



MEMORANDUM

DATE	January 6, 2025
TO	Veterinary Medical Board
FROM	Multidisciplinary Advisory Committee (MDC) Richard Sullivan, DVM, Chair
SUBJECT	Agenda Item 6. Review, Discussion, and Possible Action on Multidisciplinary Advisory Committee (MDC) Report

J. Proposed Rulemaking to Repeal CCR, Title 16, Section 2068.6 Regarding Out of State Registration as Equivalent

Background

During previous Board meetings, Board members have raised concerns that not all pathways for RVT applicants to obtain a registration are equivalent.

Currently, RVT applicants who are not registered in another state are required to complete some amount of education to qualify for registration. Business and Professions Code (BPC) section [4841.5](#) states the following:

To obtain registration as a registered veterinary technician, the applicant shall furnish satisfactory evidence of one of the following:

(a) Graduation from, at minimum, a two-year curriculum in veterinary technology, in a college or other postsecondary institution approved by the board, or the equivalent thereof, as determined by the board. In the case of a private postsecondary institution, the institution shall also be approved by the Bureau for Private Postsecondary Education. Proof of graduation shall be submitted directly to the board by the college, other postsecondary institution, or American Association of Veterinary State Boards.

(b) Education or a combination of education and clinical practice experience, as determined by the board.

(c) Education equivalency certified by the American Association of Veterinary State Boards Program for the Assessment of Veterinary Education Equivalence for Veterinary Technicians. The certificate of education equivalence shall be submitted directly to the board by the American Association of Veterinary State Boards.

The Board, through California Code of Regulations (CCR), title 16, section [2068.5](#) deemed a combination of education (20 semester units, 30 quarter units, or 300 hours

of instruction) and 4,416 directed clinical practice experience in specified areas to be equivalent to the two-year curriculum.

In addition, through CCR, title 16, section [2068.6](#)¹, the Board deemed an “Out of State Registration” equivalent if the applicant meets the following requirements:

(a) The applicant is licensed, certified, or registered as a veterinary technician in the United States, Canada or U.S. territory in good standing, as defined in Section 4848 (b) (1) (A) and (B) of Business and Professions Code, in which the board has determined that he or she has passed the national veterinary technician examination or an examination equivalent to the written examination last required in California.

(b) The applicant has obtained at least 4,416 hours, completed in no less than 24 months, of directed clinical practice, under the direct supervision of a veterinarian licensed in the United States, Canada or U.S. territory.

(c) The directed clinical practice shall have provided the applicant with knowledge, skills and abilities in the areas of communication with clients, patient examinations, emergency procedures, laboratory procedures, diagnostic imaging, surgical assisting, anesthesia, animal nursing, nutrition, dentistry, animal behavior and pharmacology. The supervising veterinarian(s) shall complete a check list attesting to proficiency in specific skill areas within the preceding categories.

(d) The board determines that no disciplinary action has been taken against the applicant by any public agency concerned with the practice of animal health care and that the applicant has not been the subject of adverse civil or criminal judgments resulting from the practice of animal health care which the board determines constitutes evidence of a pattern of incompetency or negligence.

Notably, there is no education component required.

When the “Out of State Registration as Equivalent” path went into effect in 1989, at least two states (Wisconsin and Alaska) accepted an experience only pathway commonly referred to as “on the job training” or “OJT”. Currently, Wisconsin, Alaska, Utah, and Montana also have OJT pathways to registration. It does not specify *where* the experience must have been obtained.

In addition, as each state began regulating technicians, most had transition periods that allowed those with experience to become registered without any education (and some without an examination).

As long as those out-of-state registered applicants met the other requirements in CCR, title 16, section [2068.6](#), they qualify for veterinary technician registration in

¹ Assembly Bill (AB) 1535 (Committee on Business and Professions, Chapter 631, Statutes of 2021) moved all RVT examination requirements to registration requirements. A section 100 package is currently pending with OAL to change “examination” to “registration” in CCR, title 16, section 2086.6 to mirror this change.

California. This pathway has led to many individuals obtaining clinical experience in any state, including California, obtaining a registration in one of the four other states, and then immediately applying for and obtaining a registration in California.

Some Board members were concerned this may be an inconsistent and/or unfair requirement to those applicants applying through the education and experience pathway defined in CCR, title 16, section 2068.5. As such, the MDC was tasked with reviewing the RVT pathways further and making recommendations to the full Board.

Subcommittee Meetings and Recommendation

The Subcommittee held two stakeholder meetings to review the current pathways and receive feedback on how to make the RVT requirements consistent. Specifically, the Subcommittee requested feedback on whether RVT applicants seeking Board registration should be required to satisfy education or education and experience requirements or whether RVT applicants would be safe to practice in California after completing clinical practice without education.

In response to the initial stakeholder notification, the Board received nearly 200 comments from individuals in favor of requiring or removing the education requirement. Staff divided those comments and placed them in two folders for easy reference:

- [In Favor of Requiring Education](#)
- [In Favor of Removing Education](#)

Roughly 70 individuals, many representing academia or professional associations, attended the first stakeholder meeting. All those who commented were in favor of requiring education, whether through an accredited program or the education/experience pathway defined in CCR, title 16, section 2068.5. Commenters cited the need for education to understand the “why” behind patient treatments and therapies, the importance of client education, and how experience is not equivalent to education. Those commenters also raised concerns that the profession would take a step backward if the education requirement was removed.

Since the Subcommittee only heard from one perspective during the first stakeholder meeting, the Subcommittee reached out to those who may have different perspectives - those who submitted comments in favor of removing the education requirement and those who had obtained a registration through the “Out of State Registration” pathway.

During the second stakeholder meeting, most attendees expressed concerns with requiring education for everyone, because they were unable to obtain education due to educational costs, timing, and/or lack of access. The attendees agreed education was important to being a successful RVT and understanding the “why” behind RVT tasks for patient safety and communicating with clients, but some attendees believed education could be gained through experience. Interestingly, many had started education prior to becoming registered and then completed education after they were registered, because they believed it made them better RVTs.

Based on the feedback from both meetings that education is important to patient and client safety, the Subcommittee recommends requiring some component of education for all RVT applicants. As such, the Subcommittee believes CCR, title 16, section 2068.6 should be repealed.

Action Requested:

If the MDC agrees with the Subcommittee’s recommendation, please entertain a motion to recommend the Board take the following actions:

Approve repealing all regulatory text for CCR, title 16, section 2068.6.

Direct staff to submit the text to the Director of the Department of Consumer Affairs and the Business, Consumer Services, and Housing Agency for review, and if the Board does not receive any comments providing objections or adverse recommendations specifically directed at the proposed action or to the procedures followed by the Board in proposing or adopting the action, then the Board authorizes the Executive Officer to take all steps necessary to initiate the rulemaking process, make any technical or non-substantive changes to the package, and set the matter for hearing, if requested.

If after the 45-day public comment period, no adverse comments are received, and no public hearing is requested, authorize the Executive Officer to take all steps necessary to complete the rulemaking, and repeal the regulation as described in the text notice for CCR, title 16, section 2068.6.

K. Proposed Direction Regarding Veterinary Technician Registration Education Requirements

While the Subcommittee believes education should be a requirement for all RVT applicants, there are concerns related to the educational component in CCR, title 16, section 2068.5. The Subcommittee would like to evaluate this regulation closer to consider decreasing the number of required experience and/or education hours and whether the “qualified instructor” criteria is adequate for consumer protection.

Before moving forward with the evaluation, the Subcommittee would like feedback from the MDC and the Board on whether this is an approved direction.

Attachments:

1. Regulatory Proposal to Repeal CCR, Title 16, Section 2068.6 Regarding Out of State Registration as Equivalent

CALIFORNIA VETERINARY MEDICAL BOARD

**REGULATORY PROPOSAL TO REPEAL CALIFORNIA CODE OF REGULATIONS,
TITLE 16, SECTION 2068.6 REGARDING OUT OF STATE REGISTRATION AS
EQUIVALENT**

Proposed additions are indicated in single underline.

Proposed deletions are indicated in ~~single strikethrough~~.

~~§ 2068.6. Out of State Registration As Equivalent.~~

~~An applicant shall be eligible for the California veterinary technician examination provided such applicant meets the following requirements:~~

~~(a) The applicant is licensed, certified, or registered as a veterinary technician in the United States, Canada or U.S. territory in good standing, as defined in Section 4848 (b) (1) (A) and (B) of Business and Professions Code, in which the board has determined that he or she has passed the national veterinary technician examination or an examination equivalent to the written examination last required in California.~~

~~(b) The applicant has obtained at least 4,416 hours, completed in no less than 24 months, of directed clinical practice, under the direct supervision of a veterinarian licensed in the United States, Canada or U.S. territory.~~

~~(c) The directed clinical practice shall have provided the applicant with knowledge, skills and abilities in the areas of communication with clients, patient examinations, emergency procedures, laboratory procedures, diagnostic imaging, surgical assisting, anesthesia, animal nursing, nutrition, dentistry, animal behavior and pharmacology. The supervising veterinarian(s) shall complete a check list attesting to proficiency in specific skill areas within the preceding categories.~~

~~(d) The board determines that no disciplinary action has been taken against the applicant by any public agency concerned with the practice of animal health care and that the applicant has not been the subject of adverse civil or criminal judgments resulting from the practice of animal health care which the board determines constitutes evidence of a pattern of incompetency or negligence.~~

~~Note: Authority cited: Section 4808, Business and Professions Code. Reference: Section 4841.5 and 4848, Business and Professions Code.~~