



———— The Alliance for ————  
Professionalism in Dog Training

April 14, 2022

The Honorable Adrin Nazarian  
Assembly District 46  
1021 O Street, Suite 6230  
P.O. Box 942849  
Sacramento, CA 94249

*Submitted electronically*

**Re: AB 1901 – Dog training services and facilities: requirements – Oppose/Amend**

Dear Assemblymember Nazarian:

On behalf of the [Alliance for Professionalism in Dog Training](#) (the “Alliance”) and its more than 500 professional dog trainers in California, we write regarding AB 1901. We support your goal of establishing standards for dog trainers to ensure dogs are safe from harm and neglect when receiving training. However, as currently drafted, we are concerned that the bill omits baseline qualification and professional conduct requirements for those offering dog training services to the public and contains other provisions that do not best serve the profession or the public.

For these reasons, we do not favor the bill in its current form. We instead offer our proposal for a substitute bill.

As explained below, the Alliance has engaged in a months-long effort to develop well-vetted [model legislation](#) requiring licensing for dog trainers that would more comprehensively and more precisely advance the worthy objectives of AB 1901. We respectfully request that you consider offering the Alliance’s model legislation as a substitute bill with strong backing from the professional dog trainer and animal welfare communities. Our model legislation:

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 geographic mobility.

## **About the Alliance for Professionalism in Dog Training**

The Alliance was formed in 2021 for three key reasons: (1) to protect consumers and dogs from unqualified or unethical trainers; (2) to advocate for licensing laws that include the dog trainer profession's voice and expertise while providing appropriate regulatory oversight of professional dog trainers; and (3) to permit multiple pathways for professional dog trainers to receive legal authorization to practice.

Our organization is an unincorporated nonprofit association founded by the [Certification Council for Professional Dog Trainers](#) (CCPDT), the leading certification council for the profession, and the [Association for Professional Dog Trainers](#) (APDT), the leading trade association for dog trainers. Combined, we represent no fewer than 4,500 professional dog trainers within the United States. In developing the model legislation, the Alliance sought multiple rounds of input from the national community of dog training professionals, resulting in carefully considered model legislation.

## **Model Professional Dog Trainer Licensing Legislation**

To qualify for a license under the model legislation, professional dog trainers would need to hold current certification in dog training either from an approved certification program or as a Certified Applied Animal Behaviorist or Associate Certified Applied Animal Behaviorist. Dog trainers without certification could obtain permits to provide dog training services under the supervision of a licensed dog trainer. Licensed dog trainers and permit holders must also adhere to policies equivalent to or more restrictive of aversive practices than the [Joint Standards of Practice, Professional Code of Ethics](#), and [Least Intrusive, Minimally Aversive](#) (LIMA) Effective Behavior Intervention Policy as developed by APDT, CCPDT, and the International Association of Behavior Consultants (IAABC).

Our model legislation goes beyond the current provisions in AB 1901 to add a level of consistency by setting minimum standards and providing for enforcement of those standards through the state licensing board. This focus goes to the heart of consumer protection and animal welfare.

By including a requirement for all professional dog trainers to adhere to the Joint Standards of Practice, Professional Code of Ethics, and LIMA, the model legislation also gets to the heart of AB 1901's concerns by including, among other things:

- Requiring knowledge of and adherence to applicable laws, ethics and professional standards, which would include current health regulations governing facilities for boarding dogs;
- Truth in advertising and full disclosure of financial arrangements, fees, and services rendered;
- Competence to perform professional services within the individual's training and level of experience; and
- Adherence to minimum standards.

If you are willing to substitute the model legislation for the current draft of AB 1901, the Alliance offers ourselves as a passionate partner to work with you to pass the legislation. We look forward to continuing the discussion on how we can support your efforts to adopt

legislation that emphasizes the professionalism of certified dog trainers, helps ensure that consumers can obtain safe and effective training for their dogs, and protects dogs from sub-standard or dangerous practice.

Thank you for considering our views.

Sincerely,



Ashley Foster CBCC-KA  
President  
Certification Council for Professional Dog Trainers



Heidi Meinzer CPDT-KSA CNWI  
Secretary/Treasurer  
Association for Professional Dog Trainers

cc: Assemblymember Marc Berman  
Assemblymember Heath Flora  
Members, Assembly Committee on Business and Professions