



Virginia Department of Planning and Budget **Economic Impact Analysis**

18 VAC 150-20 Regulations Governing the Practice of Veterinary Medicine
Department of Health Professions
Town Hall Action/Stage: 6131 / 10523
April 8, 2026

The Department of Planning and Budget (DPB) has analyzed the economic impact of this proposed regulation in accordance with § 2.2-4007.04 of the Code of Virginia (Code) and Executive Order 19. The analysis presented below represents DPB's best estimate of the potential economic impacts as of the date of this analysis.¹

Summary of the Proposed Amendments to Regulation

As a result of a 2023 periodic review,² the Board of Veterinary Medicine (Board) proposes to 1) include licensure by Canadian jurisdictions as acceptable for veterinary technicians seeking licensure by endorsement in Virginia, 2) simplify how a technician from another jurisdiction can demonstrate qualifications, 3) allow license verification printed from the agency's license lookup feature to satisfy the requirement for posting licenses, 4) allow non-original documentation of continuing education as acceptable evidence of compliance, 5) remove a limitation on insertions of microchips in animals pursuant to a change in legislation, 6) provide more flexibility to the veterinarian-in-charge when notifying the Board in writing of the closure of a registered facility, and 7) permit late renewal of establishment registration up to 90 days without involvement of the Board.

¹ Code § 2.2-4007.04 requires that such economic impact analyses determine the public benefits and costs of the proposed amendments. Further the analysis should include but not be limited to: (1) the projected number of businesses or other entities to whom the proposed regulatory action would apply, (2) the identity of any localities and types of businesses or other entities particularly affected, (3) the projected number of persons and employment positions to be affected, (4) the projected costs to affected businesses or entities to implement or comply with the regulation, and (5) the impact on the use and value of private property.

² <https://townhall.virginia.gov/L/ViewPReview.cfm?PRid=2093>

Background

This regulation establishes rules for licensed veterinarians, licensed veterinary technicians, registered veterinary establishments, and registered equine dental technicians. Following a periodic review in 2023, the Board proposes many amendments that pertain to licensure by endorsement for veterinary technicians; posting of licenses; licensure and renewal requirements; requirements for registration as a veterinary establishment; requirements for veterinarian-in-charge; and renewal of veterinary establishment registrations. The specific changes that appear to have some economic impacts are discussed below.

Estimated Benefits and Costs

Licensure by endorsement for veterinary technicians

The Board proposes to include licensure by Canadian jurisdictions as acceptable for applicants seeking licensure by endorsement. According to the Department of Health Professions (DHP), the American Association of Veterinary State Boards, which owns and administers the Veterinary Technician National Exam, accepts Canadian candidates for the exam. Candidates must be graduates of an accredited program by the American Veterinary Medical Association or the Canadian Veterinary Medical Association. This change should expand the pool of qualified potential applicants for licensure by endorsement in the Commonwealth. Employers of veterinary technicians could benefit from the larger pool of qualified candidates to choose from, potentially finding more productive employees. Conversely, this could create additional job competition for current and future qualified veterinary technicians in Virginia, which may make it harder for them to find jobs or potentially could lower their market wage. Although no data exist on the potential number of applicants from Canadian jurisdictions, it seems unlikely that this change would result in a large increase in the pool of qualified candidates, and thus the impact on employment and wages would likely be small.

The Board proposes to simplify how a technician from another jurisdiction can demonstrate qualifications. Currently, licensed technicians are required to provide documents to prove their qualifications. These include providing documentation showing that they have been regularly engaged in clinical practice as a licensed, certified, or registered veterinary technician or veterinary nurse for at least two of the past four years immediately preceding the application, and also documentation showing completion of at least 16 hours of continuing

education requirements during the preceding four years. However, according to DHP, the Board does not feel it is necessary to make the applicant “prove” such licensure requirements in the other jurisdiction with evidence beyond simply proving that they have a current and active license with no disciplinary actions. Thus, this change should reduce the administrative burden for licensure by endorsement applicants to become technicians in Virginia.

Posting of licenses

Currently, the regulation requires that licenses and registrations must be posted in a place conspicuous to the public at the establishment. According to DHP, this requirement is burdensome for veterinarians that work at multiple establishments as they must physically move their posted license from place to place. The Board proposes to allow a license verification printed from the agency’s online license lookup feature to satisfy this requirement; this online information is updated immediately whenever any changes in licensure occur. This proposal is expected to save the licensees time and money by not having to obtain duplicate copies of their licenses.

Licensure and renewal

The Board proposes to make the requirement to maintain “original” documentation of continuing education more flexible. DHP notes that continuing education may be completed online and, in such cases, there is no way to produce an “original” electronic certificate. Under the proposal, non-original continuing education documentation would be sufficient to provide evidence of completion making the requirement less burdensome.

Requirements for registration as a veterinary establishment

The Board proposes to remove a limitation on insertions of microchips pursuant to a change in legislation in 2024.³ DHP states that Virginia Code § 3.2-6521 no longer contains this restriction; and an existing Board Guidance Document 150-4⁴ addresses the issue of microchip insertion in animal shelters. This change would align the regulation with the changes made to the Code of Virginia.

³ See <https://legacylis.virginia.gov/cgi-bin/legp604.exe?241+ful+CHAP0241>

⁴ See https://townhall.virginia.gov/L/GetFile.cfm?File=C:\TownHall\docroot\GuidanceDocs\223\GDoc_DHP_166_v4.pdf

Requirements for veterinarian-in-charge

The Board proposes to provide more flexibility to the veterinarian-in-charge when notifying the Board in writing of the closure of a registered facility. The Board proposes to remove the current requirement that it be notified ten days prior to closure, and only require that the notification be prior to closure, providing more flexibility to the veterinarian-in-charge.

Renewal of veterinary establishment registrations

The Board proposes to permit late renewal of establishment registration up to 90 days after expiration without the involvement of the Board. Currently, a late renewal must go to the Board to grant an allowance of a late renewal once 30 days have passed after expiration. According to DHP, once an establishment registration has been expired for longer than 30 days, it can no longer be renewed by paying a late fee. In such cases, reinstatement requires an application and inspection. This creates additional burdens on Board staff, DHP inspectors, and the veterinarians-in-charge who are responsible for renewing the registration. By contrast, an expired license may be renewed up to 12 months after expiration by paying a late fee. Thus, this change should provide some administrative cost savings to the staff, the inspectors, and the veterinarians-in-charge. DHP also notes that the Board would still be able to take action against an establishment for operating without a valid registration and/or against a veterinarian-in-charge for failure to ensure the establishment maintains a current and valid registration.

Businesses and Other Entities Affected

The proposed amendments apply to the 5,228 licensed veterinarians, 2,874 licensed veterinary technicians, 1,364 registered veterinary establishments, and 21 registered equine dental technicians.⁵ None of the regulated entities appear to be disproportionately affected.

The Code of Virginia requires DPB to assess whether an adverse impact may result from the proposed regulation.⁶ An adverse impact is indicated if there is any increase in net cost or reduction in net benefit for any entity, even if the benefits exceed the costs for all entities

⁵ <https://www.dhp.virginia.gov/about/stats/2026Q3/04CurrentLicenseCountQ3FY2026.pdf>

⁶ Pursuant to Code § 2.2-4007.04(D): In the event this economic impact analysis reveals that the proposed regulation would have an adverse economic impact on businesses or would impose a significant adverse economic impact on a locality, business, or entity particularly affected, the Department of Planning and Budget shall advise the Joint Commission on Administrative Rules, the House Committee on Appropriations, and the Senate Committee on Finance.

combined.⁷ While most of the proposals provide more flexibility and reduce regulatory burdens, as described above current and future qualified veterinary technicians in Virginia could be made moderately worse off through increased competition for jobs from candidates from Canadian jurisdictions. Thus, an adverse impact is indicated.

Small Businesses⁸ Affected:⁹

The proposed amendments do not appear to adversely affect small businesses.

Localities¹⁰ Affected¹¹

The proposed amendments do not introduce costs for localities, nor do they particularly affect any locality.

Projected Impact on Employment

The proposals to include licensure by Canadian jurisdictions as acceptable for licensure by endorsement applicants and to simplify for a technician from another jurisdiction to demonstrate qualifications should help increase the supply of licensed veterinary technicians in Virginia.

Effects on the Use and Value of Private Property

To the extent the proposed changes provide administrative cost savings to registered veterinary establishments, their asset values should be positively affected. Additionally, if veterinary establishments are able to hire more productive technicians due to the increased supply of qualified candidates, their asset values may also be moderately increased through this

⁷ Statute does not define “adverse impact,” state whether only Virginia entities should be considered, nor indicate whether an adverse impact results from regulatory requirements mandated by legislation. As a result, DPB has adopted a definition of adverse impact that assesses changes in net costs and benefits for each affected Virginia entity that directly results from discretionary changes to the regulation.

⁸ Pursuant to § 2.2-4007.04 of the Code of Virginia, small business is defined as “a business entity, including its affiliates, that (i) is independently owned and operated and (ii) employs fewer than 500 full-time employees or has gross annual sales of less than \$6 million.”

⁹ If the proposed regulatory action may have an adverse effect on small businesses, Code § 2.2-4007.04 requires that such economic impact analyses include: (1) an identification and estimate of the number of small businesses subject to the proposed regulation, (2) the projected reporting, recordkeeping, and other administrative costs required for small businesses to comply with the proposed regulation, including the type of professional skills necessary for preparing required reports and other documents, (3) a statement of the probable effect of the proposed regulation on affected small businesses, and (4) a description of any less intrusive or less costly alternative methods of achieving the purpose of the proposed regulation. Additionally, pursuant to Code § 2.2-4007.1, if there is a finding that a proposed regulation may have an adverse impact on small business, the Joint Commission on Administrative Rules shall be notified.

¹⁰ “Locality” can refer to either local governments or the locations in the Commonwealth where the activities relevant to the regulatory change are most likely to occur.

¹¹ § 2.2-4007.04 defines “particularly affected” as bearing disproportionate material impact.

means. No impact on the use and value of other private property or on real estate development costs is expected.