



STATE OF WASHINGTON

DEPARTMENT OF HEALTH

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April 15, 2024

To Whom It May Concern,

The Veterinary Board of Governors (board) is adopting an amendment to WAC 246-935-060 to clarify that a registered apprenticeship program is an approved post-secondary educational pathway to qualify for licensure exams as a veterinary technician.

The adopted amendment to WAC 246-935-060 will become effective on May 12, 2024. A copy of the adopted rule is attached.

The adopted rule is not different from the text of the proposed rule as published in the Washington State Register 23-21-094.

The following table is a summary of all comments received and the department’s response:

Comment subject matter	Board response
Experience in the field is valuable but it does not replace the knowledge gained from a formal education.	The board considered this comment, but did not make any changes to the proposed language because the apprenticeship has a formal, didactic component.
Significant patient harm is caused by under or uneducated staff.	The board considered this comment, but did not make any changes to the proposed language. Apprentices are supervised by licensed staff. Staff meet the same educator standards as required by Washington State Board for Community and Technical Colleges.

<p>An apprenticeship program is a career advancement pathway for prospective LVTs in rural areas where there is not access to a traditional program.</p>	<p>This comment is in support of the proposed language and no changes were made.</p> <p>The board acknowledged that an apprenticeship adds a training option and it will take time to determine if it does or does not help alleviate the LVT shortage in Washington State.</p>
<p>The shortage of LVTs in the state of Washington has reached a critical point, affecting the accessibility of veterinary services.</p>	<p>The board did not make any changes to the proposed language based on this comment. The proposed language addresses the commenter's concerns.</p> <p>Addressing the workforce shortage is part of the reason Cascade Veterinary Clinics requested assistance to develop the apprenticeship program.</p>
<p>Students in an apprenticeship program must still pass the same tests as those who attend a traditional LVT program.</p>	<p>The board considered this comment, but did not make any changes to the proposed language.</p> <p>Passing the exam is a requirement for licensure in Washington State, regardless of educational pathway.</p>
<p>Apprenticeship training does not equate to the standard of training for licensed veterinary technicians.</p>	<p>The board considered this comment, but did not make any changes to the proposed language.</p> <p>The apprenticeship program addresses all essential skills as required by the Committee on Veterinary Technician Education and Activities.</p>
<p>Apprenticeships are a consequential step backwards in our efforts to recognize and standardize Licensed Veterinary Technicians.</p>	<p>The board considered this comment, but did not make any changes to the proposed language.</p> <p>While some board members believe an apprenticeship is equivalent to the on the job training requirement that was repealed in 2010 and effective in 2015 and reverses progress that has been made, they also recognize that there are other healthcare professions who have</p>

	<p>apprenticeship programs as a pathway to licensure.</p>
<p>Apprenticeships will not solve the current shortage of Licensed Veterinary Technicians.</p>	<p>The board considered this comment, but did not make any changes to the proposed language.</p> <p>Apprenticeship adds a training option and time will determine how it does or does not help alleviate the LVT shortage in Washington State.</p>
<p>Approving apprenticeships goes against the advice and expertise of countless veterinary organizations and individuals who are working to uphold the integrity of the Licensed Veterinary Technician profession.</p>	<p>The board considered this comment but did not make any changes to the proposed language.</p> <p>In 2017, Washington State Governor Jay Inslee announced the Career Connect Washington initiative to expand registered apprenticeship programs in non-traditional fields, such as healthcare. This apprenticeship aligns with Gov. Inslee’s goals to advance workforce development while also protecting the public.</p>

Any person may petition the adoption or amendment of these rules in accordance with [RCW 34.05.330](#).

Any questions regarding this rule adoption should be directed to Poppy Budrow, Program Manager, at poppy.budrow@doh.wa.gov or 564-669-0026.