



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: 6364 / 10521
March 5, 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

For licensure by endorsement, the Board of Veterinary Medicine (Board) proposes to: 1) expand the pool of acceptable licenses to include those issued by a jurisdiction in Canada, 2) reduce the continuing education requirement from 30 hours during the preceding four years to 15 hours during the preceding two years, 3) eliminate the requirement that applicants have regularly engaged in clinical practice for at least two of the past four years immediately preceding application, 4) eliminate the requirement that applicants sign a statement attesting that the applicant has read, understands, and will abide by the statutes and regulations governing the practice of veterinary medicine in Virginia, and 5) eliminate superfluous language.

Background

According to the Department of Health Professions (DHP), the Board determined a need to increase the number of licensed veterinarians in the Commonwealth by reducing barriers to obtaining a license by endorsement. One of the means of accomplishing this selected by the

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.

Board to is to accept Canadian licensure, using the same criteria for accepting licensure from a jurisdiction in the United States: holding a current, unrestricted license and not being a respondent in any board action. DHP reports that all five Canadian veterinary colleges are accredited by the American Veterinary Medical Association Council on Education (AVMA COE), which ensures eligibility to take the North American Veterinary Licensing Examination (NAVLE). Graduating from an AVMA-COE accredited veterinary school and passing the NAVLE qualify a veterinary applicant to be licensed by examination in Virginia. Thus, a Canadian license is acceptable as an American license from another jurisdiction for licensure by endorsement.

The Board proposes to require 15 hours of continuing education rather than 30 to reflect lower continuing education requirements for renewal in other jurisdictions, since the applicant for licensure by endorsement would hold a current license in another jurisdiction. The Board also believes that, if the license in the other jurisdiction did not require continuing education for renewal, obtaining 15 hours could be done relatively easily by applicants given the availability of online continuing education.

The Board also decided to eliminate two requirements. First, the Board proposes to eliminate the requirement that applicants regularly engage in clinical practice, noting that the clinical practice requirement is not needed to protect public health and safety. Applicants may have acted as research veterinarians or in a teaching capacity in another jurisdiction. The Board also considered a hypothetical situation in which a veterinarian with 15 years of practice does not practice for four years due to personal reasons. That individual's prior practice should not be discounted by the Board when considering minimum requirements for licensure. The Board felt that requiring such individuals to obtain clinical practice prior to licensure presents an unnecessary hardship. Second, the Board proposes to eliminate the attestation requirement, noting that the requirement is unnecessary because it does not protect public health, safety, or welfare.

Estimated Benefits and Costs

Reducing barriers and costs for veterinarians licensed in other U.S. jurisdictions and newly allowing veterinarians licensed in Canada to become licensed by endorsement in the Commonwealth, would be beneficial for out-of-state veterinarians interested in becoming

licensed in Virginia and could be beneficial for Virginia consumers of veterinary services. Such reduced barriers and costs may increase the number of qualified veterinarians available to provide these services. This may reduce the difficulty some Virginians have finding available veterinary services. According to a January 2025 report from the Virginia Healthcare Workforce Data Center,² less than one percent of veterinarians in the Commonwealth are involuntarily unemployed, which suggests that available appointments for veterinary services may be limited in some areas and waiting times for veterinary services may be long. A greater supply of available veterinarians could also be beneficial for practices looking to add another vet and other businesses or entities looking to hire a vet. On the other hand, some current Virginia veterinary practices may face greater competition and have less ability to raise rates for service if more services become available at other practices due to an increase in the number of qualified veterinarians available.

Licensed veterinarians are required to abide by the statutes and regulations governing the practice of veterinary medicine in Virginia whether or not they sign a statement attesting to having read and understood such statutes and regulations. Eliminating the attestation requirement saves a small amount of time and paperwork and would have no other substantive impact.

Businesses and Other Entities Affected

The proposed amendments would particularly affect applicants for licensure by endorsement. In 2025, 135 individuals became Virginia licensed veterinarians via licensure by endorsement.³ The proposed reduction in barriers to become licensed by endorsement may lead to more individuals gaining licensure than otherwise would occur. Consumers of veterinary services, veterinary practices and other employers of veterinarians, and the 10,032 veterinarians currently licensed in the Commonwealth may be affected as well. According to survey data from the Virginia Healthcare Workforce Data Center report titled *Virginia's Veterinarian Workforce: 2024*,⁴ the primary employers of licensed veterinarians by establishment type in the Commonwealth are distributed as follows:

² See <https://www.dhp.virginia.gov/media/dhpweb/docs/hwdc/vetmed/0301Veterinarians2024.pdf>.

³ Data source: DHP

⁴ See note 2. This report dated January 2025 was the most recent version published as of the date this Economic Impact Analysis was completed.

Primary Employers of Veterinarians by Type	Percentage
Group Practice	45%
Solo Practice/Partnership	40%
Veterinary Education Program	2%
Shelters or Rescue (Public or Private)	2%
Public Health Program	1%
Laboratory	1%
Other Practice Setting	9%

The Code requires DPB to assess whether an adverse impact may result from the proposed regulation.⁵ 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 combined.⁶ As noted above, some current veterinary practices could face increased competition in providing services through the proposed reduction in barriers to licensure by endorsement and newly allowing veterinarians licensed in Canada to become licensed by endorsement in the Commonwealth. Thus, an adverse impact is indicated.

⁵ 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.

⁶ 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.

Small Businesses⁷ Affected:⁸

Types and Estimated Number of Small Businesses Affected

The Board regulates individual practitioners, but not their employers. Thus, data on the number of small businesses affected is not available. Most, if not all, private employers of veterinarians likely are small businesses.⁹

Costs and Other Effects

As described above, some small providers of veterinary services may have less ability to raise rates for service due to potentially increased competition.

Alternative Method that Minimizes Adverse Impact

There are no clear alternative methods that both reduce adverse impact and meet the intended policy goals.

Localities¹⁰ Affected¹¹

Localities adjacent or otherwise near a neighboring state or the District of Columbia may be disproportionately affected as some veterinarians in such jurisdictions who live relatively close to the border of Virginia may be compelled to practice in the Commonwealth given the reduced barriers to licensure by endorsement and more reasonable commute time than localities further away.

The proposed amendments do not appear to substantively affect costs for local governments.

⁷ 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.”

⁸ 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.

⁹ According to the U.S. Small Business Administration, 99.6 percent of Virginia businesses are small businesses. See https://advocacy.sba.gov/wp-content/uploads/2025/06/Virginia_2025-State-Profile.pdf.

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.

Projected Impact on Employment

The proposed reduced barriers for licensure by endorsement may increase the number of individuals employed as veterinarians in the Commonwealth. The number of veterinarians licensed in another U.S. jurisdiction or Canada who would be encouraged to apply for licensure by endorsement in Virginia due to the proposed reduction in barriers is not known.

Effects on the Use and Value of Private Property

The potential increase in supply of licensed veterinarians may enable some practices and other private employers of veterinarians to offer more service (such as additional available appointments), which could increase revenue and potentially profits, increasing the value of the business. Other veterinary firms may lose business to new competitors or not be able to raise rates due to increased competition. The latter firms may have moderately reduced value.

The proposed amendments do not affect real estate development costs.