

MEMORANDUM

DATE	June 26, 2025
TO	Multidisciplinary Advisory Committee (MDC)
FROM	<u>Registered Veterinary Technician Subcommittee (Subcommittee)</u> Kristi Pawlowski, RVT Leah Shufelt, RVT
SUBJECT	Agenda Item 5.A. Discussion and Possible Action to Amend Assembly Bill (AB) 1502 (Berman, 2025) Veterinary Medicine: California Veterinary Medical Board; Business and Professions Code (BPC) Section 4841.5

Background

As discussed in more detail [here](#), the MDC was tasked with reviewing the Veterinary Medicine Practice Act statutes and supporting regulations related to approving registered veterinary technician (RVT) educational programs, as well as other RVT educational accreditation/approval bodies, to determine whether the California Veterinary Medical Board's (Board) role in the approval process should be reduced or eliminated. The Subcommittee was tasked with performing this review.

As part of the review, the Subcommittee identified a new RVT issue related to out-of-state applicants. BPC section [4841.5](#) provides three education pathways for applicants to obtain RVT registration: through an accredited or approved two-year program; through education or a combination of education and clinical experience, or through the American Association of Veterinary State Board's (AAVSB) education equivalency certification program. The statute does not authorize any individual to obtain an RVT registration without completing education.

However, California Code of Regulations (CCR), title 16, section [2068.6](#) provides a pathway for RVTs licensed, certified, or registered in another state to obtain RVT registration in California solely through clinical experience. To maintain out-of-state license reciprocity, the Subcommittee recommended placing the regulation in statute and clearly identifying the experience-only pathway for RVT applicants licensed in another state.

At the Board's April 2023 meeting (see [April 19-20, 2023 Board Meeting Minutes](#), Agenda Item 5.D.), the Board approved the legislative proposal, which was discussed as a new issue in the Board's [2025 Sunset Review Report](#) (p. 68). The legislative proposal to amend BPC section 4841.5, which also proposed to require graduation from a college or other postsecondary institution accredited by the American Veterinary

Medical Association (AVMA) rather than approved by the Board, was included in the Board's Sunset bill, [AB 1502](#) (Berman, 2025).

The Subcommittee also was tasked with evaluating the RVT registration pathways and making recommendations to the MDC, and ultimately the California Veterinary Medical Board (Board), related to whether the combination of practical experience and education set forth in CCR, title 16, section [2068.5](#) should continue to be deemed the equivalent of a two-year curriculum in animal health technology.

The Subcommittee presented its [recommendations](#) to the MDC at its April 2025 meeting. The Subcommittee noted that CCR, title 16, 2068.5, subdivision (g), requires the directed clinical practice to have provided the RVT applicant with knowledge, skills, and abilities in specified categories and requires the supervising veterinarian to complete a check list attesting to the applicant's proficiency in specific skill areas within the categories. One of the Subcommittee's recommendations was to eliminate the check list requirement and instead trust the professional judgment of the licensed veterinarian supervisor attesting to the applicant's knowledge, skills, and abilities in each category.

During that meeting, the MDC asked the Subcommittee to compare the Board's current "[Registered Veterinary Technician Task List – Proof of Experience](#)" to the American Veterinary Medical Association (AVMA) Center for Veterinary Education Accreditation (CVTEA) "[Veterinary Technology Student Essential and Recommended Skills List](#)."

AB 1502 (Berman, 2025) Recommendations

While reviewing the check lists and CCR, title 16, section 2068.5, the Subcommittee realized the proposed amendments to BPC section 4841.5 shown in the April 30, 2025 version of [AB 1502](#) do not adequately capture the Board's intent as discussed in previous Board meetings. Upon further review, the Subcommittee recommends additional amendments to BPC section 4841.5.

Due to the legislative committee hearing deadlines, the MDC and the Board would not meet until after the last policy committee hearing on AB 1502. To ensure the amendments made it into the bill, the Executive Committee submitted the proposed amendments on the Board's behalf, and the additional amendments were added to the bill on June 25, 2025. The Board will need to ratify the following proposed amendments at the Board's July meeting. (Additional amendments shown in underlined text for additions and strikethrough text for deletions.)

1. **BPC section 4841.5, subdivision (a)(4)(A):** Add "(AVMA)," strike "or the equivalent thereof, as determined by the board," and add "(BPPE)."

(4) Furnish satisfactory evidence of one of the following:

(A) Graduation from, at minimum, a two-year curriculum in veterinary technology, in a college or other postsecondary institution accredited by the American Veterinary

Medical Association or the equivalent thereof, as determined by the board (AVMA). In the case of a private postsecondary institution, the institution shall also be approved by the Bureau for Private Postsecondary Education (BPPE). Proof of graduation shall be confirmed through electronic means or direct submission from the college, other postsecondary institution, or American Association of Veterinary State Boards (AAVSB).

The Subcommittee is concerned that leaving “or the equivalent thereof, as determined by the board” may be interpreted to apply to an equivalent accrediting entity rather than the equivalent to a “two-year curriculum.” CCR, title 16, section [2068.5](#) currently references this language to define the alternate pathway.

However, as discussed in more detail in Agenda Item 5.B., the Subcommittee believes the alternate pathway specified in CCR, title 16, 2068.5 should be tied to BPC section 4841.5, subdivision (a)(4)(B): “...a combination of education and clinical practice experience, as determined by the board.”

2. **BPC section 4841.5, subdivision (a)(4)(B):** Add “All education shall be accredited by AVMA or the Accrediting Commission for the Community and Junior Colleges, or approved by BPPE.”

(B) A combination of education and clinical practice experience, as determined by the board. All education shall be accredited by the AVMA or the Accrediting Commission for the Community and Junior Colleges, or approved by the BPPE.

The MDC and the Board agreed to remove the Board’s authority to approve educational programs because the other oversight entities (AVMA, ACCJC, and BPPE) provided adequate student protection. However, these entities were not specified in the statute. The Subcommittee recommends adding a clarifying statement that all education shall be accredited or approved by one of the oversight entities.

3. **BPC section 4841.5, subdivision (a)(5)(B):** Strike clauses (i) and (ii) from subdivision (a)(5)(B).

(B) Submit proof of having practiced clinical veterinary medicine for a minimum of two years and completed a minimum of 2,500 hours of clinical practice in another state, Canadian province, or United States territory within the three years immediately preceding filing an application for licensure in this state.

(i) The directed clinical practice shall have provided the applicant with knowledge, skills, and abilities in the areas of communication with clients, patient examinations, emergency procedures, laboratory procedures, diagnostic imaging, surgical assisting, anesthesia, animal nursing, nutrition, dentistry, animal behavior, and pharmacology.

(ii) The supervising veterinarian shall complete a checklist attesting to the proficiency in the skill areas described in clause (i).

These clauses were proposed to be added because they reflect current requirements for alternate pathway candidates under CCR, title 16, section 2068.5. However, this out-of-state pathway for RVT registration was not intended to mirror the alternate pathway. Instead, it was intended to mirror the license reciprocity requirements for veterinarians who passed the national examination over five years from the date of submitting their application but who have practiced clinical veterinary medicine in another state, Canadian province, or United States territory prior to filing the license application, as specified (BPC, § [4846](#), subd. (a)(5)).

Submitting proof of 2,500 clinical practice hours is one of three ways to demonstrate a veterinarian license applicant's continued competence. Veterinarians who attest to their practice hours often have been practicing in another state for well over five years and decide to practice in California. They are not required to have a supervisor attest to a list of proficient skill areas as if they were entering practice for the first time.

Similarly, RVTs who utilize this reciprocity pathway likely have been practicing in another state well over five years. They should not be subject to more strict requirements than those required for veterinarians.

Action Requested

If the MDC agrees with the Subcommittee recommendations, please entertain a motion to recommend the Board ratify the proposed amendments to BPC section 4841.5 in the June 25, 2025 version of AB 1502.

Attachment

1. Proposed Amendments to Business and Professions Code Section 4841.5 in AB 1502, as Amended on June 25, 2025

CALIFORNIA VETERINARY MEDICAL BOARD

**PROPOSED AMENDMENTS TO BUSINESS AND PROFESSIONS CODE SECTION
4841.5 IN AB 1502, AS AMENDED ON JUNE 25, 2025**

Additions are indicated in underlined text; deletions are indicated in ~~striketrough text~~.

[...]

SEC. 15. Section 4841.5 of the Business and Professions Code is amended to read:

4841.5. (a) To obtain registration as a registered veterinary technician, the applicant shall satisfy the following requirements:

- (1) Complete and submit an application upon a form furnished by the board.
- (2) Pay the applicable fees specified in Section 4905.
- (3) Pursuant to Section 144, submit a full set of fingerprints for the purpose of conducting a criminal history record check and undergo a state and federal criminal offender record information search conducted through the Department of Justice, pursuant to subdivision (u) of Section 11105 of the Penal Code. The Department of Justice shall provide a state or federal response to the board pursuant to paragraph (1) of subdivision (p) of Section 11105 of the Penal Code.
- (4) Furnish satisfactory evidence of one of the following:
 - (A) Graduation from, at minimum, a two-year curriculum in veterinary technology, in a college or other postsecondary institution accredited by the American Veterinary Medical Association (AVMA) ~~or the equivalent thereof, as determined by the board~~. In the case of a private postsecondary institution, the institution shall also be approved by the Bureau for Private Postsecondary Education (BPPE). Proof of graduation shall be confirmed through electronic means or direct submission from the college, other postsecondary institution, or American Association of Veterinary State Boards (AAVSB).
 - (B) A combination of education and clinical practice experience, as determined by the board. All education shall be accredited by AVMA or the Accrediting Commission for the Community and Junior Colleges, or approved by BPPE.
 - (C) Graduation from a veterinary college recognized by the board. Proof of graduation shall be confirmed through electronic means or direct submission from the veterinary college or the AAVSB.
 - (D) Education equivalency certified by the AAVSB's Program for the Assessment of Veterinary Education Equivalence (PAVE) for Veterinary Technicians. The certificate of education equivalence shall be confirmed through electronic means or direct submission from the American Association of Veterinary State Boards.

(E) Education equivalency certified by the Educational Commission for Foreign Veterinary Graduates (ECFVG) or PAVE. The certificate of education equivalence shall be confirmed through electronic means or direct submission from ECFVG or PAVE.

(5) Pass the national licensing examination for veterinary technicians. If the applicant passed the national licensing examination over five years from the date of submitting the veterinary technician registration application, the applicant shall perform one of the following:

(A) Retake and pass the national licensing examination.

(B) Submit proof of having practiced clinical veterinary medicine for a minimum of two years and completed a minimum of 2,500 hours of clinical practice in another state, Canadian province, or United States territory within the three years immediately preceding filing an application for licensure in this state.

~~(i) The directed clinical practice shall have provided the applicant with knowledge, skills, and abilities in the areas of communication with clients, patient examinations, emergency procedures, laboratory procedures, diagnostic imaging, surgical assisting, anesthesia, animal nursing, nutrition, dentistry, animal behavior, and pharmacology.~~

~~(ii) The supervising veterinarian shall complete a checklist attesting to the proficiency in the skill areas described in clause (i).~~

(C) Complete the minimum continuing education requirements of Section 4858.2 for the current and preceding year.

(b) The applicant shall disclose each state, Canadian province, or United States territory in which the applicant currently holds or has ever held a license, registration, certificate, or permit to practice veterinary medicine. License verification, including any disciplinary or enforcement history, shall be confirmed through electronic means or direct submission from each state, Canadian province, or United States territory in which the applicant has identified that the applicant holds or has ever held a license to practice veterinary medicine.

(c) An application for veterinary technician registration shall be subject to denial pursuant to Sections 480 and 4883.

[...]