

Significant Legislative Rule Analysis

Licensed Veterinary Technicians

Qualifying Practical Experience

Section 1. What is the scope of the rule?

These proposed rules are in response to 2007 Legislation. HB 1331 (Chapter 235, Laws of 2007) directed the Veterinary Board of Governors to adopt rules identifying standard tasks and procedures that must be included in the training of veterinary technician candidates who qualify to sit for the licensing examination through practical experience. Developing standards for the practical experience will assure the public that the practical experience for a veterinary technician applicant includes a structured training program.

A candidate may qualify to sit for the national examination by one of two methods. The candidate may either complete a two year accredited program or complete five years experience under the supervision of a licensed veterinarian.

Section 2. What are the general goals and specific objectives of the proposed rule's authorizing statute?

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HB 1331 followed a sunrise review of the issues related to training of veterinary technicians in Washington State. There was significant support for the practical experience training option that was expressed during the sunrise review process. There was also support for the practical experience to include a more structured program. The proposed rules use the practical experience option, but also require that specific tasks and procedures be completed as part of that process.

The statute's objectives the rule implements are:

1. To adopt rules identifying standard tasks and procedures that must be included in the training of veterinary technician candidates who qualify to sit for the licensing examination through practical experience.
2. To adopt rules for requirements for the attestation to be completed by the supervising veterinarian to verify the successful completion of the required tasks and procedures

Section 3. What is the justification for the proposed rule package?

The proposed rules are based on RCW 18.92.128 which directs the Veterinary Board of Governors to adopt rules identifying standard tasks and procedures that must be included in the experience of a person who qualifies to take the veterinary technician examination through the period of practical experience. The board was also directed to adopt rules for requirements for the attestation to be completed by the supervising veterinarian to verify the successful completion of the required tasks and procedures. Chapter 18.130 RCW imposes a penalty for violation of the law or rule regulating the profession. Statute requires the board to adopt standards in rule.

Section 4. What are the costs and benefits of each rule included in the rules package? What is the total probable cost and total probable benefit of the rule package?

1. Identification of total number of rules in rules package

- WAC 246-935-145: Purpose and performance of practical experience standard tasks and procedures.
- WAC 246-935-150: Definitions
- WAC 246-935-160: Basic veterinary science knowledge.
- WAC 246-935-170: Clinical/pathology and laboratory diagnostics.
- WAC 246-935-180: Hospital standard operating procedures, instruments, and equipment.
- WAC 246-935-190: Anesthesia and emergency procedures.
- WAC 246-935-200: Pharmacy
- WAC 246-935-210: Public health, infectious diseases, and zoonosis.
- WAC 246-935-220: Dental
- WAC 246-935-230: Imaging equipment and techniques.
- WAC 246-935-235: Supervised practical experience and unlicensed practice.
- WAC 246-935-240: Trainee
- WAC 246-935-250: Supervising veterinarian’s attestation.
- WAC 246-935-255: Forms

2. Table: Non-Significant Rule Identification

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#	WAC Section	Section Title	Section Subject	Reason
1	WAC-935-145	Purpose and performance of practical experience standard tasks and procedures	States purpose of the rule.	Does not require action or enforcement.
2	WAC-935-150	Definitions	Provides definitions	Does not require action or enforcement.

3. Significant Rule Analysis

The purpose of these rules is to identify knowledge areas and standard tasks and procedures that must be included in the 9500 hours of experience that a person needs in order to qualify take the veterinary technician licensing examination. Veterinary technicians have seven years to fulfill this requirement which is equivalent to five years of work. The proposed rules provide categories of required knowledge areas, tasks, and procedures.

The supervising veterinarian will attest to the candidate's knowledge or completion of the required tasks and procedures on forms provided by the secretary. The tasks and procedures will be performed under the appropriate supervision by the licensed veterinarian. The forms are check sheets divided into skill areas that must be demonstrated through knowledge based or practical demonstrations. The forms are available to candidates as part of the application process.

Those tasks that can be demonstrated through “**Knowledge based demonstration of experience**” means that the candidate can verbally, in writing, or schematically demonstrate an understanding of the principles necessary to complete the required task or procedure. This knowledge is usually obtained through classes, independent reading, or research.

Some tasks may require “**practical demonstration of experience**” which requires the candidate to actually perform the task for the supervisor. The tasks can be performed on live animals or suitable man made replicas of animals.

Large and small animal tasks:

The task lists require demonstrations of knowledge based and practical experience with large and small companion (usually considered to be dogs and cats) animals. Many veterinary practices are limited to small animal veterinary care. A candidate may need to spend time at alternate sites to obtain experience in those tasks that require practical demonstration of experience related to large animals. Of those individuals who were contacted, all agreed that cross training could be arranged to complete the required tasks and procedures on both large and small (companion) animals.

The following example of tasks and procedures related to microbiology will clarify the association and relationship between the rule and the check sheet used to document that the candidate has completed specific tasks and procedures that fall within the scope of the specific rule.

There is a corresponding “checklist” for each section of the proposed rules. **See Appendix A**

RULE	DESCRIPTION	ACTIVITY	BENEFIT
WAC 246-935-160: Basic veterinary science knowledge	Provides categories of basic veterinary science tasks that must be completed	Maintain attestation forms; demonstrate the task or procedure and	Gain general animal knowledge and experience, including daily food and care

	during the period of practical experience.	independent study or attendance at courses.	requirements, behavior traits, grooming, anatomy, physiology and organ systems, restraint techniques, history taking, euthanasia techniques, charting, and reproduction.
WAC 246-935-170 Clinical/pathology and laboratory diagnostics	Provides categories of clinical/pathology and laboratory diagnostic tasks and procedures that must be completed during the period of practical experience.	Maintain attestation forms; demonstrate the task or procedure and independent study or attendance at courses.	Gain knowledge and experience in clinical pathology and laboratory diagnostics including parasitology, serology, hematology, ophthalmologic testing, urinalysis, microbiology, necropsy, and cytology.
WAC 246-935-180: Hospital standard operating procedures, instruments, and equipment	Provides categories of hospital standard operating procedures, instruments, and equipment tasks and procedures that must be completed during the period of practical experience.	Maintain attestation forms; demonstrate the task or procedure and independent study or attendance at courses.	Gain knowledge and experience in hospital standard operating procedures, instruments, and equipment and routine patient treatment/nursing.
WAC 246-935-190: Anesthesia and emergency procedures	Provides categories of anesthesia and emergency procedures that must be completed during the period of practical experience.	Maintain attestation forms; demonstrate the task or procedure and independent study or attendance at courses.	Gain knowledge and experience in anesthesia and emergency procedures including triage, response to common veterinary emergencies, and general anesthesia.
WAC 246-935-200: Pharmacy	Provides categories of pharmacy that must be completed during the period of practical experience	Maintain attestation forms; demonstrate the task or procedure and independent study or attendance at courses. Cost to obtain and maintain a veterinary medication clerk	Obtain basic knowledge and experience of clinical and legal pharmacy practices including major drug categories, pharmacology, and uses and side effects. Become familiar with relevant pharmacy laws. Complete the

		registration.	requirements for veterinary medication clerk certification.
WAC 246-935-210: Public health, infectious diseases, and zoonosis	Provides categories of public health, infectious diseases and zoonosis tasks and procedures that must be completed during the period of practical experience.	Maintain attestation forms; demonstrate the task or procedure, and independent study or attendance at courses.	Gain knowledge and experience in public health infectious diseases and zoonosis including pathology, epidemiology and prevention and treatment of common diseases and zoonosis; vaccinations and basic immunology, and public health and safety issues.
WAC 246-935-220: Dental	Provides categories of dental tasks and procedures that must be completed during the period of practical experience.	Maintain attestation forms; demonstrate the task or procedure and independent study or attendance at courses.	Obtain knowledge and experience in dental/oral anatomy, charting, and nomenclature, teeth cleaning, polishing, hand instrumentation and standard dental equipment, treatment of dental disease, diagnostics, pathology and prevention.
WAC 246-935-230: Imaging equipment and techniques	Provides categories of imaging equipment and techniques tasks and procedures that must be completed during the period of practical experience.	Maintain attestation forms; demonstrate the task or procedure and independent study or attendance at courses.	Obtain knowledge and experience in radiology, And imaging technology.
WAC 246-935-235: Supervised practical experience and unlicensed practice.	Designates the candidate as a “trainee” during the final 1900 hours (one year) of training and recognizes that the candidate is able to perform licensed veterinary technician duties outlined in WAC 246-935-050. The	Maintain attestation forms; demonstrate the task or procedure, and independent study or attendance at courses.	The “trainee” will receive the training necessary and that training will be under the immediate supervision of the supervising veterinarian.

	“trainee” status is only effective for the last twelve months of the experience. Immediate supervision is required.		
WAC 246-935-240: Trainee	Defines the steps necessary for the veterinary technician applicant to qualify for a “trainee” designation to allow the applicant to then complete the last twelve months of the experience.	Complete the final year under immediate supervision. Log all activities on the attestation forms.	The “trainee” will receive the training necessary and that training will be under the immediate supervision of the supervising veterinarian.
WAC 246-935-250: Supervising veterinarian’s attestation	Identifies how the supervising veterinarian shall attest to successful completion of the tasks by the candidate.	Complete attestation forms; demonstrate the task or procedure and independent study or attendance at courses.	Provides a written retrievable record of when the required tasks are completed.
246-935-255: Forms	Identifies or describes the task or procedure that must be completed. Requires a signature and date of by the supervising veterinarian attesting to completion of the required tasks.	Complete attestation forms; demonstrate the task or procedure and independent study or attendance at courses.	Provides a written retrievable record of when the required tasks are completed.

4. Rule Package Cost/Benefit Conclusion

A structured and consistent practical experience is more effective than on the job experience that does not have specific requirements. The veterinary technician candidate who completes specific tasks and procedures has been exposed to defined duties and can demonstrate that they have acquired the skills needed to provide safe and efficient care for the animal patients.

Candidates will be in a better position to pass the national licensing examination because they have attained the knowledge and practical experience in the categories of care that are required

of the licensed veterinary technician. Licensed veterinarians will benefit from a licensed technician who has received and demonstrated competence in a broader area of training. Because of this, the veterinarian will be able to delegate more tasks to the licensed technician. This will give the veterinarian more time to devote to animal patients.

Most of the training will be completed on the job and should not result in measurable time away from duties for the veterinary technician candidate. While the rule may result in a varying range of costs to the supervising veterinarian and the veterinarian technician, the benefits gained from a broader and more efficient training program outweigh the costs.

Required Action Assessment Table (Section 4)

Subject (Who must complete action)	Action Verb Statement	Frequency	Cost Category (Type of Cost)	Action Verb Cost (estimate per year)	Benefit Category (Type of Benefit)	Action Verb Benefit
Supervising veterinarian	1. Supervise completion and maintain record of practical experience tasks and procedures completed by the veterinary technician and sign off on the attestation form.	Every time a required practical experience task or procedure is completed.	Record Keeping	\$752.00	Improved training resulting in improved quality of care.	Provides a record that the veterinary technician applicant has completed the required tasks and procedures during the practical experience.
Veterinary Technician Candidate	2. Assist the supervising veterinarian in maintains record of practical experience tasks and procedures completed by the veterinary technician and sign off on the attestation form.	Every time a required practical experience task or procedure is completed	Record Keeping	\$224.00	Improved training resulting in improved quality of care.	Provides a record that the veterinary technician applicant has completed the required tasks and procedures during the practical experience.
Veterinary Technician Candidate	3. Obtain a veterinary medication clerk registration	Annual renewal	Required Registration	\$30.00 year		The veterinary technician candidate has training in the counting, labeling and packaging of

						legend drugs.
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Section 5. What alternative versions of the rule did we consider? Is the proposed rule the least burdensome approach?

Department of Health staff worked closely with constituents and the public to develop rules that meet the directive of the statute and are the least burdensome to those who must comply with the rules. The department held at least three stakeholder meetings to obtain input from the public and interested persons. The Veterinary Board of Governors designated a committee to oversee these meetings. The committee was made up of two members of the Veterinary Board of Governors and one Pro Tem member. Two of the members are licensed veterinarians and one is a licensed veterinary technician.

During the development process, the following portion of an alternative version of the rule was considered and rejected. This portion, related to restraints, includes an excessive number of tasks and procedures. The rule relating to restraints is now in an outline form with the actual tasks and procedures related to restraints listed on the corresponding attestation form in WAC 246-935-255. The final number of required restraints to demonstrate by knowledge or experience has been reduced removing such things as: feline cat bag restraint; haltering and leading the horse; attaching and using a chain lead with the halter already in place on a horse; attaching a chain or rope nose twitch to a haltered horse; and application of tail restrain in a bovine patient.

All of the attestation forms needed to document the period of practical experience are contained in WAC 246-935-255.

The current proposed version of the rule is less burdensome. It provides an outline of all categories of required experience and then provides the corresponding attestation forms which list all of the required tasks and procedures that must be completed. The rule doubles as a form for use by the applicant.

Section 6. Did we determine that the rule does not require anyone to take an action that violates another federal or state law?

The rule does not require those to whom it applies to take an action that violates requirements of federal or state law.

Section 7. Did we determine that the rule does not impose more stringent performance requirements on private entities than on public entities unless the difference is required in federal or state law?

The rule does not impose more stringent performance requirements on private entities than on public entities.

Section 8. Did we determine if the rule differs from any federal regulation or statute applicable to the same activity or subject matter and, if so, did we determine that the difference is justified by an explicit state statute or by substantial evidence that the difference is necessary?

The rule does not differ from any applicable federal regulation or statute.

Section 9. Did we demonstrate that the rule has been coordinated, to the maximum extent possible, with other federal, state, and local laws applicable to the same activity or subject matter?

There are no other applicable laws.