

DEPARTMENT OF CONSUMER AFFAIRS  
TITLE 16. PROFESSIONAL AND VOCATIONAL REGULATIONS  
**DIVISION 20. VETERINARY MEDICAL BOARD**

**NOTICE OF PROPOSED REGULATORY ACTION**

Minimum Standards for Alternate Veterinary Premises

**NOTICE IS HEREBY GIVEN** that the California Veterinary Medical Board (Board) is proposing to take the action described in the Informative Digest below, after considering all comments, objections, and recommendations regarding the proposed action.

**PUBLIC HEARING**

The Board has not scheduled a public hearing on this proposed action. However, the Board will hold a hearing if it receives a written request for a public hearing from any interested person, or their authorized representative, no later than 15 days prior to the close of the written comment period. A hearing may be requested by making such request in writing addressed to the individuals listed under "Contact Person" in this notice.

**WRITTEN COMMENT PERIOD**

Written comments relevant to the action proposed, including those sent by mail, facsimile, or e-mail to the addresses listed under "Contact Person" in this Notice, must be **received by the Board at its office no later than Monday, August 4, 2025**, or must be received by the Board at the hearing, should one be scheduled.

**AUTHORITY AND REFERENCE**

Pursuant to the authority vested by sections 4808, 4836 and 4854 of the Business and Professions Code (BPC), and to implement, interpret, or make specific BPC sections 4836. 4836.1, 4852, 4853, 4854, 4855, 4856, and 4883 of said code, the Board is considering amending sections 2030, 2030.05, 2030.1, 2030.2, and 2030.3 of article 4 of division 20 of title 16 of the California Code of Regulations (CCR<sup>1</sup>).

**INFORMATIVE DIGEST / POLICY STATEMENT OVERVIEW**

BPC section 4800.1 mandates that the protection of the public shall be the highest priority of the Board in exercising its licensing, regulatory, and disciplinary functions. Whenever the protection of the public is inconsistent with other interests sought to be promoted, the protection of the public shall be paramount. BPC section 4808 authorizes the Board, in accordance with the Administrative Procedure Act (Government Code section 11400 et seq.), to adopt, amend, or repeal such rules and regulations as may be

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<sup>1</sup> All CCR references are to title 16 unless otherwise noted

reasonably necessary to enable it to carry into effect the provisions of the Veterinary Medicine Practice Act (Practice Act) (BPC section 4800, et seq.).

Existing law requires all veterinary premises to be registered with the Board (BPC section 4853) and conform to the minimum standards established by the Board (BPC section 4854). Current regulations specify the requirements for the licensee manager (veterinarian), fixed veterinary premises, small animal fixed premises, small animal mobile clinics, and small animal vaccination clinics. However, these provisions do not include all types of mobile veterinary practice, nor consider exemptions from those operating standards, where appropriate. This proposal would establish such standards and exemptions.

The Board proposes to update and revise existing minimum standards for all premises locations and update practice standards for the types of animal health care tasks that may be performed under the supervision of a licensed veterinarian by a registered veterinary technician, veterinary assistant, or veterinary assistant controlled substance permit holder at a small animal vaccination clinic (to be retitled “Minimum Standards - Animal Vaccination Veterinary Premises”).

The Board’s proposal would:

- Consolidate existing and newly proposed minimum veterinary premises requirements for all locations in one section of the Board’s regulations at CCR, title 16, section 2030 entitled “Minimum Standards – Veterinary Premises” and repeal outdated or unnecessary standards for all locations,
- Provide new categories of exemptions from those minimum standards paragraphs in Section 2030 that do not apply to the specified veterinary premises type and are not relevant or necessary to ensure minimum operating standards are met in specified locations,
- Standardize various existing veterinary naming conventions of clinics, facilities, and hospitals to the consistent use of the terms “veterinary premises” throughout, and would set minimum standards and definitions for the following veterinary premises types: small animal fixed veterinary premises, large animal fixed veterinary premises, mobile veterinary premises, and animal vaccination veterinary premises,
- For Section 2030.3, amend the title from “Small Animal Vaccination Clinic” to “Minimum Standards -- Animal Vaccination Veterinary Premises.” In addition to specifying the minimum standards for this location and veterinarian responsibilities, Section 2030.3 would be revised to describe the services provided at this type of veterinary premise, the personnel who may administer the services, and when such services are authorized to be provided,
- Remove all apparent building standards, including any exemptions to those standards, from these regulations (a separate rulemaking to amend CCR, Title 24,

was recently approved via the California Building Standards Commission (CBSC) rulemaking process, which added the mentioned building standards, and related exemptions, to section 1251 of title 24 of the CCR),

- Make minor, technical or grammatical changes, including removal of gender specific language and replacement of that language with gender neutral language, and
- Increase information to consumers through signage requirements, and new written disclosures that include contact information and information where after-hours emergency care is available.

## **ANTICIPATED BENEFITS OF PROPOSAL**

The regulatory proposal supports consumer protection by establishing minimum standards for alternate veterinary premises by updating the standards for locations to follow when providing veterinary services. The maintenance of consistent standards across all premises regulated by the Board helps ensure the health and safety of the public, the animal patients, and the clients served, regardless of location.

The Board anticipates consumers will also benefit from increased availability and readability of information from the veterinary premises when the consumer has an emergency for their animals or has stopped by a veterinary premises after hours. Veterinarians and their staff will benefit from clarification of the requirements specific to the veterinary premises type where they provide services. In addition, standardizing all of the premises requirements will allow for consistency among the various veterinary premises types, while allowing exceptions for standards not relevant or necessary to ensure minimum standards of care are met in specified types of locations.

Additionally, the Board anticipates support from the public, veterinarians, and veterinary professionals in relation to vaccination events, as “designated veterinary professionals” would be able to provide vaccinations instead of only veterinarians.

Lastly, this regulatory proposal, along with the separate Title 24 rulemaking referenced above, will ensure that veterinary practice management standards are only found under title 16 of the CCR, while all apparent building standards, and any exemptions to those standards, are only found under title 24 of the CCR, and that no overlap or duplicative language exists between the two areas of the CCR.

## **EVALUATION OF CONSISTENCY AND COMPATIBILITY WITH EXISTING STATE REGULATIONS**

During the process of developing this regulatory proposal, the Board identified overlapping and duplicative language between titles 16 and 24 of the CCR. Through meetings with the CBSC and the Office of Administrative Law (OAL), it was determined that building standards, along with any exemptions to building standards, can only be contained within title 24 of the CCR, as the CBSC oversees the development, adoption, approval, publication, and implementation of all California building standards. OAL

therefore cannot review or approve any building standards or exemptions to building standards.

One goal of this regulatory proposal, along with the Title 24 proposal referenced above, is to ensure that all applicable building standards and related exemptions are contained under title 24 of the CCR and that all applicable practice management standards related to veterinary premises are contained under title 16 of the CCR. These two regulatory proposals ensure that no overlap or duplicative language exists between the two areas of the CCR.

Additionally, the Board determined that this proposed regulation is not inconsistent or incompatible with existing regulations. After conducting a review for any regulations that would relate to or affect this area, the Board has concluded these are the only regulations that concern Minimum Standards for Alternate Veterinary Premises.

## **DISCLOSURES REGARDING THIS PROPOSED ACTION**

### **FISCAL IMPACT ESTIMATES**

**Fiscal Impact on Public Agencies Including Costs or Savings to State Agencies or Costs/Savings in Federal Funding to the State:** None. The regulations do not result in a fiscal impact to the state, including any costs or savings to any state agency or any costs or savings in federal funding to the state.

The Board does not anticipate additional workload or costs resulting from the proposed regulations.

**Nondiscretionary Costs/Savings to Local Agencies:** None

**Local Mandate:** None

**Cost to any Local Agency or School District for which Government Code Sections 17500–17630 Require Reimbursement:** None

**Mandate Imposed on Local Agencies or School Districts:** None

**Significant Effect on Housing Costs:** None

### **BUSINESS IMPACT ESTIMATES**

The Board has made the initial determination that the proposed regulatory action would have no significant statewide adverse economic impact directly affecting business, including the ability of California businesses to compete with businesses in other states.

This initial determination is based on the following facts:

The proposal consolidates and updates existing minimum standards applicable to all veterinary premises (including small animal fixed veterinary premises, large animal fixed

veterinary premises, mobile veterinary premises, and animal vaccination veterinary premises) consistent with the current practice of veterinary medicine. Businesses and licensees are anticipated to comply with the regulations within normal business operations at no additional costs.

The Board does anticipate that there may be an increase in the hiring of “designated veterinary personnel” when vaccination events are provided to the public since the services may be provided by additional personnel besides the veterinarian(s), but does not have estimates of the number or quantity of personnel that may be hired at this time.

### **Cost Impact on Representative Private Person or Business**

The Board is not aware of any cost impacts that a representative private person or business would necessarily incur in reasonable compliance with the proposed action.

Any workload and costs to comply with the regulations are anticipated to be completed and incurred within normal business operations.

### **Business Reporting Requirements**

The regulatory action does not require businesses to file a report with the Board.

### **Effect on Small Business**

The Board has determined that the proposed regulations are not expected to result in additional workload or costs to existing and small businesses. Although small businesses owned by licensees of the Board may be impacted, the Board does not maintain data relating to the number or percentage of licensees who own a small business; therefore, the number or percentage of small businesses that may be impacted cannot be predicted.

## **RESULTS OF ECONOMIC IMPACT ASSESSMENT / ANALYSIS**

The Board has determined that this regulatory proposal will not have a significant impact on the creation of jobs or new businesses or the elimination of jobs or existing businesses or the expansion of businesses in the State of California.:

- It will not eliminate jobs within the State of California because it does not impose requirements of a sufficient magnitude to eliminate businesses or eliminate licensees. The proposal may create jobs within the State of California for “designated veterinary personnel” when vaccination events are provided to the public since the services may be provided by additional personnel besides the veterinarian(s) (existing regulation limits such services to veterinarians only). However, there is no anticipation for the elimination of veterinarian jobs within the State of California as the impact is on the requirements for operating veterinary premises in compliance with the law, non-substantive changes to the managing licensee (veterinarian’s) responsibilities while overseeing the veterinary premises, and a veterinarian is still required to be on-site when a vaccination event occurs.

- The proposal is not anticipated to create new businesses or eliminate existing businesses within the State of California because the proposed regulation will update the minimum standards for veterinary premises consistent with current veterinary practice, and therefore these changes are not of a magnitude that would be expected to affect existing and small businesses.
- It will not affect the expansion of businesses currently doing business within the State of California because it does not impose additional hiring requirements for owners or a managing licensee (veterinarian) over a veterinary premises.

This regulatory proposal has the following benefits to the health and welfare of California residents:

- This regulatory proposal benefits the health, safety, and welfare of California residents and increases access to veterinary care for vaccination events, by allowing “designated veterinary personnel” under the supervision of a veterinarian to provide vital vaccinations to consumer’s animals to reduce the probability of the spread of diseases in the community. The proposal will allow more veterinary professionals to provide vaccination services by expanding the animal health care tasks these professionals may provide during a vaccination event. Veterinarians and their staff will benefit from clarification of the requirements specific to the veterinary premises type where they provide services.

The proposed regulation also supports consumer protection by establishing minimum standards for alternate veterinary premises by updating the standards for locations to follow when providing veterinary services. The maintenance of consistent standards across all premises regulated by the Board helps ensure the health and safety of the public, the animal patients, and the clients served, regardless of location. The Board anticipates consumers will also benefit from increased availability and readability of information from the veterinary premises when the consumer has an emergency for their animals or has stopped by a veterinary premises after hours.

- It does not affect worker safety because it does not involve worker safety.
- It does not affect the state’s environment because it does not involve the environment.

## CONSIDERATION OF ALTERNATIVES

In accordance with Government Code section 11346.5, subdivision (a)(13), the Board must determine that no reasonable alternative it considered to the regulatory proposal or that has otherwise been identified and brought to its attention would be more effective in carrying out the purpose for which the action is proposed, would be as effective and less burdensome to affected private persons than the proposal described

in this Notice, or would be more cost-effective to affected private persons and equally effective in implementing the statutory policy or other provision of law.

Any interested person may submit comments to the Board in writing relevant to the above determinations at 1747 North Market Blvd., Suite 230, Sacramento, California 95834 during the written comment period, or at the hearing if one is scheduled or requested.

### **AVAILABILITY OF STATEMENT OF REASONS AND RULEMAKING FILE**

The Board has compiled a record for this regulatory action, which includes the Initial Statement of Reasons (ISOR), proposed regulatory text, and all the information on which this proposal is based. This material is contained in the rulemaking file and is available for public inspection upon request to the contact persons named in this notice.

### **TEXT OF PROPOSAL**

Copies of the exact language of the proposed regulations, and any document incorporated by reference, and of the initial statement of reasons, and all of the information upon which the proposal is based, may be obtained upon request from the Board at 1747 North Market Blvd., Suite 230, Sacramento, California 95834.

### **AVAILABILITY OF CHANGED OR MODIFIED TEXT**

After considering all timely and relevant comments, the Board, upon its own motion or at the request of any interested party, may thereafter adopt the proposals substantially as described in this Notice, or may modify such proposals if such modifications are sufficiently related to the original text. With the exception of technical or grammatical changes, the full text of any modified proposal, with the modifications clearly indicated, will be available for review and written comment for 15 days prior to its adoption from the person designated in this Notice as the Contact Person and will be mailed to those persons who submit written or oral testimony related to this proposal or who have requested notification of any changes to the proposal.

### **AVAILABILITY AND LOCATION OF THE FINAL STATEMENT OF REASONS AND RULEMAKING FILE**

All of the information upon which the proposed regulations are based is contained in the rulemaking file, which is available for public inspection by contacting the person named below.

A copy of the Final Statement of Reasons may be obtained once it has been prepared by making a written request to the Contact Person named below or by accessing the website listed below.

### **CONTACT PERSONS**

Inquiries or comments concerning the proposed rulemaking action may be addressed to:



Name: Justin Sotelo  
Address: California Veterinary Medical Board  
1747 North Market Blvd., Suite 230  
Sacramento, CA 95834  
Telephone No.: (916) 905-5511  
Fax No.: (916) 928-6849  
E-Mail Address: justin.sotelo@dca.ca.gov

The backup contact person is:

Name: Matt McKinney  
Address: Veterinary Medical Board  
1747 North Market Blvd., Suite 230  
Sacramento, CA 95834  
Telephone No.: (916) 282-3529  
Fax No.: (916) 928-6849  
E-Mail Address: matthew.mckinney@dca.ca.gov

#### **AVAILABILITY OF DOCUMENTS ON THE INTERNET**

Copies of the Notice of Proposed Regulatory Action, Initial Statement of Reasons, Proposed Regulatory Language of the regulations with modifications noted, as well as the Final Statement of Reasons when completed, and modified text, if any, can be accessed through the Board's website at:

[https://www.vmb.ca.gov/laws\\_regs/proposed\\_regs.shtml](https://www.vmb.ca.gov/laws_regs/proposed_regs.shtml).