

# Regulations Impacting Use of Volunteers, Interns, and Staff: Excessive Bureaucracy or Ensuring Quality Animal Care?

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**Abstract:** Many wildlife rehabilitators holding licenses or permits, especially those operating high volume rehabilitation facilities, often enlist help from others (volunteers, staff, interns), most of whom have not undergone rehabilitation licensure themselves, to perform tasks involving direct animal care. Recently, at least one wildlife agency clarified in their regulations how unlicensed people assisting rehabilitators with direct wildlife care should be trained and supervised, permitted tasks they can perform, and new recordkeeping requirements. This paper describes what prompted these new regulations, approved in Colorado in 2009, on a key aspect of rehabilitation that generally has not been addressed in state regulations, a description of the new regulations, and the predictable and varied reactions from rehabilitators. Since rehabilitator practices regarding the training, supervising, and monitoring of unlicensed volunteers, staff, and/or interns can have a direct impact on the possession, release, and quality of animal care, other state wildlife agencies may consider similar regulations to help ensure an acceptable level of care by specifying requirements for all of the people involved in the rehabilitation process.

**Key Words:** Wildlife rehabilitation regulations, wildlife regulations, wildlife rehabilitation volunteers, wildlife rehabilitation interns, wildlife rehabilitation training, acceptable wildlife rehabilitation animal care, Colorado wildlife rehabilitation regulations, role of unlicensed rehabilitation volunteers, supervision of wildlife rehabilitation volunteers

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## INTRODUCTION

State, provincial, and federal wildlife agencies develop and enact regulations that govern wildlife rehabilitation, including requiring permits and licenses, facility inspections, and recordkeeping. In 2009, the Colorado wildlife agency determined that any person involved in the hands-on care of wildlife directly impacts the outcome of the rehabilitation process for an individual animal. As a result, Colorado Parks and Wildlife (CPW), previously the Colorado Division of Wildlife, expanded existing wildlife rehabilitation regulations to specifically address what the agency called "Unlicensed individuals assisting rehabilitators with direct wildlife care," even when that contact occurs at the licensed rehabilitator's facility and under direct supervision. The CPW regulations delved into a much deeper level of wildlife rehabilitation practices than has been typical. This paper describes factors that prompted the agency action, new regulations, reactions, and further considerations.

## BACKGROUND

Licensed and/or permitted rehabilitators have enlisted help from others to accomplish the many and varied rehabilitation tasks for decades. With rare exception, wildlife agencies have left the training, activities, and supervision of these 'assistants' to the discretion of the rehabilitator and their facility.

Some rehabilitators use help with rehabilitation activities year-round, including as occasional back-up when the rehabilitator is off-site, falls ill, and so forth. More rehabilitators are likely to use extra help during the heaviest seasonal caseload, such as in the spring and summer. Some of the rehabilitation activities involve direct care of wildlife, while other tasks do not involve hands-on care. Some wildlife rehabilitation tasks are difficult and complex. Some tasks may involve higher risk species and/or activities, and possibly

involve restrictions, such as requiring rabies pre-exposure vaccines. Other tasks may be more simple, repetitive, and time consuming, and less difficult or risky for people and animals.

Some rehabilitators formalize this relationship, requiring these potential assistants, who are often unpaid volunteers, to complete an application, attend training, and commit to a regularly scheduled shift and tasks. Other rehabilitators, especially if feeling overwhelmed, may have less stringent requirements and more willingly accept anyone with interest and time available, and then quickly assign them tasks, with little or occasionally no substantial training.

The approach to training assistants varies, with most rehabilitators determining the content of training they provide or require depending on tasks the person will be performing. In many cases, licensed rehabilitators personally present the training and supervise the unlicensed people performing their assigned responsibilities. Other rehabilitation facilities may allow knowledgeable and experienced volunteers or staff that do not have a rehabilitation license, to conduct the training and supervise other volunteers, interns, or seasonal staff. In some situations, this approach can daisy chain into volunteers training and supervising new volunteers, who then train and supervise even newer volunteers, sometimes over a very short period of time during heavy seasonal caseload.

## **AGENCY PERSPECTIVE AND CONCERNS**

During 1994–95, Colorado’s wildlife rehabilitation regulations had an extensive revision and expansion to include provisions now commonly found in many other states. The changes included specifying personal qualifications and experience requirements, renewal and reporting requirements, caging criteria, use of a consulting veterinarian, release regulations, and many others, but also included a new license class for apprentices called a Provisional Rehabilitation License. These regulations, a successful result of agency and rehabilitation community collaboration, remained virtually unchanged for almost 14 years. The Colorado wildlife agency believed many rehabilitators were doing a good job rehabilitating and releasing wildlife in compliance with regulations.

By 2008, the agency had growing concerns about “regulatory compliance and wildlife rehabilitation care by a few rehabilitators around the state.” The agency, in September 2008, initiated a review and revision of rehabilitation regulations focused on the training and requirements of new Provisional (apprentice) license holders to ensure regulatory compliance and acceptable wildlife care. Stakeholder meetings were conducted and a survey was sent to all state licensed rehabilitators (about 100). Additional issues also were raised during the process.

### **Reasons Rehabilitators Use Unlicensed People to Assist with Direct Animal Care**

1. Admissions and case load continue to increase
2. Rehabilitators want to expand rehabilitation capacity
  - a. Number of animals in rehabilitation
  - b. Species
  - c. Complexity of cases
3. The unlicensed person needs experience working with wildlife to meet minimum requirements to obtain own license
4. Unlicensed person wants to learn about wildlife rehabilitation
5. Having someone able to do the more simple, routine tasks allowing person with higher skills to work on more difficult tasks
6. Additional assistance provides a back-up if the rehabilitator has other commitments or cannot be on-site
7. Can help build interest in and increase a sense of responsibility and stewardship for wildlife and the environment

One of the issues was related to the use of unlicensed assistants working directly with wildlife when rehabilitators were not on-site at a rehabilitation facility. The agency knew that there were times when a licensed rehabilitator needed to be off-site and relied on others to perform time-sensitive tasks, such as feeding young animals on an established schedule. Some rehabilitators had relied on Provisional rehabilitators and/or unlicensed people (volunteers, interns, and staff) to care for wildlife in rehabilitation during these situations. Larger rehabilitation centers with high volume caseloads and state labor laws limiting the amount of hours that paid staff is able to work, relied more heavily on unlicensed seasonal staff and volunteers to perform a broad scope of rehabilitation functions.

The agency believed that use of unlicensed assistants had resulted in considerable variation in the effectiveness of animal care and regulatory compliance throughout the state. They believed that the amount and quality of training and supervision of the unlicensed people helping the rehabilitator significantly contributed to successfully attaining rehabilitation objectives, such as healthy wild animals that could survive at release or prompt humane euthanasia when an animal was determined to be non-releasable. Variations in knowledge, skill, performance, and reliability affected results. Inconsistent attendance and increasing turnover also influenced quality of animal care, especially for rehabilitation centers that relied on many different unlicensed volunteers per week, often over 80 per week. The use of unlicensed people was not unique to larger centers, as individual home-based rehabilitators with much smaller caseloads and operations also used unlicensed individuals from time to time.

Both the rehabilitation community and wildlife agency were aware of situations where Provisional license holders and unlicensed people had direct responsibility for wildlife care and decisions for which they were not prepared. The lack of training, supervision, and back-up was believed to have compromised the quality of wildlife care, releases, and overall compliance with the regulations in some cases.

The agency also had concern that delegation of significant responsibilities to unlicensed people when the rehabilitator was off-site created an impression that licenses were not essential and diminished the importance of training and experience. In addition, the agency was concerned that allowing unlicensed people to exercise so much responsibility when the rehabilitator was absent might be considered a de-facto license. In fact, some unlicensed volunteers did

request that their volunteer time and experience qualify them for an upgrade to a more advanced license level.

The wildlife agency had concerns about assistants having possession of wildlife for which they were not licensed. Unlicensed possession occurred at the rehabilitation facility when licensed rehabilitators were off-site, as well as when assistants were transporting wildlife to veterinarians, other rehabilitators, and release sites.

After rigorous discussions between the wildlife agency and rehabilitators, lively testimony at Wildlife Commission meetings and in-depth analysis of responses from the survey of rehabilitators, the agency proposed a revised regulation that they believed would allow rehabilitators to use trained unlicensed help, ensure acceptable wildlife care, and hold people accountable for their actions. The Wildlife Commission approved the revised regulations related to the use of unlicensed people in July 2009 and implemented the new regulations September 2009, one full year after the revision process had begun. These regulations have been in use for three years at the time of this publication.

## **NEW REGULATION**

The revised Colorado CPW regulation, Chapter 14: Wildlife Rehabilitation—Article II, 1401.6, allows both Full-license and Provisional rehabilitators to use unlicensed people to help with direct wildlife care, as before, but now according to specific criteria. The revision also required that rehabilitators conduct training on animal care for unlicensed helpers rather than having unlicensed people, who could be new themselves, conduct the training and supervise others. The regulations allowed Provisional (apprentice) license holders to train and use unlicensed people to assist them with direct wildlife care according to defined criteria with approval by their licensed rehabilitator sponsor. The regulations also increased recordkeeping related to training and use of unlicensed people.

The CPW included a statement that the agency could restrict the rehabilitator's use of unlicensed people if a wildlife rehabilitator is not in compliance with regulations regarding the use of unlicensed individuals, or where such wildlife rehabilitator or unlicensed individual fails to provide an acceptable level of care.

The bulleted items in the following five subsections indicate what the revised regulations require in key areas. A discussion of impacts and reactions to these regulation requirements follows the bulleted items.

## Training.

- Specifies minimum training topics for those *assisting with direct animal care*, including five subjects: 1) Wildlife rehabilitation ethics, 2) Rehabilitation regulations, 3) Wildlife diseases and parasites, 4) Capture and handling of species with which they will be working, and 5) Nutrition, diet and feeding of species with which they will be working.
- Requires further training for unlicensed people assisting with other tasks (transportation, conducting examinations, providing first aid, administering medications, decisions on euthanasia, etc.).
- Requires the training of unlicensed people assisting with direct animal care to be conducted by fully licensed or Provisional rehabilitators (and not by other unlicensed people).
- Requires annual reporting with topics and dates of training received for each unlicensed person working directly with wildlife care.

In general, rehabilitators have made their own decisions and developed policies about training, content, and instructors for any unlicensed individuals they are teaching, whether at home-based facilities or rehabilitation centers. While there may be some requirements for training and experience for people who are working with the rehabilitator in order to obtain knowledge and experience to obtain their own rehabilitation license, there is still considerable flexibility. Some rehabilitators conduct training in small groups or classes. Others provide one-on-one demonstrations with multiple practice sessions, feedback, and close supervision. Some simply provide close monitoring, coaching, and feedback to ensure the person accomplishes the task in a manner that achieves high quality care and safe practices. Other rehabilitators demonstrate the task one or two times and then allow the helper to perform the task independently along with a plethora of variations.

The CPW website provides an online description of the general topics the sessions should include. It is recognized that the quality of training and performance still will vary. Rehabilitators, however, do know that training for unlicensed people helping them with direct wildlife care is required, and not optional.

The requirement for licensed rehabilitators to conduct the training for unlicensed people working with direct animal care was due to the belief that the license holder has more knowledge of, skill in, experience with, and a greater sense of responsibility and accountability for wildlife. The agency expressed reservations about allowing unlicensed people to provide training to other new people as they may have less

complete qualifications and perhaps only tangential involvement in certain wildlife care tasks.

## Supervision of People Assisting with Direct Animal Care.

- Rehabilitator must provide direct on-site supervision to assistants who have been trained in the animal care activities and have demonstrated proficiency.
- If the rehabilitator is off-site for a short time, the unlicensed assistant(s) may continue performing activities according to regulatory criteria.
- Provisional rehabilitators may use unlicensed assistants for tasks they themselves have had prior training, the unlicensed people also have had training, and with approval of their sponsoring, fully licensed rehabilitator.

Just as with training, rehabilitators have made their own decisions about who supervises any volunteers, interns, et al, for the range of activities involved in wildlife rehabilitation, including the wide range of activities that do not involve direct animal care (cage building and maintenance, educational outreach, laundry and cleaning, ordering supplies, fundraising, etc.). The Colorado regulations now specify that licensed rehabilitators are the direct supervisors and that unlicensed people cannot supervise other unlicensed people assisting with direct wildlife care. In non-animal care activities, experienced and knowledgeable staff, volunteers, interns, and others often are allowed to supervise.

## Off-site Restrictions.

- If the rehabilitator is off-site, the assistant(s) may continue performing activities for which they are trained if written protocols exist for tasks performed, including administering medications and performing euthanasia that requires emergency decision/action as directed by the license holder.
- There must be emergency or 'back-up' contact phone numbers for the responsible rehabilitator and another rehabilitator licensed for those species if the appropriately trained unlicensed person is performing rehabilitation tasks in the absence of the licensed rehabilitator.

Some wildlife rehabilitators have written protocols and policies guiding their practices, particularly those operating large rehabilitation centers that have multiple people involved in the rehabilitation activities, making decisions, supervising, and monitoring results. The extent, scope, and completeness of these written protocols vary widely. Some have extensive protocols

and others little to none. Many rehabilitators who work independently with few or no volunteers, rarely document their rehabilitation practices due to the limited number of people who occasionally help them.

The requirement to have written protocols for assistance with direct animal care when the licensed rehabilitator was not on-site meant that documentation of care practices was necessary. While this initially takes time to develop, documentation available for use by people with less knowledge and experience with various rehabilitation activities has benefits. The unlicensed people helping with wildlife can familiarize themselves with the assignments and ensure they know what to do and how to do it. If they do not know what to do, they can ask questions or get help from others. If something unexpected occurs or they forget what to do when there is not a licensed rehabilitator on-site, the unlicensed people can refer to the written practices to help them remain calm and remember what to do. Since rehabilitating wildlife often involves 'surprises,' the documentation may benefit the animals and rehabilitators. It also could help identify an epicenter and transmission path in the case of disease or even a zoonotic event.

The regulatory language uses the term "short periods of time" when referring to a rehabilitator needing to be off-site. In various of the stakeholder meetings held to discuss the issues around this topic, the agency expressed the opinion that having written protocols in place is not to be construed as tacit approval for the rehabilitator to be absent for long periods of time when assistants are working with direct animal care.

### **Recordkeeping and Accountability.**

- Recordkeeping required on-site for all people assisting with direct animal care, showing duties and dates worked.
- Submission of work records plus dates and type of training received for each assistant.

It is fairly common for rehabilitators relying on unlicensed people to help with direct animal care to have some sort of documented schedule so that they know when people will be available to help, such as with feeding orphaned animals, helping with releases, and so forth. The Colorado rehabilitation regulations include some additional elements. First, the records include the subjects in which the unlicensed helper has been trained, training date, and the name of the trainer.

Second, documentation is to be maintained on-site specifying who was working with the wildlife and at what times those tasks were performed.

The wildlife agency required this due to comments by a few rehabilitators they were unable to identify who were responsible for problems, including possible violations and disease transmission. Documentation of the type of work a person had performed was hoped to help the person feel greater responsibility and accountability (e.g., feeding baby birds, cleaning raccoon cages), as well as make it easier for the rehabilitator to identify and resolve causes of problems, especially in a large rehabilitation facility with multiple people working with many animals each day.

Third, Colorado's regulations require that documentation of the use of licensed people to assist with direct wildlife care be submitted to the wildlife agency when the annual rehabilitation report is submitted either electronically or by paper. While rehabilitators considered this time consuming and questioned why submitting records as to use of unlicensed helpers was necessary, the agency's concerns about accountability prevailed. It would seem that maintaining documentation on-site for review upon request, but not submitting it to the agency would accomplish the objective and reduce work for the agency and rehabilitator.

### **Concept of "Acceptable Animal Care."**

- May restrict a rehabilitator's continued use of assistants if the arrangement "fails to provide an acceptable level of care."
- The regulations further indicate that the fully licensed wildlife rehabilitator is responsible for the wildlife rehabilitation activities performed, whether provided personally, by Provisional wildlife rehabilitators, or unlicensed individuals under their direction.

The regulations declare that the licensed rehabilitator is responsible for the actions and activities of unlicensed individuals, as well as any violations of the regulations by those people. CPW regulations state that if the level of animal care is found to be unacceptable, rehabilitators would be required to take action to improve animal care to an acceptable level. Such improvements could include changes in caging or facilities, rehabilitation practices, limiting the species and numbers of animals rehabilitated, limiting the use of unlicensed individuals in assisting with animal care, or more.

After the Commission approved the regulations, CPW used input from rehabilitators, agency staff, and publications to clarify the concept of acceptable care. CPW posted a document on the agency's website that clarified the concept of "acceptable care." It states that the agency "recognizes that most rehabilitators

are already striving to achieve a high level of animal care.” They continue that the reference to “acceptable care” is intended to establish a minimum threshold in providing animal care, and is not intended as a way to impede rehabilitation or rehabilitators. CPW also stated that rehabilitating wildlife is complex and difficult in many ways and there is more than a single method to achieve positive results. While the phrase “acceptable animal care” is now included in the current regulations, it also is recognized that more completely defining what constitutes “acceptable animal care” is challenging and will develop over time. The CPW document then lists several factors that contribute to acceptable animal care and provides examples of positive performance indicators and comparative measures. Table 1 provides examples from the document.

The CPW document about acceptable care also mentions release rate. It says “Release rate can help rehabilitators look at the ‘big picture’ from a year or trends from multiple years, or comparing release rates of species or other rehabilitators working with comparable species, ages, and conditions of animals. But only considering release rate as a ‘raw’ percentage can be misleading since many factors may affect the release rate, including calculation method, consistency, animal’s health at time of release, and more.”

While the definition of “acceptable care” in the Colorado regulations is not defined in detail and is somewhat subjective, its inclusion adds an expectation of a standard of care—more than a rehabilitator just holding a license. The ambiguity, however, could affect enforcement in the field as well as during judicial process. While the Rehabilitators Code of Ethics, as published in the *Minimum Standards for Wildlife Rehabilitation*, 3rd edition, states that a rehabilitator “should strive to achieve a high standard of care,” the concept deserves considerably more discussion and clarity, especially since it is now in regulation.

## **REACTION TO CHANGES**

Predictably, the reactions from rehabilitators in the state ranged from praise to outright disdain. Many of the responses indicated a general discomfort with further regulatory involvement or interference in their activities. Some responded that the new requirements were already largely in place in their facility and felt that additional paperwork and reporting were unnecessary. The following is a sampling of responses during and after the changes were considered and implemented:

*I already train my volunteers because they need to know the stuff if they are going to work with wildlife here. We don’t need regulations on volunteers.*

*We have rehab licenses and care about the animals, probably more than wildlife agency. The volunteers care about wildlife too. We should be able to use volunteers as we wish. Period.*

*We were already providing training for any volunteers so this was not a big deal except having to submit records to the agency. Submitting the extra paperwork is unnecessary.*

*I am not thrilled with having more regulations. But we all know of rehabbers who left volunteers and staff who didn’t know what they are doing with hundreds of animals that got hurt, spread disease, and animals died. If we don’t step up and make sure rehab is done well, we shouldn’t complain when the Division finally noticed and acted.*

*There are too many regulations on rehabilitation. Overregulation of a volunteer activity where we spend our own time and money makes people quit or go ‘underground.’*

*I don’t think the agency looks at my rehab records much less volunteer records. It is a waste of time to submit volunteer records.*

*The amount of time it would take to develop and write protocols of my rehab practices and train volunteers is more than the help I would get from volunteers. So I’ll rehab fewer animals and not use volunteers.*

*I don’t like regulations on volunteers, but it wasn’t good for volunteers who didn’t know what they were doing to be left making decisions about so many animals and causing harm.*

*I feel the volunteers who have been around for a long time should be able to train and supervise other volunteers even if they don’t have licenses.*

*Most rehabbers already try their best to care for wildlife. Putting a reference to acceptable care in regulations isn’t needed. And I’m not sure officers know the difference between good and bad rehab care anyhow.*

*I already trained volunteers and had ‘back-up’ phone numbers if I had to leave. I had to write protocols but having notes that volunteers can refer to if I’m not there reduces the chance that they will forget what to do when something unexpected occurs—which happens fairly often with wildlife. While I would prefer not having regs, these are generally ‘good business,’ except for having to submit volunteer records to the DOW.*

Reactions from wildlife agency staff also varied. Some agency staff was glad that anyone involved with direct care of wild animals had basic training on regulations, diseases, and capture and handling. They appreciated that there was a ‘chain of responsibility’ and expectation of quality of care identified so people

Table 1. Examples of Acceptable Animal Care Excerpted from Colorado Regulations.

Factors	Examples of Positive Performance Indicators and Comparative Measures
Caging and Facilities	Caging adheres to regulatory requirements; not crowded; proper lighting, ventilation, and temperature; clean and free of accumulated waste; minimal odors; barriers from humans and domestic animals; appropriate nesting and bedding; clean water and appropriate diet; absence of parasite and pests; shelter as needed.
Humane and Timely Euthanasia	No animal on site in obvious, untreatable pain and suffering; no animals with non-releasable injuries or conditions; records indicate timely euthanasia; most euthanasia occurs within first four days of rehabilitation; records and protocols document humane methods for euthanasia.
First Aid Is Timely and Effective	Presence of first aid supplies (medications, fluids, bandages); presence of stabilization equipment (restricted movement caging, heating pads, incubators, etc.); records and protocols document nature and timing of species-specific treatments.
Veterinary Care	Solid working relationship with DVM(s); DVM knowledgeable of /approves medical treatments; records indicate DVM visits when needed plus treatments performed.
Improving Animal Health	Records indicate sustained growth rates or improvements; explain mortality rate after four days exceeding statewide average of 8% for birds and 10% for mammals; analyze higher rates to improve husbandry practice; on-site reference materials available.
Imprinted on Own Species	Pre-weaned animals only handled for feeding or treatments; minimal contact for post-weaned animals; housed with conspecifics (after quarantine); escape behavior evident.
Time in Captivity	Records clearly indicate time in captivity; average time should not significantly exceed statewide average per species; holding past 365 days should indicate CPW approval.
Appropriate Release	Appropriate timing and location (to minimize human conflict); animals ready for independent survival upon release; release location within 10 miles of capture point unless CPW approval.

could be held accountable, rather than use the excuse, such as ‘a volunteer did that when I was not around—it wasn’t me.’ Officers whose responsibilities included rehabilitation facilities with larger numbers of unlicensed people helping with direct animal care believed the regulations provided them with tools to better monitor, encourage, and, if needed, enforce compliance with regulations and quality of animal care. Some agency staff appreciated that possession issues related to rehabilitation were ‘tightened up,’ while others with less interest in or appreciation of rehabilitation did not care. Some officers paid attention to rehabilitation records, while others did not.

**ATYPICAL REGULATIONS OR A POTENTIAL NEW TREND?**

A new regulation often prompts a range of thoughts and reactions, especially if it is significantly different from other, more commonly seen regulations. One wonders if new regulation is due to a reaction to a

specific local problem or need, or if it could signal the start of a trend. In the case of wildlife rehabilitation, which is a relatively new topic of wildlife regulations compared to the more traditional activities such as angling or hunting, it very easily could be the early start of a trend. The regulations described in this paper could be either.

While rehabilitators may want to use volunteers, interns, and others to help them, they would prefer not to have regulations governing the volunteer use. The agency, however, needs to ensure that temporary possession of wildlife provides an acceptable level of quality animal care, especially if in the hands of people that have not satisfied the requirements of permitting and licensure. Recognizing these differing but overlapping perspectives, the rehabilitation field may want to ensure that use of unlicensed people is done well and that the objectives of quality care, safety, and regulatory compliance are met.

Perhaps the start of another trend is having regulations that include and apply the term “acceptable animal care.” As rehabilitators know, rehabilitation practices vary widely. While some practices may be highly effective, there are also some common practices far less effective, so it is not surprising there are different opinions about what constitutes acceptable rehabilitation. Clearly, the topic is difficult, sensitive, and controversial. This issue needs considerably more discussion by the rehabilitation community so it can be addressed proactively and positively, rather than ending up as a regulatory decree by an agency with less familiarity with this complex subject.

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