

WAC 246-935-050 Animal health care tasks. [11.13.24 Updates With Public Comments](#)

No individual, other than a licensed veterinary technician may advertise or offer their her/his services in a manner calculated to lead others to believe that they she/he is are a trained or licensed veterinary technician.

- (1) Licensed veterinary technicians and unregistered assistants are prohibited from performing the following activities:
  - (a) Surgery except as outlined below;
  - (b) Diagnosis and prognosis;
  - (c) Prescribing drugs, medication, or appliances;
  - (d) Initiation of treatment without prior instruction by a veterinarian except as outlined under emergency animal care.
- (2) Tasks not specifically listed, or delegated by the veterinarian, or otherwise restricted may be performed by a licensed veterinary technician or unregistered assistant under the indirect supervision of a veterinarian.
- (3) Animal health care tasks may be performed as checked in the table below:

Category	Task	Licensed Technician			Unregistered Assistant			Strictly Prohibited
		Immediate	Direct	Indirect	Immediate	Direct	Indirect	
Anesthesia	Induction of Anesthesia		✓					✓
	Maintenance of anesthesia <i>with or without supervisor consultation</i>		✓		✓			
	<i>Maintain anesthesia with supervisor consultation and monitor sedated or anesthetized patient</i>			✓	✓			
	<i>Monitor sedated or anesthetized patient</i>			✓	✓			
	Intubation		✓					✓
Category	Task	Licensed Technician			Unregistered Assistant			Strictly Prohibited
		Immediate	Direct	Indirect	Immediate	Direct	Indirect	
Bandaging	Application of casts, splints, and slings for the immobilization of fractures		✓					✓
	Application of splints/slings for the temporary immobilization of fractures			✓				✓
	Closure, including suturing of prepared skin wound or gingival incision		✓					✓

**Commented [PB1]:** PC LVT: Euthanasia is absent from the chart. It should be clarified whether this is a task restricted to LVTs and veterinarians...

**Commented [PB2R1]:** PC LVT: tasks not on the list that should be for a tech or doctor only: Epidural, dental ...

**Commented [PB3R2]:** PC Euthanasia clarification is ...

**Commented [PB4R1]:** Full Title Protection: Outside of ...

**Commented [PB5]:** Public comment LVT: This is ...

**Commented [TM6]:** LVT: is there another category for ...

**Commented [TM7]:** LVT: chart updated to have the ...

**Commented [PB8]:** Public Comment: This should be ...

**Commented [PB9R8]:** PC LVT: Maintaining and ...

**Commented [PB10R8]:** PC DVM: Maintenance of ...

**Commented [PB11R8]:** PC LVT: The wording "Maintain ...

**Commented [PB12R8]:** PC LVT: Maintenance of ...

**Commented [PB13R8]:** PC Ops MGR: Allowing UAs to ...

**Commented [PB14R8]:** PC LVT: No UA should provide ...

**Commented [PB15R8]:** PC: maintenance of anesthe ...

**Commented [PB16R8]:** PC WSAVT feels strongly that ...

**Commented [PB17R8]:** PC LVT: I feel that it should ...

**Commented [PB18R8]:** PC: Maintenance of anesthe ...

**Commented [PB19R8]:** PC DVM: Strong support for th ...

**Commented [PB20R8]:** Becky LVT - surgeon not as ...

**Commented [PB21R8]:** Discuss at DECEMBER board ...

**Commented [PB22R8]:** Consider: ASA scores where i ...

**Commented [PB23R8]:** Controlled substances ...

**Commented [TM24R8]:** DVM: the maintenance of ...

**Commented [TM25R8]:** DVM: maintenance of ...

**Commented [TM26R8]:** LVT: need clarification for the ...

**Commented [TM27R8]:** WSAVT: the proposed langua ...

**Commented [PB28]:** P.C. Currently, Uas can perform ...

**Commented [PB29R28]:** PC Clinic Ops Mgr: "Bandag ...

**Commented [PB30R28]:** PC Ops Mgr: Under Bandagi ...

**Commented [PB31R28]:** PC: What about bandaging ...

**Commented [PB32R28]:** PC: UAs can do bandaging ...

**Commented [PB33R28]:** PC: it would be beneficial to ...

**Commented [PB34R28]:** NOTE: Under point 2 above, ...

**Commented [TM35R28]:** DVM - beneficial to include ...

**Commented [TM36R28]:** DVM: the first and second ...

**Commented [TM37R28]:** LVT: there are many ...

**Commented [PB38]:** PC What about stay sutures? Fo ...

**Commented [PB39R38]:** PC LVT: this section should ...

	Removal of sutures, drain tubes and staples			✓		✓				Commented [PB40]: PC LVT: I think abdomino centesis could be direct supervision. Cystocentesis should be direct as well... What about FNA's, which are currently allowed by licensed technicians under indirect supervision?
	Removal of exposed foreign bodies			✓		✓				Commented [PB41]: PC LVT: Dental extractions shou...
<b>Category</b>	<b>Task</b>	<b>Licensed Technician</b>			<b>Unregistered Assistant</b>					Commented [PB42R41]: PC: dental extractions ...
		Immediate	Direct	Indirect	Immediate	Direct	Indirect	Strictly Prohibited		Commented [PB43R41]: PC: This is very vague and ...
<b>Centesis Procedures</b>										
	Abdominocentesis; thoracocentesis; percardiocentesis	✓						✓		Commented [PB44R41]: PC: Dental extractions - the ...
	Cystocentesis			✓				✓		Commented [PB45R41]: PC: While not a currently ...
<b>Category</b>	<b>Task</b>	<b>Licensed Technician</b>			<b>Unregistered Assistant</b>					Commented [PB46R41]: PC: Extractions are surgical ...
		Immediate	Direct	Indirect	Immediate	Direct	Indirect	Strictly Prohibited		Commented [PB47R41]: PC: LVTs are not allowed to ...
<b>Dental Procedures</b>										
	<span style="color: red;">Dental extraction Single root extractions not requiring sectioning of the tooth or sectioning of the bone or incision of gingiva</span>	✓						✓		Commented [PB51R41]: PC: I oppose LVTs performin ...
	Dental prophy			✓	✓					Commented [PB52R41]: PC: opposed to LVTs doing ...
	Floating teeth		✓						✓	Commented [PB53R41]: PC: AVMA, AAHA,, etc are ...
<b>Category</b>	<b>Task</b>	<b>Licensed Technician</b>			<b>Unregistered Assistant</b>					Commented [PB54R41]: PC: I agree with everything ...
		Immediate	Direct	Indirect	Immediate	Direct	Indirect	Strictly Prohibited		Commented [PB55R41]: Rossi: Flaps and bone is ora ...
										Commented [TM56R41]: DVM - very vague and open ...
<b>Diagnostic Procedures</b>										
	Blood Pressure			✓		✓				Commented [TM57R41]: DVM: dental extractions ...
	Cytology analysis including urine sediment and basic hematology			✓	✓	✓				Commented [PB58]: PC: Dental cleaning is not ...
	Electrocardiogram measurement			✓		✓				Commented [PB59]: Barnet: support Uas perfoming ...
	Fecal analysis			✓		✓				Commented [PB60]: PC LVT: Vas should not be allow ...
	Urine dipstick and specific gravity			✓		✓				Commented [PB61R60]: PC: Its ok for an assistant to ...
	<span style="color: red;">Placement of a urinary catheter in unobstructed animal</span>			✓				✓		Commented [PB62R60]: PC LVT: I am not in favor of ...
	Acquisition of diagnostic images			✓		✓				Commented [PB63R60]: PC: Under the category of ...
										Commented [PB64R60]: Further clarification is need ...
										Commented [PB65R60]: PC LVT: Oppose changes for ...
										Commented [PB66R60]: PC Policy Research: ...
										Commented [PB67R60]: PC LVT: Cytology analysis ...
										Commented [PB68R60]: Breen: Move to Direct ...
										Commented [TM69R60]: LVT: opposes changes for ...
										Commented [TM70R60]: LVT: do not agree that ...
										Commented [PB71]: PC LVT: Fecal analysis - on the jo ...
										Commented [PB72]: PC: Urinary catheterization shou ...
										Commented [PB73R72]: PC: Urinary catheter should ...
										Commented [PB74R72]: PC: There has been a lot of ...
										Commented [PB75R72]: PC: Language regarding ...
										Commented [PB76R72]: CONSIDER: is immediate ...
										Commented [TM77R72]: DVM: IV catheters would no ...

	Placement of nasogastric and orogastric tubes.			✓				✓		Commented [PB78]: Discuss at September meeting Commented [PB79R78]: Talk at SC MTG.
	Use of nasogastric and orogastric tubes.			✓		✓				Commented [PB80R78]: PC LVT: Possibly separate out Orogastic and Nasogastric. Commented [PB81R78]: Separated Placement and Use of tubes
	Skin scraping			✓		✓				Commented [PB82R78]: Barnet: Support Uas using the tubes for feeding.
	Carbon dioxide and blood oxygen saturation			✓		✓				Commented [PB83]: PC LVT : This needs clarification regarding if this refers to the sample collection procedure or the running of the actual samples for these lab values. Arterial sample? Uas should not collect arterial samples. If this is running the sample it should be direct for LVT and Immediate for Uas.
Category	Task	Licensed Technician			Unregistered Assistant					
		Immediate	Direct	Indirect	Immediate	Direct	Indirect	Strictly Prohibited		
Injections										
	Intramuscular and subcutaneous injections			✓		✓				Commented [PB84]: PC LVT: Intra-testicular block for local anesthesia I believe should only be allowed by a technician or doctor...this procedure is rather quick for a tech or doctor, its not worth the risk of allowing an assistant with no proper training.
	Intraperitoneal injections		✓					✓		Commented [PB85R84]: PC: this should be for LVT only
	Intra-testicular block for local anesthesia			✓	✓					Commented [PB86R84]: Further clarity on regional anesthesia should be considered. While intra-testicular blocks are clearly outlined, it is unclear whether licensed veterinary technicians or unregistered veterinary assistants can perform other types of blocks and under what level of supervision. We suggest
	Peripheral Nerve Block		✓					✓		Commented [PB87R84]: PC: Uas should not be allowed to give intra-testicular blocks
	Intravenous injection in uncatheterized vein			✓	✓					Commented [PB88]: PC LVT: Intravenous injection in uncatheterized vein - I think this should remain as a suggestion
	Microchip implantation			✓		✓				Commented [PB89R88]: PC: Injections- intravenous injections in uncatheterized view was called out on the slide Commented [PB90R88]: PC Ops Mgr: Under Injections you have included "Intravenous injection in uncatheterized view" - I think this should remain as a suggestion
	Vaccines (except rabies and those diseases described in subsection 8 of this section) with the veterinarian's verification signature on an appropriate certificate			✓		✓				Commented [PB91R88]: PC LVT: Immediate Sup for Uas - Some meds are for sedation or emergent situations Commented [PB92R88]: PC: I oppose changes for assistants to perform injections to uncathertrized veins. Commented [PB93R88]: PC LVT: IV injection into uncatheterized vein - the risk for paravascular injection if done incorrectly
Category	Task	Licensed Technician			Unregistered Assistant					
		Immediate	Direct	Indirect	Immediate	Direct	Indirect	Strictly Prohibited		
Intravenous Devices										
	Placement of arterial & central venous catheters		✓					✓		Commented [TM95R88]: WSAVT: suggest adding other blocks such as epidural, brachial nerve blocks and
	Place and secure an IV catheter			✓		✓				Commented [TM96]: PC Ops Mgr: Under Intravenous Devices I would highly recommend you restrict this to
										Commented [TM97R96]: PC: allowing unlicensed assistants to give IV injections into an catheterized vein
										Commented [PB98]: PC: While I also agree that arterial and central catheters should be only placed by licensed
										Commented [PB99]: PC: IV catheters would not be appropriate for a vet assistant with no training or

	Blood and blood product administration		✓					✓		Commented [PB100]: PC: While I think it is crucial that a licensed veterinary technician set up and start a blood transfusion, blood transfusions often need to be given over 4 hours and unlicensed assistants can be easily trained to monitor a transfusion with direct supervision. This should be clarified.
<b>Lab Sample collection and Test Preparation (not evaluation) Including:</b>										Commented [PB101R100]: PC DVM: Monitoring blood product administration is very procedural. This can be done by a trained unregistered assistant.
	Venipuncture			✓		✓				Commented [TM102]: LVT: takes the same level of skill to stick a vein to draw blood as to give an injection so it should have the same level of supervision or not be allowed for assistants
<b>Category</b>	<b>Tasks</b>	<b>Licensed Technician</b>			<b>Unregistered Assistant</b>					
		Immediate	Direct	Indirect	Immediate	Direct	Indirect	Strictly Prohibited		
<b>Ophthalmological Procedures</b>										Commented [PB103]: PC Ops Mgr: Under Ophthalmological Procedures you have moved what used to be strictly prohibited for UAs to allowable under direct supervision. Again, this is expanding what UAs can do which allows for less need to have an LVT employed. At a bare minimum please move the level of supervision for UAs to immediate supervision.
	Tear production testing			✓		✓				Commented [PB104R103]: PC: I oppose assistants to perform eye testing.
	Topical anesthetic application			✓		✓				Commented [PB105R103]: PC LVT: Ophthalmological tests, especially tonometry. This is an advanced skill that should remain an LVT task.
	Fluorescein staining of cornea			✓		✓				Commented [PB106R103]: PC: all tasks should be immediate for assistants
<b>Category</b>	<b>Tasks</b>	<b>Licensed Technician</b>			<b>Unregistered Assistant</b>					
		Immediate	Direct	Indirect	Immediate	Direct	Indirect	Strictly Prohibited		
<b>Other</b>										
	Enema			✓		✓				Commented [PB107]: PC Animal Massage Therapist: Massage should only be done by Licensed Animal Massage Therapists.
	Ear flush			✓		✓				Commented [PB108]: PC: Was the section about controlled substances omitted on purpose? POP NOTE: We added it! 😊
	Massage (except where regulated)			✓		✓				Commented [PB109R108]: PC: more clarity on controlled substances administration (in order by DVM) would be appreciated.
	Non-invasive cardiopulmonary resuscitation and basic first aid procedures			✓			✓			Commented [PB110R108]: PC: Controlled substances has been removed... (added back)
	Packaging, preparation, administration, or delivery of controlled substances See also: WAC 246-935-420			✓				✓		Commented [PB111R108]: There has been a lot of discussion nationwide about whether licensed veterinary technicians can perform urinary catheterization specifically when a cat is obstructed. In some states this is legal and some it is not. I do not see urethral catheter placement listed
<b>Veterinary Biologics</b>										Commented [TM112R108]: LVT: clarification on controlled substances administration (in order by DVM)

	Veterinary biologics for rabies and those diseases listed in WAC 16-42-026(1)		✓			✓			
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(4) Emergency Animal Care

Under conditions of an emergency, a licensed veterinary technician and unregistered assistant may render certain life saving aid to an animal patient as checked in the matrix below:

Category	Tasks	Licensed Technician			Unregistered Assistant			
		Immediate	Direct	Indirect	Immediate	Direct	Indirect	Strictly Prohibited
Emergency Care:								
	Provide emergency animal care as directed by a veterinarian (or LVT in absence of veterinarian) in an immediate, potentially life threatening situation		✓			✓		
	Cardiopulmonary resuscitation		✓			✓		
	All tasks in matrix above marked for LVT-Direct, Indirect, UA Immediate, Direct, Indirect		✓				✓	
	Administer pharmacologic agents and parenteral fluids only after communication with a veterinarian		✓			✓		
	Apply Utilize basic life support including non-invasive cardiopulmonary resuscitation and basic first aid procedures		✓			✓		
	Provide other aid upon the order of a licensed veterinarian as outlined in this section		✓			✓		

**Commented [PB113]:** WSVMA comment - discuss at SC meeting.

**Commented [PB114R113]:** PC: This section no longer dictates specific tasks

**Commented [PB115R113]:** PC: Regarding the task "Provide emergency animal care as directed by a veterinarian (or LVT in absence of veterinarian) in an immediate, potentially life threatening situation", further clarification is needed. It is unclear whether a licensed veterinary technician can instruct another licensed veterinary technician and/or unregistered veterinary assistant.

**Commented [PB116]:** Adding tasks back - for clarity.

Nothing in the above chapter should be construed to prohibit the provision of basic first aid to animals in the absence of a veterinarian or licensed veterinary technician.

**Commented [PB117]:** Breen: Use licensed VETERINARY technician.

(8) Veterinary Biologics. Licensed veterinary technicians and unregistered assistants may only administer veterinary biologics for rabies and those diseases listed in WAC 16-42-020(1) under the direct supervision of a veterinarian.

**Commented [PB118R117]:** SC: Agree. Completed.

(5) Rabies vaccinations require an appropriate rabies certificate. The certificate is considered part of the medical record and must contain at least the following information:

- (a) Owner's name, address, and telephone number;
- (b) Species, age, breed, sex, size, name, and predominant colors/markings;
- (c) Month, day, and year of vaccination;
- (d) Month, day, and year of next vaccination due date;
- (e) Product name and identification of manufacturer;
- (f) Effective date of vaccine, example: One year, three years;
- (g) Vaccine serial or lot number; and
- (h) Veterinarian's name, license number, address, and signature.

(10) To be authorized to dispense pharmaceuticals, unregistered assistants must be registered as a veterinary medication clerk under chapter 246-937 WAC.

**Commented [PB119]:** Make a clarifying FAQ regarding front desk personnel.

**Commented [PB120R119]:** PC LVT: Should say "...to dispense, prepare, or administer pharmaceuticals..."