(Name)

(Address)

(City, State, ZIP)

June 12, 2017

Honorable Jerry Hill

Chair, Senate Business, Professions and Economic Development Committee

State Capitol, Room 2053

Sacramento, CA 95814

RE: Oppose AB 1705

Dear Senator Hill:

I oppose AB 1705 as amended, which would extend the term of the California State Board of Guide Dogs for the Blind (Board) for one year, and establish a task force under the Board’s jurisdiction to make recommendations concerning the role of the Board.

The two consumer organizations in California composed of blind people-the National Federation of the Blind of California and the California Council of the Blind-as well as the largest guide dog school in California-Guide Dogs for the Blind, Inc.-oppose AB 1705. The Lighthouse for the Blind and Visually Impaired in San Francisco also opposes AB 1705. The only entity arguing for the continuance of the Board is the Board itself.

At its convention in October 2015, the NFBCA passed a resolution calling on the Legislature to sunset the Board. The Board was created in 1947 to address issues related to fraudulent guide dog trainers. Those issues were resolved by the Board and the Board fulfilled its function at the time.

Now, more than seven decades after the Board was created, in the United States and internationally, guide dog schools subscribe to standards set by the International Federation of Guide Dogs (IGDF). Fourteen United States-based guide dog schools--including the three guide dog schools based in California--and eighty-five international guide dog schools, subscribe to the standards and practices of the IGDF. Accreditation by the IGDF of any guide dog program is accepted globally as representing the highest standard any guide dog program can attain.

California remains the only state with a guide dog board, which created an additional set of parallel standards with which guide dogs schools must comply. The standards set by the Board are modeled after the IGDF standards. They are duplicative and add nothing to existing IGDF standards. Further, there is no evidence that guide dog schools in other states provide a different quality of service than schools based in California. Thus, the Board no longer serves the purpose for which it was created.

Moreover, the Board is more of a hindrance than a help to guide dog users. It creates hurdles for guide dog users who require follow-up services from their guide dog schools. In 2009 the Board began to increase its jurisdiction to prevent out-of-state schools from entering California to provide follow-up services to guide dog handlers unless an instructor from the school had a state license. Rather than work with consumers to resolve problems faced by consumers caused by the increase of its jurisdiction, the Board fought consumers every step of the way, causing consumers to seek a legislative solution with SB 1331. Again, rather than work with consumers to create solutions, the Board adamantly opposed SB 1331, which the Legislature passed in 2016. The Board continues to create hurdles between consumers and their chosen schools.

Additionally, although the Board argues it is an example of California trend-setting for the nation to explain its continued existence, none of the other states with guide dog schools has established a similar board, even though the California board has existed since 1947. The Board has attempted to expand to other states and has been declined.

The Board has also argued it should continue to exist to conduct arbitrations between consumers and guide dog schools. In reality, few arbitrations are conducted. Not even one is conducted in most years. More importantly, if the legislature deemed it necessary to do so, it could fashion a dispute resolution mechanism without extending the term of the Board.

Additionally, guide dog schools could better use the fees paid by their programs to the Board for consumers and their programs. There is no reason for schools to pay fees to create an extra layer of regulation that adds nothing to existing standards and practices.

Finally, while the costs of the Board are not derived from general fund money, oversight by the Department of Consumer Affairs costs the state a minimal amount. The NFBCA therefore opines that it would be a fiscally wise decision to oppose AB 1705, extension of the Board’s term and establishment of a task force.

Thank you for your consideration.

Sincerely,

(First and Last Name)