



Guide Dogs for the Blind



April 21, 2017

Dear Assembly Member –

Guide Dogs for the Blind, the largest guide school in North America and correspondingly the largest guide school in California, urges you to vote “NO” on AB 1705, which would extend the term of the California State Board of Guide Dogs for the Blind for another four years. The California State Board of Guide Dogs for the Blind is a regulatory body created by the Legislature in 1947. It was established at a time when guidance and regulation of guide dog school programs in the State of California was deemed necessary. The stated purpose of the Board is the public protection of guide dog users in California.

Our clients and other guide dog consumers in the State of California, many of whom have contacted you directly, are clear that they do not want or feel they need the State Board.

In addition, the State Board places an undue burden on the guide dog schools in California. With the passing of SB 1331, schools from outside of California can operate within the State unregulated. The justification for this is that the schools are certified through the International Guide Dog Federation (IGDF), globally considered the highest standard any guide dog program can attain. All three guide dog schools in California are certified through IGDF, thereby meeting the requirements for safe and appropriate instruction and protection put forth to all consumers through SB1331.

Guide dog schools within California are required to pay substantial fees to the Board as a requirement of operation within the State. However, SB 1331 has exempted schools outside the State that are IGDF certified from paying fees or having to qualify in order to operate within the State. We believe that this is an undue burden on California schools and penalizes us relative to our out-of-state counterparts.

Guide Dogs for the Blind pays approximately 80% of all of the fees paid to the Board. Last year we were required to pay \$124,000, not including individual licensing fees or renewals. This is a significant amount of money for a non-profit to pay, particularly because we also pay fees to be IGDF certified and are being held to a higher standard through IGDF than that of the State Guide Dogs for the Blind Board.

(800) 295-4050 | guidedogs.com

National Headquarters: P.O. Box 151200, San Rafael, CA 94915-1200

California Campus: 350 Los Ranchitos Road, San Rafael, CA 94903 | (415) 499-4000

Oregon Campus: 32901 SE Kelso Road, Boring, OR 97009 | (503) 668-2100

SB1331 clearly states that the Board does not represent all guide dog users in California, but only those who have graduated from a California guide dog school. This distinction places responsibility on the consumer to pick a California school if they want the protection of the Board – this limits options for the consumer as well as further diluting the mission of the Board because the State Board protects only a subset of guide dog users within California.

In conclusion, we believe that the California State Guide Dogs for the Blind Board is redundant and should be sunsetted. The quality of the guide dog industry is determined and enforced through the IGDF, not through the California State Guide Dog Board. The IGDF has a much broader reach within California because they oversee and protect every guide dog handler within the State who has chosen to receive services from an IGDF accredited school. The State Board only protects those consumers from California-based schools. No other state has a board, and we are unaware of any evidence that non-California, IGDF-certified guide dogs schools perform significantly worse with respect to their instruction than IGDF-certified California schools.

We, therefore, urge you to vote “NO” on AB 1705.

Sincerely,

A handwritten signature in black ink, appearing to read "Christine Benninger". The signature is fluid and cursive, with a large initial "C" and "B".

Christine Benninger
President and CEO
Guide Dogs for the Blind