California Veterinary Medical Board

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MEMORANDUM

DATE	October 6, 2025
TO	California Veterinary Medical Board (Board)
FROM	Justin Sotelo, Policy Specialist
SUBJECT	**Agenda Item 10.A. 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: Final Filing

   Summary: This regulatory proposal would standardize language utilized in modern veterinary practice and update the requirements for fixed, mobile, vaccination, and shelter premises. Additionally, the proposal would remove all

apparent building standards, including any exemptions to those standards, from title 16 of the CCR.

The regulatory proposal would also:

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

Update: On June 10, 2025, the rulemaking package was submitted to OAL for publication, which initiated the 45-day public comment period; the Notice of Proposed Regulatory Action was published on June 20, 2025. The public comment period concluded on August 4, 2025. During the public comment period, one question was received and one letter was submitted during the July 2025 Board meeting. Neither item was adverse and did not warrant official responses by the Board.

On August 14, 2025, the regulatory package was submitted to the DCA Director for final review; it was approved on the same date. On August 15, 2025, the final rulemaking package was submitted to OAL for final approval. On September 25 and 26, 2025, Board staff and Regulations Counsel met with the OAL reviewing attorney to address what OAL deemed clarity issues in the proposed text. Ultimately, it was determined that the regulatory package would need to be withdrawn and Modified Text would need to be pursued in order to address the issues.

On September 30, 2025, Board staff and Regulations Counsel met with Multidisciplinary Advisory Committee Chair Marie Ussery, RVT, Grant Miller, DVM, Director of Regulatory Affairs, California Veterinary Medical Association (CVMA), and Dan Baxter, Executive Director, CVMA, to discuss the issues. During this meeting, Modified Text was discussed, and some text was drafted. Subsequently, it appeared that more edits were needed, so additional work was done and will be reviewed by the OAL reviewing attorney prior to the Board's October 2025 meeting.

The Board will be reviewing proposed Modified Text at this meeting and will subsequently notice that text for a 15-day public comment period. At the conclusion of the 15-day public comment period (providing no adverse comments are received), the Board will proceed with the rulemaking process.

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

Phase: Initial Filing

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 establish labeling requirements for compounded drugs requiring refrigeration.

Update: On July 15, 2025, the regulatory package was submitted to the DCA Director for initial review; it was approved on July 25, 2025. On August 1, 2025, the regulatory package was submitted to Agency for initial review; it was approved on August 29, 2025. On September 3, 2025, the rulemaking package was submitted to OAL for publication. The Notice of Proposed Regulatory Action was published on September 29, 2025, which initiated the 45-day public comment period. The public comment period concludes on November 3, 2025. Any comments received will be reviewed and if they necessitate Board approval, the comments will be brought up at the January Board meeting. If no comments are received, the package will be submitted to OAL as a final rulemaking.

3. Records—CCR, Title 16, Section 2032.3

Phase: Production

Summary: This regulatory proposal would:

1. Change 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. Address animal patient record keeping requirements for single patient records and group records.
3. Make animal patient record keeping requirements less prescriptive.
4. Address when a copy or a summary of records must be provided to the client, or the client's authorized agent.

Update: Corresponding legislative amendments to Business and Professions Code (BPC) sections 4826.6 and 4855 were included in the Board's Sunset Bill, Assembly Bill (AB) 1502. The bill was enrolled and presented to Governor Gavin Newsom on September 22, 2025. 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 October to initiate the review process and to obtain initial approvals before submitting to OAL for publication and public comment (initial filing phase).

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 (also included in AB 1502). 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 once the related legislative proposal is approved and enacted.

Update: In anticipation of the legislative changes being enacted, this regulatory package is being prepared for Regulations Counsel review and initial DCA Director and Agency approvals.

5. **RVT Registration Pathways—CCR, Title 16, Sections 2068.5 and 2068.6**

Phase: Production

Summary: The Multidisciplinary Advisory Committee's (MDC) RVT Subcommittee was tasked with evaluating all RVT registration pathways and making recommendations to the MDC and the Board. As a result, regulatory proposals to amend CCR, title 16, section 2068.5 and to repeal section 2068.6 were approved by the Board in January and July 2025. Prior to the July 2025 Board meeting, it was determined that the proposals would be merged into one regulatory package.

Together, the proposals would: address concerns related to "qualified instructors", the number and location of required clinical practice hours for RVT applicants, supervising veterinarian license requirements; and how supervising veterinarians attest to the clinical practice experience of RVT applicants; and, eliminate the experience only pathway for RVT registration that currently only exists for out-of-state applicants.

Update: At the July 2025 MDC and Board meetings, revised amendments to CCR, title 16, section 2068.5 were reviewed and considered; the Board approved the revised amendments. The regulatory package will 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: This 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 package earlier this year; however, they were deemed substantive by OAL and, therefore, had to be excluded from the Section 100 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.

Additionally, 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 rulemaking 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: 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 September 30, 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	Withdrawn from OAL on 09/26/2025 Board to review Modified Text on 10/15/2025	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	Submitted: 05/02/2025 Approved: 06/04/2025	Submitted: 06/10/2025 Published: 06/20/2025	06/20/2025 through 08/04/2025	N/A	TBD	08/14/2025	08/14/2025	N/A	N/A	Submitted: 8/15/2025 Withdrawn on 09/26/2025 in order to prepare and notice Modified Text	
Drug Compounding	Initial Filing Phase 45-Day Public Comment Period - 09/19/2025 through 11/03/2025	4/19/2022 10/18/2023 01/16/2024	01/25/2023 Re-Approved on 04/17/2024	05/12/2025	07/15/2025	07/25/2025	Submitted: 08/01/2025 Approved: 08/29/2025	Submitted: 09/03/2025 Published: 09/19/2025	09/19/2025 through 11/03/2025								
Records	Production Phase Contingent on approval of legislative proposal Staff preparing package for initial approvals	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														
RVT Registration Pathways: Out of State Registration as Equivalent (Repeal CCR 2068.6) Education and Clinical Practice Experience (CCR 2068.5)	Production Phase Merged with revised CCR 2068.5 proposal	09/16/2024 11/18/2024	1/15/2025 (Repeal CCR 2068.6) Revised CCR 2068.5 proposal approved by Board at July 2025 meeting														
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