



PREPROPOSAL STATEMENT OF INQUIRY

CR-101 (October 2017)
(Implements RCW 34.05.310)

Do **NOT** use for expedited rule making

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FILED

DATE: October 21, 2025

TIME: 8:30 AM

WSR 25-21-129

Agency: Department of Health - Veterinary Board of Governors

Subject of possible rule making: Veterinarian-Client-Patient Relationship (VCPR). The Veterinary Board of Governors (board) is considering amending WAC 246-933-010 and 246-933-200 to establish additional standards for telemedicine services in veterinary care.

Statutes authorizing the agency to adopt rules on this subject: RCW 18.92.030

Reasons why rules on this subject may be needed and what they might accomplish: In July 2025, the board adopted amendments to WAC 246-933-010 and 246-933-200 to clarify the regulatory requirements for establishing and maintaining a VCPR and specifying allowances for the utilization of telehealth in veterinary care. During the process of adopting the rule changes, the board received multiple comments, both in support and opposition to the proposed rule language.

Those who spoke in opposition felt that the proposed rules still limit access to veterinary care because an initial in-person visit to establish a VCPR and an annual in-person visit to maintain a VCPR, as required in subsections (1) and (2) of WAC 246-933-200, were not changed.

The board understands that the ability to establish and maintain a VCPR via telehealth would provide greater access to care. However, without further research, they had concerns that, for the time being, more stringent safeguards need to be in place for the health and safety of the animal. The board had concerns that without an initial in-person assessment or an annual in-person exam, the veterinarian will not be able to identify critical medical conditions.

At the completion of the rules project, the board committed to reopening the rules to work with interested parties on additional standards for telehealth services in veterinary care.

Identify other federal and state agencies that regulate this subject and the process coordinating the rule with these agencies: None

Process for developing new rule (check all that apply):

- ☐ Negotiated rule making
- ☐ Pilot rule making
- ☐ Agency study
- ☒ Other (describe) Collaborative rulemaking

Interested parties can participate in the decision to adopt the new rule and formulation of the proposed rule before publication by contacting:

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(If necessary)

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Additional comments: The department will use existing GovDelivery lists and other known contact information to inform interested parties of opportunities to provide input on proposed rule language. To find out more information about our rule making, visit www.doh.wa.gov. To subscribe to GovDelivery, please visit www.doh.wa.gov, and select the "Sign up for Updates From DOH" button at the bottom of the page. After signing in, click open the box labeled "Health Systems Quality Assurance (HSQA)." Next, select the box labeled "Health Professions," and then select "Veterinary Board of Governors"

Date: October 21, 2025

Name: Andrea Sanchez-Chambers, DVM

Title: Chairperson, Veterinary Board of Governors

Signature:

