



MEMORANDUM

DATE	July 1, 2026
TO	California Veterinary Medical Board (Board)
FROM	Jessica Sieferman, Executive Officer (EO)
SUBJECT	Agenda Item 9. Review and Discussion on the Ability of Animal Control Officers to Perform Euthanasia and Carry Controlled Substances

Background

During the October 2025 Multidisciplinary Advisory Committee (MDC) meeting, the Unlicensed Practice Subcommittee shared concerns raised during a recent stakeholder meeting with the shelter community related to the ability for animal control officers (ACOs) to carry controlled substances when euthanizing animals in the field.

An MDC member recalled that California Code of Regulations (CCR), title 16, section [2039.5](#) was created to address training requirements for ACOs to administer sedation drugs for euthanasia purposes. During public comment, a California Veterinary Medical Association (CVMA) representative stated the issue was not with state law but federal law in the Veterinary Medicine Mobility Act (VMMA) (see 21 USCA § 822(e)(2)). According to the representative, the VMMA states that only veterinarians can carry controlled substances.

After public comments, the Subcommittee asked for clarification as to how ACOs can carry controlled substances if state law conflicts with federal law. Board counsel referenced a prior memo on the VMMA and the ability for a registered veterinary technician (RVT) to carry controlled substances to rodeos as an agent of a veterinarian. However, there were no discussions at the time regarding ACO authority to carry controlled substances under federal law.

The MDC Chair shared the concerns with the Board during its October meeting. During the future agenda items discussion at the April 2026 Board meeting, the EO asked the Board if they wanted the EO to research the issue further. The Board requested the EO provide clarification on the current issue, describe the federal law conflict, and what other states have done to address the issue.

Overview

In 2017, Board counsel provided the attached memo outlining how RVTs are authorized to carry controlled substances pursuant to the VMMA (Attachment 1). The memo

explains the RVT serves as a midlevel practitioner since they are providing services under the direct or indirect supervision of a licensed veterinarian.

Midlevel practitioner is defined under the federal Controlled Substances Act (CSA) (21 USCA § 802(21)). An individual practitioner (such as an RVT or ACO) who is an agent or employee of another practitioner (licensed veterinarian) registered by the DEA to dispense controlled substances may, when acting in the normal course of business or employment, administer, dispense, or transport a controlled substance if and to the extent that such individual practitioner is authorized or permitted to do so by the jurisdiction in which they practice. (21 CFR 1301.22(b).)

Pursuant to Penal Code (PC) section 597.1, subdivision (a)(2), ACOs are authorized to possess and administer tranquilizers that contain controlled substances to gain control of the animal with direct or indirect supervision as determined by a licensed veterinarian, provided that the officer has met each of the following requirements:

(A) Has received training in the administration of tranquilizers from a licensed veterinarian. The training shall be approved by the California Veterinary Medical Board.

(B) Has successfully completed the firearms component of a course relating to the exercise of police powers, as set forth in Section 832.

(C) Is authorized by the officer's agency or organization to possess and administer the tranquilizer in accordance with a policy established by the agency or organization and approved by the veterinarian who obtained the controlled substance.

(D) Has successfully completed the euthanasia training set forth in Section 2039 of Title 16 of the California Code of Regulations.

(E) Has completed a state and federal fingerprinting background check and does not have any drug- or alcohol-related convictions.

Since an ACO has authority to possess and administer a tranquilizer that contains controlled substances under veterinarian supervision, the ACO is acting as a midlevel practitioner, pursuant to the VMMA. However, the ACO is only authorized to possess and administer that tranquilizer "to gain control of" that animal – not to euthanize the animal.

PC section 597.1, subdivision (b), authorizes an ACO to euthanize an animal "if, after a reasonable search, no owner of the animal can be found," but it does not specifically authorize the ACO to possess and administer the controlled substances for euthanasia.

This raises concern that because state law does not authorize an ACO to possess and administer a controlled substance for euthanasia, an ACO transporting, possessing, and

administering a controlled substance for such purpose would be doing so in violation of federal law.

To allow ACOs to transport, possess, and administer controlled substances for euthanasia purposes and satisfy the requirements under the VMMA, PC section 597.1 would need to be amended.

Other State Solutions

As indicated in the attached survey (Attachment 2) by the American Association of Veterinary State Boards, many (seven out of 13 respondents) veterinary state boards issue animal euthanasia technician certifications to specifically authorize animal control officers to possess and administer controlled substances. Four states stated they are regulated and/or certified by other agencies, and two stated they are not regulated or have an exemption in their act.

Options to Consider

Legislative Proposals

Board staff could draft a legislative proposal for Board consideration to:

1. amend PC section 597.1 to specifically authorize ACOs to transport, possess, and administer controlled substances for euthanasia purposes; or,
2. create a euthanasia technician license/registration like other state veterinary boards.

Assign to the MDC

The Board could send this to the MDC to engage stakeholders on potential solutions and provide recommendations at a future meeting.

Maintain Status Quo

The Board could choose not to pursue a legislative solution, since ACOs are directly regulated under the Veterinary Medicine Practice Act. Staff does not recommend maintaining the status quo given the significant confusion and lack of specified authority for ACOs to carry controlled substances.

Action Requested

After discussing the information provided and hearing from members of the public, the Board is asked to provide further direction to staff on how to proceed.

Attachments:

1. Controlled Substances Act and RVT Registration Memo, dated March 27, 2017
2. AAVSB Survey Results Regarding Euthanasia Technicians



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MEMORANDUM

DATE	March 27, 2017
TO	Members, Veterinary Medical Board
FROM	Tara Welch, Attorney Legal Affairs Division, Department of Consumer Affairs
SUBJECT	Controlled Substances Act and RVT Registration

Below are the major points regarding the operation of the federal Controlled Substances Act (CSA) and its registration requirements as applied to a registered veterinary technician (RVT) who transports and administers a controlled substance at a location other than the veterinarian’s principal place of business.

CSA – Registration: The CSA requires a practitioner, which includes a veterinarian, who prescribes, dispenses, or administers any controlled substance to obtain registration from the United States Department of Justice, Drug Enforcement Administration (DEA). (21 USCA §§ 802(2)(A), (10), (21), (22), and 822(a)(2).) The CSA also requires a separate registration at each principal place of business or professional practice where a registration applicant prescribes, dispenses, or administers controlled substances. (21 USCA § 822(e)(1).)

Veterinary Medicine Mobility Act of 2014 (Mobility Act) – Registration Exemption: Pursuant to the Mobility Act, a veterinarian, whose principal place of business is registered by the DEA, is not required to have a separate registration in order to transport and dispense controlled substances in the usual course of veterinary practice so long as the site of transporting and dispensing is located in a State where the veterinarian is licensed to practice veterinary medicine and is not a principal place of business or professional practice. (21 USCA § 822 (e)(2).) In effect, the Mobility Act did not authorize or prohibit transport or administration of a controlled substance – **it only exempted the transporting/administering veterinarian from having to register with the DEA his automobile or location where the controlled substance is ultimately administered.**

CSA Registration – RVT: The CSA defines practitioner as a “person licensed, registered, or otherwise permitted, by the United States or the jurisdiction in which he practices . . . to distribute, dispense, . . . administer . . . a controlled substance.” (21 USCA § 802(21).) Different categories of practitioners are specified in the Code of Federal Regulations (CFR), which provides that a “mid-level” practitioner means an individual practitioner, other than a physician, dentist, veterinarian, or podiatrist, who is licensed, registered, or otherwise permitted by the United States or the jurisdiction in which he/she practices, to dispense a controlled substance in the course of professional practice. (21 CFR

Members, Veterinary Medical Board

March 27, 2017

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1300.01.) An RVT falls under this definition because he or she is required to be registered by the Board (Business and Professions Code (BPC) § 4841) and is authorized to administer a controlled substance pursuant to BPC section 4836.1(a), which requires direct or indirect supervision by the licensed veterinarian.

Although an RVT is a mid-level practitioner under the CSA, the CSA provides an exemption from the DEA registration requirement for an agent or employee of the practitioner if such agent or employee is acting in the usual course of his business or employment. (21 USCA § 822(c)(1).) The federal regulations clarify that an individual practitioner (RVT) who is an agent or employee of another practitioner (licensed veterinarian) registered by the DEA to dispense controlled substances may, when acting in the normal course of business or employment, administer, dispense, or transport a controlled substance if and to the extent that such individual practitioner is authorized or permitted to do so by the jurisdiction in which he or she practices. (21 CFR 1301.22(b).) Accordingly, when an RVT is transporting and dispensing a controlled substance at a site other than the veterinarian's principal place of business and under the direct or indirect supervision of the licensed veterinarian, the RVT would be operating under the DEA registration of the licensed veterinarian. As such, the RVT would not need his or her own DEA registration under the CSA in order to lawfully transport controlled substances.

Question - Euthanasia Technician Regulation - 12-12-25 - Your Response : Entry # 4696

Select your jurisdiction

Louisiana

Name

Jared Granier

Title

Executive Director

Provide your answer

1. Yes, the LBVM issues a certificate to individuals specifically to perform euthanasia, primarily at government animal shelters.
Statutes and Rules found at www.lsbvm.org/practice-act (La. R.S. 37:1551-1558 and LAC 46:LXXXV, Chapter 12)
2. The LBVM hosts trainings which detail the statutes and rules for the Board, as well as DEA and LA Board of Pharmacy rules. There is a written exam as well as a practical exam with this training. The practical exam is taught by one of our DVM licensees who is employed at one of our two larger animal shelters.

Question - Euthanasia Technician Regulation - 12-12-25 - Your Response : Entry # 4637

Select your jurisdiction

Nevada

Name

Jennifer Pedigo

Title

Executive Director

Provide your answer

Yes, we issue licenses to Euthanasia Technicians (ETs)

You can see our regulations starting on page 58 of the attached document. (Don't mind the weird color coding, our state attorneys are behind on codification so we have to sort of get by with our own copy)

Our office issues the training and is provided on a basis where we have enough seats filled to offer a class. For any LVTs that are looking to also become ETs, we don't require them to take the hands on examination, just the written.

If you have a file you would like to submit, please upload here:

- [Uncodified-Regulations-672024.pdf](#)

Question - Euthanasia Technician Regulation - 12-12-25 - Your Response : Entry # 4568

Select your jurisdiction

Virginia

Name

Kelli Moss

Title

Executive Director

Provide your answer

Euthanasia certification is performed by a different state agency, [Virginia Department of Agricultural and Consumer Services](#) (VDACS), which also regulates and inspects animal shelters.

Question - Euthanasia Technician Regulation - 12-12-25 - Your Response : Entry # 4341

Select your jurisdiction

Louisiana

Name

Jared Granier

Title

Executive Director

Provide your answer

Louisiana does issue certificates for individual Animal Euthanasia Technicians to euthanize at animal shelters. The statutes and rules can be found at www.lsbvm.org/practice-act. Statutes are La. R.S. 37:1551-1558 and Rules are in Chapter 12 of the LA Administrative Code 46:LXXXV.

Question - Euthanasia Technician Regulation - 12-12-25 - Your Response : Entry # 4313

Select your jurisdiction

Kentucky

Name

Michelle Shane

Title

Question - Euthanasia Technician Regulation - 12-12-25 - Your Response : Entry # 4313

Animal Euthanasia Specialists (AESs)

Provide your answer

Kentucky licenses Animal Euthanasia Specialists (AESs) with strict scope of practice. [KRS 321.207](#) and [KRS 321.208](#) establish the Board's authority as well as certain scope of practice restrictions. The following administrative regulations govern in more detail:

- [201 KAR 16:514](#) - Fees for animal control agencies and animal euthanasia specialists
- [201 KAR 16:550](#) - Authorization for animal control agencies to apply for a restricted controlled substances certificate from DEA
- [201 KAR 16:552](#) - Responsibilities for certified animal control agencies; limitations on drugs
- [201 KAR 16:560](#) - Certification as an animal euthanasia specialist
- [201 KAR 16:562](#) - Duties and responsibilities of an animal euthanasia specialist
- [201 KAR 16:572](#) - Certificate renewal for animal control agencies and animal euthanasia specialists; renewal notice

Animal Control Officers (ACOs) in Kentucky are governed under a different chapter ([KRS Chapter 258](#)), and, unless an ACO is also licensed by KBVE, they cannot perform chemical euthanasia in the field -- the ACO's only options for euthanasia are: 1) dispatch by gun, or 2) taking the animal to a veterinarian or KBVE-certified AES for euthanasia.

Training is required to become a KBVE-certified AES -- a 16 hour Euthanasia By Injection (EBI) course. KBVE contracts with an EBI course vendor and the workshops are held at board-certified Animal Control Agencies (ACAs). The curriculum is based off the HSUS EBI training, but has been modified for Kentucky's laws.

Please let me know if you have additional questions.

Question - Euthanasia Technician Regulation - 12-12-25 - Your Response : Entry # 4310

Select your jurisdiction

New Mexico

Name

Deborah Schenk

Title

Executive Director

Provide your answer

New Euthanasia Techs must send in an application, fee, photo, HS Diploma or College degree, clear background check and an approved euthanasia training class and once all documents are received, we issue a license which is good for 1 year. We also require 4 hours of continuing education annually.

16.24.2.13 APPLICATION FOR LICENSURE AS A EUTHANASIA TECHNICIAN:

A. In order to obtain a license as a licensed euthanasia technician, the applicant shall submit the following documentation and a completed application on a form provided by the board which may available online, accompanied by the required fees:

- (1) proof of age indicating the applicant is at least 18 years of age, such as a copy of a driver's license or a copy of a state issued identification card (do not submit a copy of a birth certificate);
- (2) two, two inch by two inch original photographs taken within the past six months;

Question - Euthanasia Technician Regulation - 12-12-25 - Your Response : Entry # 4310

- (3) a notarized authorization for release of information form;
- (4) state criminal history background check as specified in 16.24.2.17 NMAC;
- (5) verification that the applicant holds a high school diploma or its equivalent;
- (6) verification that the applicant holds a certificate of completion, or similar document, of a board approved euthanasia technician training course within three years preceding the date the application for licensure is submitted, which course shall be approved as described in 16.24.2.18 NMAC;
- (7) verification of passing a board approved examination administered by a certified euthanasia instructor at a board approved euthanasia training course with a grade of at least eighty percent;
- (8) passing an examination, administered by the board, with a grade of at least eighty percent;
- (9) any other information or verifications the board may request.

B. Sixty-day temporary euthanasia technician license.

(1) A temporary license may be issued at the discretion of the board. The temporary license is intended to assist a licensed euthanasia agency to hire trained personnel in the event the agency's only licensed euthanasia technician leaves the agency or is no longer able to perform euthanasia for any reason. The temporary license is valid for a period of no more than 60 calendar days. The temporary license cannot be renewed by the euthanasia technician. No more than one temporary license may be granted to an individual unless approved by the board in consideration of extenuating circumstances.

(2) To qualify for a temporary license, an applicant shall submit all items required in Paragraphs (1) through (6) of Subsection A of 16.25.11.12 NMAC.

[16.24.2.13 NMAC - N, 7/1/18

If you have a file you would like to submit, please upload here:

- [Title-16-Chapter-24-July-2025.pdf](#)

Question - Euthanasia Technician Regulation - 12-12-25 - Your Response : Entry # 4268

Select your jurisdiction

District of Columbia

Name

Vito DelVento

Title

Executive Director

Provide your answer

DC does offer registration for Veterinary Euthanasia Technicians.

The below link contains all the education and background necessary to meet the check list requirements for both Veterinary Technicians and Veterinary Euthanasia Technicians.

The link for all checklists:

Question - Euthanasia Technician Regulation - 12-12-25 - Your Response : Entry # 4268

<https://dchealth.dc.gov/service/board-veterinary-medicine-veterinarians-licensing>

Question - Euthanasia Technician Regulation - 12-12-25 - Your Response : Entry # 4266

Select your jurisdiction

Texas

Name

Brittany Sharkey

Title

Executive Director

Provide your answer

There is an exception to the Texas VLA for animal shelter employees and animal control officers performing euthanasia in the course of their duties. They are required to undergo a training designed and administered by our Department of State Health Services prior to performing euthanasia.

Select your jurisdiction

Mississippi

Nancy Christiansen

Executive Director

Mississippi does not regulate euthanasia technicians. However, veterinary technicians employed in shelters, may, under supervision of a licensed veterinarian, perform euthanasias.

Question - Euthanasia Technician Regulation - 12-12-25 - Your Response : Entry # 4259

New York

Question - Euthanasia Technician Regulation - 12-12-25 - Your Response : Entry # 4259

Name

Stephen Boese

Title

Executive Secretary

Provide your answer

In NYS, the Department of Health regulates euthanasia techs. Please see https://www.health.ny.gov/professionals/narcotic/licensing_and_certification/animal_control.htm

Question - Euthanasia Technician Regulation - 12-12-25 - Your Response : Entry # 4254

Select your jurisdiction

North Carolina

Name

Keith West

Title

Executive Director

Provide your answer

In NC these certifications are part of the NC Department of Agriculture and Consumer Services. Here are links with all the requested information:

<https://www.ncagr.gov/veterinary/aws/cetfaqs>

<https://www.ncagr.gov/divisions/veterinary/aws/euthanasia>

Question - Euthanasia Technician Regulation - 12-12-25 - Your Response : Entry # 4251

Select your jurisdiction

Georgia

Name

Question - Euthanasia Technician Regulation - 12-12-25 - Your Response : Entry # 4251

Adrienne Price

Title

Executive Director

Provide your answer

In Georgia, the Georgia Department of Agriculture regulates certified euthanasia technicians and/or licenses certified animal control agencies. It must be performed by a licensed veterinarian or physician or a lay person who is properly trained in the proper and humane use of a method of euthanasia. Such lay person shall perform euthanasia under supervision of a licensed veterinarian or physician. This shall not be construed so as to require that a veterinarian or physician be present at the time euthanasia is performed. The legal provisions can be found in the Georgia Animal Protection Act (O.C.G.A. § 4-11-1) and Georgia Department of Ag's rules (Chapter 40-13-13).

Question - Euthanasia Technician Regulation - 12-12-25 - Your Response : Entry # 4250

Select your jurisdiction

Illinois

Name

Rochelle Hartman

Title

Board Liaison

Provide your answer

In Illinois, a veterinarian may work with shelter or rescue groups to provide euthanasia. A shelter or rescue may also employ a [Certified Euthanasia Technician](#).

We have three licenses related to euthanasia: Technician, [Agency](#), and [Agency Controlled Substance](#).

The Rule specifies the sources of that training for licensing or certification. One of our veterinary board members, an animal control professional, provides euthanasia training in Illinois and neighboring states. It's my understanding that she is one of very few such trainers. My agency's Act and Rules apply specifically to animal shelters. There would be separate regulations for wildlife and livestock through Depts of Natural Resources and Agriculture.

Question - Euthanasia Technician Regulation - 12-12-25 - Your Response : Entry # 4249

Select your jurisdiction

Oklahoma

Name

Question - Euthanasia Technician Regulation - 12-12-25 - Your Response : Entry # 4249

Cathy Kirkpatrick

Title

Executive Director

Provide your answer

Yes we do certify euthanasia technicians since 2004. Must be employee of an animal control, animal shelter or can be employee of a 501c3 organization.

I copied and paste the CAET from our Statutes and Rules.

If you have a file you would like to submit, please upload here:

- [Certified-Animal-Euthnasia-Tech-OKlahoma.docx](#)

Question - Euthanasia Technician Regulation - 12-12-25 - Your Response : Entry # 4248

Select your jurisdiction

West Virginia

Name

Trish Holstein

Title

Executive Director

Provide your answer

1. WV does issue a certificate for animal euthanasia technicians.
 - a. They must submit an application and provide the required documentation. Here is a link to the application checklist: <https://wvbvm.gov/Home/Practitioners/Certified-Animal-Euthanasia-Technicians/Certification-Application/CAET-Application-Checklist>
2. The Board developed and provides a 3 day training.