



— The Alliance for — Professionalism in Dog Training

Frequently Asked Questions About the Campaign for Licensing Legislation for Professional Dog Trainers

We are continuing to add to this document, as comments are received. Please send your questions to feedback@prodogtraineralliance.org.

1. Why add regulation to the current system? Dog owners looking for qualified trainers can already ask about training and certification status.

The [model licensing legislation](#) builds on current training and certification, but licensing adds a level of consistency, setting minimum standards and providing for enforcement of those standards. Without licensing requirements, it's a "buyer beware" system for dog owners seeking professional dog training or behavior consulting. And those most at risk from unqualified or abusive trainers are the animals, who have no say in how careful or well-informed their owners are in selecting the trainers who are entrusted with their dogs. Even dog owners seeking qualified trainers may not know what credentials they should look for in a professional dog trainer. Every state in the U.S. has licensing laws for teachers and counselors for people; dogs deserve that same level of protection.

2. What's the harm in allowing dog trainers to do business without any certification or licensing?

Certification provides assurances to the public that a certified dog trainer has met rigorous standards for knowledge in science-based dog training techniques, covering key content developed by subject matter experts in the profession. While many dog trainers who don't hold certifications may provide high quality training services, the model legislation supported by CCPDT and APDT would assure that all practicing dog trainers have demonstrated the knowledge, experience, and commitment to appropriate, competent, and safe training practices that should be the hallmark of our profession.

Beyond certification requirements, the model legislation calls for licensing boards to require professional dog trainers to adhere to policies equivalent to the Joint Standards of Practice and Code of Ethics and Least Intrusive, Minimally Aversive Effective Behavior Intervention Policy (“LIMA”) as developed by APDT, CCPDT, and the International Association of Behavior Consultants (“IAABC”). Dog trainers’ adherence to these standards would have avoided the kinds of horrific outcomes recounted in these recent news reports:

- An eight-month-old puppy enrolled in a five-week training course [died from strangulation](#) due to the trainer’s use of a choker collar to apply pressure to the dog’s neck during a “power struggle”; the trainer was convicted of animal cruelty – Wisconsin, October 2020
- Forty-one dogs were [found severely neglected](#), with many emaciated, after authorities searched a dog training business; citations were issued against the trainer – South Carolina, May 2021
- Twelve dogs were found at a training facility with [untreated injuries, no access to food or water](#), in feces-filled crates; the trainer was charged with felony animal cruelty – Virginia, March 2021
- A dog trainer [killed a dog by stabbing it](#) with pocketknife in an attempt to control and then euthanize the dog; the trainer was charged with torture of an animal – Kentucky, April 2020.

These appalling incidents all led to law enforcement involvement and criminal charges, but substandard training can also harm dogs in lasting ways for which animal mistreatment laws provide no remedy, causing stress, trauma, and behavioral problems. By enforcing minimum requirements for practice of the profession, licensing would protect against these outcomes. Certification organizations can develop the *content* of standards for professional dog training, but *enforcement* of standards is more effectively done by a licensing agency. Private certification organizations lack the legal authority and the resources to serve as a substitute for licensing boards in protecting the welfare of the animals entrusted to dog trainers and behavior consultants.

3. Does the model legislation have a goal other than providing the public assurance in hiring qualified professionals?

The primary goal of developing model legislation on dog trainer licensure is to have a voice in shaping such legislation. In at least two states, legislation to require licensure of dog trainers was introduced, without CCPDT or APDT proposing or being offered the opportunity to comment on it. CCPDT and APDT have developed a model for such legislation that (1) prioritizes the well-being of the dogs receiving training, (2) provides assurances to the public of the competencies and quality of dog trainers, (3) is appropriately inclusive of other pathways to licensure besides CCPDT certification, (4) provides an appropriate and balanced structure of licensing board oversight of dog trainers, and (5) supports dog trainer mobility. State legislators routinely utilize model legislation developed by stakeholders and/or experts as a guide in crafting formal legislation.

4. What would be required for a dog trainer to obtain a license?

The model legislation proposes that, once a state's Dog Trainer Licensure Board is up and running, an individual who works as a professional dog trainer for compensation would need to be an adult of good moral character (as determined by the Licensure Board), with a high school degree or GED, and must hold current certification in dog training from an Approved Certification Program. The Licensure Board would issue licenses for a three-year term, and renewal of licensure would be based on payment of a reasonable fee and evidence that the licensee continues to hold current certification with an Approved Certification Program. For initial licensure, the model legislation calls for a "grandfathering" period in which certification would not be required for any applicant who continuously engaged in the practice of dog training for at least a year prior to the phase-in date for licensure. "Grandfathered" licensees, however, would be required to hold current certification in order to renew their license.

5. What programs would qualify as an Approved Certification Program?

The model legislation supports multiple options for certification. Under the bill, the Licensure Board would establish the criteria for Approved Certification Programs. The criteria would include minimum education and/or experience eligibility requirements, adherence to LIMA or to equivalent policies adopted by the Licensure Board, and maintenance of certification requirements of at least 36 continuing education units per three-year period. The Licensure Board would publish on its website a list of Approved Certification Programs, as well as a list of approved dog trainer education programs that meet minimum education requirements for Approved Certification Programs.

6. What about dog trainers who haven't yet earned certification or are just entering the profession?

In addition to the "grandfathering" period after licensing regulations are first rolled out, the model legislation also calls for the Licensure Board to issue provisional dog trainer permits that would authorize unlicensed applicants to provide dog training services under the supervision of a licensed dog trainer for a one-year period. These permits would enable individuals to develop the work experience required by some certification programs or give those individuals more time to earn their certifications.

7. What level of supervision is required for a trainer holding a provisional permit?

Aspiring trainers who hold a high school degree or GED can qualify for a provisional permit, under the provisions in the model legislation. Provisional permit holders must work under the supervision of a licensed dog trainer. The level of supervision would be up to the dog trainer. Supervision requirements are common in many licensed professions, including in health care professions. The licensed supervisor would bear responsibility for the actions of the permit-holder they supervise, but the model legislation does not include a requirement that the licensed dog trainer be continuously present while the permit holder is working with a dog.

8. What about out-of-state dog trainers?

The model legislation calls for the Licensure Board to adopt regulations to allow for short-term limited dog training or dog behavior consultant services by out-of-state practitioners who hold current certification from an Approved Certification Program but who do not hold a license in the State, as well as procedures to allow such individuals to apply for temporary limited permits that authorize the individual to work in the State as a dog trainer for a longer, but still limited, period of up to a specified maximum number of days per calendar year. The model legislation also calls for reciprocal licensure for individuals who hold current certification in dog training from an Approved Certification Program and hold a dog trainer license issued by another State.

9. Who would serve on the Licensure Board?

The model legislation calls for the Licensure Board to have appointed members that include a state agency employee, professional dog trainers who hold the required certification or license (including at least one holding a professional certification as a dog behavior consultant), licensed veterinarians, a representative of a nonprofit animal protection group, and a member of the public who has used dog trainer services. In addition to the oversight Licensure Board, the model legislation authorizes appointment of an employed Executive Director and, as needed and if funding is available, support staff.

10. How would the Licensure Board supervise licensed dog trainers?

Under the provisions of the model legislation, the Licensure Board may adopt LIMA or equivalent standards as the practice standards for licensed dog trainers. Any licensed dog trainer or provisional permit holder who violates those standards or engages in other enumerated offenses would be subject to disciplinary action by the Licensure Board, according to procedures established by the Licensure Board. Penalties could include revocation of licensure or eligibility for licensure, or lesser disciplinary actions. Fraudulently claiming to be licensed could subject an individual to civil penalties or prosecution.

11. Does the model legislation exclude those with disabilities from holding a dog trainer license?

No. Safety and competence are touchstones of licensing, and individuals with disabilities – whether a physical disability or a mental health diagnosis – are fully able to earn certification as a professional dog trainer and to hold a license to practice as a dog trainer. The model legislation includes no eligibility standards that address whether an applicant has a disability.

The model legislation gives authority to the Licensure Board to investigate ethics complaints and potentially suspend or revoke a license if a dog trainer poses a substantial risk to the health or safety of the public or of animals under the dog trainer's care or supervision. One basis for disciplinary action rests on proof that a dog trainer practiced while the dog trainer's ability to practice in a safe and competent manner was materially impaired. The initial draft of the model legislation stated a list of factors that could result in such material impairment, including alcohol or drug abuse, physical impairment, or mental instability. Early feedback on the model legislation questioned whether the listed factors would disqualify individuals with disabilities from holding a license. That was never the intent of the model legislation, and the comments

demonstrate that the list detracts from the core focus of the provision: that dog trainers should refrain from practicing while so materially impaired that they cannot provide safe or competent services. An updated draft of the model legislation will delete this list of factors entirely. Input from the community has been extremely valuable in helping the Alliance address the concerns within Section 11 of the model legislation, and we look forward to continued input and support.

12. Will the process be fee-heavy?

The model legislation specifically calls for Licensure Boards to “set the fees such that the revenue generated from these fees is not expected to exceed the operating costs incurred by the Board” in administering statutory requirements of the legislation. The expectation is that the fees involved would be modest.

13. Why does the model legislation leave some provisions undefined, such as not setting some of the specific timelines or identifying the list of the Approved Certification Programs?

The model legislation aims for a balance between specificity and flexibility. Some specific details are left to each state to identify or alter, such as the duration of grandfathering eligibility or of temporary authorization for out-of-state dog trainers to provide services without applying for a license. Other details are left to each Licensure Board to address through a rulemaking process that includes public comment. Where specifics have been included, such as with the composition of the Licensure Board, these specifics reflect our proposals for optimal operation of the licensing authorities and align with our policy objectives that are protective of public and animal health, safety, and welfare. Of course, CCPDT and APDT recognize that this is only a model, and that each state legislature may make other changes as part of the legislative process.

14. In how many states will CCPDT and APDT pursue consideration of the model legislation?

We will be launching our campaign in a few initial states that will serve as pilots for the legislation but ultimately aim to have the model legislation adopted across the country. As with any legislative effort, the timing and the political dynamics are hard to predict. Our hope is that once a few states successfully adopt this model, some other states may follow suit even on their own initiative, recognizing dog trainer licensure as a best practice.

15. How can I help support this effort?

After the model legislation has been introduced in a state, grassroots advocacy can be instrumental in winning support for the bill among legislators. We’re not yet at the stage for mobilizing such support, but please fill out this short [form](#) if you would like us to contact you when the time is right to support our advocacy efforts in a state where you live or work.