

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

STATEMENT OF EXPLANATION FOR SECTION 100 FILING

Veterinarian-Client-Patient Relationship (VCPR)

Senate Bill (SB) 669 (Chapter 882, Statutes of 2023) was approved by the Governor on October 13, 2023 and became effective January 1, 2024 (copy [attached](#)). Assembly Bill (AB) 1399 (Chapter 475, Statutes of 2023) was approved by the Governor on October 8, 2023 and became effective January 1, 2024 (copy [attached](#)). As a result of these bills, all provisions related to the veterinarian-client-patient relationship (VCPR) can now be found within Business and Professions Code (BPC) Section 4826.6 and are thus duplicated under section 2032.1 of article 4 of division 20 of title 16 of the California Code of Regulations (CCR). Section 2032.1 can therefore be repealed. Additionally, references to section 2032.1 should be amended under sections 2032.25 and 2038.5.

Pursuant to title 1, division 1, chapter 1, article 2, section 100(b)(1) and (3), of the California Code of Regulations (CCR), the Veterinary Medical Board (Board) submits this written statement explaining why the proposal to amend sections 2032.25 and 2038.5 and repeal section 2032.1 does not materially alter any requirement, right, responsibility, condition, prescription, or other regulatory element of any CCR provision.

Subject to the approval of the Office of Administrative Law, the Board proposes to amend sections 2032.25 and 2038.5 and repeal section 2032.1 of article 4 of division 20 of title 16 of the CCR.

**ARTICLE 4.
PRACTICE**

1. Amend section 2032.25. Written Prescriptions in Absence of Originally Prescribing Veterinarian.

As noted above, as a result of SB 699 and AB 1399, all provisions related to the VCPR are now found in statute, BPC section 4826.6, and are duplicated under section 2032.1. The Board is therefore proposing to repeal section 2032.1 and update the cross-reference to the VCPR provisions under new BPC section 4826.6. This proposed change would be a cross-reference update and therefore a change without regulatory effect.

2. Amend section 2038.5. Animal Physical Rehabilitation.

As noted above, as a result of SB 699 and AB 1399, all provisions related to the VCPR are now found in statute, BPC section 4826.6, and are thus duplicated under section 2032.1. The Board is therefore proposing to repeal section 2032.1 and update the cross-reference to the VCPR provisions under new BPC section 4826.6. This proposed change would be a cross-reference update and therefore a change without regulatory effect.

3. Repeal section 2032.1. Veterinarian-Client-Patient Relationship.

As noted above, as a result of SB 699 and AB 1399, all provisions related to the VCPR are now found in statute, BPC 4826.6 and are thus duplicated under section 2032.1. Section 2032.1 can therefore be repealed and is a change without regulatory effect because the contents of CCR 2032.1 can now be found in BPC section 4826.6. Below please find the breakdown section by section of where the contents of CCR 2032.1 can now be found in BPC 4826.6.

- CCR 2032.1(a): Language is duplicated in BPC 4826.6(a)
- CCR 2032.1(b): Language is duplicated in BPC 4826.6(a)
- CCR 2032.1(b)(1): Language is duplicated in BPC 4826.6(a)(1)
- CCR 2032.1(b)(2): Language is duplicated in BPC 4826.6(a)(2) and (b)(1) - (3)
- CCR 2032.1(b)(3): Language is duplicated in BPC 4826.6(a)(3)
- CCR 2032.1(c): Language is duplicated in BPC 4826.6(i)(1) and (2)
- CCR 2032.1(d): Language is duplicated in BPC 4826.6(j)
- CCR 2032.1(e): Language is duplicated in BPC 4826.6(e)
- CCR 2032.1(f): Language is duplicated in BPC 4826.6(k)

These are changes without regulatory effect because the contents of the CCR section 2032.1 can now be found within BPC 4826.6 which supersedes the regulation.