



## VETERINARY MEDICAL BOARD MEETING MINUTES JANUARY 15–16, 2025

In accordance with Government Code section 11122.5, the California Veterinary Medical Board (Board) met in-person with additional public participation available via a teleconference/WebEx Event on **Wednesday, January 15, 2025** and **Thursday, January 16, 2025**, with the following location available for Board and public member participation:

Department of Consumer Affairs  
1625 N. Market Blvd., Hearing Room  
Sacramento, CA 95834

### Webcast Links:

- Agenda Items 1–8, 11, and 24.A. (only the Budget portion of Item 24.A.) (<https://youtu.be/AKvAbz-VtYM>)
- Agenda Items 9 and 11–26 (excluding the Budget portion of Item 24.A.) (<https://youtu.be/iYFkSTjGigs>)

**10:00 a.m., Wednesday, January 15, 2025**

### 1. **Call to Order / Roll Call / Establishment of a Quorum**

Board President, Maria Preciosa S. Solacito, Doctor of Veterinary Medicine (DVM), called the meeting to order at 9:59 a.m. Executive Officer (EO), Jessica Sieferman, called roll; all six members of the Board were present, and a quorum was established.

#### **Members Present**

Maria Preciosa S. Solacito, DVM, President  
Kristi Pawlowski, Registered Veterinary Technician (RVT), Vice President  
Christina Bradbury, DVM  
Patrick Espinoza, Esq.  
Barrie Grant, DVM  
Steven Manyak, DVM

#### **Student Liaisons Present**

Anna Styles, Western University of Health Sciences (Western University)

### **Board Staff Present**

Jessica Sieferman, EO  
Matt McKinney, Deputy EO  
Alicia Hernandez, Administration and Licensing Manager  
Patty Rodriguez, Enforcement Manager  
Ashley Sanchez, Enforcement Manager  
Rob Stephanopoulos, Enforcement Manager  
Susan Acklin, Licensing Technician  
Keith Betchley, Enforcement Analyst  
Kellie Fairless, Licensing Analyst  
Nellie Forget, Enforcement Analyst  
Brett Jarvis, Enforcement Analyst  
Amber Kruse, Enforcement Analyst  
Anh-Thu Le, Enforcement Analyst  
Rachel McKowen, Enforcement Analyst  
Jeff Olguin, Administration Analyst  
Robert Rouch, Enforcement Analyst  
Bryce Salasky, Enforcement Analyst  
Heather Satterfield, Licensing Technician  
Justin Sotelo, Policy Specialist  
Daniel Strike, Enforcement Analyst  
Zakery Tippins, Enforcement Analyst

### **Department of Consumer Affairs (DCA) Staff Present**

David Bouilly, Moderator, DCA, Strategic Organizational Leadership and Individual Development (SOLID)  
Alex Cristescu, Television Specialist, DCA, Office of Public Affairs (OPA)  
Harmony DeFilippo, Budget Manager, DCA, Budget Office  
Elizabeth Dietzen-Olsen, Regulations Counsel, Attorney III, DCA, Legal Affairs Division  
Peter Fournier, Information Officer I, DCA, OPA  
Karen Navarro, Assistant Deputy Director of Communications, DCA, Communications Division  
Bryce Penney, Television Specialist, DCA, OPA  
Kristy Underwood, EO, California Board of Barbering and Cosmetology  
Kristin Walker, EO, California Board of Chiropractic Examiners  
Matt Woodcheke, Information Officer II (Supervisory), DCA, OPA  
Amy Welch-Gandy, DCA, Office of Professional Examination Services (OPES)  
Tara Welch, Board Counsel, Attorney IV, DCA, Legal Affairs Division

### **Guest Presenters**

Melissa Gear, Deputy Director, DCA, Board and Bureau Relations  
Gerald Johnson, DVM, American Veterinary Chiropractic Association (AVCA)

Annette Jones, DVM, State Veterinarian, California Department of Food and Agriculture (CDFA)  
Jennifer Pedigo, Executive Director, Nevada Veterinary Board (NVB)  
Michelle Shane, Executive Director, Kentucky Board of Veterinary Examiners (KBVE)  
Richard Sullivan, DVM, Chair, Multidisciplinary Advisory Committee (MDC)  
Jon Zeagler, Doctor of Chiropractic (DC), AVCA

### **Guests Present**

DD  
GK  
JC  
Jen  
Mary  
Karen Atlas, President, Animal Physical Therapy Coalition (APTC)  
GV Ayers, Lobbyist, Gentle Rivers Consulting, LLC, contract lobbyist for APTC  
Dan Baxter, Executive Director, California Veterinary Medical Association (CVMA)  
Dawn Benton  
Kathy Bowler, Member, MDC  
Carrie Callay  
Shasta Carey  
Nancy Ehrlich, RVT, California Registered Veterinary Technicians Association (CaRVTA)  
Lauryn Garcia, Staff to Senator Henry Stern  
B. Irwin  
Jame Israelsen, DC in Utah  
Gerald Johnson, DVM  
Edie Marshall, DVM, Branch Chief, CDFA, Animal Health and Food Safety Services (AHFSS), Antimicrobial Use and Stewardship (AUS) Program  
Grant Miller, DVM, Director of Regulatory Affairs CVMA, and State Coordinator, California Veterinary Medical Reserve Corps (CAVMRC)  
Katie Murray, DVM, CDFA, AHFSS  
Priscilla Nguyen, CDFA, Agricultural Technician  
Mark Nunez, DVM, Director, American Association of Veterinary State Boards (AAVSB) and Member, MDC  
Sarah Reuss, Veterinary Medicines Directorate (VMD), President Elect, American Association of Equine Practitioners (AAEP)  
Amy Rice  
Nickolaus Sackett, Social Compassion in Legislation (SCIL)  
Marissa Silva, DVM, CDFA, AHFSS  
Julianna Tetlow, San Diego Humane Society  
Marie Ussery, RVT, Vice Chair, MDC  
Kristy Ventri  
Beth Venit, DVM, Chief Veterinary Officer, AAVSB  
Bruce Wagman, Esq., Riley Safer Holmes & Cancila, LLP

Ezat Yomtovian, DVM  
Deb Zumerling

Dr. Solacito informed the Board that Dianne Prado resigned from her Board Member position and thanked Ms. Prado for her invaluable service for the previous five years. She noted the Board will be working with DCA to fill her position as soon as possible.

Dr. Solacito made a land acknowledgement to publicly recognize the indigenous peoples who have been dispossessed and displaced from their ancestral homelands and territories, and the culture, history, and continued contributions of the original caretakers of the land on which the meeting was held, including the Nisenan, Southern Maidu, Valley and Plains Miwok, Patwin Wintun Peoples, and the Wilton Rancheria tribes. She noted the Board's continued commitment to working with the tribes on issues of mutual concern.

## 2. Public Comment on Items Not on the Agenda

**Public Comment:** Dr. Solacito requested public comment on this item. The following public comments were made on this item:

- [Steven Mayo](#) provided the Board with the following written public comment read into the record by Ms. Siefertman:

### **Regulation Request: Written Notification Provided by a Veterinary Practice to Animal Owners of the Availability of their Animal's Medical Records**

Mr. Mayo's written public comment stated Jeff Olguin was kind enough to respond to his voicemail regarding the proposed changes to medical records [California Code of Regulations (CCR), title 16, section] 2032.3. The written public comment provided a brief background, stating Mr. Mayo and his wife lost their nearly 15-year-old beloved dog, Bambi, on March 22, 2024, which the couple adopted when she was nine weeks old. The written public comment stated the couple had filed complaints against the vet[erinarian]s with the [Board] and were told, it was being investigated. The written public comment stated they were told one thing by their veterinarians, but the written record of Bambi revealed a completely different scenario. Along with numerous violations of the Board's rules and regulations, the couple was never given those records nor even informed that they existed prior to Bambi's passing. It was not until Bambi's passing, and a lot of research, that the couple became aware of their right to request her records. The written public comment stated Bambi would have had a better chance at a longer life, but nobody ever told them the record existed or that they had a right, as per the regulations, to request them; as a member of the public, the public needs to know that these records exist. The written public comment stated it will be so simple to add a regulation that requires veterinary practices to inform pet owners, in writing, that these records

of the pet(s) exist and that pet owners have the right to request them. Mr. Mayo wrote it amazed him that it is not a requirement. If the public does not know these records exist, how can they ever request them; knowledge is power. Mr. Mayo inquired why not give the public that knowledge; what could possibly be a problem with giving pet owners a simple information.

### **Closing Remarks and Request for a Response**

The written public comment concluded that Mr. Mayo is a licensed California realtor for over 40 years; [realtor] paperwork is tremendous, but they inform their clients that they have access to it all. If realtors can provide the information to the public when all they are doing is selling brick and mortar, should not the [veterinary] profession also inform the public when living, breathing creatures are involved. He requested that an individual from the Board's rules and regulations section read the request and respond.

- [Ezat Yomtovian](#), DVM, provided the Board with the following public comment:

#### **Telehealth: Standard of Care Issues**

Regarding telehealth, Dr. Yomtovian was concerned regarding the poor standard of care, the potential diversion, the excesses of medications being prescribed, and really no oversight. She was unsure of who manages the telehealth rules. She stated the [American Veterinary Medical Association] AVMA is pretty strict about what they view as good medicine and what is appropriate. As a licensee in several states, every state has different rules that deviate from the AVMA standards. She saw a lot of bad things happening online, such as animals waiting for medications and signalment was not presented properly. She has been practicing for a long time, and noticed pretty basic issues that maybe a newer doctor cannot see based on the history.

#### **Telehealth Discussion Request**

She requested the Board discuss whether it can make telehealth more appropriate for some of the things that people are calling in: triage, follow up and discussion, and not actually diagnosis.

- [Sarah Reuss](#), VMD, President Elect of AAEP, equine internal medicine specialist, provided the Board with the following public comment:

#### **Equine Prescriptions**

Dr. Reuss called in support of California equine veterinarians. She heard from several equine practitioners that they are being told that they cannot or should not be prescribing or dispensing products such as Omeprazole without a confirmed gastroscopic examination. She added while scoping maybe the gold standard to characterize disease, presumptive diagnosis and response to

treatment are certainly well accepted means of diagnosis and treatment of gastric ulcers throughout the profession, including small animal and human medicine. Due to the high prevalence of gastric ulcer disease across all disciplines, management schemes, breed types, etc., of horses that any delayed response of institutional treatment in an animal with clinical signs is, in her opinion, a much more significant welfare concern than holding out for gold standard diagnostics when they may not be available for a variety of reasons.

- [JC](#) provided the Board with the following public comment:

#### **Access to Animal Chiropractic Services**

Thanked the Board for taking the time to look into the animal chiropractic situation and consider the options that will allow the people of California to get access to animal chiropractic care with certified and trained chiropractors who are trained in animal chiropractic care.

- [Deb Zumerling](#) provided the Board with the following public comment (comment was made under agenda item 3):

#### **Librela Usage**

In relation to the use of librela with animals in the state of California, Ms. Zumerling stated while the Board may not be able to control the Federal Drug Administration (FDA), it was clear the FDA rubber stamped this product coming into the country. She asserted animals are being used as guinea pigs to collect statistics on librela and others for use on cats and dogs. Her dog died after three injections with librela. She has worked in the medical industry for years. To receive this drug into offices, she stated veterinarians should have to sign off that they have read all of the adverse reactions. She added, for an owner to have their animal injected with librela, they need to sign off that they have read the extensive adverse reaction list. She stated that in September 2024, over 22,000 animals had adverse actions. In less than two or three months, the number went up to 24,158. She requested the State of California to ban librela coming into the state before more animals die. She added, it was clear the FDA is collecting statistics. She concluded that going forward, her animal was not to be used as a guinea pig; she is gone forever.

### **3. [Review and Approval of October 16–17, 2024 Board Meeting Minutes](#)**

The Board had minor changes to the [October 16–17, 2024 Board meeting minutes](#).

**Motion:** Dr. Solacito requested a motion. Kristi Pawlowski, RVT, moved and Christina Bradbury, DVM, seconded a motion to approve the October 16–17, 2024 meeting minutes as amended.

**Public Comment:** Dr. Solacito requested public comment on the motion. There were no public comments made on the motion.

**Roll Call Vote:** Dr. Solacito called for the vote on the motion. Ms. Siefertman took a roll call vote on the motion. The motion carried 6-0.

| Members                                | Vote |     |         |        |
|--|------|-----|---------|--------|
|  | Yea  | Nay | Abstain | Absent |
| Maria Preciosa S. Solacito, DVM, Pres. | X    |     |         |        |
| Kristi Pawlowski, RVT, Vice President  | X    |     |         |        |
| Christina Bradbury, DVM                | X    |     |         |        |
| Patrick Espinoza, Esq.                 | X    |     |         |        |
| Barrie Grant, DVM                      | X    |     |         |        |
| Steven Manyak, DVM                     | X    |     |         |        |

4. **\*Report and Update from Department of Consumer Affairs (DCA)**

Melissa Gear, Deputy Director, DCA, Board and Bureau Relations, wished the Board well in its upcoming Sunset review hearings and thanked all personnel for their continued service on the Board. She thanked Ms. Prado for her service and commitment to protecting California’s consumers and wished her well in her future endeavors.

Ms. Gear provided the Board with the following updates from DCA:

- **Governor’s 2025–26 Proposed State Budget:** Governor Newsom’s proposed budget included eight Budget Change Proposals (BCPs) for DCA’s boards and bureaus, including:
  - **DCA Vacancy Reduction and Government Efficiency Plans:** DCA’s vacancy reduction and government efficiency plans were approved by the Department of Finance and may be made official in the Spring revisions.
  - **California Housing and Homeless Agency:** To address the housing and homeless crisis, the Governor proposed the creation of a dedicated California Housing and Homeless Agency.
  - **Consumer Protection Agency:** DCA and other regulators currently under the California Business, Consumer Services, and Housing Agency would form a Consumer Protection Agency. It would create an Agency Secretary within the Governor’s cabinet that could strengthen its mission, momentum, and delivery of services to California. The Governor’s reorganization proposal will be reviewed by the non-partisan Little Hoover Commission and the Legislature in the spring. DCA will continue to keep Board leadership updated as more information is available.

- **Form 700 Filing:** The Governor signed Assembly Bill (AB) 1170 (Valencia, Chapter 211, Statutes of 2024), which requires Board Members to now file their Form 700s electronically with the Fair Political Practice Commission (FPPC) using the FPPC's electronic filing system. Effective January 1, 2025, Board Members must file Form 700s through the FPPC's online system. Filings will no longer be filed via the NetFile portal and paper filings will not be accepted. The FPPC emailed all Board Members on January 2, 2025, with a link to the FPPC portal and login information. The Annual Form 700 Filing deadline is Tuesday, April 1, 2025.
- **Upcoming President's Training:** DCA invited the Board's Presidents and Vice President to attend its annual president's training on February 19, 2025, from 10:00 a.m. to 12:30 p.m. The virtual training is for Board Members who are new to the role of president or vice president, and those who have served in the role for a year or more. The training will review the role of a board president, communication best practices with the EO and board members, as well as the president's administrative duties. It also includes a panel of prior board members who will share their knowledge and expertise and answer questions from attendees.
- **Board and Bureau Relations Team:** Yvonne Dorantes, who served as the Assistant Deputy Director of Board and Bureau Relations since October 2022, was appointed by the Governor as the Assistant Deputy Director of Legislative and Government Affairs at the California Governor's Office of Emergency Services. Ms. Dorantes' last day at DCA was December 31, 2024.

**Public Comment:** Dr. Solacito requested public comment on this item. There were no public comments made on this item.

\*Agenda items for this meeting were taken out of order, and the Board moved to [Agenda Item 24.A](#). The order of business conducted herein follows the publicly noticed Board meeting Agenda.

## 5. [Report and Update from California Department of Food and Agriculture \(CDFA\)](#)

Annette Jones, DVM, State Veterinarian, CDFA, presented the Board with the following updates from the CDFA:

- **H5N1 CDFA and U.S. Department of Agriculture (USDA) Update:** The H5N1 influenza virus has impacted California as follows:
  - **Dairy Impact:** 736 herds have tested positive as of January 2025, 627 currently quarantined, 109 released, and roughly 140 are in the process of testing out. It has a high morbidity rate among cows but has a low mortality rate. Surveillance is ongoing with weekly testing. There are fewer new



detections. Pasteurization has been proven to 100% inactivate or kill the virus.

- **Poultry Impact:** The virus has high introductions from wild birds as well as from dairy farms, and the mortality and morbidity rate in poultry is high. California is now in its third wave of the virus and has lost (most euthanized) the following: 10.4 million layers/pullets, over 4.5 million boilers, 589,000 turkeys, 422,000 ducks, and 45,000 pheasants/chuckers.
- **Feline Impact:** Cats are susceptible to the virus. Southern California companies that were selling raw cat food associated with cat deaths were not registered with the CDFA, but the CDFA does not believe it was malicious; those entities are working to become licensed with the CDFA. It recommended that veterinarians inform their clients if they choose raw food for their animals, that the food come from a CDFA licensed pet food provider.
- **Farmer and Rancher Impact:** The virus has caused significant losses, particularly in the Central Valley of California, where both dairy and poultry farms are located near each other. Once a farm is cleared of the virus, farmers can restock their animals.
- **Response to the Outbreak:** The response to the outbreak includes establishing control areas, mandatory testing, euthanizing infected flocks, and cleaning and disinfecting facilities.
- **Raw Animal Food:** The Meat Inspection Program approves the source of raw meat, which is then cooked, canned, or processed. The California Department of Public Health (CDPH) regulates the canning and drying aspect of the process.
- **Tracking How the Virus Spreads:** The CDFA is researching and finding ways to reduce the spread of the virus over time. It has found the virus spreads in serum, which leads it to believe there is at least a transient stage when animals are infected systemically; the virus also spreads in urine.

The spread was not likely caused by migrating birds, but the CDFA has detected at low levels the spread of the virus from doves, starlings, and pigeons to dairy farms; other possibilities include dust or flies.

- **Response to Southern California Fires:** The CDFA has provided the following response to the fires in Southern California:
  - **Emergency Services Function (ESF) 11:** CDFA's ESF 11 focuses on animals and agriculture, maintains situational awareness, and reports to the Governor's Office of Emergency Services (OES).
  - **California Animal Emergency Response Support (CARES):** At the state level, CARES was formed via a Memorandum of Understanding (MOU) between the CDFA, OES, and UC Davis School of Veterinary Medicine to respond to emergencies. CARES uses its limited resources to dedicate training and coordination needed during a disaster.

- **Control of Emergency Response:** California believes all disasters are most appropriately left in the control of the impacted community, which includes the local cities and county government. At the state level, it will coordinate to move people and resources around to provide support for local governments and non-governmental organizations.
- **Training and Veterinarian Requests:** CVMA's Animal Emergency Response Team (CVR) and UC Davis' California Veterinary Emergency Team (CVET) coordinate to provide training to help local get veterinarians to provide assistance to local communities.
- **Additional Animal Assistance:** CDFA and OES primarily coordinate: search and rescue, sheltering, animal control officers, etc. Volunteer organizations or professional organizations, such as Cal Animals, also provide resources and assistance.
- **Outreach:** The CDFA has utilized social media to share vital information on how people can help, where donations should go, and locations of shelters. The CDFA also has a hotline for the public to ask questions.
- **Fairground Support:** The CDFA has a very close relationship with the fairgrounds throughout the state and is actively engaged with fairgrounds to provide sheltering for animals.
- **Mutual Aid Requests for Animal Control Officers:** The CDFA facilitates the Emergency Management Mutual Aid System for animal control officers.
- **Reporting Outbreaks:** Veterinarians may report outbreaks in captive wildlife to the California Department of Fish and Wildlife (CDFW), USDA Animal Care, CDPH, or CDFA.

**Discussion:** Dr. Jones answered Board questions about the report. The Board inquired if there was anything it could do to assist the CDFA. Dr. Jones noted the Board has done a great job of sharing outreach information, and she looked forward to the Board continuing its assistance in sharing information.

**Public Comment:** Dr. Solacito requested public comment on this item. There were no public comments made on this item:

[Anna Styles](#), Student Liaison for Western University, provided the Board with additional comments as follows:

### **Impacts of the Southern California Fires**

Ms. Styles stated while Western University was not in the immediate zone near the fires, the wildfires have impacted students, including some who have had to evacuate just as the semester started in early January. She was interested how students could provide assistance and which agency they should contact, such as representative at the CDFA or any other agency. She inquired on how emergency response at UC Davis School of Veterinary Medicine was involved and how Western University could be engaged in similar assistance. She stated Western University students have been doing things more on an individual

level, but she thought it would be great to have Western University alongside UC Davis. She stated it is known these wildfires are happening [in Southern California] now, but due to climate change, these things are getting worse and more frequent. She added, having northern and southern California veterinarian students involved helps them to get involved and help their community.

Dr. Jones stated that Western University students should coordinate with the County Animal Response Team (CART) prior to volunteering. She added that nobody should just show up because then it is an unsafe situation, and there is more chaos. For emergency response, she suggested reaching out to the community CART on how individuals can help.

**Public Comment:** The Board received the following public comment:

- [Grant Miller](#), DVM, State Coordinator, CAVMRC, advised the CAVMRC is the largest volunteer organization of veterinarians and RVTs in the country with over 3,000 members.

### **California Veterinary Medical Reserve Corps Deployed**

Dr. Miller stated the CAVMRC is currently deployed to the fires, but in more of an administrative capacity. He noted the organization has been asked for some organizational support in their emergency operations centers, but he anticipates the CAVMRC will be deployed on the ground to help in the upcoming weeks. In addition to being involved with the local CARTS, he encouraged individuals to become a registered member of the CAVMRC.

### **CAVMRC Membership**

Dr. Miller noted membership is free and open to students; volunteering and deploying is only if the individual chooses to be deployed. He stated Diane McClure, DVM, a faculty member of Western University, is a Deputy Coordinator for the CAVMRC, and she is a great resource for students to learn more about the organization. He stated he would be happy to speak to Western University, which he had previously done, and explain how students can be involved.

### **UC Davis' California Veterinary Emergency Team (CVET)**

Dr. Miller stated UC Davis' disaster team does not involve students at all. UC Davis CVET is a disaster response team funded by the State of California, and they provide a lot of coordination and logistical support. He noted, UC Davis students are not out responding to the fires.

## CAVMRC Coordinated Response

Dr. Miller stated if there was a coordinated response through the CAVMRC, students would be welcome to participate in the extent that they could. He reiterated and encouraged individuals to register and to reach out to Dr. McClure for additional questions.

### 6. Review, Discussion, and Possible Action on Multidisciplinary Advisory Committee (MDC) Report—*Richard Sullivan, DVM, Chair, MDC*

#### A. [Overview of January 14, 2025 MDC Meeting](#)

Dr. Sullivan provided the Board with an overview of items 8, 9, 10, and 11 of the [January 2025 MDC meeting](#) as follows:

- **Complaint Audit Subcommittee Update**: Dr. Sullivan provided the Board with an update from [Complaint Audit Subcommittee report](#) and the Subcommittee will be bringing legislative recommendations in the near future.
- **Outreach Subcommittee**: The Subcommittee met with professors at UC Davis School of Veterinary Medicine and were updated on what the school is doing to teach the difference between spectrum of care and the gold standard; it also included discussion under what conditions the spectrum of care should be used. The Subcommittee also listened to the unlicensed practice stakeholders meeting and appreciated the suggested outreach activities that were discussed.
- **Election of 2025 Officers**: Marie Ussery, RVT, was elected as the 2025 MDC Chair and Cheryl Waterhouse, DVM, was elected as the 2025 MDC Vice Chair.

**Public Comment**: Dr. Solacito requested public comment on this item. There were no public comments made on this item.

#### B. [Recommendation on Legislative Proposal to Repeal Business and Professions Code \(BPC\) Sections 4838 and 4846.5 and Add Article 3.1 \(Sections 4858, 4858.1, 4858.2, and 4858.3\) Regarding Continuing Education](#)

Dr. Sullivan presented from the [meeting materials](#), including the [legislative proposal](#) and changes to the proposed legislation text approved by the MDC below. Dr. Sullivan, Ms. Siefertman, and Ms. Welch answered Board questions.

**Discussion**: The Board discussed the proposal as follows:

- **CE Credit for Passing the California Veterinary Law Examination (VLE):** The Board decided to add language allowing veterinarians who pass the VLE to earn one hour of CE credit per renewal cycle.
- **CE Credit for Attending Board or MDC Meetings:** The Board decided to add language allowing veterinarians and RVTs who attend a Board or MDC meeting to earn two hours of CE credit per renewal cycle.

**Changes to the Text:** The following includes the changes to the [meeting materials](#) that were discussed and approved by the MDC and the Board to the following sections (proposed additions are in [double underline blue text](#); proposed deletions are in ~~double red strikethrough text~~):

**§ 4858.1.**

[...]

(b) ~~(1) Notwithstanding any other law, e~~ Continuing education hours for veterinarians shall be earned [as follows](#):

(1) ~~by a~~ [Attending courses relevant to veterinary medicine and sponsored or cosponsored by any of the following](#):

[...]

(2) ~~Notwithstanding paragraph (1), a~~ [total of six hours or less of the required 36 hours of continuing education may be earned by doing either of the following, or a combination thereof](#):

[...]

(B) (i) ~~The services shall be performed at a facility or mobile unit that is~~ [veterinary premises](#) registered with the board pursuant to Section 4853.

[...]

(5) [For purposes of paragraph \(1\), U](#) [up to 24 hours of continuing education credit may be earned for completing courses in business practice management or ~~stress seminars~~ \[licensee mental health and wellness and its impact on the delivery of veterinary services\]\(#\).](#)

(6) [Up to one hour of continuing education credit may be earned by passing the California Veterinary Law examination](#).

(7) Up to two hours of continuing education credit may be earned by attending a board or Veterinary Medicine Multidisciplinary Advisory Committee meeting, as verified by the board.

[...]

**§ 4858.2.**

[...]

(b) ~~(1)~~ Continuing education hours for registered veterinary technicians shall be earned as follows:

(1) ~~by a~~ Attending courses provided by those specified in subparagraphs (A) through (D) of paragraph (1) of subdivision (b) of Section 4858.1 or sponsored or cosponsored by one of the following:

[...]

(2) ~~Notwithstanding paragraph (1), u~~ Up to four hours of the required 20 hours of continuing education may be earned by doing either of the following, or a combination thereof:

[...]

(B) (i) The services shall be performed under the direct supervision of a licensed veterinarian at a ~~facility or mobile unit that is~~ veterinary premises registered with the board pursuant to Section 4853.

[...]

(4) Up to ~~16~~ nine hours of continuing education credit may be earned by participating as an expert in an examination preparation workshop for the national licensing examination.

(5) ~~For purposes of paragraph (1), u~~ Up to ~~15~~ 13 hours of continuing education credit may be earned for completing courses in business practice management or ~~stress seminars~~ mental health and wellness and its impact on the delivery of veterinary services.

(6) Up to one hour of continuing education credit may be earned by passing the California Veterinary Law examination.

(7) Up to two hours of continuing education credit may be earned by attending a board or Veterinary Medicine Multidisciplinary Advisory Committee meeting, as verified by the board.

[...]

**§ 4858.3.**

[...]

- (b) (2) The maximum number of hours ~~that an individual attendee can earn~~ offered at the continuing education event, accompanied by a log of the actual courses attended by the attendee. The log of courses attended shall be completed by either the provider or the attendee.

[...]

**Motion:** Dr. Solacito requested a motion. Kristi Pawlowski, RVT, moved and Christina Bradbury, DVM, seconded a motion to submit to the California State Legislature the legislative proposal to repeal BPC sections 4838 and 4846.5 and add Article 3.1 (sections 4858, 4858.1, 4858.2, and 4858.3) as amended regarding continuing education.

**Public Comment:** Dr. Solacito requested public comment on the motion. The following public comment was made on the motion:

- [Grant Miller](#), DVM, Director of Regulatory Affairs, CVMA, provided the following public comment:

### **CE Credit for Passing the VLE**

Dr. Miller inquired on Dr. Bradbury's proposal regarding the VLE, including confirmation of his understanding that veterinarians have to request the examination from the Board, possibly pay a fee, and take and pass the examination.

Ms. Siefertman confirmed his understanding, but noted the plan for the future was to convert the VLE into a course, where the individual will have to watch and learn from the law course and then answer questions. The transition has not happened.

### **CE Credit for Attending Board Meetings**

Dr. Miller stated regarding the attendance of the Board meeting, he thought it was a great idea, and a lot of people will use it to earn CE credit. He stated he constantly receives calls from veterinarians stating their license is due, but they are short some units. He stated veterinarians are "Type A" folks and get nervous if they do not have a completion certificate or something that they can show for documentation.

## CE Credit Category

He inquired if the Board would like to keep it as “live” and “interactive” or if it would fall closer to the definition of self-guided and self-study. He asked for two reasons. First, logistically, it will be much easier for the Board because it would not have to deal with self-guided and self-study; it is essentially on the honor system because somebody can state they have a journal, read it, and earn six units. He added, it would be about the same in regard to attending the meetings. He said, the live interactive means that you have the chance to interact with the course instructor, and in these meetings due to limitations, there is not that opportunity to interact the way [attendees] would freely like to [interact]. [Attendees] are limited to 2 minutes of comment time, and it is not quite the same level of interaction that one would expect if they attended a seminar or as regular CE. He thought it will reduce a logistical burden on the Board by making it self-study, and it would relax the concerns of veterinarians seeking a completion certificate. He added, it would fall closer to the true definition because [the public] is really just sitting out there listening and maybe making some brief comments here and there.

## Replacing “MDC” with “a Committee”

[Dr. Miller](#) asked the Board to consider replacing “Multidisciplinary Advisory Committee” with “a committee of the veterinary medical board” because the future is unknown. He noted there are other boards that have dozens of committees. He liked statutes that did not require babysitting over time. So, if it was the Board or any committee of the Board, it would qualify and provide flexibility in the future, if any other committees were added to the Board.

- [Karen Atlas](#), President, APTC, provided the following public comment:

## CE Credit Category

Ms. Atlas stated she knew the Physical Therapy Board [of California] (PTBC) allows CE credit for its licenses. She stated the [PTBC] might be a nice resource to connect with and to find out more about how they deal with it. When she has attended [PTBC] meetings, she has received CE units. She fills out a card at the actual meeting, submits it, and then the [PTBC] verifies the card and attendance. The [PTBC] and licensees can keep track of the [CE].

- [Nancy Ehrlich](#), RVT, CaRVTA, provided the following public comment:



### Suggested Additional Language for Meeting Attendance

Ms. Ehrlich suggested adding “in person or virtually” for individuals attending a Board meeting because “attending” sounded as though it had to be in person. She inquired if the Board would know about people who are attending virtually. She stated obviously their name comes up. She asked if the information was stored and possible for the Board to look it up later.

[The Board](#) considered public comments but decided to keep the language unchanged. With respect to clarifying attendance at a board or committee meeting, Ms. Siefertman noted there is no “in person” limitation in the text, so attendance could be virtual or in person, and the Board does keep attendance records for virtual attendees.

**Roll Call Vote:** Dr. Solacito called for the vote on the motion. Ms. Siefertman took a roll call vote on the motion. The motion carried 6-0.

| Members                               | Vote |     |         |        |
|---------------------------------------|------|-----|---------|--------|
|                                       | Yea  | Nay | Abstain | Absent |
| Maria Preciosa S. Solacito, DVM, Pres | X    |     |         |        |
| Kristi Pawlowski, RVT, Vice President | X    |     |         |        |
| Christina Bradbury, DVM               | X    |     |         |        |
| Patrick Espinoza, Esq.                | X    |     |         |        |
| Barrie Grant, DVM                     | X    |     |         |        |
| Steven Manyak, DVM                    | X    |     |         |        |

C. [Recommendation on Legislative Proposal to Further Amend BPC Section 4841.5 Regarding Veterinary Technician Registration Examination Requirements](#)

Dr. Sullivan presented from the [meeting materials](#), including the [legislative proposal](#), to the Board.

**Motion:** Dr. Solacito requested a motion. Kristi Pawlowski, RVT, moved and Barrie Grant, DVM, seconded a motion to submit to the California State Legislature the legislative proposal to further amend BPC section 4841.5 regarding veterinary technician registration examination requirements.

**Public Comment:** Dr. Solacito requested public comment on the motion. There were no public comments made on the motion.

**Roll Call Vote:** Dr. Solacito called for the vote on the motion. Ms. Siefertman took a roll call vote on the motion. The motion carried 6-0.

| Members                                      | Vote |     |         |        |
|--|------|-----|---------|--------|
|  | Yea  | Nay | Abstain | Absent |
| <b>Maria Preciosa S. Solacito, DVM, Pres</b> | X    |     |         |        |
| <b>Kristi Pawlowski, RVT, Vice President</b> | X    |     |         |        |
| <b>Christina Bradbury, DVM</b>               | X    |     |         |        |
| <b>Patrick Espinoza, Esq.</b>                | X    |     |         |        |
| <b>Barrie Grant, DVM</b>                     | X    |     |         |        |
| <b>Steven Manyak, DVM</b>                    | X    |     |         |        |

**D. [Recommendation on Legislative Proposal to Amend BPC Sections 4846 and 4848.1 Regarding Veterinarian License Requirements](#)**

Dr. Sullivan presented from the [meeting materials](#), including the [legislative proposal](#), to the Board.

**Motion:** Dr. Solacito requested a motion. Christina Bradbury, DVM, moved and Kristi Pawlowski, RVT, seconded a motion to submit to the California State Legislature the legislative proposal to amend BPC sections 4846 and 4848.1 regarding veterinarian license requirements.

**Public Comment:** Dr. Solacito requested public comment on the motion. There were no public comments made on the motion.

**Roll Call Vote:** Dr. Solacito called for the vote on the motion. Ms. Siefertman took a roll call vote on the motion. The motion carried 6-0.

| Members                                      | Vote |     |         |        |
|--|------|-----|---------|--------|
|  | Yea  | Nay | Abstain | Absent |
| <b>Maria Preciosa S. Solacito, DVM, Pres</b> | X    |     |         |        |
| <b>Kristi Pawlowski, RVT, Vice President</b> | X    |     |         |        |
| <b>Christina Bradbury, DVM</b>               | X    |     |         |        |
| <b>Patrick Espinoza, Esq.</b>                | X    |     |         |        |
| <b>Barrie Grant, DVM</b>                     | X    |     |         |        |
| <b>Steven Manyak, DVM</b>                    | X    |     |         |        |

**E. [Recommendation on Legislative Proposal to Amend BPC Section 4883 Regarding Disciplinary Action](#)**

Dr. Sullivan presented from the [meeting materials](#).

**Motion:** Dr. Solacito requested a motion. Christina Bradbury, DVM, moved and Kristi Pawlowski, RVT, seconded a motion to submit to the California State Legislature the legislative proposal to amend BPC section 4883 regarding disciplinary action.

**Public Comment:** Dr. Solacito requested public comment on the motion. There were no public comments made on the motion.

**Roll Call Vote:** Dr. Solacito called for the vote on the motion. Ms. Siefertman took a roll call vote on the motion. The motion carried 6-0.

| Members                                      | Vote |     |         |        |
|--|------|-----|---------|--------|
|  | Yea  | Nay | Abstain | Absent |
| <b>Maria Preciosa S. Solacito, DVM, Pres</b> | X    |     |         |        |
| <b>Kristi Pawlowski, RVT, Vice President</b> | X    |     |         |        |
| <b>Christina Bradbury, DVM</b>               | X    |     |         |        |
| <b>Patrick Espinoza, Esq.</b>                | X    |     |         |        |
| <b>Barrie Grant, DVM</b>                     | X    |     |         |        |
| <b>Steven Manyak, DVM</b>                    | X    |     |         |        |

**F. [Recommendation on Legislative Proposal to Amend BPC Sections 4825.1 and 4826.6 Regarding Veterinary Medicine Definitions and Telehealth](#)**

Dr. Sullivan informed the Board the Subcommittee decided to postpone the item in order to have a discussion with stakeholders before bringing it to the MDC. Discussion is expected to occur at the April MDC meeting.

**Public Comment:** Dr. Solacito requested public comment on this item. There were no public comments made on this item.

**G. [Recommendation on Legislative Proposal to Amend BPC Section 4827 Regarding Veterinary Medicine Practice Exemptions](#)**

Dr. Sullivan presented from the [meeting materials](#), including the [legislative proposal](#), to the Board.

Ms. Siefertman noted the Board submitted to the MDC two separate tasks, which include:

- **Include Commercial Equines in Livestock Definition:** As part of the Board’s strategic plan, revise the definition of “livestock” in BPC section 4825.1 to include commercial equines. Ms. Siefertman noted that since the Board’s strategic planning discussion, the medical records concern has been resolved through a proposal to restructure medical records requirements for single and group records.
- **Narrow Owner Exemption:** The MDC was tasked with narrowing the current owner exemption in BPC section 4827 and revert to its original intended purpose, which was for livestock and food animals.

Dr. Sullivan, Ms. Siefertman, and Ms. Welch responded to the Board’s questions.

**Discussion:** The Board discussed the item as follows:

- **Livestock Definition:** Under BPC section 4825.1(e), the Board discussed keeping the definition unchanged.
- **Exemption for Livestock or Food Animal:** Under BPC section 4827(a)(1), the Board discussed only including the words “food animals” to the language. The Board raised concerns on how the proposed language would be a negative impact on shelters and rescue groups, in particular abandoned animals; it acknowledge the current language was also abused by certain groups, including breeders and individuals providing services to equines.

The Board requested the MDC re-review the language to see how it would impact various aspects of California industries and government agencies.

- **Ability to Administer Medication Pursuant to a Written Treatment Plan:** Under BPC section 4827(a)(6), the Board discussed and was in favor of the proposed owner exemption language to allow for administration of a drug or medication pursuant to a written treatment plan.
- **Ability to Administer Non-Prescription Drug or Medication:** Under BPC section 4827(a)(7), the Board discussed and was in favor of the proposed owner exemption language to allow for administration of a nonprescription drug or medication.
- **Complaint Concerns:** The Board noted it is an organization that primarily relies on the public to file a complaint before it can take action; it is not an organization that actively seeks to create complaints.
- **District Attorney (DA) Prosecution for Animal Cruelty:** Ms. Welch noted the issue with animal cruelty claims is the law requires intentional mistreatment of the animal, which likely is difficult to prove when the animal owner believed they were providing treatment for the benefit of the animal. She noted the Board does not see many cases prosecuted since the DA’s offices are working on other cases that have greater risks to the public. The proposal is intended to find another way to protect animals from harm through veterinary practice. She stated finding language to create specific exemptions from the practice is preferred rather than leaving the existing owner exemption open wide for continued animal harm.
- **Input from the Shelter Community:** The Board noted limited follow up response from the shelter community to the proposed changes. The Board suggested offering the shelter community another opportunity with a deadline to respond to the Board’s request to identify specific exemptions.

- **Shelter Exemptions:** Under BPC section 4827(a)(5), Ms. Welch noted the shelter community recently was successful in creating shelter exemptions.
- **Owner Exemptions:** Ms. Siefertman stated it was her understanding of the MDC meeting, owners wanted the ability to provide any kind of care necessary to their own animals. The concern by shelters was if owners were unable to provide services to their own animals, they would relinquish the animal to the shelters, which may result in the influx of more animals at shelters.

**Public Comment:** Dr. Solacito requested public comment on this item. The following public comments were made on this item:

- [Grant Miller](#), DVM, Director of Regulatory Affairs, CVMA, provided the following public comment:

#### **BPC section 4827(a)(6) and (a)(7)**

Dr. Miller noted he wanted to preserve his ability to comment on BPC sections 4827(a)(6) and (a)(7), if the Board continues to those provisions. He had thought the wording could be changed.

#### **No Official Position from the CVMA**

The CVMA does not have an official position on this legislative amendment, but it does support the Board's concept of curbing illegal practice, which he thought the shelter was one part of [the discussion]. The illegal practice is something different and is where he thought there was a lot of trouble. He said it was not the first time the CVMA has been at the table trying to reduce illegal practice. He said every time it has tried in history, it has resulted in similar types of kind of conversations that the Board is having now.

#### **Municipal Shelters, Private Shelters, and Rescues**

Dr. Miller did not speak for the shelters but noted that not all shelters were the same. He referenced Dr. Solacito's discussion on the 14-day hold period and the ability for the shelter to do things in that period, which is under [Penal Code section] 597.1, applies to municipal shelters. He noted there are also private shelters, which contend they only have a 72-hour hold period based on a separate section of the law. He added rescues also have a different requirement. He reiterated that shelters are not all the same. He thought the shelter community is greatly concerned about not only their abilities, but the abilities of the people they serve. He added it is known that roughly a quarter of the pet owning population cannot afford to [bring their pet] to a vet[erinerian]; they end up crossing paths in one way or another with a shelter. He thought the shelters are compelled to speak out for those

folks who might be doing a lot of their own medical practice on some of the animals. He stated while items 6 and 7, which the Board had yet to be discussed, partially get at the concerns but not fully.

### **Common Practice for Equine Issues**

Dr. Miller stated on the equine side, one of the most common things seen is hoof abscesses, which is next to colic, are the most common [infections] seen in horses. He stated it is really common for people to either call their farrier or veterinarian. The farrier is the horse shoer. Whoever responds or gets to the call first can carve out the hoof abscess. He thought they worry about the farrier no longer providing the service and now, it should be the veterinarian. He said that was an example of where people get nervous when the Board starts to talk about these things.

### **Closing Remarks**

In general, Dr. Miller thought the idea of curbing illegal practice is a really good one. He stated if the wording could be done in such a way that did not cause unintended consequences for those who are doing good things and things that the Board wanted to continue to allow them to do every day.

- [GV Ayers](#), Lobbyist, Gentle Rivers Consulting, LLC, contract lobbyist for APTC, provided the following public comment:

### **Suggestions and Recommendations Not Included**

Mr. Ayers noted the APTC participated in the stakeholder meeting on unlicensed activity. He noted the APTC made some suggestions and recommendations, and none of the recommendations were even commented on in the MDC's report or in their discussion. He stated the APTC was a bit frustrated. The APTC thought what the discussion was about with unlicensed activity involves harm to the animals. He stated there are a number of issues where there is not harm to an animal, and the APTC thought there could be allowances made in the law to where a veterinarian could refer to an allied profession, such as discussed in agenda item 8 where there is no demonstrated public harm done. He claimed that takes care of those complaints of unlicensed activity only, but there is no consumer harm in them. He stated it is a complex thing to be soured out. He asked the Board to consider their input going forward.

- [Julianna Tetlow](#) of the San Diego Humane Society, the nonprofit animal care and control agency for most of the San Diego region, provided the following public comment:

## **Advocated Against Eliminating the Ownership Exemption**

Ms. Tetlow urged the Board to reconsider eliminating the ownership exemption in the Practice Act. She clarified the concerns from the San Diego Shelter are the claims Ms. Siefertman mentioned. She stated when owners cannot provide basic care to their own animals, which is what the removal of the exemption will state in statute regardless of intent, and the owners cannot access veterinary care, the shelters will end up with [the animals]. She stated the ownership exemption is critical for ensuring timely and affordable care for animals in situations where licensed veterinary services are unavailable or inaccessible. This exemption allows animal owners and caretakers to provide basic and necessary care without facing legal barriers. Eliminating this exemption could disproportionately harm individuals in rural or underserved areas where access to licensed veterinarians is already limited. Furthermore, she stated the ownership exemption does not shield individuals who commit acts of cruelty under the guise of veterinary care.

## **Utilizing Existing Law**

Ms. Tetlow stated existing law already allows for criminal prosecution in cases where individuals harm animals through neglect, cruelty, or unqualified procedures. Eliminating the exemption would penalize well intentioned caretakers while doing little to address the actual cases of abuse which are already be enforceable under current animal cruelty statutes. The discussions she has heard so far fail to acknowledge that the practice of veterinary medicine is not limited to surgery or operations on animals. The practice of veterinary medicine includes treating and preventing health issues. She stated the statements from members of the MDC at the January 14, 2025 meeting that this exemption elimination is not intended to criminalize care provided to pets by their owners was nice to hear, but by simply removing that exemption, it literally does that.

## **Recommended Alternatives**

Ms. Tetlow stated instead of removing the exemption, she urged the Board to consider identifying deficiencies in the enforcement process, additional oversight, or providing additional education and support to ensure care remains ethical and safe; striking a balance between professional regulation and the practical necessity is key to safeguarding animal welfare without creating unnecessary burdens.

- [Karen Atlas](#), President, APTC, represents veterinarians, physical therapists, RVTs, and the animal owning public. She provided the following public comment:

## **APTC Suggestions Not Incorporated**

Ms. Atlas stated on behalf of the groups she represents, she attended meetings, provided public comment during the meetings, and attempted to engage in discussion. She sent in two letters on behalf of APTC for the Board to consider for each of the small animal and large animal stakeholder meetings on unlicensed activity. She stated that despite the considerations and exemption alternatives the APTC provided, not one of them was considered or even spoken about. She stated because the MDC proposal to the Board relating to unlicensed activity does not include any of the alternative solutions they offered to the subcommittee, it made them wonder if the public stakeholder meetings even meant anything to the Board. She added, it has been extremely disappointing to spend hours preparing alternative solutions for this Board only for the suggestions to be ignored time and again. She urged the Board to listen to stakeholder input and to consider them when it is making new legislation and regulation that will affect the public.

### **Evidence Request**

Ms. Atlas noted the APTC continues to hear the Board talk about these rules being made because of harm. She stated there has yet to be proven a single case of harm. She added it would be nice if there were some concrete evidence to show harm before making rules that would create more barriers to care.

- [Carrie Callay](#), member of the public, provided the following public comment:

### **Seconded Statements by APTC and Ms. Siefertman**

Ms. Callay stated she has been following this issue as closely as possible. She applauded and seconded the statements of Ms. Atlas and [Mr. Ayers] from the APTC; she also applauded Ms. Siefertman's comments about the ambiguities and problems associated with rescue and shelter groups.

### **Rehabbers and Farriers**

Ms. Callay stated that it seemed rehabbers would be subject to the requirement, along with the already mentioned farriers.

### **Request for Additional Stakeholders and More Rewording**

She stated it is a huge thing. She is sure it would be a huge problem if it were publicized adequately and not just kept within the Board's email list and the small number of stakeholders who have responded. She felt it was obvious the whole effort for the legislative proposal was extremely premature. She stated there is no way it should be voted on today; it needs



a lot more work. She thought the public needs to know about what is going on, a lot more than what the Board has done in terms of publicity. She thought there were many generalizations that were put out there in terms of describing the number of complaints. She stated no one ever stated the number of complaints; she asked where it was published. She stated the words “a lot” and “many” did not mean anything. She added, obviously, there is [animal] cruelty and intent, which are terrible, but the [public] also needs to know exactly which procedures the Board is objecting to, such as only surgeries. She rhetorically asked do not shelters employ surgeons to provide surgeries within a shelter situation. She stated there were so many [issues] with the language. She urged the Board to not move forward right now and to do more work when it comes to specifying [the requirements] for the Legislature to review; it is all really premature.

- [Bruce Wagman](#), Esq., an attorney with an exclusive practice in animal law for the last 20 years representing 55 animal shelters, 35 animal rescues around the State of California, dozens of companion animal owners, and a legal policy program for companion animals, provided the following public comment:

### **Opposed to Removing the Ownership Exemption**

Mr. Wagman stated all of his clients will vociferously oppose any effort to get the [proposed legislation] passed. He added the proposal to remove the ownership exemption will have devastating effects on access to care for California pets and their owners, on the public at large, and on shelter populations. Crucially, the ownership exemption is used on a daily basis by owners around the state to allow intervention to prevent, relieve, diagnose, and treat illness and injury in California pets. He claimed 36 states have the identical exemption, and nobody is moving to change it.

### **Impact on Law Abiding Citizens**

Mr. Wagman thought the drafters of the language did not intend to go into homes, but they actually [will]; it will prohibit California pet owners from taking care of their animals. He stated the drafter’s intent is really meaningless. In light of the indisputable language, when compared to BPC section 4826, which defines the practice of veterinary medicine and includes administering a “...treatment of whatever nature for the prevention...of a wound...” He provided the following examples:

- A dog comes into his house with a superficial bleeding wound, and the owner places a bandage on the animal or he washes it with soap and water, it is a violation of [BPC section] 4826[(c)] without the ownership exemption because it would be treatment and even diagnosis.

- A cat with chronic upper respiratory disease who is in a room with a dehumidifier; the [owner] is clearly administering a treatment for the relief of a disease.

Mr. Wagman claimed if the Board took away those opportunities, either the owner is not going to [help the animal] and the [animal] will suffer, or the owner will do it and they will feel like they are doing something illegal. He claimed law abiding citizens will be chilled by the removal of the ownership exemption. He claimed there are a dozen more examples. Every good California pet owner who wants to do good things for their animals would become law breakers, and the change will have a horrible chilling effect.

### **Animal Cruelty and Owner Exemption**

Mr. Wagman agreed there are unfortunate examples of harmful things happening to animals by people engaging in practices that would amount to animal cruelty. He pointed out he does a lot of work around California Penal Code [sections] 597 and 597b; [Penal Code section 597b] does not require the malicious intent that has been stated. He stated it is clearly still animal cruelty. He agreed that those were still problems, but what the Board is suggesting would throw the baby out with the bathwater; good people will no longer be able to do their work. He asserted this is dropping an atomic bomb on a street gang to end a street fight. He stated the owner exemption allows thousands of Californians to provide important care to their animals and must be maintained.

#### **H. Recommendation on Legislative Proposal to Amend BPC Section 4875.2 and Add Section 4875.7 Regarding Unlicensed Practice Citations**

Dr. Sullivan presented from the [meeting materials](#), including the [legislation proposal](#), to the Board.

**Motion:** Dr. Solacito requested a motion. Christina Bradbury, DVM, moved and Steven Manyak, DVM, seconded a motion to submit to the California State Legislature the attached legislative proposal to amend BPC section 4875.2 and add section 4875.7 regarding unlicensed practice citations.

**Public Comment:** Dr. Solacito requested public comment on the motion. The following public comment was made on the motion:

- [Karen Atlas](#), President, APTC, provided the following public comment:

#### **APTC Suggestions Not Incorporated; Against Citation Fine Increases**

Ms. Atlas stated the APTC attended all of the stakeholder meetings on unlicensed activity and not one of its recommendations was incorporated or

even discussed. She stated the APTC had other ways to help deal with this issue other than just increasing fines and none of its recommendations were entertained. She stated it was remarked at the MDC meeting that all attendees appeared to be in favor of a citation increase. She said there were attendees that were not in favor of the citation increases; it was inaccurate to state that [claim].

- [JC](#) provided the following public comment:

#### **Against Citation Fine Increases**

JC stated she was also against fine increases. She stated it seemed many doctors who are practicing are being hit with fines that are unnecessarily high to shut down their practices. She believed increasing these fines without proper investigations are unnecessary. She repeated her opposition.

- [Carrie Callay](#) provided the following public comment:

#### **Against Citation Fine Increases**

Ms. Callay stated the one of the Board members mentioned earlier the Board is only responding to the number of incidents with a complaint and there was no intent to go out seeking any incidences. However, she remembered the second stakeholder meeting where there was serious discussion of trying to find money to do undercover stings. She wanted to bring that into the public record that was at least an intent of the Committee. She stated this proposal is so premature. She hoped the Board does not vote to go ahead with this. She also thought these fines needed to be put on the table as well as the rest of their proposal.

- [Grant Miller](#), DVM, Director of Regulatory Affairs, CVMA, provided the following public comment:

#### **CVMA: No Formal Position**

Dr. Miller noted the CVMA has no formal position on the Board's statutory proposal to change fines for unlicensed practice. In response to public comments, he stated the fines are specifically for illegal veterinary practice; the fines do not affect veterinarians. He added, it has to do with illegal veterinary practice. The comments that were made are tangential to the conversation about the fines. While the CMVA did not have a formal position, its leadership is at least aware the Board has done a significant amount of work in researching this [topic], and the CVMA did not believe it was premature to be addressing the issue now. The CVMA believed it had been very well thought out. While there still is time to make a formal

position, the CVMA believed this [proposal] should move forward at this time.

[Ms. Siefertman](#) and Dr. Bradbury provided the following response in reference to public comment regarding undercover investigations:

- **Investigation Initiation**: Investigations can be initiated based on complaints or internally without needing external complaints.
- **Citations**: Citations are not issued to increase revenue; their purpose is to incentivize compliance with the law.
- **Special Investigator and Licensing Fees**: During discussion, a suggestion was made to increase licensing fees to fund a new special investigator position. Instead, the Board was able to reclassify a current position to a special investigator role without raising fees.
- **Purpose of Investigations**: Citations are not issued to increase revenue; their purpose is to incentivize compliance with the law.

**Roll Call Vote**: Dr. Solacito called for the vote on the motion. Ms. Siefertman took a roll call vote on the motion. The motion carried 6-0.

| Members                                      | Vote |     |         |        |
|--|------|-----|---------|--------|
|  | Yea  | Nay | Abstain | Absent |
| <b>Maria Preciosa S. Solacito, DVM, Pres</b> | X    |     |         |        |
| <b>Kristi Pawlowski, RVT, Vice President</b> | X    |     |         |        |
| <b>Christina Bradbury, DVM</b>               | X    |     |         |        |
| <b>Patrick Espinoza, Esq.</b>                | X    |     |         |        |
| <b>Barrie Grant, DVM</b>                     | X    |     |         |        |
| <b>Steven Manyak, DVM</b>                    | X    |     |         |        |

I. **[Recommendation to Initiate a Rulemaking to Amend California Code of Regulations \(CCR\), Title 16, Section 2043 Regarding Unlicensed Practice Citations](#)**

Dr. Sullivan presented from the [meeting materials](#), including the [regulatory proposal](#), to the Board.

**Motion**: Dr. Solacito requested a motion. Kristi Pawlowski, RVT, moved and Steven Manyak, DVM, seconded a motion to take the following actions:

- Approve the regulatory text for CCR, title 16, section 2043.
- 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 adopt the proposed regulations as described in the text notice for CCR, title 16, section 2043.

**Public Comment:** Dr. Solacito requested public comment on the motion. The following public comment was made on the motion:

- [Karen Atlas](#), President, APTC, provided the following public comment:

**Public Comments Not Incorporated**

Ms. Atlas stated the APTC submitted substantive alternatives for this unlicensed activity issue. She stated none of [the recommendations] were considered as a remedy, and no public comments were incorporated.

**Roll Call Vote:** Dr. Solacito called for the vote on the motion. Ms. Siefertman took a roll call vote on the motion. The motion carried 6-0.

| Members                                      | Vote |     |         |        |
|--|------|-----|---------|--------|
|  | Yea  | Nay | Abstain | Absent |
| <b>Maria Preciosa S. Solacito, DVM, Pres</b> | X    |     |         |        |
| <b>Kristi Pawlowski, RVT, Vice President</b> | X    |     |         |        |
| <b>Christina Bradbury, DVM</b>               | X    |     |         |        |
| <b>Patrick Espinoza, Esq.</b>                | X    |     |         |        |
| <b>Barrie Grant, DVM</b>                     | X    |     |         |        |
| <b>Steven Manyak, DVM</b>                    | X    |     |         |        |

**J. [Recommendation to Initiate a Rulemaking to Repeal CCR, Title 16, Section 2068.6 Regarding Out of State Registration as Equivalent](#)**

Dr. Sullivan presented from the [meeting materials](#), including the [regulatory proposal](#). Dr. Sullivan and Ms. Siefertman answered questions.

**Discussion:** The Board discussed the proposal as follows:

- **Workforce Concerns:** The Board noted the pathway has been an option since 1989, and there is no evidence of consumer harm from individuals who earned an RVT registration through this pathway.

- **Education Debt:** Dr. Bradbury noted discussion in the second stakeholder meeting that this pathway allowed RVTs to earn registration in California without having to take on the debt of education. She was not in favor of taking away the pathway.
- **Education Requirement:** Ms. Pawlowski stated based on feedback during the second stakeholder meeting, all of the registrants felt they needed education. Dr. Solacito stated her feedback from the second stakeholder meeting was education was nice to have, but not a requirement; she added new hires still require training.
- **Veterinary Technician National Examination (VTNE) Requirement:** The Board noted RVT applicants must pass the VTNE regardless of education or experience.
- **Retroactively Require Education:** The Board could not retroactively require education for its RVTs who earned a registration without education.
- **Loophole for Registration:** The Board noted many of the individuals applying through this pathway were California residents, applying and earning an out-of-state registration with no intent to practice out-of-state, who then applied for a California RVT registration.

**Public Comment:** Dr. Solacito requested public comment on the item. The following public comment was made on the item:

- [Grant Miller](#), DVM, Director of Regulatory Affairs, CVMA, provided the following public comment:

### **Supports Repealing CCR, Title 16, 2068.6**

Dr. Miller stated the CVMA has an RVT Committee, but it has not discussed this particular motion. The CVMA has discussed the concept of the challenges the RVT profession faces with the various RVT requirements across the United States. He stated RVTs universally, at least on the CVMA RVT Committee, agree that part of the way of building the profession is to standardize what it means to be an RVT. The CVMA is in support of repealing section 2068.6.

### **RVT Alternate Route Pathway**

Dr. Miller noted the happy medium is the alternate pathway, which the CVMA created in California; the CVMA was heavily involved in creating the alternate pathway. He claimed college in California is free; anybody can attend. He added, individuals have the option to work as a [veterinary] assistant and attend night courses at a junior college to get the education. He emphasized education was important. He stated there needs to be

formal education when inducing anesthesia, understanding respiratory physiology, biochemistry, and other things of that nature.

### **Elevating the Standard of Care**

Dr. Miller stated simply learning how to do it on the job does not put California's animals at a level of protection the CVMA felt is necessary to hold what the California community would expect to be done. If this loophole stays open, there will be people avoiding RVT school and not taking the alternate pathway. He stated the RVTs will go to the four states that allow experience only, and there will be a different education experience among California RVTs. He stated it lowers the standard of what it means to be an RVT. He inquired if it was the direction the Board wished to take especially when the Board already created the alternate pathway to meet these people in the middle so that they would have a pathway to do this if they did not have enough money. The CVMA felt closing the loophole was important.

- [Nancy Ehrlich](#), RVT, CaRVTA, provided the following public comment:

#### **Compromise Request**

Ms. Ehrlich asked for a little compromise. Instead of eliminating [CCR, title 16, section] 2068.6 entirely, she request it be amended so California residents could not use it, and only people from out-of-state could use it. She stated it would probably eliminate most people who are using it but still allow people who are coming from other states to become RVTs in California.

- [Michelle Shane](#), Executive Director, KBVE, provided the following public comment:

#### **On-the-Job Training and Current Assessment**

Ms. Shane inquired how the prior Board determined that on-the-job training was equivalent to education. She asked if the current Board talked about completing another assessment, and if a current assessment was taken today, would the same conclusion be reached about equivalency.

**Motion:** Dr. Solacito requested a motion. Kristi Pawlowski, RVT, moved and Patrick Espinoza, Esq., seconded 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.

**Public Comment:** Dr. Solacito requested public comment on the motion. The following public comment was made on the motion:

- [Richard Sullivan](#), DVM, provided the following public comment:

#### **Cases of Harm**

Dr. Sullivan thought trying to find cases of harm was a false equivalency because a licensed veterinarian is delegating the task. If it is the wrong delegation or something goes wrong, the veterinarian is going to take the responsibility. If the veterinarian does not take responsibility, there are going to be two violations: wrong delegation of the task and wrong result. He did not think the Board would find [cases of harm] because there is always a veterinarian that is over the RVT who is assuming the ultimate responsibility. He noted there are mistakes being made, but the Board is not seeing them.

- [Grant Miller](#), DVM, Director of Regulatory Affairs, CVMA, provided the following public comment:

#### **Supports Repealing CCR, Title 16, 2068.6**

Dr. Miller followed up on Dr. Sullivan's comment by stating the job of the Board is to set a minimum standard. It is not always necessarily based on a demonstrated harm; it is based on what is best based on the Practice Act. He added, it is based on the Board's commitment to consumer protection. From his perspective, it seemed to increase the pressure on veterinarians every year, but here now the Board is taking presumably a gigantic step backwards and decreasing it for RVTs. He did not think demonstrating harm is the only qualification. He added, there is a certain amount of consideration given to what is the right thing to make this profession



educated in a way that best serves California consumers. He asked what would California consumers expect.

**Evolution of Animal Care Tasks for RVTs**

Dr. Miller noted the evolution of RVT animal care tasks, including the critical care tasks permitted in [CCR, title 16] section 2069 that allows them to do a number of live saving procedures without any veterinary supervision or involvement at all. Senate Bill [SB] 669 enables them to now act as an agent of the veterinarian, which means that presumably for certain procedures, only the RVT would interact with the client for regular routine health care items. He stated for pets that only get vaccines for parasite control, the animal is potentially only seen by is an RVT; it is an increasing role.

**Conclusion**

He provided a hypothetical where the state removed the formal education requirement for veterinarians. He asked if the Board would let them practice without a license.

**Roll Call Vote:** Dr. Solacito called for the vote on the motion. Ms. Siefertman took a roll call vote on the motion. The motion carried 5-1 with Dr. Bradbury voting nay.

| Members                               | Vote |     |         |        |
|---------------------------------------|------|-----|---------|--------|
|                                       | Yea  | Nay | Abstain | Absent |
| Maria Preciosa S. Solacito, DVM, Pres | X    |     |         |        |
| Kristi Pawlowski, RVT, Vice President | X    |     |         |        |
| Christina Bradbury, DVM               |      | X   |         |        |
| Patrick Espinoza, Esq.                | X    |     |         |        |
| Barrie Grant, DVM                     | X    |     |         |        |
| Steven Manyak, DVM                    | X    |     |         |        |

**K. Proposed Direction Regarding Veterinary Technician Registration Education Requirements**

Dr. Sullivan presented from the [meeting materials](#).

**Discussion:** The Board approved the Committee to continue in its direction.

**Public Comment:** Dr. Solacito requested public comment on this item. There were no public comments made on this item.

7. **Presentation Regarding Animal Chiropractic Certification Programs—**  
***Representatives from American Veterinary Chiropractic Association (AVCA)***  
***and International Veterinary Chiropractic Association (IVCA)***

Gerald Johnson, DVM, AVCA, and Jon Zeagler, DC, AVCA, presented from the [meeting materials](#) and answered Board questions. Representatives from the IVCA were unavailable for the meeting.

**Discussion:** The Board discussed this item as follows:

- **Supervision Requirements for Animal Chiropractic:** The level of supervision varies by state, which includes direct supervision, indirect supervision, or no supervision as long as the veterinarian is informed.
- **Differences Between Chiropractic and Physical Therapy:** Chiropractors focus on diagnosing and adjusting spinal misalignments (subluxations), often with techniques to impact the nervous system and improve alignment, posture, and muscle function.

Physical therapists specialize in rehabilitation through exercises, modalities like ultrasound or shockwave therapy, and recovery strategies for musculoskeletal conditions. They do not perform spinal adjustments but may offer manipulations.

There is a crossover in skills but distinct training and licensing requirements. Physical therapists can perform gross manipulations on humans but not spinal adjustments.

- **Philosophy on Non-Veterinarians in Animal Chiropractic:** Non-veterinarian chiropractors are not meant to replace veterinarians but act as adjuncts to support overall animal health through biomechanical adjustments. Veterinarians remain the primary authority for medical diagnoses and treatment, while chiropractors help with spinal health and alignment issues. The goal is to collaborate with veterinarians, not to supplant their care.
- **Role of Non-Veterinarian Chiropractors:** These practitioners are only allowed to diagnose vertebral subluxations (misalignments of the spine). They are not authorized to make broader medical diagnoses. In states where no referral is required, non-veterinarian chiropractors must still work within their scope, referring animals back to veterinarians when necessary.
- **Red Flags and Safety Protocols:** Red flag recognition is a part of each school's curriculum to prevent certain chiropractic adjustments. Chiropractors are taught to recognize when an animal's condition is beyond their scope and to refer to specialists (e.g., neurologists, veterinarians) for further evaluation or treatment.

**Public Comment:** Dr. Solacito requested public comment on this item. The following public comments were made on the item:

- [Grant Miller](#), DVM, Director of Regulatory Affairs, CVMA, provided the following public comment:

### **Supervision Information Relayed in the Approved Programs**

Dr. Miller thanked both doctors for providing the presentation. He stated it appeared and it was confirmed, the AVCA basically approves all of the other chiropractic training programs in the United States. Dr. Miller understood the speakers might not know the nuances of each one of the [school's] training programs, but he knew from experience Options for Animals, at least in the past, was very clear about imparting, not only at the beginning of their program but throughout the program, that chiropractors should work under the direct supervision of a veterinarian. He inquired about what is told by the approved program providers to their attendees about supervision.

### **Red Flags and Regional Diseases**

Dr. Miller inquired as to how much of the program is devoted to identifying red flags. He referred to the discussion about neurologic disease. He noted Dr. Grant is a surgeon, who pioneered a basket or caging surgery on horses' necks to stabilize a condition called wobblers. Dr. Miller stated neurologic deficit in horses is very difficult to detect. He noted there are board certified neurologists who do nothing but try to decipher [the condition]. Horses are exquisitely capable of hiding neurologic disease and also making it only appear on occasion in certain circumstances. He wondered how much of the education in the approved programs devote time for detecting those type of red flag issues. He also asked if they address regional issues, such as silicosis, which only occurs in the State of California.

- [Michelle Shane](#), Executive Director, KBVE, provided the following public comment:

### **Medication, Supplements, and Parallel Modalities**

Ms. Shane was interested to know if there was discussion about not prescribing [medication], and if that included recommendations for supplements and nutraceuticals. Additionally, she requested more information about parallel modalities, such as laser, sonics, and rehab, etc.

- [James Israelsen](#), DVM, DC, a veterinarian practicing in Utah, animal chiropractor trained at Options for Animals, and certified animal chiropractor with ABCA for roughly 20 years, provided the following public comment:

## No Supervision in Utah

Dr. Israelsen thought the gentlemen did a great job presenting the goals of the AVCA. He stressed that they cannot speak to what the schools are teaching. In his experience with Options for Animals and the gentleman were strongly suggesting that DCs only adjust with direct supervision. He thought that holds back to the time when that training was done; at that time, there were almost no states that allowed animal chiropractors to adjust without that supervision. He thought it has evolved significantly. In Utah, there is no supervision required. Utah veterinarians felt if they were supposed to be supervising animal chiropractors, but they were not chiropractors, the veterinarians did not want the liability. He stated it has been the law for a couple of years now, and it has worked well.

- [JC](#) provided the following public comment:

### IVCA and Options for Animals Contacts

JC stated the Board could reach out to [International Veterinary Chiropractic Association] (IVCA) representative Jennifer Henrickson if it wanted to hear from the IVCA, since it looked like they were not represented at this meeting. She agreed with Dr. Israelsen's comments about Options for Animals Robbie at Options for Animals is a good contact. She believed [Options for Animals] are in support of certified animal chiropractors without needing direct supervision. She suggested the Board reach out to the school directly.

Dr. Johnson and Dr. Zeagler provided the following responses to public comment:

- **Supervision Regulations:** Each state is responsible for regulating the practice of animal chiropractic. The rules vary depending on the state, and it is up to the state to decide whether a referral or direct supervision is required for non-veterinarian chiropractors.
- **Role of the AVCA:** The AVCA oversees the approval of educational programs for chiropractic candidates, ensures the curriculum is scientific, practical, and research-oriented, and evaluates the number of hours students are required to complete, but the AVCA does not actively monitor the specific content taught. The goal is for students to succeed in written and practical exams and ultimately be able to practice chiropractic adjustments.
- **Autonomy of States and Schools:** While the AVCA sets the guidelines for education and supports ensuring quality education, it does not oversee how each program delivers content beyond approval.
- **Understanding Limitations of Adjustments:** During exam preparation, students are taught that not all conditions will respond to adjustments. There

are cases where mobility or neurologic issues do not improve with adjustments, highlighting the need to recognize these signs.

- **Referral and Further Diagnostics:** If a single or a few adjustments do not yield improvement, the practitioner must refer the case for additional diagnostics.
- **Wobblers and Neurological Conditions:** Neurological conditions, including wobblers, are addressed in chiropractic school and are part of the curriculum. With respect to specific cases in California, the curriculum would not be that detailed in neurological cases. In every chiropractic school, there is a strong background in spinal and neuro anatomy and neurophysiology. While they do not have that for animals in chiropractic school, as far as knowing neurology and spinal anatomy, most chiropractors are pretty strong in neurology. At the annual convention, speakers present on neurology and neurophysiology to continue to educate doctors that way.
- **Supplements and Other Therapies:** Chiropractors receive extensive training in nutrition (20–30 hours), but they are advised not to offer nutritional advice unless specifically trained. Chiropractors typically do not use laser therapy and shockwave therapy on animals unless certified or allowed by state boards.
- **Regulation and Complaints:** It varies among jurisdictions.

8. [Presentation Regarding Allied Health Certifications Issued by the Kentucky Board of Veterinary Examiners \(KBVE\) and the Nevada Veterinary Board \(NVB\)](#)—*Michelle Shane, Executive Director, KBVE, and Jennifer Pedigo, Executive Director, NVB*

Michelle Shane, Executive Director, KBVE, and Jennifer Pedigo, Executive Director, NVB, presented from the [meeting materials](#) and answered Board questions.

**Discussion:** The Board reviewed and discussed the materials as follows:

- **Authority for Premises Permits and Inspections:** Nevada does not specifically inspect facilities for allied professionals but does inspect brick-and-mortar facilities and mobile clinics for veterinarians and similar services. Kentucky’s inspection initiative is underway.
- **Complaints:** Nevada has had complaints mostly related to unlicensed practice (especially animal physical therapists) or body work practitioners from other states without certification; none against licensees. Kentucky has received complaints against equine dental providers.
- **Licensure and Numbers of Allied Health Professionals:** Nevada has roughly 10 animal chiropractors and physical therapists; Kentucky has roughly 50 equine dental providers and 10 animal chiropractors and physical therapists.

- **Unlicensed Practice Across State Borders:** Kentucky has a history of out-of-state practitioners crossing into Kentucky (especially in the equine industry) to perform services without a license. Unlicensed practice is typically reported through industry contacts, and grievances are investigated. In Nevada, most issues are resolved with education, but more severe cases can involve legal actions like sending cease and desist orders or injunctions.

**Public Comment:** Dr. Solacito requested public comment on this item. The following public comment was made on the item:

- Ms. Sieferman noted that [GV Ayers](#), Lobbyist, Gentle Rivers Consulting, LLC, contract lobbyist for APTC, provided written public comment to the Board for agenda items 8 and 9.
- [Karen Atlas](#), President, APTC, provided the following public comment:

#### **Encourages Board Support of Animal Physical Professionals**

Ms. Atlas stated the APTC was very interested in the experience of the other states with allied health certifications. The APTC appreciated the testimony from Kentucky and Nevada boards about regulation in their states. She noted the APTC submitted letters highlighting the successful utilization of animal physical therapists in Nevada, which was included in the agenda materials. She noted Nevada had implemented a straightforward, simple, and effective regulatory scheme that protects the welfare of animals. She noted the practice provides essential rehabilitation care for animals. In Nevada, animal physical therapy has proven to not only be effective in providing essential access to care, which benefits the animal patients, but also safe in that there had been no disciplinary actions taken against animal physical therapists since its implementation in 2004. The APTC encouraged the Board to support a similar framework authorizing animal physical therapy in the state. She concluded by stating common sense laws are long overdue, and the APTC standings willing to help in these efforts.

\*Agenda items for this meeting were taken out of order, and the Board moved to [Agenda Item 10](#). The order of business conducted herein follows the publicly noticed Board meeting Agenda.

### **9. \*Update, Discussion, and Possible Action on Potential 2025 Legislation Impacting the Board, DCA, and/or the Veterinary Profession**

#### **A. [Potential Legislation Related to the Board's Sunset Review](#)**

Ms. Sieferman presented from the [meeting materials](#). She informed the Board the deadline for introducing bills is February 21, 2025.

**Public Comment:** Dr. Solacito requested public comment on this item. There were no public comments made on this item.

**B. Potential Legislation Related to Licensed Chiropractors Practicing on Animals**

Ms. Sieferman presented from the [meeting materials](#).

**Discussion:** The Board reviewed and discussed this item as follows:

- **Individuals Seeking Certification over Licensure:** Some individuals were more interested in certification rather than licensure.
- **Consumer Protection Concerns:** It was unclear to the Board if states provided sufficient consumer protection over the indirect supervision of the individuals providing animal chiropractic services. The Board noted it was also confusing as to where the consumer would go to file a complaint.
- **Shockwaves in Practice:** The Board was disturbed to learn therapists are using shockwaves in practice. Chiropractors are not currently using it, but they might in the future. The Board was concerned about the use of shockwaves on animals without a written recommendation from a veterinarian.

**Public Comment:** Dr. Solacito requested public comment on the item. The following public comment was made on the item:

- [Grant Miller](#), DVM, Director of Regulatory Affairs, CVMA, provided the following public comment:

**Opposed to Animal Chiropractic Services**

Dr. Miller stated the CVMA has a long standing history and will remain in strong opposition to any attempt by a human healthcare practitioner to increase their scope of practice to include animals, including chiropractic attempts. He stated that with a referral model, the ability for the veterinarian to keep eyes on that patient diminishes over time. He stated there are many conditions in animal patients that are a medical condition or a neurologic condition that may manifest. What one might perceive to be a chiropractic issue, may emerge almost insidiously over time as something completely different. He stated all veterinarians have seen it and can name a number of examples. He stated the CVMA is concerned about the health, safety, and welfare of these animals. He recommended a veterinarian be continually involved in the oversight of somebody who has no formal training in all of the nuances of animal physiology.

## Red Flags

Dr. Miller noted his previous discussion about the red flags and how could they possibly encompass all of the red flags in veterinary medicine in a certification course. He noted the response was that the chiropractors treat the animal once, and if it gets better, they keep going. If the animal did not get better, it would be referred back [to the veterinarian]. He stated there could be an animal with multiple problems that does indeed get better from some chiropractic, but it did not eliminate the fact there is an underlying problem. He stated multiple veterinarians, who work in this area, are seeing cases in which something was overlooked or there is an emergency issue. He stated the CVMA was opposed for those reasons and because they know these professions will not stop there.

## Expanded Requests from Non-Veterinary Organizations

Dr. Miller stated the Board heard from the [KBVE] about how these individuals want to use lasers and prescribe medication (e.g., nutraceutical). He stated it did not matter if it was a nutraceutical or over-the-counter medication. The second there is a prescription for a treatment plan, it is treated as a [Food and Drug Administration] (FDA) drug. In addition, the individuals talked about taking X-rays and reading radiographs. He inquired if they could read a neck on a horse. Based on the information provided from [KBVE], he warned when one comes, they all come.

## Closing Remarks

He stated if the door is opened in California, there will be a massive shift in allowing people, who do not have a formal standardized education in animals, to work on animals. He added it is unacceptable to the CVMA. If that is possible in people's mind, he rhetorically suggested creating reciprocity to allow veterinarians, who take a weekend certification course, to work on human beings. He emphasized the CVMA's stance that it was strongly opposed, and it will remain their number one opposition issue. He encouraged the Board to also join the CVMA, as it historically has, in the opposition.

### C. [Potential Legislation Related to Licensed Physical Therapists Practicing on Animals](#)

Ms. Siefertman presented from the [meeting materials](#).

**Discussion:** The Board noted the topic of physical therapy for animals has been an ongoing discussion with no significant change.

**Public Comment:** Dr. Solacito requested public comment on this item. The following public comment was made on this item:



- [Karen Atlas](#), President, APTC, provided the following public comment:

### **Memo Clarification**

Ms. Atlas stated the APTC has been committed to increasing access to animal healthcare options through common sense legislative change. She pointed out that information in the Agenda Item 9.C. memo describing the stakeholder meeting needs some clarification. In the memo, it characterizes that the [Senate Business, Professions and Economic Development] (BPED) [Committee] staff hosted a round table discussion regarding allowing physical therapists to practice on animals without veterinary supervision. She stated that more accurately, Senate BPED [Committee] staff called the stakeholder meeting with the intent of furthering discussions on a framework that balances animal patient safety with access to services physical therapists can provide animal patients in continued coordination and collaboration with a licensed veterinarian. She stated the true purpose was to ensure the professional barriers were worked through so [Animal Physical Therapists] (APTs) can provide safe animal physical therapy services to California residents.

She stated Agenda Item 9.C. memo indicates the Senate BPED [Committee] stakeholder discussion included physical therapists (PTs) practicing without veterinary supervision. However, Dr. Miller raised the supervision issue and argued the current definitions of supervision do not fit well in the context of the Practice Act. She added, during the meeting, Dr. Miller asked on behalf of the CVMA to use the term “referral” as the preferred nomenclature and to remove any language that discusses supervision since the current understanding of supervision levels are not used in this type of practice context. She added he stated this type of supervision is different and not used in the type of practice context that a veterinarian owns the [veterinary] hospital and has hired employees. She asserted Dr. Miller stated that using the current supervision language does not fit into the context, therefore, it should not be used. Historically, the APTC has introduced two separate bills, AB 3013 in 2018 and AB 8814 in 2013, that mirrored Nevada legislation, both of which the Board opposed. She said it is nice and ensuring the Board may be open to having some sort of regulations and legislation that would be common sense to allow qualified physical therapists to practice. She is hopeful the Board will not continue to oppose the common sense legislation that the APTC continues to put before the Board.

#### **D. Potential Legislation Related to Regulating Pet Crematories**

Ms. Sieferman presented from the [meeting materials](#) and answered questions.

**Discussion:** The Board discussed this item as follows:

- **Regulation of Crematories:** The Board felt it did not have the authority to regulate deceased animals beyond the veterinary premises, but it could create regulations for storage of the remains within the care of the veterinarian. The Board noted handling of the remains would be best regulated by the California Cemetery and Funeral Bureau (CFB).
- **Disposing of Remains:** The various ways to handle remains includes: aquamation pet crematories, dropping the remains off at a municipal shelter, private or group cremation, and preservation services.
- **Costs of Handling Remains:** The CFB may not have enough resources to handle a new requirement as the cost of cremation is already significant, which may result in higher costs to the consumer.
- **Potential Health Risks:** Consumers who were unable to afford the cost of disposal may throw the remains in the garbage or bury them in the backyard.

**Public Comment:** Dr. Solacito requested public comment on the item. The following public comment was made on the item:

- [Grant Miller](#), DVM, Director of Regulatory Affairs, CVMA, provided the following public comment:

#### **“No” Position**

Dr. Miller stated the CVMA has not reviewed the language. He stated the CVMA has a “no” position. He stated that in early conversations in the CVMA it was not against the regulation, but against it being regulated by the Board.

#### **California Cemetery and Funeral Bureau Responsibility**

Dr. Miller stated pet cremation is not the practice of veterinary medicine. The Board is responsible for the practice of veterinary medicine. He noted there were several allied industries that spin off of a veterinary practice, such as regulated waste, controlled drug disposal, etc. He stated there were many other parts to the requirement. He felt sorry the CFB has this role, but it is their responsibility. He stated the CVMA will definitely be watching the bill very carefully and be very concerned if the onus of responsibility is intended to be placed on the Board. He stated it is going to be very expensive, and a very difficult lift for the Board. He noted the concerns about how licensing dollars were spent and stated the CVMA would like the CFB to handle the responsibility. The CVMA’s concerns preliminarily are the CFB is attempting to make it the Board’s responsibility.

## High Costs

Dr. Miller stated on the horse side, there is a state law in California in the Food and Agriculture Code that requires veterinarians to mark the horses that have a barbiturate in their system. If the horses are rendered, not for animal consumption, he believes the horses are incinerated, which is what is told by the two companies that offer horse disposal services in California. He stated the companies are not very forthcoming about what they are doing because there are trade secrets they do not want to talk about. He stated a horse that has a barbiturate in their system must have a letter "B", four inches high in orange, placed on the horses' head. The markings signal to the company that the horse cannot go into the rendering stream. The horse goes into a separate part of the transfer station or to the plant, are transported, and then disposed of. He concluded that there were cremation options for horses in California through those two same companies, but it is very costly.

[Ms. Sieferman](#) clarified that the representative from the CFB was not opposed to the idea of additional work and was very open and receptive to the discussion. CFB staff expressed a willingness to assist in any way possible. However, the CFB raised a concern about not knowing the current number of staff involved, noting that if the matter were handed over to the CFB; it would involve her and possibly two other staff members. The CFB representative also mentioned that if it were regulated, there would be high costs. Despite these concerns, they did not block or oppose the idea.

\*Agenda items for this meeting were taken out of order, and the Board moved to [Agenda Item 19](#). The order of business conducted herein follows the publicly noticed Board meeting Agenda.

### 10. Recess Open Session until January 16, 2025, at 9:00 a.m.

Dr. Solacito recessed open session at 5:23 p.m.

**9:00 a.m., Thursday, January 16, 2025**

#### Webcast Links:

- Agenda Items 9 and 11–26 (excluding the Budget portion of Item 24.A.) (<https://youtu.be/iYFkSTjGiqs>)
- Agenda Item 24.A. (only the Budget portion of Item 24.A.) (<https://youtu.be/AKvAbz-VtYM?t=24m46s>)

11. **\*Reconvene Open Session – Establishment of a Quorum**

Board President, Maria Preciosa S. Solacito, DVM, called the meeting to order at 9:00 a.m. EO, Jessica Siefertman, called roll; all six members of the Board were present, and a quorum was established.

**Members Present**

Maria Preciosa S. Solacito, DVM, President  
Kristi Pawlowski, RVT, Vice President  
Christina Bradbury, DVM  
Patrick Espinoza, Esq.  
Barrie Grant, DVM  
Steven Manyak, DVM

**Student Liaison Present**

Anna Styles, Western University

**Board Staff Present**

Jessica Siefertman, EO  
Matt McKinney, Deputy EO  
Alicia Hernandez, Administration and Licensing Manager  
Patty Rodriguez, Enforcement Manager  
Ashley Sanchez, Enforcement Manager  
Rob Stephanopoulos, Enforcement Manager  
Susan Acklin, Licensing Technician  
Melissa Caudillo, Enforcement Analyst  
Kellie Fairless, Licensing Analyst  
Nellie Forget, Enforcement Analyst  
Kimberly Gorski, Enforcement Analyst  
Brett Jarvis, Enforcement Analyst  
Amber Kruse, Enforcement Analyst  
Anh-Thu Le, Enforcement Analyst  
Jeff Olguin, Administration Analyst  
Kim Phillips-Francis, Enforcement Analyst  
Robert Rouch, Enforcement Analyst  
Bryce Salasky, Enforcement Analyst  
Justin Sotelo, Policy Specialist  
Daniel Strike, Enforcement Analyst  
Zakery Tippins, Enforcement Analyst

**Department of Consumer Affairs (DCA) Staff Present**

David Bouilly, Moderator, DCA, SOLID  
Alex Cristescu, Television Specialist, DCA, OPA

Peter Fournier, Information Officer I, DCA, OPA  
Melissa Gear, Deputy Director, DCA, Board and Bureau Relations  
Bryce Penney, Television Specialist, DCA, OPA  
Kristy Underwood, EO, California Board of Barbering and Cosmetology  
Kristin Walker, EO, California Board of Chiropractic Examiners  
Tara Welch, Board Counsel, Attorney IV, DCA, Legal Affairs Division

### **Guests Present**

Abigail  
GK  
Karen Atlas, President, APTC  
Dan Baxter, Executive Director, CVMA  
Jeff Blea, DVM, Petitioner  
Faith Blea  
Kathy Bowler, Member, MDC  
Carrie Callay  
Ryan Carpenter  
Nancy Ehrlich, RVT, CaRVTA  
Annie Glen-Blea, DVM  
B. Irwin  
Marcie Larson, Administrative Law Judge (ALJ), Office of Administrative Hearings  
(OAH)  
Sandy Linares  
Michael Manno, DVM  
Priscilla Nguyen, CDFA, Agricultural Technician  
Stephanie Alamo-Latif, Deputy Attorney General (DAG), Office of the Attorney  
General (OAG), Department of Justice (DOJ)  
Elissa Silva, Consultant, Senate BPED Committee  
Kristy Ventri

## **12. Special Order of Business**

### **A. [Hearing on Petition for Early Termination of Probation of Jeff A. Blea, DVM, License No. VET 11928](#)**

Dr. Grant recused himself from the petition hearing due to a conflict.

ALJ Marcie Larson presided over the [petition for early termination of probation](#) at 9:03 a.m.

DAG Stephanie Alamo-Latif updated and presented the case against Petitioner Jeff Alan Blea, DVM.

Dr. Blea answered questions from the DAG and Board Members.

ALJ Marcie Larson closed the hearing at 10:03 a.m.

### **13. Recess Open Session**

Dr. Solacito recessed open session at 10:03 a.m.

### **14. Convene Closed Session**

Dr. Solacito convened closed session at 10:06 a.m.

### **15. Pursuant to Government Code Section 11126(c)(3), the Board Will Meet in Closed Session to Deliberate and Vote on Disciplinary Matters, Including the Above-Identified Petitions, Stipulated Settlements, and Proposed Decisions**

In the Matter of the Petition for Early Termination of Probation by Jeff A. Blea, DVM, License No. VET 11928; Board Case No. 4602021001570; OAH Case No. 2024120602.

The Board granted the petition for early termination of probation.

In the Matter of the Accusation Against Yanita Yacoub, DVM, License No. VET 16443; Board Case No. 4602021001512.

The Board rejected the stipulated settlement and proposed a counteroffer.

### **16. Pursuant to Government Code Section 11126(e)(1) and (2)(A), the Board Will Meet in Closed Session to Confer and Receive Advice From Legal Counsel Regarding the Following Matter: *Gurdeep Deol, DVM v. Veterinary Medical Board, Riverside County Superior Court, Case No. CVPS2402058***

This item was not discussed.

### **17. Adjourn Closed Session**

Dr. Solacito adjourned closed session at 11:08 a.m.

### **18. Reconvene Open Session**

Dr. Solacito reconvened open session at 11:15 a.m.

\*Agenda items for this meeting were taken out of order, and the Board moved to [Agenda Item 9](#). The order of business conducted herein follows the publicly noticed Board meeting Agenda.

### **19. [\\*Update and Discussion on Pending Regulations](#)**

Justin Sotelo presented from the [meeting materials](#).

**Public Comment:** Dr. Solacito requested public comment on this item. There were no public comments made on this item.

## 20. Student Liaison Reports

### A. University of California, Davis, Liaison—*Holly Masterson*

Holly Masterson was not available to present this item but provided a written report in the [meeting materials](#).

**Public Comment:** Dr. Solacito requested public comment on this item. There were no public comments made on this item.

### B. Western University of Health Sciences, Liaison—*Anna Styles*

Ms. Styles presented the Board with the following updates:

- **USDA Veterinary Medicine Loan Repayment Plan:** The CDFA met to promote the USDA's Veterinary Medicine Loan Repayment Program, including providing information on the programs requirements and how to apply.
- **Survey on Food Animal Careers:** The preliminary findings of the survey indicate females were more likely to consider food animal careers. The three schools represented include:

| University              | Considering Food Animal Career |
|-------------------------|--------------------------------|
| Kansas State University | ≈50%                           |
| UC Davis                | ≈33%                           |
| Western University      | ≈25%                           |

Factors such as job opportunities, salary, and motivation are being analyzed.

- **Compassionate Care Scholarships:** Two second-year Western University students received the 2024 Compassionate Care Scholarships from the Humane Society Veterinary Medical Association.
- **Community Event:** Students have organized emergency foster care for animals displaced by wildfire evacuations and volunteered at shelters and donation centers. Students from various health professions, including veterinary medicine, provided care and resources to people experiencing homelessness.
- **Class of 2029:** For the incoming class of 2029, more than 7,000 applications have been completed so far, which is on par with previous years and ahead of the Class of 2027.

- **Wildfire Impact:** The wildfires have affected students with some needing to evacuate their homes. The Student Chapter organized to help efforts in the community.

**Discussion:** The Board listened to the presentation, thanked the Board Liaisons for their involvement to help the communities in Los Angeles County, and provided the following comment:

- **Foster Recommendation:** The Board suggested students reach out to local shelters and foster animals, as these organizations are currently overwhelmed with animals displaced by the wildfires.
- **USDA Veterinary Medicine Loan Repayment Program:** The Board strongly encouraged students to apply to the program, especially individuals looking to work in shelters or government agencies, such as the Los Angeles City and County animal control services.

**Public Comment:** Dr. Solacito requested public comment on this item. There were no public comments made on this item.

## 21. **Board President Report**—*Maria Preciosa S. Solacito, DVM*

Dr. Solacito presented the Board with the following updates:

- **Recent Meetings:** She noted the Senate BPED staff meeting with physical therapists and weekly executive meeting.
- **Acknowledgement:** She thanked past President Dr. Bradbury for her fearless leadership.

**Public Comment:** Dr. Solacito requested public comment on this item. There were no public comments made on this item.

## 22. **Registered Veterinary Technician Report**—*Kristi Pawlowski, RVT*

Ms. Pawlowski noted there was nothing to report at this time.

**Public Comment:** Dr. Solacito requested public comment on this item. There were no public comments made on this item.

## 23. **Update, Discussion, and Possible Action Regarding American Association of Veterinary State Boards Activities**

### A. **Call for Bylaws Amendments**

Jessica Siefertman presented from the [meeting materials](#).



**Motion:** Dr. Solacito requested a motion. Christina Bradbury, DVM, moved and Kristi Pawlowski, RVT, seconded a motion to submit the proposed amendments to the AAVSB.

**Public Comment:** Dr. Solacito requested public comment on this motion. There were no public comments made on this motion.

**Roll Call Vote:** Dr. Solacito called for the vote on the motion. Ms. Siefertman took a roll call vote on the motion. The motion carried 6-0.

| Members                                      | Vote |     |         |        |
|--|------|-----|---------|--------|
|  | Yea  | Nay | Abstain | Absent |
| <b>Maria Preciosa S. Solacito, DVM, Pres</b> | X    |     |         |        |
| <b>Kristi Pawlowski, RVT, Vice President</b> | X    |     |         |        |
| <b>Christina Bradbury, DVM</b>               | X    |     |         |        |
| <b>Patrick Espinoza, Esq.</b>                | X    |     |         |        |
| <b>Barrie Grant, DVM</b>                     | X    |     |         |        |
| <b>Steven Manyak, DVM</b>                    | X    |     |         |        |

**B. Call for Nominations**

Ms. Siefertman presented from the [meeting materials](#).

**AAVSB President Elect Nomination**

**Motion:** Dr. Solacito requested a motion. Christina Bradbury, DVM, moved and Kristi Pawlowski, RVT, seconded a motion to nominate Mark Nunez, DVM, as President Elect.

**Public Comment:** Dr. Solacito requested public comment on the motion. The following public comment was made on the motion:

- [Grant Miller](#), DVM, Director of Regulatory Affairs, CVMA, provided the following public comment:

**Support for the Nomination of Dr. Nunez**

Dr. Miller stated the CVMA has been impressed with Dr. Nunez and his long standing involvement and knowledge about the topics at hand. The CVMA felt it was a good idea to nominate him for President Elect. Dr. Miller noted if the CVMA could nominate Dr. Nunez, it would.

**Roll Call Vote:** Dr. Solacito called for the vote on the motion. Ms. Siefertman took a roll call vote on the motion. The motion carried 6-0.

| Members                                      | Vote |     |         |        |
|--|------|-----|---------|--------|
|  | Yea  | Nay | Abstain | Absent |
| <b>Maria Preciosa S. Solacito, DVM, Pres</b> | X    |     |         |        |
| <b>Kristi Pawlowski, RVT, Vice President</b> | X    |     |         |        |
| <b>Christina Bradbury, DVM</b>               | X    |     |         |        |
| <b>Patrick Espinoza, Esq.</b>                | X    |     |         |        |
| <b>Barrie Grant, DVM</b>                     | X    |     |         |        |
| <b>Steven Manyak, DVM</b>                    | X    |     |         |        |

### AAVSB Director Nomination

**Motion:** Dr. Solacito requested a motion. Kristi Pawlowski, RVT, moved and Maria Preciosa S. Solacito, DVM, seconded a motion to nominate Christina Bradbury, DVM, for a Director position on the AAVSB.

**Public Comment:** Dr. Solacito requested public comment on the motion. The following public comment was made on the motion:

- Grant Miller, DVM, Director of Regulatory Affairs, CVMA thought it was a great idea.

**Roll Call Vote:** Dr. Solacito called for the vote on the motion. Ms. Siefertman took a roll call vote on the motion. The motion carried 6-0.

| Members                                      | Vote |     |         |        |
|--|------|-----|---------|--------|
|  | Yea  | Nay | Abstain | Absent |
| <b>Maria Preciosa S. Solacito, DVM, Pres</b> | X    |     |         |        |
| <b>Kristi Pawlowski, RVT, Vice President</b> | X    |     |         |        |
| <b>Christina Bradbury, DVM</b>               | X    |     |         |        |
| <b>Patrick Espinoza, Esq.</b>                | X    |     |         |        |
| <b>Barrie Grant, DVM</b>                     | X    |     |         |        |
| <b>Steven Manyak, DVM</b>                    | X    |     |         |        |

### ICVA Representative Nomination

**Motion:** Dr. Solacito requested a motion. Christina Bradbury, DVM, moved and Kristi Pawlowski, RVT, seconded a motion to nominate Steven Manyak, DVM, as the ICVA representative.

**Public Comment:** Dr. Solacito requested public comment on this motion. There were no public comments made on this motion.

**Roll Call Vote:** Dr. Solacito called for the vote on the motion. Ms. Siefertman took a roll call vote on the motion. The motion carried 6-0.

| Members                                      | Vote |     |         |        |
|--|------|-----|---------|--------|
|  | Yea  | Nay | Abstain | Absent |
| <b>Maria Preciosa S. Solacito, DVM, Pres</b> | X    |     |         |        |
| <b>Kristi Pawlowski, RVT, Vice President</b> | X    |     |         |        |
| <b>Christina Bradbury, DVM</b>               | X    |     |         |        |
| <b>Patrick Espinoza, Esq.</b>                | X    |     |         |        |
| <b>Barrie Grant, DVM</b>                     | X    |     |         |        |
| <b>Steven Manyak, DVM</b>                    | X    |     |         |        |

### AAVSB Nominating Committee Nomination

**Motion:** Dr. Solacito requested a motion. Christina Bradbury, DVM, moved and Kristi Pawlowski, RVT, seconded a motion to nominate Maria Preciosa S. Solacito, DVM, for the AAVSB Nominating Committee.

**Public Comment:** Dr. Solacito requested public comment on this motion. The following public comment was made on the motion:

- [Grant Miller](#), DVM, Director of Regulatory Affairs, CVMA, provided the following public comment:

#### Support the Nomination of Dr. Solacito

Dr. Miller stated he could not think of a better person. She is who the CVMA would have nominated.

**Roll Call Vote:** Dr. Solacito called for the vote on the motion. Ms. Siefertman took a roll call vote on the motion. The motion carried 6-0.

| Members                                      | Vote |     |         |        |
|--|------|-----|---------|--------|
|  | Yea  | Nay | Abstain | Absent |
| <b>Maria Preciosa S. Solacito, DVM, Pres</b> | X    |     |         |        |
| <b>Kristi Pawlowski, RVT, Vice President</b> | X    |     |         |        |
| <b>Christina Bradbury, DVM</b>               | X    |     |         |        |
| <b>Patrick Espinoza, Esq.</b>                | X    |     |         |        |
| <b>Barrie Grant, DVM</b>                     | X    |     |         |        |
| <b>Steven Manyak, DVM</b>                    | X    |     |         |        |

## 24. Executive Management Reports

### A. \*[Administration](#)

Matt McKinney presented from the [meeting materials](#).

†[Harmony DeFilippo](#), Budget Manager, DCA, Budget Office, provided the Board with budget updates.

Mr. McKinney, Ms. Sieferman, and Ms. DeFilippo answered Board questions about the report.

**Public Comment:** Dr. Solacito requested public comment on this item. There were no public comments made on [January 15, 2025](#) or [January 16, 2025](#) on this item.

†Only the Budget section of the Administration Report was presented on January 15, 2025. The remainder of Agenda Item 24.A. was presented on January 16, 2025. Agenda items for this meeting were taken out of order, and the Board moved to [Agenda Item 5](#). The order of business conducted herein follows the publicly noticed Board meeting Agenda.

## **B. [Examination/Licensing](#)**

Matt McKinney presented from the [meeting materials](#) and answered Board questions.

**Public Comment:** Dr. Solacito requested public comment on this item. There were no public comments made on this item.

## **C. [Enforcement](#)**

Patty Rodriguez, Rob Stephanopoulos, and Ashley Sanchez presented from the [meeting materials](#) and answered Board questions.

**Public Comment:** Dr. Solacito requested public comment on the item. The following public comment was made on the item:

- [Grant Miller](#), DVM, Director of Regulatory Affairs, CVMA, provided the following public comment:

### **Medication to Equine Mares**

Dr. Miller stated Dr. Reuss' qualifications and noted she had mentioned that she wanted to stress to the Board that when equine veterinarians are administering Omeprazole to their patients, which is largely in the form of either GastroGard or UlcerGard, which are two almost identical products, that scoping the horse and putting a camera down into the horse's stomach is not necessary to justify the prescription of Omeprazole. He added Omeprazole is labeled both for the treatment and prevention of ulcers, and it is very common for equine veterinarians to make a clinical diagnosis of ulcers based on the horses behavior and give the [medication] preemptively if a horse is anticipating something stressful like a show or traveling.

He gives it to mostly pregnant mares because it is known 100% that pregnant mares in their third trimester will have gastric ulcers. He added it

is also known that 68%–80% of all horses have [gastric ulcers.]. He added the veterinarian anticipates and makes a presumptive diagnosis. He stressed to the Board and to the Enforcement folks that the CVMA hopes the messaging to equine practitioners would not involve the statement that equine practitioners should not be giving GastroGard to horses without first scoping them.

#### D. [Outreach](#)

Justin Sotelo presented from the [meeting materials](#). Ms. Siefertman answered Board questions.

**Public Comment:** Dr. Solacito requested public comment on the item. The following public comment was made on the item:

- [Grant Miller](#), DVM, Director of Regulatory Affairs, CVMA, provided the following public comment:

##### **Misbranded Drug Webinar**

Dr. Miller thanked the Board for creating the misbranded drug webinar. He stated the profession is unaware of not only what misbranding is, but also the specific laws, both federally and at the state level, that govern [the topic]. He added, the CVMA is looking forward to the misbranded drug webinar because its intention is to write an article in its magazine following the webinar to help the profession better understand misbranding.

##### **Incorporating Misbranded Drug Information in Curriculum**

Dr. Miller stated as an instructor at the UC Davis veterinary school, he was going to try to incorporate the information into their curriculums.

#### E. [Strategic Plan](#)

Matt McKinney presented from the [meeting materials](#). Ms. Siefertman answered Board questions.

**Public Comment:** Dr. Solacito requested public comment on this item. There were no public comments made on this item.

### 25. [Future Agenda Items and Next Meeting Dates](#)

Ms. Siefertman presented this item and noted the Board will have the following agenda items in the future:

- **Review Items from the MDC:** The Board will review items from the MDC.

- **Musculoskeletal Manipulation (MSM):** The Board has assigned the MDC to review potential regulations regarding MSM and potentially requiring certification.
- **Animal Remains:** The Board has assigned the MDC to review standards when handling animal remains up to when the remains leave the veterinary premises.

Ms. Sieferman provided the following proposed future meeting dates:

- April 16–17, 2025
- July 16–17, 2025
- October 15–16, 2025
- January 21–22, 2026
- April 15–16, 2026
- July 15–16, 2026
- October 14–15, 2026

**Public Comment:** Dr. Solacito requested public comment on this item. There were no public comments made on this item.

## 26. Adjournment

Dr. Solacito adjourned the meeting at 2:41 p.m.

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