgeable, skilled, experienced and successful with the tasks should have a key role in writing the protocols. Rehabilitators who have supervised others performing the tasks will have a more thorough and useful understanding of what needs to be done, how and to do them, possible problems, how to prevent and solve the problems, and how to communicate the protocols. In many cases, the person writing the protocols will be the licensed rehabilitator.

If someone else wrote the protocols, the responsible and licensed rehabilitator should carefully review them to ensure that they are appropriate and modify them as needed. It is useful for the protocols to identify resource materials that were used, including names.

If some of the resources were published, it is helpful to cite the author, titles, and dates.

In some cases, a rehabilitator may choose to use or modify published training and protocols from other rehabilitators that directly address the procedures that they follow at their facility. The rehabilitator should ensure that the protocols apply to their facility. In such situations, the rehabilitator is likely to need to supplement those with more specific and detailed instructions.

What about changing the protocols to reflect changed practices?

The protocols should be kept up-to-date and modified to incorporate advancements in the rehabilitation field and any change in practice. By their nature, practices will change over time and the written protocols should be updated to reflect those changes. Procedures will change to improve practices, clarify activities and prevent and resolve problems.

Problems can and will develop in spite of best efforts in developing, testing, and revising protocols. As a result, the protocols should be reviewed regularly and modified to reflect the most current practices and communications – and to help achieve the best possible processes and results.

What subjects, activities or tasks require written protocols?

Examples of common tasks where rehabilitators use unlicensed people to help with animal care and that would require the need for written protocols because of absences of the rehabilitator typically include feeding younger, healthy orphans or older animals in pre-release cages; cleaning cages when animals must be handled; admitting new animal patients to rehabilitation (which includes handling); and administering first aid to new admissions.

As a reminder, the written protocols are only required for the direct animal care tasks and subjects that the unlicensed person performs when the rehabilitator is away. Written protocols on other subjects would not be required if the unlicensed person would not be involved without the rehabilitator on site, such as admission or first aid. Such written protocols are also not required for subjects or tasks if the unlicensed person is working only on activities that do not involve direct animal care, such as diet preparation, cage building, cleaning empty cages, recordkeeping, or fundraising.

Rehabilitators using multiple unlicensed people to help with animal care with a larger variety and complexity of tasks and more animals need more complete and detailed written protocols on more subjects than the rehabilitator who has one unlicensed person helping with a single task for a few animals. Thus, if the rehabilitator is having a single person perform a single task, such as a spouse or neighbor, feeding several young birds when they are away for a few hours, or placing food in a pre-release cage when they are away overnight, the written protocols would likely be shorter and less elaborate.

Planning for the possibility of using unlicensed people to help with animal care is a good idea. So if there is any chance that an unlicensed person would be performing specific rehabilitation tasks when the rehabilitator is away, it is better to have the written protocols already in place and the person already trained on those activities, rather than having to scramble to document procedures and provide additional training at the last minute.

Can published materials on wildlife rehabilitation methods simply serve as the written protocols?

This is really up to each rehabilitator to decide, while keeping in mind the objectives of having the written protocols. Wildlife rehabilitation publications often address a wide variety of topics and issues, ranging from very specific to general, and may include some specific rehabilitation methods. These can provide essential information and even the basis for many rehabilitation operations and decisions.

But while some rehabilitation publications describe specific methods and practices, very few seem to provide the level of detail and specificity that could be considered an adequate and complete written protocol for a specific rehabilitation facility to guide specific activities of unlicensed individuals assisting with various direct animal care tasks. These rehabilitation publications certainly serve as a basis, foundation, or starting point for the written protocols that are then later expanded upon and made more specific for the rehabilitator's own operations. In addition, protocols are complemented by the detailed instructions for daily activities with the animals in rehabilitation.

Rehabilitators are encouraged to use such publications from knowledgeable, experienced, and effective rehabilitators, veterinarians, and others as well as their personal knowledge and experience as they write or refine their own protocols. Incorporating input and material from these publications can help integrate proven and effective practices, prevent and/or reduce problems, and may even save time and effort.

While some items that have been published, whether in print or on the internet, are of high quality and provide effective information and methods, others are not necessarily effective, practical, reasonable, up-to-date, or even provide guidance on ethical or legal rehabilitation practice. Like with other things, rehabilitators should use critical thinking and apply their personal judgment to determine what published materials should be considered in developing protocols.

What about several rehabilitators working together to develop protocols that they all use?

Again, this is really up to each rehabilitator to decide, while keeping in mind the objectives of having the written protocols. Some rehabilitators certainly may develop written protocols together as long as they add specific details for their own location. For example, the rehabilitators jointly may develop a basic set of protocols on capture and handling, placing animals in cages, preparing diets, and feeding young animals in rehabilitation. Details on the locations of equipment, cages and food ingredients would be specific to the location, as would the daily instructions.