

MEMORANDUM

DATE	July 1, 2025
TO	California Veterinary Medical Board (Board)
FROM	<u>Multidisciplinary Advisory Committee (MDC)</u> Marie Ussery, RVT, Chair
SUBJECT	Agenda Item 5.C. Recommendation to Initiate a Rulemaking to Amend California Code of Regulations (CCR), Title 16, Section 2068.5 Regarding Practical Experience and Education as Equivalent Curriculum for Registered Veterinary Technicians

Background

The MDC RVT Education Subcommittee (Subcommittee) was tasked with evaluating all the current statutory and regulatory authorized Registered Veterinary Technician (RVT) registration pathways and making recommendations to the MDC, and ultimately to the Board. As a result of several stakeholder meetings, and upon the recommendation of the MDC, the Board at the January 2025 meeting, voted to repeal one of the existing pathways, which allowed for RVTs who were licensed out of state and had no educational requirements to be licensed in California, and to initiate a rulemaking.

Additionally, during the January 14, 2025 MDC meeting, the Subcommittee raised concerns related to the educational and clinical experience components in CCR, title 16, section [2068.5](#). The Subcommittee's concerns were presented to the Board at its January 2025 meeting, and the Board authorized the MDC to evaluate this regulation closer to consider whether the "qualified instructor" criteria is adequate for consumer protection, to review the number of required clinical practice experience hours, and to review whether the combination of practical experience and education set forth in CCR, title 16, section [2068.5](#) could be improved.

At the April 2025 meeting, the Subcommittee [recommended](#), and the MDC agreed, that the Board should initiate a rulemaking to amend CCR, title 16, section 2068.5, subsection (a) to address concerns related to "qualified instructors," the number and location of required clinical practice hours, and the supervising veterinarian's license and attestation requirements. Neither the Subcommittee nor the MDC recommended to reduce the existing education hours.

The MDC Chair presented the MDC recommendations to the Board during its April 2025 meeting. During the meeting, the Board agreed with the amendments to address the concerns related to "qualified instructors," the number and location of required clinical practice hours, the supervising veterinarian's license and most attestation requirements. However, the Board raised concerns with eliminating the reference to a "checklist" for

supervising veterinarians to complete. While the Board understood the concerns the MDC raised with the current courtesy “[Registered Veterinary Technician Task List – Proof of Experience](#)” checklist, the Board determined that supervising veterinarians needed more guidance in assessing the proficient skills.

The Board requested the MDC consider and compare the Board’s current checklist with the American Veterinary Medical Association (AVMA) Center for Veterinary Education Accreditation (CVTEA) [Veterinary Technology Student Essential and Recommended Skills List](#) (Skills List).

Subcommittee Recommendation

Since the April meeting, the Subcommittee met multiple times to discuss the checklist and additional regulatory amendments that were necessary. Ultimately, the Subcommittee determined the CVTEA Skills List was similar to the categories currently listed in CCR, title 16, section 2068.5, subsection (g). However, the Subcommittee does not believe specifically listing all identified tasks and decision-making abilities is necessary for the purposes of the checklist. Instead, the specific tasks and decision-making abilities should be left to the professional judgement of the supervising veterinarian.

As such, the Subcommittee recommends CCR, title 16, section 2068.5 be amended to more closely align with CVTEA’s categories, as follows:

~~(g)~~ The directed clinical practice required in subsection ~~(f)~~ shall have provided the applicant with knowledge, skills, and abilities in each of 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. following categories:

(1) Office and Hospital Procedures, Client Relations, and Communication.

(A) Participate in facility management utilizing traditional and electronic media and appropriate veterinary medical terminology and abbreviations.

(B) Communicate in a professional manner in all formats – written, oral, non-verbal, and electronic.

[Note: The Subcommittee did not include CVTEA’s skill to “follow and uphold applicable laws and the veterinary technology profession’s ethical codes to provide high quality care to patients.” This is because laws vary state by state, and it would be challenging for supervising veterinarians and RVT applicants to know which state laws are applicable and which are not. There is also no statutory requirement for veterinarians or RVTs to follow and uphold the profession’s ethical codes.]

(2) Pharmacy and Pharmacology.

(A) Safely and effectively administer prescribed drugs to patients.

(B) Accurately dispense and explain prescribed drugs to clients.

(3) Nursing.

(A) Demonstrate and perform patient assessment techniques in a variety of animal species.

(B) Understand and demonstrate husbandry, nutrition, therapeutic, and dentistry techniques appropriate to various animal species.

(4) Anesthesia.

(A) Safely and effectively manage and maintain patients in all phases of anesthesia.

(B) Safely and effectively select, utilize, and maintain anesthetic delivery and monitoring instruments and equipment.

(5) Surgical Nursing.

(A) Understand and integrate all aspects of patient management for common surgical procedures in a variety of animal species.

(B) Understand and provide the appropriate instruments, supplies, and environment to maintain asepsis during surgical procedures.

(6) Laboratory Procedures.

(A) Recognize proper handling, packaging, and storage of specimens for laboratory analysis to ensure safety of patients, clients, and staff.

(B) Properly perform analysis of laboratory specimens.

(7) Diagnostic Imaging.

(A) Safely and effectively produce diagnostic radiographic and non-radiographic images.

(8) Avian, Exotic, or Small Mammals Procedures.

(A) Understand the approach to providing safe and effective care for avian, exotic, or small mammals.

[Note: CVTEA's ninth category requires "Avian, Exotic, *and* Small Mammals Procedures." The skill also specifies students understand "the approach to providing safe and effective care for birds, reptiles, amphibians, guinea pigs, hamsters, gerbils, and ferrets." However, alternate pathway RVTs may not be exposed to all those mammal types in an everyday clinical practice. In addition, avian, exotic, and small mammals procedures are included in the national examination, so the RVT applicants will already demonstrate knowledge in these areas.

Requiring an RVT applicant to gain practice experience in those specified mammal types may require them to seek employment elsewhere if their current place of employment does not treat those mammals. This would place an unnecessary burden on the RVT applicant. It also goes beyond the current requirement for alternate pathway applicants.]

The Subcommittee notes CVTEA's Skills List includes a "Laboratory Animal Procedures" category. However, similar to the note for subsection (f)(8), RVT applicants gaining clinical practice experience will not have access to laboratory animals used in animal research. The Subcommittee does not believe this is an essential skill to demonstrate minimum competency to become an RVT, and it is not a current requirement for alternate pathway applicants. As such, the Subcommittee does not recommend including this category in the checklist.

In addition, the Subcommittee recommends amending CCR, title 16, section 2068.5, to move the check list requirement to a new subsection (g), make minor clarifying changes to that provision, and requiring minimal information regarding the applicant and supervising veterinarian.

Courtesy Checklist

The Subcommittee created a courtesy checklist for supervising veterinarians to complete (Attachment 2). However, the Board would accept any checklist that includes the required information listed in CCR, title 16, section 2068.5, new subsection (f).

Action Requested

If the Board agrees with the Subcommittee/MDC's recommendations, please entertain a motion to take the following actions:

Approve the regulatory text in Attachment 1 to amend CCR, title 16, section 2068.5.

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 2068.5.

Attachment

1. Proposed Regulatory Language to Amend CCR, Title 16, Section 2068.5
Regarding Veterinary Technician Registration Experience and Education
2. Proposed Courtesy Checklist and Attestation Statement

CALIFORNIA VETERINARY MEDICAL BOARD
DEPARTMENT OF CONSUMER AFFAIRS
TITLE 16. VETERINARY MEDICAL BOARD

PROPOSED REGULATORY LANGUAGE
Veterinary Technician Registration Experience and Education

Legend:	Added text is indicated with an <u>underline</u> . Deleted text is indicated by strikeout .
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Amend section 2068.5 of Division 20 of Title 16 of the California Code of Regulations to read as follows:

§ 2068.5. ~~Practical Experience and Education~~ and Clinical Practice Experience as Equivalent Curriculum.

~~In lieu of a two year curriculum in animal health technology, completion of a “A combination of education and practical clinical practice experience and education in compliance with the following criteria is deemed to be “the equivalent thereof as determined by the board” pursuant to Section 4841.5(a)(4)(B) of the code means the following:~~

(a) The education shall consist of a minimum of 20 semester units, 30 quarter units, or 300 hours of instruction. The education shall be provided by a postsecondary academic institution ~~or a qualified instructor, who satisfies the qualification requirements of subsection (e)(1).~~ The education shall be accumulated in the fundamentals and principles of all of the following subjects:

- (1) Dental prophylaxis and extraction.
- (2) Anesthetic instrumentation, induction, and monitoring.
- (3) Surgical nursing and assisting, including instrumentation, suturing techniques, intravascular catheter placement, and application of casts and splints.
- (4) Radiography and radiation safety.
- (5) Diseases and nursing of animals, including zoonotic diseases and emergency veterinary care.

(b) The education shall include instruction in chemistry, mathematics, biology, microbiology, anatomy and physiology, and medical terminology, or these subjects may be obtained as separate courses.

(c) Interactive distance-learning shall be accepted if the course meets all the criteria listed in this section and the candidate achieves a documented passing score on the

course final examination.

~~(d) The candidate shall provide the board with a syllabus or an outline for each course. The candidate shall provide documentation of attendance for each course in the form of one of the following:~~

~~(1) a certificate of attendance,~~

~~(2) an official transcript, or~~

~~(3) a letter on official stationery signed by the course instructor documenting that the candidate attended a particular course. Proof of completion of education specified under subsections (a) and (b) shall be submitted directly to the board by the postsecondary institution, or American Association of Veterinary State Boards, as applicable.~~

~~(e) (1) In order for an instructor to be approved for qualification, the instructor must meet at least two of the following minimum requirements:~~

~~(A) A license, registration, or certificate in an area related to the subject matter of the course. The license, registration, or certificate shall be current, valid, and free from restrictions due to disciplinary action by this board or any other health care regulatory agency;~~

~~(B) A master's or higher degree from an educational institution in an area related to the subject matter of the course;~~

~~(C) Training, certification, or experience in teaching the subject matter of the course; or~~

~~(D) At least two years' experience in an area related to the subject matter of the course.~~

~~(2) The instructor shall provide each participant with a course syllabus or detailed outline which includes a description of the material covered.~~

~~(fe) The directed clinical practice shall consist of at least 2,5004,416 hours of directed clinical practice in any state or territory of the United States or Canadian provinces under the direct supervision of a California-licensed veterinarian(s) licensed in any state or territory of the United States or Canadian province who shall attest to the completion of that experience at the time the application is made to the board for the registered veterinary technician examination.~~

~~(gf) The directed clinical practice required in subsection (fe) shall have provided the applicant with knowledge, skills, and abilities in each of 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.~~ following categories:

(1) Office and Hospital Procedures, Client Relations, and Communication.

(A) Participate in facility management utilizing traditional and electronic media and appropriate veterinary medical terminology and abbreviations.

(B) Communicate in a professional manner in all formats – written, oral, non-verbal, and electronic.

(2) Pharmacy and Pharmacology.

(A) Safely and effectively administer prescribed drugs to patients.

(B) Accurately dispense and explain prescribed drugs to clients.

(3) Nursing.

(A) Demonstrate and perform patient assessment techniques in a variety of animal species.

(B) Understand and demonstrate husbandry, nutrition, therapeutic, and dentistry techniques appropriate to various animal species.

(4) Anesthesia.

(A) Safely and effectively manage and maintain patients in all phases of anesthesia.

(B) Safely and effectively select, utilize, and maintain anesthetic delivery and monitoring instruments and equipment.

(5) Surgical Nursing.

(A) Understand and integrate all aspects of patient management for common surgical procedures in a variety of animal species.

(B) Understand and provide the appropriate instruments, supplies, and environment to maintain asepsis during surgical procedures.

(6) Laboratory Procedures.

(A) Recognize proper handling, packaging, and storage of specimens for laboratory analysis to ensure safety of patients, clients, and staff.

(B) Properly perform analysis of laboratory specimens.

(7) Diagnostic Imaging.

(A) Safely and effectively produce diagnostic radiographic and non-radiographic images.

(8) Avian, Exotic, or Small Mammals Procedures.

(A) Understand the approach to providing safe and effective care for avian, exotic, or small mammals.

(g) The supervising veterinarian(s) shall complete a checklist attesting to the applicant's proficiency in performing the supervised specific skill(s) areas within the preceding categories. The checklist shall also include the applicant's name and contact information, as well as the supervising veterinarian(s) name, license number, state, territory, or province the license was issued, and contact information.

NOTE: Authority cited: Section 4808, Business and Professions Code.

Reference: Section 4841.5, Business and Professions Code.

**REGISTERED VETERINARY TECHNICIAN
Directed Clinical Practice
Supervising Veterinarian (SV) Attestation**

Applicant Name:

SV Name:

SV License Number:

SV State, Territory, or Province:

SV Email Address:

SV Phone Number:

I attest that the above-name applicant completed _____ hours of directed clinical practice under my supervision. I further attest to the above-named applicant's proficiency in performing the skills and abilities in the following categories (check all that apply):

☐ **OFFICE AND HOSPITAL PROCEDURES, CLIENT RELATIONS, AND COMMUNICATION**

Participate in facility management utilizing traditional and electronic media and appropriate veterinary medical terminology and abbreviations.

Communicate in a professional manner in all formats – written, oral, non-verbal, and electronic.

☐ **PHARMACY AND PHARMACOLOGY**

Safely and effectively administer prescribed drugs to patients.

Accurately dispense and explain prescribed drugs to clients.

☐ **NURSING**

Demonstrate and perform patient assessment techniques in a variety of animal species.

Understand and demonstrate husbandry, nutrition, therapeutic and dentistry techniques appropriate to various animal species.

☐ **ANESTHESIA**

Safely and effectively manage and maintain patients in all phases of anesthesia.

Safely and effectively select, utilize and maintain anesthetic delivery and monitoring instruments and equipment.

☐ **SURGICAL NURSING**

Understand and integrate all aspects of patient management for common surgical procedures in a variety of animal species.

Understand and provide the appropriate instruments, supplies and environment to maintain asepsis during surgical procedures.

☐ **LABORATORY PROCEDURES**

Recognize proper handling, packaging and storage of specimens for laboratory analysis to ensure safety of patients, clients, and staff.

Properly perform analysis of laboratory specimens.

☐ **DIAGNOSTIC IMAGING**

Safely and effectively produce diagnostic radiographic and non-radiographic images.

☐ **AVIAN, EXOTIC, OR SMALL MAMMAL PROCEDURES**

Understand the approach to providing safe and effective care for avian, exotic or small mammals.

SV Signature

Date

SV License Number

SV State

SV Email

Date