

## MEMORANDUM

<b>DATE</b>	January 12, 2026
<b>TO</b>	California Veterinary Medical Board (Board)
<b>FROM</b>	Justin Sotelo, Policy Specialist
<b>SUBJECT</b>	<b>Agenda Item 7.A. Status on Pending Regulations</b>

### Regular Rulemaking Process

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.

Two regular rulemaking packages were recently approved by OAL. Four 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**

**Status: APPROVED; Effective Date: January 1, 2026**

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

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

The amendments 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; and
4. Set specified requirements for animal shelters.

**Update:** 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 was reviewed by the OAL reviewing attorney prior to the Board's October 2025 meeting.

At the October 2025 meeting, the Board reviewed and approved proposed Modified Text and subsequently noticed that text for a 15-day public comment period, which commenced on October 17, 2025 and ended on November 3, 2025. During the comment period, the Board received one inquiry and one public comment. The inquiry was not adverse and the public comment did not pertain to the Modified Text, nor did it pertain to the originally proposed text. Therefore, no additional modifications to the text were necessary.

On November 12, 2025, the final rulemaking package was resubmitted to OAL. After review, the package was approved on December 29, 2025 and filed with the Office of the Secretary of State on the same date. The approved regulations took effect on January 1, 2026 and have been posted on the Board's Approved Regulations [web page](#).

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

**Status: APPROVED; Effective Date: April 1, 2026**

**Summary:** These regulatory amendments:

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; and
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 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 concluded on November 3, 2025. One inquiry and three comments were received; the items were not adverse.

Board staff corresponded with the first commenter who provided the inquiry; and asked for clarification; the commenter responded that after re-reading the proposed changes, he had no additional questions or concerns. Two of the additional comments received were not germane to the proposed regulatory language. The fourth comment highlighted a technical drafting error that the Board sought to fix through the Executive Officer’s delegated authority.

On November 24, 2025, the DCA Director approved the final rulemaking package. On November 25, 2025 the package was submitted to OAL. After

review, the package was approved on January 12, 2026 and filed with the Office of the Secretary of State on the same date. The approved regulations have been posted on the Board's Approved Regulations [web page](#) and take effect on April 1, 2026.

### **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; and
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](#) [Berman, Chapter 195, Statutes of 2025], which was approved by Governor Gavin Newsom on October 1, 2025. These amendments became effective January 1, 2026.

As a result of the legislative amendments, 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 early 2026 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 was also contingent on the approval and enactment of legislative changes - amending BPC section [4875.2](#) and adding section [4875.7](#) regarding unlicensed practice citations (also included in AB [1502](#)). This proposal would remove references to unlicensed practice citations, as there will no longer be a need for unlicensed practice citations to be assigned a classification, as a result of the legislative changes.

**Update:** This regulatory package is being prepared for Regulations Counsel review and initial DCA Director and Agency approvals. Board staff will submit this package to Regulations Counsel in early 2026 to initiate the review process and to obtain initial approvals before submitting to OAL for publication and public comment (initial filing phase).

## **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 repeal section 2068.6 were approved by the Board in January and July of 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 in 2025; 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:** 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 early 2026 to initiate the review process and to obtain initial approvals before submitting to OAL for publication and public comment (initial filing phase).

#### **Attachment**

1. Status of Pending Board Regulations – Updated January 12, 2026

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	Approved by OAL: 12/29/2025  Effective Date 01/01/2026	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	10/17/2025 through 11/03/2025	8/14/2025 11/10/2025 (Resubmission)	8/14/2025 N/A (Resubmission)	N/A N/A (Resubmission)	N/A N/A	Submitted: 8/15/2025  Withdrawn on 09/26/2025 in order to prepare and notice Modified Text  Re-submitted: 11/12/2025  Approved: 12/29/2025	01/01/2026
Drug Compounding	Approved by OAL: 1/12/2026  Effective Date 4/1/2026	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	N/A	N/A	11/20/2025	11/24/2025	N/A	N/A	Submitted: 11/25/2025  Approved: 1/12/2026	04/01/2026
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