

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			
		Immediate	Direct	Indirect	Immediate	Direct	Indirect	Strictly Prohibited
Anesthesia								
	Induction of Anesthesia		✓					✓
	Maintenance of anesthesia <u>with or without supervisor consultation</u>		✓		✓			
	<u>Maintain anesthesia with supervisor consultation and monitor sedated or anesthetized patient</u>			✓	✓			
	<u>Monitor sedated or anesthetized patient</u>			✓	✓			
	Intubation		✓					✓
Category	Task	Licensed Technician			Unregistered Assistant			
		Immediate	Direct	Indirect	Immediate	Direct	Indirect	Strictly Prohibited
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 "Mainta
- 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 t
- Commented [PB20R8]:** Becky LVT - surgeon not as
- Commented [PB21R8]:** Discuss at DECEMBER board
- Commented [PB22R8]:** Consider: ASA scores where
- 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			✓		✓		
	Removal of exposed foreign bodies			✓		✓		
Category	Task	Licensed Technician			Unregistered Assistant			
		Immediate	Direct	Indirect	Immediate	Direct	Indirect	Strictly Prohibited
Centesis Procedures								
	Abdominocentesis; thoracocentesis; pericardiocentesis	✓						✓
	Cystocentesis			✓				✓
Category	Task	Licensed Technician			Unregistered Assistant			
		Immediate	Direct	Indirect	Immediate	Direct	Indirect	Strictly Prohibited
Dental Procedures								
	Dental extraction Single root extractions not requiring sectioning of the tooth or sectioning of the bone or incision of gingiva	✓						✓
	Dental prophy			✓	✓			
	Floating teeth		✓					✓
Category	Task	Licensed Technician			Unregistered Assistant			
		Immediate	Direct	Indirect	Immediate	Direct	Indirect	Strictly Prohibited
Diagnostic Procedures								
	Blood Pressure			✓		✓		
	Cytology analysis including urine sediment and basic hematology			✓	✓	✓		
	Electrocardiogram measurement			✓		✓		
	Fecal analysis			✓		✓		
	Urine dipstick and specific gravity			✓		✓		
	Placement of a urinary catheter in unobstructed animal			✓				✓
	Acquisition of diagnostic images			✓		✓		

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?

Commented [PB41]: PC LVT: Dental extractions shou...

Commented [PB42R41]: PC: dental extractions

Commented [PB43R41]: PC: This is very vague and

Commented [PB44R41]: PC: Dental extractions - the

Commented [PB45R41]: PC: While not a currently

Commented [PB46R41]: PC: Extractions are surgical

Commented [PB47R41]: PC: LVTs are not allowed to

Commented [PB48R41]: PC: I am strongly against

Commented [PB49R41]: PC: AVDT is opposed to den

Commented [PB50R41]: PC: AVMA's policy on

Commented [PB51R41]: PC: I oppose LVTs performin

Commented [PB52R41]: PC: opposed to LVTs doing

Commented [PB53R41]: PC: AVMA, AAHA,, etc are

Commented [PB54R41]: PC: I agree with everything

Commented [PB55R41]: Rossi: Flaps and bone is ora

Commented [TM56R41]: DVM - very vague and open

Commented [TM57R41]: DVM: dental extractions

Commented [PB58]: PC: Dental cleaning is not

Commented [PB59]: Barnet: support Uas performing

Commented [PB60]: PC LVT: Vas should not be allow

Commented [PB61R60]: PC: Its ok for an assistant to

Commented [PB62R60]: PC LVT: I am not in favor of

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 j

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 nd

	Placement of nasogastric and orogastric tubes.			✓				✓	Commented [PB78]: Discuss at September meeting
	Use of nasogastric and orogastric tubes.			✓		✓			Commented [PB79R78]: Talk at SC MTG.
	Skin scraping			✓		✓			Commented [PB80R78]: PC LVT: Possibly separate out Orogastric and Nasogastric.
	Carbon dioxide and blood oxygen saturation			✓		✓			Commented [PB81R78]: Separated Placement and Use of tubes
Category	Task	Licensed Technician			Unregistered Assistant				Commented [PB82R78]: Barnet: Support Uas using the tubes for feeding.
		Immediate	Direct	Indirect	Immediate	Direct	Indirect	Strictly Prohibited	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.
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
	<u>Peripheral Nerve Block</u>		✓					✓	
	Intravenous injection in uncatheterized vein			✓	✓				Commented [PB87R84]: PC: Uas should not be allowed to give intra-testicular blocks
	Microchip implantation			✓		✓			Commented [PB88]: PC LVT: Intravenous injection in uncatheterized vein - I think this should remain as a sk
	Vaccines (except rabies and those diseases described in subsection 8 of this section) with the veterinarian's verification signature on an appropriate certificate			✓		✓			Commented [PB89R88]: PC: Injections- intravenous injections in uncatheterized view was called out on the
Category	Task	Licensed Technician			Unregistered Assistant				Commented [PB90R88]: PC Ops Mgr: Under Injections you have included "Intravenous injection in
		Immediate	Direct	Indirect	Immediate	Direct	Indirect	Strictly Prohibited	Commented [PB91R88]: PC LVT: Immediate Sup for Uas - Some meds are for sedation or emergent situatio
Intravenous Devices									Commented [PB92R88]: PC: I oppose changes for assistants to perform injections to uncathertrized veins.
	Placement of arterial & central venous catheters		✓					✓	Commented [PB93R88]: PC LVT: IV injection into uncathetrized vein - the risk for paravascular injection i
	Place and secure an IV catheter			✓		✓			Commented [PB94R88]: PC: allowing unlicensed assistants to give IV injections into an uncatheterized
									Commented [TM95R88]: WSAVT: suggest adding other blocks such as epidural, brachial nerve blocks and
									Commented [PB96]: 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 license
									Commented [PB99]: PC: IV catheters would not be appropriate for a vet assistant with no training or

	Blood and blood product administration		✓					✓	
Lab Sample collection and Test Preparation (not evaluation) Including:									
	Venipuncture			✓		✓			
Category	Tasks	Licensed Technician			Unregistered Assistant				
		Immediate	Direct	Indirect	Immediate	Direct	Indirect	Strictly Prohibited	
Ophthalmological Procedures									
	Tear production testing			✓		✓			
	Topical anesthetic application			✓		✓			
	Fluorescein staining of cornea			✓		✓			
	Eye pressures/ tonometry			✓		✓			
Category	Tasks	Licensed Technician			Unregistered Assistant				
		Immediate	Direct	Indirect	Immediate	Direct	Indirect	Strictly Prohibited	
Other									
	Enema			✓		✓			
	Ear flush			✓		✓			
	Massage (except where regulated)			✓		✓			
	Non-invasive cardiopulmonary resuscitation and basic first aid procedures			✓			✓		
	Packaging, preparation, administration, or delivery of controlled substances See also: WAC 246-935-420			✓				✓	
Veterinary Biologics									

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.

Commented [PB101R100]: PC DVM: Monitoring blood product administration is very procedural. This can be done by a trained unregistered assistant.

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

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.

Commented [PB104R103]: PC: I oppose assistants to perform eye testing.

Commented [PB105R103]: PC LVT: Ophthalmological tests, especially tonometry. This is an advanced skill that should remain an LVT task.

Commented [PB106R103]: PC: all tasks should be immediate for assistants

Commented [PB107]: PC Animal Massage Therapist: Massage should only be done by Licensed Animal Massage Therapists.

Commented [PB108]: PC: Was the section about controlled substances omitted on purpose?
POP NOTE: We added it! 😊

Commented [PB109R108]: PC: more clarity on controlled substances administration (in order by DVM) would be appreciated.

Commented [PB110R108]: PC: Controlled substances has been removed... (added back)

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

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.

~~(8) Veterinary Biologics. Licensed veterinary technicians and unregistered assistants may only administer veterinary biologics for rabies and those diseases listed in WAC 16-42-026(1) under the direct supervision of a veterinarian.~~

(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 [PB117]: Breen: Use licensed VETERINARY technician.

Commented [PB118R117]: SC: Agree. Completed.

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

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