



PROPOSED RULE MAKING

CR-102 (June 2024)
(Implements RCW 34.05.320)
Do **NOT** use for expedited rule making

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STATE OF WASHINGTON
FILED

DATE: March 05, 2025

TIME: 11:53 AM

WSR 25-06-092

Agency: Department of Health - Veterinary Board of Governors

☒ **Original Notice**

☐ **Supplemental Notice to WSR**

☐ **Continuance of WSR**

☒ **Preproposal Statement of Inquiry was filed as WSR 24-10-093; or**

☐ **Expedited Rule Making--Proposed notice was filed as WSR _____; or**

☐ **Proposal is exempt under RCW 34.05.310(4) or 34.05.330(1); or**

☐ **Proposal is exempt under RCW _____.**

Title of rule and other identifying information: (describe subject) Veterinarian and veterinary technician continuing education, examination, and licensure requirements - reducing barriers. The Veterinary Board of Governors (board) is proposing amendments to chapters 246-933 and 246-935 WAC to implement Second Substitute House Bill (2SHB) 1724 (chapter 425, Laws of 2023), codified as RCW 18.130.077. The board is also proposing general housekeeping by repealing the licensure examination rules that are no longer relevant.

Hearing location(s):

Date:	Time:	Location:	Comment:
06/02/2025	9:15 A.M.	Physical Department of Health Town Center 2, Rm 153 111 Israel Rd. SE Tumwater, WA 98501 Virtual link https://us02web.zoom.us/j/83902481471?pwd=KE86EbyHLC22LRkzb4wb90AdFMudJj.1	The rule hearing will be hybrid. Individuals may attend either virtually or in-person.

Date of intended adoption: 06/02/2025 (Note: This is **NOT** the effective date)

Submit written comments to:

Name: Poppy Budrow

Address: PO Box 47852

Olympia, WA 98504-7852

Email: veterinary@doh.wa.gov

Fax: n/a

Other: <https://fortress.wa.gov/doh/policyreview>

Beginning (date and time) Date and time of this filing

By (date and time) 05/26/25 at 11:59pm

Assistance for persons with disabilities:

Contact: Poppy Budrow

Phone: 564-669-0026

Fax: n/a

TTY: 711

Email: poppy.budrow@doh.wa.gov

Other:

By (date) 05/21/25

Purpose of the proposal and its anticipated effects, including any changes in existing rules: The board is proposing amendments to chapters 246-933 and 246-935 WAC to remove barriers to entering into, remaining in, and returning to the healthcare workforce. The proposed amendments will streamline and shorten the credentialing process for veterinarians and veterinary technicians and remove WACs that are no longer applicable to the professions.

The proposed amendments: (1) remove the jurisprudence (JP) exam as a requirement for initial licensure for veterinarians and veterinary technicians; (2) add a new section to each chapter requiring, as part of continuing education, successful completion of training in Washington state law respective to their profession, to be completed after initial licensure and prior

to the licensee's first renewal; (3) remove the national exam and submitting proof of active practice as a requirement to reactivate a veterinary license that has been expired for three or more years; and (4) repeal WACs that were only applicable when the board administered the licensure examination.

Reasons supporting proposal: RCW 18.130.077 directs all disciplining authorities for licensed healthcare professionals to waive education, training, experience, and exam requirements for applicants who have been credentialed in another state or states with substantially equivalent standards for at least two years immediately preceding their application with no interruption in licensure for longer than 90 days.

The intent of the bill is to make disciplining authorities review and adjust licensure requirements to remove barriers to entering and remaining in the healthcare workforce, and to streamline and shorten the credentialing process. Rulemaking is necessary to amend licensure requirements in chapters 246-933 and 246-935 WAC to align and comply with RCW 18.130.077.

Other housekeeping changes are necessary to ensure rules are clear, concise and up-to-date to be essential to the practice of veterinary medicine, surgery, and dentistry.

Statutory authority for adoption: RCW 18.92.030 and 18.130.077

Statute being implemented: RCW 18.92.030 and 18.130.077

Is rule necessary because of a:

Federal Law?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Federal Court Decision?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
State Court Decision?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

If yes, CITATION:

Agency comments or recommendations, if any, as to statutory language, implementation, enforcement, and fiscal matters: None

Name of proponent: Veterinary Board of Governors

Type of proponent: ☐ Private. ☐ Public. ☒ Governmental.

Name of agency personnel responsible for:

	Name	Office Location	Phone
Drafting:	Poppy Budrow	111 Israel Rd SE, Tumwater, WA 98501	564-669-0026
Implementation:	Poppy Budrow	111 Israel Rd SE, Tumwater, WA 98501	564-669-0026
Enforcement:	Poppy Budrow	111 Israel Rd SE, Tumwater, WA 98501	564-669-0026

Is a school district fiscal impact statement required under [RCW 28A.305.135](#)? ☐ Yes ☒ No

If yes, insert statement here:

The public may obtain a copy of the school district fiscal impact statement by contacting:

Name
Address
Phone
Fax
TTY
Email
Other

Is a cost-benefit analysis required under [RCW 34.05.328](#)?

☒ Yes: A preliminary cost-benefit analysis may be obtained by contacting:

Name: Poppy Budrow
Address: PO Box 47852, Olympia, WA 98504-7852
Phone: 564-669-0026
Fax: n/a
TTY: 711
Email: poppy.budrow@doh.wa.gov
Other: veterinary@doh.wa.gov

☐ No: Please explain:

Regulatory Fairness Act and Small Business Economic Impact Statement

Note: The [Governor's Office for Regulatory Innovation and Assistance \(ORIA\)](#) provides support in completing this part.

(1) Identification of exemptions:

This rule proposal, or portions of the proposal, **may be exempt** from requirements of the Regulatory Fairness Act (see [chapter 19.85 RCW](#)). For additional information on exemptions, consult the [exemption guide published by ORIA](#). Please check the box for any applicable exemption(s):

☐ This rule proposal, or portions of the proposal, is exempt under [RCW 19.85.061](#) because this rule making is being adopted solely to conform and/or comply with federal statute or regulations. Please cite the specific federal statute or regulation this rule is being adopted to conform or comply with, and describe the consequences to the state if the rule is not adopted.

Citation and description:

☐ This rule proposal, or portions of the proposal, is exempt because the agency has completed the pilot rule process defined by [RCW 34.05.313](#) before filing the notice of this proposed rule.

☐ This rule proposal, or portions of the proposal, is exempt under the provisions of [RCW 15.65.570](#)(2) because it was adopted by a referendum.

☐ This rule proposal, or portions of the proposal, is exempt under [RCW 19.85.025](#)(3). Check all that apply:

☐ [RCW 34.05.310](#) (4)(b)
(Internal government operations)

☐ [RCW 34.05.310](#) (4)(e)
(Dictated by statute)

☐ [RCW 34.05.310](#) (4)(c)
(Incorporation by reference)

☐ [RCW 34.05.310](#) (4)(f)
(Set or adjust fees)

☐ [RCW 34.05.310](#) (4)(d)
(Correct or clarify language)

☐ [RCW 34.05.310](#) (4)(g)
((i) Relating to agency hearings; or (ii) process requirements for applying to an agency for a license or permit)

☒ This rule proposal, or portions of the proposal, is exempt under [RCW 19.85.025](#)(4). (Does not affect small businesses).

☐ This rule proposal, or portions of the proposal, is exempt under RCW _____.

Explanation of how the above exemption(s) applies to the proposed rule: The proposed changes only apply to the credential holder, not the business.

(2) Scope of exemptions: *Check one.*

☒ The rule proposal: Is fully exempt. (*Skip section 3.*) Exemptions identified above apply to all portions of the rule proposal.

☐ The rule proposal: Is partially exempt. (*Complete section 3.*) The exemptions identified above apply to portions of the rule proposal, but less than the entire rule proposal. Provide details here (consider using [this template from ORIA](#)):

☐ The rule proposal: Is not exempt. (*Complete section 3.*) No exemptions were identified above.

(3) Small business economic impact statement: *Complete this section if any portion is not exempt.*

If any portion of the proposed rule is **not exempt**, does it impose more-than-minor costs (as defined by RCW 19.85.020(2)) on businesses?

☐ No Briefly summarize the agency's minor cost analysis and how the agency determined the proposed rule did not impose more-than-minor costs.

☐ Yes Calculations show the rule proposal likely imposes more-than-minor cost to businesses and a small business economic impact statement is required. Insert the required small business economic impact statement here:

The public may obtain a copy of the small business economic impact statement or the detailed cost calculations by contacting:

Name
Address
Phone
Fax
TTY
Email
Other

Date: March 5, 2025 Name: Andrea Sanchez-Chambers, DVM Title: Chair, Veterinary Board of Governors	Signature: 
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AMENDATORY SECTION (Amending WSR 22-11-062, filed 5/16/22, effective 6/16/22)

WAC 246-933-250 Examination and licensure requirements. To qualify for licensure ~~((in this state, a candidate must))~~ as a veterinarian, an applicant shall:

(1) Successfully complete either the North American Veterinary Licensing Examination (NAVLE) or the National Board Examination for Veterinary Medical Licensing (NBE); and

~~(2) ((Successfully complete the Washington state jurisprudence examination; and~~

~~(3)))~~ Be a graduate of a program that is accredited by the American Veterinary Medical Association. A person who is a graduate of a college of veterinary medicine not accredited by the American Veterinary Medical Association must:

(a) Successfully complete the American Veterinary Medical Association's Educational Commission for Foreign Veterinary Graduates program (ECFVG); or

(b) Successfully complete the American Association of Veterinary State Board's Program for the Assessment of Veterinary Education Equivalence (PAVE).

AMENDATORY SECTION (Amending WSR 07-20-036, filed 9/25/07, effective 10/26/07)

WAC 246-933-270 Examination results. The board accepts the following minimum passing score for licensure examinations.

(1) The minimum passing score for the North American Veterinary Licensing Examination (NAVLE) is the criterion-referenced passing score established by the National Board of Veterinary Medical Examiners.

(2) The minimum passing score before December 1982 for the National Board Examination for Veterinary Medical Licensing (NBE), and the Clinical Competency Test (CCT) is 1.5 standard deviation below the mean of the criterion population. From December 1992 through April 2000 the minimum passing score is the criterion referenced passing score required by the National Board of Veterinary Medical Examiners.

~~((3) The minimum passing score on the Washington state jurisprudence examination is ninety percent.))~~

AMENDATORY SECTION (Amending WSR 14-06-067, filed 2/28/14, effective 3/31/14)

WAC 246-933-275 Reactivation of an expired veterinary license.

(1) To reactivate a veterinary license that has been expired for three years or less, the veterinarian must meet the requirements of chapter 246-12 WAC ~~((, Part 2))~~.

(2) To reactivate a veterinary license that has been expired for more than three years, the practitioner must ~~((÷~~

~~(a)) submit verification of unrestricted licensure in another state or jurisdiction(;~~ and

~~(b) Submit documentation of two hundred hours of active practice within each of the previous three years within that state or jurisdiction)).~~

For purposes of this subsection, documentation of licensure ((and active practice)) in a foreign country is acceptable if there is an American Veterinary Medical Association accredited school or college of veterinary medicine in that country.

(3) To reactivate a veterinary license that has been expired for more than three years, when the veterinarian has not held ~~((an unre-~~stricted)) a license and has not been in active practice, the veterinarian must:

(a) ~~((Successfully complete the current North American Veterinary Licensing Examination as provided in WAC 246-933-250(1); and~~

~~(b)) Meet the continuing education requirements of WAC 246-12-040 and chapter 246-933 WAC; and~~

(b) Complete an additional 15 hours of continuing education which meet the defined requirements in WAC 246-933-445 (1) (a).

NEW SECTION

WAC 246-933-438 Veterinarian jurisprudence continuing education.

A licensed veterinarian shall complete a board-approved, one-time training in Washington state jurisprudence, which will count as one credit hour toward meeting applicable continuing education requirements. Training must include Washington state veterinary law.

(1) This training must be completed after initial licensure and prior to the veterinarian's first license renewal.

(2) The board accepts only courses that are listed on the board's website.

REPEALER

The following section of the Washington Administrative Code is repealed:

WAC 246-933-265	Scope of Washington state jurisprudence examination.
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AMENDATORY SECTION (Amending WSR 08-11-099, filed 5/20/08, effective 6/20/08)

WAC 246-935-070 Examination for licensure as a veterinary technician. (1) ~~((All applicants)) To qualify for licensure as a veterinary technician, an applicant shall ((be required to)) successfully complete the veterinary technician national examination as approved by the board((, and the Washington state examination that consists of questions pertaining to the laws and rules regulating technicians)).~~

(2) The passing criteria or score is ~~((÷~~

~~((a))) the criteria-referenced passing score on the national examination.~~

~~((b) Ninety percent on the Washington state examination.))~~

NEW SECTION

WAC 246-935-308 Veterinary technician jurisprudence continuing education. A licensed veterinary technician shall complete a board-approved, one-time training in Washington state jurisprudence, which will count as one credit hour toward meeting applicable continuing education requirements. Training must include Washington state veterinary technician law.

(1) This training must be completed after initial licensure and prior to the veterinary technician's first license renewal.

(2) The board accepts only courses that are listed on the board's website.

REPEALER

The following sections of the Washington Administrative Code are repealed:

WAC 246-935-090	Examination review procedures.
WAC 246-935-110	Examination procedures.
WAC 246-935-120	Frequency and location of examination.