BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY • GAVIN NEWSOM, GOVERNOR
DEPARTMENT OF CONSUMER AFFAIRS • VETERINARY MEDICAL BOARD
1747 North Market Blvd., Suite 230, Sacramento, CA 95834-2978
P (916) 515-5220 | Toll-Free (866) 229-0170 | www.vmb.ca.gov

MEMORANDUM

DATE	June 26, 2025
TO	California Veterinary Medical Board (Board)
FROM	Justin Sotelo, Policy Specialist
SUBJECT	**Agenda Item 7. Update and Discussion on Pending Regulations**

Regular Rulemaking Packages

A regular rulemaking package moves through the following phases:

- **Concept Phase**: a program identifies the need for a new regulation or a need for clarification or revisions to an existing regulation.
- **Production Phase**: the preparation of an entire rulemaking package for initial approval by the Department of Consumer Affairs (DCA) and the Business, Consumer Services and Housing Agency (Agency) and initial submission to the Office of Administrative Law (OAL).
- **Initial Filing Phase**: upon initial approval by Agency, submission of rulemaking package to OAL for publication and public comment.
- **Final Filing Phase**: the preparation of the final rulemaking package for final DCA, Agency, and Department of Finance (if there is a fiscal impact) approvals and submission to OAL for final approval.

Six regular rulemaking packages are pending in various phases of the rulemaking process, as described in more detail below.

1. **Minimum Standards for Alternate Veterinary Premises—California Code of Regulations (CCR), Title 16, Sections 2030, 2030.05, 2030.1, 2030.2, and 2030.3 – PRIORITY**

   Phase: Initial Filing

   Summary: The regulatory proposal would standardize language utilized in modern veterinary practice and update the requirements for fixed veterinary premises, mobile veterinary premises, vaccination veterinary premises, and shelter premises. Additionally, the proposal would remove all apparent building standards, including any exemptions to those standards, from title 16.

   The proposed language also:

1. Provides for the needs of large animal practitioners and limitations they have for equipment or movement of large animals.
2. Provides for the various mobile veterinary premises types, including house calls and services for equines or food animals/livestock.
3. Clarifies personnel authorized to provide vaccinations at a veterinary premises and the veterinarian's responsibilities.
4. Sets specified requirements for animal shelters.

Update: On April 22, 2025, the rulemaking package was submitted to the DCA Director for initial review; it was approved on May 1, 2025. On May 2, 2025, the rulemaking package was submitted to Agency for initial review; it was approved on June 4, 2025. On June 10, 2025, the rulemaking package was submitted to OAL for publication, which initiates the public comment period; the Notice of Proposed Regulatory Action was published on June 20, 2025. The 45-day public comment period concludes on August 4, 2025.

2. Drug Compounding—CCR, Title 16, Sections 2036.5, 2090, 2091, 2092, 2093, and 2094

Phase: Production

Summary: This regulatory proposal would:

1. Make technical revisions regarding animal health care tasks performed by permit holders and veterinary assistants.
2. Make technical revisions regarding Registered Veterinary Technician (RVT) drug compounding under the supervision of a veterinarian in a registered veterinary premises.
3. Add a definition for "immediate use."
4. Clarify the definition of "office stock" regarding administration and dispensing of the office stock.
5. Clarify the policy and procedure and master formula document requirements and documentation requirements for animal patient specific compounded drug preparations.
6. Establish documentation requirements for immediate use compounded drug preparations.
7. Clarify compounded drug preparation documentation requirements in animal patient medical records.
8. Make technical corrections regarding drug compounding training requirements.
9. Establish expiration of non-immediate use intravenous (IV) or subcutaneous (SQ) compounded drug preparations.
10. Clarify drug compounding labeling requirements for office stock, establish labeling requirements for IV, intramuscular, and SQ drug preparations, and establishing labeling requirements for compounded drugs requiring refrigeration.

Update: On May 12, 2025, the prepared regulatory package was submitted to Regulations Counsel for pre-review. During May and June, additional revisions and updates were made to the package. On June 25, 2025, Board staff and Regulations Counsel met with DCA Budget Office staff to address questions regarding the proposed text and potential impacts, if any.

Upon final review by the Budget Office, the package will soon be submitted to the DCA Director for initial review. After initial approvals by DCA and Agency, the regulatory package will be submitted to OAL for publication and public comment (initial filing phase).

3. Records—CCR, Title 16, Section 2032.3

Phase: Production

Summary: This regulatory proposal addresses the following:

1. Changes the logical order of the required information that makes up an animal patient record to follow a SOAP (Subjective, Objective, Assessment, and Plan) format for recording patient medical encounters and medical record documentation, which is taught in the majority of veterinary schools.
2. Addresses animal patient record keeping requirements for single patient records and group records.
3. Makes animal patient record keeping requirements less prescriptive.
4. Addresses when a copy or a summary of records must be provided to the client, or the client's authorized agent.

Update: In July 2024, corresponding legislative amendments to Business and Professions Code (BPC) sections 4826.6 and 4855 were approved by the Board. In anticipation of those amendments being enacted, this regulatory package is in the production phase of the rulemaking process and is being prepared for initial DCA Director and Agency approvals.

Board staff will submit this package to Regulations Counsel in July to initiate the review process and to obtain initial approvals before submitting to OAL for publication and public comment (initial filing phase). However, this regulatory package is contingent on the approval and enactment of the legislative amendments.

4. Civil Penalties for Citation—CCR, Title 16, Section 2043

Phase: Production

Summary: This regulatory proposal is contingent on the approval and enactment of the legislative proposal to amend BPC section 4875.2 and add section 4875.7 regarding unlicensed practice citations. This proposal would remove references to unlicensed practice citations, as there would no longer be a need for

unlicensed practice citations to be assigned a classification, if the related legislative proposal is approved and enacted.

Update: At the January 2025 meetings, the Multidisciplinary Advisory Committee (MDC) and Board approved this regulatory proposal. In anticipation of those legislative changes being enacted, this regulatory package will be prepared between now and the next Board meeting for Regulations Counsel review and initial DCA Director and Agency approvals.

5. Out of State Registration as Equivalent—CCR, Title 16, Section 2068.6

Phase: Production

Summary: The regulatory proposal would repeal CCR, title 16, section 2068.6 and would thus, eliminate the experience only pathway for RVT registration that currently only exists for out-of-state applicants.

Update: At the January 2025 meetings, the MDC and Board approved this regulatory proposal. At the April 2025 meetings, the MDC and Board reviewed separate proposed amendments to CCR, title 16, section 2068.5 regarding RVT Practical Experience and Education as Equivalent Curriculum. More specifically, the MDC's RVT Subcommittee (Subcommittee) was tasked with evaluating the RVT registration pathways and making recommendations related to whether the combination of practice experience and education set forth in the regulation should continue to be deemed the equivalent of a two-year curriculum in animal health technology.

It was determined at the April 2025 Board meeting that further considerations should be made by the Subcommittee regarding how supervising veterinarians attest to the clinical practice experience of RVT applicants; the Subcommittee met on May 23, 2025 to address this issue. At the July 2025 MDC and Board meetings, revised amendments to CCR, title 16, section 2068.5 will be reviewed and considered.

If approved, that regulatory proposal will be merged with the previously approved proposal to amend CCR, title 16, section 2068.6. The regulatory package will then be prepared for Regulations Counsel review and initial DCA Director and Agency approvals.

6. Licensing and Registration Examinations—CCR, Title 16, Sections 2014, 2015, and 2015.2

Phase: Production

Summary: The regulatory proposal would repeal CCR, title 16, sections 2014, 2015, and 2015.2. Section 2014 (previously, CCR, title 16, section 2014, subsection (b)), which deals with the grading method for the national veterinarian examination, and section 2015.2, which deals with the administration of the

Veterinary Law Examination (VLE), were originally proposed to be repealed via a Section 100 rulemaking earlier this year; however, they were deemed substantive by OAL and, therefore, had to be excluded from the Section 100 regulatory package.

Prior to the April 2025 Board meeting, it was also determined that CCR, title 16, section 2015 could be repealed for the following reasons: BPC section 4846 sufficiently ensures veterinarian license applicants have demonstrated they are competent to practice regardless of the period between the national examination and the VLE; and, subsections (c), (d), and (e) are obsolete (due to the elimination of the California examinations) and should have previously been repealed in the Section 100 regulatory package, as there are no longer two examinations (national/California) to mark the beginning and end of the sixty month period before applicants are required to retake and pass all examinations.

Update: At the April 2025 meeting, the Board approved this regulatory proposal. The regulatory package will be prepared for Regulations Counsel review and initial DCA Director and Agency approvals.

Attachment

1. Status of Pending Board Regulations – Updated June 26, 2025

Status of Pending CVMB Regulations

Rulemaking Title	Current Status	INITIAL PHASE										FINAL PHASE					
		Concept Date(s)	Board Approval	Submitted to DCA for PRE-Review	Submitted to DCA for INITIAL Review	DCA Director Approval	Submitted to Agency/Agency Approval	Notice Submitted to OAL & Notice Published by OAL	45-Day Public Comment Period	Public Hearing (Optional)	15-Day Comment Period (Modified Text), if applicable	Submitted to DCA for FINAL Review	DCA Director FINAL Approval	Submitted to Agency/ FINAL Agency Approval	Submitted to DOF/ DOF Approval	Submitted to OAL/ OAL Approval	Effective Date
Minimum Standards for Alternate Veterinary Premises	Initial Filing Phase 45-Day Public Comment Period - 06/20/2025 through 08/04/2025	2017-2024	11/14/2018 04/19/2023 10/18/2023 Combined with the Minimum Standards for Shelter Premises Package Re-Approved on 04/17/2024	7/11/2024 Re-Approved by Budget Office on 08/01/2024 Resubmitted to Regulations Unit on 03/25/2025	04/22/2025	05/01/2025	05/02/2025	06/04/2025	Submitted to OAL for publication on 06/10/2025 45-Day Public Comment Period - 06/20/2025 through 08/04/2025								
Drug Compounding	Production Phase DCA Pre-Review Pending Budget Office Review	4/19/2022 10/18/2023 01/16/2024	01/25/2023 Re-Approved on 04/17/2024	05/12/2025 Pending Budget Office Review													
Records	Production Phase Contingent on approval of legislative proposal	06/26/2023 08/29/2023	07/24/2024														
Civil Penalties for Citation	Production Phase Contingent on approval of legislative proposal	09/16/2024 11/18/2024	01/15/2025														
Out of State Registration as Equivalent	Production Phase To be merged with CCR 2068.5 proposal (RVT Practical Experience and Education as Equivalent Curriculum)	09/16/2024 11/18/2024	1/15/2025 CCR 2068.5 proposal to be considered by MDC/Board at April 2025 meetings														
Licensing and Registration Examinations	Production Phase Approved by Board at April 2025 meeting	N/A	04/17/2025														

Red Text = Updates since last meeting

= Completed

= Current Status/ Pending