



**CALIFORNIA VETERINARY MEDICAL BOARD
MULTIDISCIPLINARY ADVISORY COMMITTEE
MEETING MINUTES
January 14, 2025**

In accordance with Government Code section 11122.5, the Multidisciplinary Advisory Committee (Committee) of the California Veterinary Medical Board (Board) met in-person with additional public participation available via teleconference/WebEx Event on **Tuesday, January 14, 2025**, with the following location available for Committee and public member participation:

Department of Consumer Affairs
1625 North Market Boulevard, Hearing Room
Sacramento, CA 95834

Webcast Link: <https://youtu.be/3gN84kRefL8>

10:00 a.m., Tuesday, January 14, 2025

1. Call to Order / Roll Call / Establishment of a Quorum

Committee Chair, Richard Sullivan, Doctor of Veterinary Medicine (DVM), called the meeting to order at 10:00 a.m. Executive Officer (EO), Jessica Sieferman, called roll, and all nine members of the Committee were present; a quorum was established.

A moment of reflection was conducted for the people and animals impacted by the wildfires in Los Angeles County.

Members Present

Richard Sullivan, DVM, Chair
Marie Ussery, Registered Veterinary Technician (RVT), Vice Chair
Kathy Bowler
Jeni Goedken, DVM
Barrie Grant, DVM, Board Liaison (Remote)
Mark Nunez, DVM
Kristi Pawlowski, RVT, Board Liaison
Leah Shufelt, RVT
Cheryl Waterhouse, DVM

Staff Present

Jessica Siefertman, EO
Matt McKinney, Deputy EO
Patty Rodriguez, Enforcement Manager
Ashley Sanchez, Enforcement Manager
Rob Stephanopoulos, Enforcement Manager
Susan Acklin, Licensing Technician
Kimberly Gorski, Enforcement Analyst
Amber Kruse, Enforcement Analyst
Anh-Thu Le, Enforcement Analyst
Jeff Olguin, Administration Analyst
Justin Sotelo, Policy Specialist

Department of Consumer Affairs (DCA) Staff Present

Julianne Allen, Legislative Analyst, DCA, Legislative Affairs Division
David Bouilly, Moderator, DCA, Strategic Organizational Leadership and Individual Development (SOLID)
Judie Bucciarelli, Staff Services Manager, DCA, Executive Office
Elizabeth Dietzen-Olsen, Regulations Counsel, Attorney III, DCA, Legal Affairs Division
Peter Fournier, Information Officer I, DCA, Office of Public Affairs (OPA)
Melissa Gear, Deputy Director, DCA, Board and Bureau Relations
Christina Kitamura, Analyst, Board of Behavioral Sciences (BBS)
Bryce Penney, Television Specialist, DCA, OPA
Tara Welch, Board Counsel, Attorney IV, DCA, Legal Affairs Division

Guests Present

Lori Aldrete
Karen Atlas, President, Animal Physical Therapy Coalition (APTC)
Dan Baxter, Executive Director, California Veterinary Medical Association (CVMA)
Christina Bradbury, DVM, Board Member
Pamela Collier, RVT
Jaye Eaton
Nancy Ehrlich, RVT, California Registered Veterinary Technicians Association (CaRVTA)
Laura Kibby
Karen Kolber
Steven A. Maio
Michael Manno, DVM, Equine Veterinarian
Grant Miller, DVM, Director of Regulatory Affairs, CVMA
Amy Rice, RVT
Maria Solacito, DVM, Board Member

Julianna Tetlow, San Diego Humane Society
Kristy Veltri, RVT
Bruce Wagman, Esq., Riley Safer Holmes & Cancila, LLP
Pamela Wittenberg, DVM
Scott Young
Patrica Zehna, RVT

2. Public Comment on Items Not on the Agenda

Public Comment: Dr. Sullivan requested public comment on this item. The following comment was made:

- [Steven Mayo](#) provided the Committee with the following written public comment read into the record by Ms. Sieferman:

Regulation Request: Written Notification Provided by a Veterinary Practice to Animal Owners of the Availability of their Animal's Medical Records

Mr. Mayo's written public comment stated Jeff Olguin was kind enough to respond to his voicemail regarding the proposed changes to medical records [California Code of Regulations (CCR), title 16, section] 2032.3. The written public comment provided a brief background, stating Mr. Mayo and his wife lost their nearly 15-year-old beloved dog, Bambi, on March 22, 2024, which the couple adopted when she was nine weeks old. The written public comment stated the couple had filed complaints against the veterinarians with the [Board] and were told it was being investigated. The written public comment stated they were told one thing by their veterinarians, but the written record of Bambi revealed a completely different scenario. Along with numerous violations of the Board's rules and regulations, the couple was never given those records nor even informed that they existed prior to Bambi's passing. It was not until Bambi's passing, and a lot of research, that the couple became aware of their right to request her records. The written public comment stated Bambi would have had a better chance at a longer life, but nobody ever told them the record existed or that they had a right, as per the regulations, to request them; as a member of the public, the public needs to know that these records exist. The written public comment stated it will be so simple to add a regulation that requires veterinary practices to inform pet owners, in writing, that these records of the pet(s) exist, and pet owners have the right to request them. Mr. Mayo wrote it amazed him that it is not a requirement. If the public does not know these records exist, how can they ever request them; knowledge is power. Mr. Mayo inquired why not give the public that knowledge; what could possibly be a problem with giving pet owners a simple information.

Closing Remarks and Request for a Response

The written public comment concluded that Mr. Mayo is a licensed California realtor for over 40 years; [realtor] paperwork is tremendous, but they inform their clients that they have access to it all. If realtors can provide the information to the public when all they are doing is selling brick and mortar, should not the [veterinary] profession also inform the public when living, breathing creatures are involved. He requested that an individual from the Board's rules and regulations section read the request and respond.

3. Review and Approval of October 15, 2024 Committee Meeting Minutes

The Committee made minor changes to the [October 15, 2024 meeting minutes](#).

Motion: Dr. Sullivan requested a motion. Kristi Pawlowski, RVT, moved and Kathy Bowler seconded a motion to approve the October 15, 2024 meeting minutes as amended.

Public Comment: Dr. Sullivan requested public comment on the motion. There were no public comments made on the motion.

Roll Call Vote: Dr. Sullivan called for the vote on the motion. Ms. Sieferman took a roll call vote on the motion. The motion carried 9-0.

Members	Vote			
	Yea	Nay	Abstain	Absent
Richard Sullivan, DVM, Chair	X			
Marie Ussery, RVT, Vice Chair	X			
Kathy Bowler	X			
Jeni Goedken, DVM	X			
Barrie Grant, DVM	X			
Mark Nunez, DVM	X			
Kristi Pawlowski, RVT	X			
Leah Shufelt, RVT	X			
Cheryl Waterhouse, DVM	X			

Dr. Nunez thanked the Board and its staff for improving the minutes from the version of the minutes used in the past.

4. **Update, Discussion, and Potential Recommendation from the Executive Subcommittee—*Richard Sullivan, DVM and Marie Ussery, RVT***

A. **[Proposed Legislation to Repeal Business and Professions Code \(BPC\) Sections 4838 and 4846.5 and Add Article 3.1 \(Sections 4858, 4858.1, 4858.2, and 4858.3\) Regarding Continuing Education](#)**

Dr. Sullivan presented the [meeting materials](#), including the [legislative proposal](#), to the Committee.

Discussion: The Committee reviewed the meeting materials, discussed the legislative proposal, and allowed for public comment on each section of the proposal as follows:

[Repeal BPC Section 4838](#)

- The Committee had no objections or changes to the [proposed repeal of BPC section 4838](#).

Public Comment: Dr. Sullivan requested public comment on this item. There were no public comments made on this item.

[Repeal BPC Section 4846.5](#)

- The Committee had no objections or changes to the [proposed repeal of BPC section 4846.5](#).

Public Comment: Dr. Sullivan requested public comment on this item. There were no public comments made on this item.

[Add Article 3.1 \(Sections 4858, 4858.1, 4858.2, and 4858.3\)](#)

[Add BPC Section 4858](#)

- The Committee had no objections or changes to the [proposed addition of BPC section 4858](#) and discussed the section as follows.
- **Review of Exemption Requests:** Under subdivision (e), Dr. Nunez inquired if the exemption was issued by the EO or discussed in closed session by the Board. Ms. Siefertman responded that the exemption is implemented by the Board and Board staff. Board staff will receive the request and utilize the regulations it has for review and approval/denial of the request.

Public Comment: Dr. Sullivan requested public comment on this item. There were no public comments made on this item.

Add BPC Section 4858.1

- The Committee discussed and made revisions to the [proposed addition of BPC section 4858.1](#) as follows.
- **Local Affiliated Associations:** Under subdivision (b)(1)(B), Ms. Pawlowski inquired if the local affiliated associations were currently covered under existing law.

Dr. Sullivan confirmed that the associations were covered under current law, and the proposed language cleans up the location of the approved continuing education (CE) providers. He added the Subcommittee went over it thoroughly to ensure it was not missing any items; it also consulted the CVMA on the items.

Ms. Sieferman added that after meeting with the CVMA and CaRVTA, neither entity had any concerns with this section of the legislative proposal.

- **Affiliated Human Medicine Associations:** Under subdivision (b)(1)(D), Dr. Nunez inquired if the American Medical Association (AMA) and American Dental Association (ADA) were currently covered under existing law. Dr. Sullivan responded that the wording was from existing law.

Dr. Nunez thought that human doctors do not know veterinary medicine. He provided an example of a human doctor referring a pet owner to have their cat checked at a veterinary clinic because the human owner was diagnosed with ringworm, which the human doctor stated the human patient got from the cat. He understood it was current law, but he inquired why the human organizations were allowed in statute in the first place.

Dr. Sullivan believed it was due to One Health. He recalled receiving credit for a CE course in One Health that was presented by medical professionals and veterinarians. Dr. Nunez inquired if it would be difficult to clarify that [One Health] is the type of CE that is approved.

Ms. Sieferman read the [proposed language in subsection \(b\)\(1\)](#). She noted it was not a blanket approval for all CE providers, but the courses must be relevant to veterinary medicine.

Dr. Waterhouse noted that veterinary specialists may attend human medical [courses to obtain new ideas, treatments, or procedures] since it is difficult for them to find experts in their field.

- **CE Credit Calculation for Performing Pro Bono Spay and Neutering Services:** Under subdivision (b)(2)(B), Dr. Waterhouse inquired if one hour of surgery equals one hour of CE for licensees providing pro bono spay and

neutering services or if neutering one dog would grant a licensee with four hours of CE credit.

Dr. Sullivan responded that it is understood it is one hour of CE credit for one hour of work. Ms. Sieferman clarified that credit for earning CE is defined in regulation ([CCR, tit. 16, § 2085.3](#), subs. (a)).

Dr. Waterhouse inquired if the hours credit earned only applies to CE coursework earned under a lecturer. Ms. Sieferman responded that it would apply to all CE hours earned.

Dr. Waterhouse was concerned the language did not define how a licensee would earn the four hours of CE credit. Ms. Sieferman responded that once the legislative proposal goes through, the Board could review its CE regulations; if the regulations were unclear because they referred to courses and not services, a rulemaking package would be presented in the future.

- **Removing Unnecessary Text:** Under subdivision (b)(1), Ms. Welch asked the Committee to consider removing “notwithstanding any other law” as she was unaware of any other law that requires CE for veterinarians; she noted the language was not included in the CE legislative proposal for RVTs.

Dr. Goedken inquired if “notwithstanding any other law” accounted for federal [laws] because there are some federal Drug Enforcement Administration (DEA) requirements that exempt veterinary medicine.

Ms. Welch read out subdivision (a), which is the statute for CE requirements for veterinarians to maintain their California issued veterinarian license and reiterated that the disclaimer “notwithstanding any other law” did not appear to be necessary. She noted a licensee could potentially use a course or CE that was a requirement for their federal or DEA registration to also comply with their California veterinarian license renewal requirements.

Dr. Goedken believed veterinarian licensees could use the CE they earned for their DEA registration for their California veterinarian license renewal. She inquired if there was any other organization or law that would stand alone that was not included.

Ms. Welch responded no and the language “notwithstanding any other law” means do not look at any other legal requirements; this is how a licensee satisfies their CE hours by attending courses relevant to veterinary medicine. She reiterated her suggestion to remove the language.

Ms. Welch also suggested the Committee consider removing “notwithstanding paragraph (1)” from subdivision (b)(2). She noted subdivision (b)(1) establishes the courses, while subsequent subdivisions provide additional ways to satisfy the CE requirement. She added if the language “notwithstanding paragraph (1)” remained, it would need to be added to the beginning of paragraphs (3), (4), and (5) of subdivision (b).

Dr. Sullivan agreed with Ms. Welch’s suggestion for subdivision (b)(1), but he questioned the removal in subdivision (b)(2).

Ms. Welch suggested restructuring subdivision (b) to begin “Continuing education hours for veterinarians shall be earned as follows.” She stated the Committee also had the option to change “shall” to “may.”

Ms. Welch also suggested subdivision (b)(1) state “attending courses relevant to veterinary medicine and sponsored or cosponsored by any of the following.” The new suggested language establishes all the different ways a veterinarian can satisfy the CE requirement.

The Committee accepted Ms. Welch’s recommendation, while also keeping “shall” in subdivision (b).

- **Veterinarian Mental Health and Wellness Courses:** The Committee discussed the current language under subdivision (b)(5), regarding CE credit for attending stress seminars and whether the topic of those seminars is how to manage stress. Ms. Welch interpreted the provision to mean managing veterinarian stress for veterinarian health. She noted the Dental Board of California has a statute that provides CE credit for taking courses in mental and physical wellness of the practitioner to help improve the dental professional’s ability to practice. She advised the Committee it could expand on the term “stress” in the proposed language to describe the kinds of courses practitioners could take to promote their own mental and physical wellbeing as it relates to the practice on animals. Dr. Nunez inquired whether those types of courses would be accredited by the accrediting bodies. Ms. Welch responded potentially; when the Board authorizes CE credit for courses, the course providers begin offering those types of courses. She noted that if “stress” courses is not descriptive enough of the kinds of courses practitioners could take to better manage their own mental and physical wellbeing to improve their practice, then the Committee may want to consider adding a word or two that describes the kinds of stress or wellness courses. Dr. Nunez asked whether taking a yoga class would qualify. Dr. Goedken responded no, the courses would be mental health supporting seminars directed toward veterinarians, which CVMA and local veterinary associations offer to manage burnout, crises, and suicide prevention. These are veterinary related courses, not just going

to the gym or having a spa day. Ms. Pawlowski noted the language does not currently limit the courses to veterinary related courses; she cautioned the Committee to utilize veterinary-related stress language. Ms. Welch provided the Committee with the following suggested options to clarify the proposed language:

- Combining paragraph (5) with paragraph (1) since both paragraphs are specific to coursework.
- Rewriting paragraph (5) to state “For purposes of paragraph (1)” at the beginning of the provision and replacing “stress seminars” at the end with “licensee mental health and wellness and its impact on the delivery of veterinary services.” These revisions would clarify the paragraph (5) courses would be tied to the course providers listed in paragraph (1) and provide a relationship between the mental health and wellness course and the practice of veterinary medicine. This provision would not be combined with paragraph (1) because the paragraph (5) course hours are limited to only 24 hours.

The Committee accepted Ms. Welch’s second recommendation. The Committee also questioned the percentage of 24 hours under paragraph (5) authorized of the total required CE credit and why 24 hours was selected. The Committee was advised that the 24 hours provision was existing regulatory language and decided to hear public comment before contemplating changing the number. Dr. Grant noted an increase in the number of business practice management and stress seminars provided by the American Association of Equine Practitioners and wondered how the CE hours would be documented during a three to five-day event. Dr. Sullivan said the CE documentation given by the program provider would have to show the CE hours by course. Ms. Siefertman confirmed the CE provider would have to document the courses and hours offered during the event that were attended by the licensee; the licensee would not automatically get credit for all of the hours offered during the event.

Public Comment: Dr. Sullivan requested public comment on this item. The following public comment was made on this item:

- [Grant Miller](#), DVM, Director of Regulatory Affairs, CVMA, provided the following public comment:

**Supports 24 Hours for Business Practice Management and
Licensee Mental Health and Wellness**

Dr. Miller thought Ms. Welch’s suggested language used from the Dental Board of California made a lot more sense. Initially, he thought the wording would be along the lines of stress management but agreed the new

proposed wording was much more appropriate. He also thought the up to 24 hours was appropriate.

Suggest Replacing “Facility or Mobile Unit” with “Premises”

During public comment for BPC section 4858.2, [Dr. Miller](#) suggested if his proposed change was made to BPC section 4858.2(b)(2)(B)(i) regarding “facility or mobile unit” was accepted, then it should also be updated in BPC section 4858.1(b)(2)(B)(i) to replace “facility or mobile unit that is registered” with “registered premises.”

The Committee considered public comment and made the following remarks:

- **Keep the 24 Hour Requirement for Business Practice Management and Licensee Mental Health and Wellness:** The Committee decided to keep the number at 24 hours for business practice management and licensee mental health and wellness in BPC section 4858.1(b)(5).
- **Replacing “Facility or Mobile Unit” with “Veterinary Premises”:** Regarding changes to “facility and mobile unit” comment from Dr. Miller, Ms. Welch suggested “facility or mobile unit that is registered” be replaced with “veterinary premises registered.” The Committee accepted the suggested revisions to BPC section 4858.1(b)(2)(B)(i).

Add BPC Section 4858.2

- The Committee discussed and made revisions to the [proposed addition of BPC section 4858.2](#) as follows.
- **Conforming Changes to Mirror the Requirements of CE for Veterinarians:** Ms. Welch suggested conforming changes to subdivision (b) for the Committee to consider, which included:
 - Removing “(1)” from (b)(1) and include “as follows” to the end of the sentence.
 - Removing “by” and inserting “(1)” before the words “attending courses.”
 - Removing “notwithstanding paragraph (1)” from the beginning of paragraph (2).
 - Inserting “for the purposes of paragraph (1)” before “up to” and replacing “stress seminars” with “licensee mental health and wellness and its impact on the delivery of veterinary services” to paragraph (5).

Ms. Siefertman inquired if the word “licensee” needed to be added to the language. Ms. Welch stated the word could be removed. The Committee

accepted the proposed changes to the language above along with not including the word “licensee” to paragraph (5).

- **CE for Participating as an Expert in an Examination Preparation Workshop:** Under subdivision (b)(4), the Committee discussed the 16 hours earned for CE for participating as an expert in an examination preparation workshop for the national examination. The Committee acknowledged the multi-day attendance and research commitment it takes for individuals developing questions for the examination and sought to provide equitable balance for CE credit.

Public Comment: Dr. Sullivan requested public comment on this item. The following public comment was made on this item:

- [Grant Miller](#), DVM, Director of Regulatory Affairs, CVMA, thanked the Board for its willingness to improve access to veterinary care by allow CE credit for RVTs performing pro bono animal health care tasks related to spay and neutering services. He also provided the following public comment:

Direct Supervision of Veterinarian for Pro Bono Spay and Neutering Services

Dr. Miller stated based on his knowledge of where shelters are going, he was concerned the proposed language allowed some ambiguity in deciding the actual supervising veterinarian. He said one change could be made to ensure that the veterinarian who is performing the spay and neuter surgery is the person under [BPC section 4858.2(b)(2)(B)](ii) and helps to provide the proof of completion. He felt it could be accomplished by adding “direct” before supervision to [BPC section 4858.2(b)(2)(B)](i). He stated it immediately tethers the supervision to a veterinarian who is on the premises and performing the surgery. He added, if it is specified “direct,” there is no opportunity for them to state they have a veterinarian who is overseeing the shelter via telemedicine and they are supervising the RVTs, so they will write the certificate. He said the intention is the veterinarian, who is doing the surgery, and the [veterinary] technician is assisting, to be the one to write the certificate. He added, it was suggested under [BPC section 4858.2(b)(2)(B)](ii) but thought if “direct” was included under [BPC section 4858.2(b)(2)(B)](i), it makes it crystal clear it has to be this veterinarian who is doing the surgery.

[Dr. Sullivan](#) inquired if [BPC section 4858.2(b)(2)(B)](ii) needed to be more specific.

[Dr. Miller](#) responded he did not think so because it states, “by the supervising veterinarian.” He added, if the word “direct” is added to [BPC

section 4858.2(b)(2)(B))(i), there is only one veterinarian; it is the one who is at the premises, in the building. He reiterated [BPC section 4858.2(b)(2)(B))(ii) would not have to be changed if the Committee added “direct” before supervision [BPC section 4858.2(b)(2)(B))(i) because it means the veterinarian is there at the premises.

Replacing “Facility or Mobile Unit” with “Premises”

Dr. Miller appreciated the Board’s efforts to help the profession understand the word “premises” because there has been so many misunderstandings about the word “premises.” He asked the Committee to consider replacing “facility or mobile unit” in [BPC section 4858.2(b)(2)(B))(i) with the word “premises.” He stated CVMA is starting to train the profession on the single term in the statute. He stated everyone knows that it is a mobile unit or a facility, but he requested the Committee get away from using a word such as “facility.” He noted the efforts to clean up the [Veterinary Medicine Practice] Act, and he felt it was a better choice of wording.

Proportional CE Credit as an Expert in Examination Preparation Workshop

Under BPC section 4858.2(b)(4), Dr. Miller questioned the 16 CE hours RVTs can earn by participating as an expert in the examination preparation. He noted it was a good point that was made that clearly it is a collaborative effort and a learning effort. His concern was that the proportion of CE allowed to an RVT to be an expert examiner in their CE allotment is higher than the proportion that is afforded to veterinarians. He stated veterinarians have a 36 unit requirement, for which they can use 16 units to be an examiner. [RVTs] have a 20 unit requirement, and they can use 16 units to be an examiner. He said that proportion is not correct. He added, if it were correct, it would be nine hours.

Proportional CE Credit for Business Practice Management and Mental Health and Wellness

Under BPC section 4858.2(b)(5), Dr. Miller questioned the 15 CE hours an RVT could earn for business practice management and mental health [and] wellbeing. He stated for veterinarians, the requirement allows 24 hours out of 36 hours. He stated if it was to be proportional, it should only be 13 hours. He asked the MDC to consider his request.

Inquiry with the Proportional Hour Difference Between Veterinarians and RVTs

Dr. Miller inquired if it was more important for RVTs to have stress management and exam writing than it is for veterinarians because in the [current proposed] ratio, it is allowing RVTs a greater proportion in that way.

Response to Public Comment: The Committee considered public comment and made the following remarks:

- **Accepted “Supervision” Changed to “Direct Supervision”:** The Committee accepted Dr. Miller’s suggestions to add “direct” before supervision to BPC section 4858.2(b)(2)(B)(i).
- **Accepted Replacing “Facility or Mobile Unit” with “Veterinary Premises”:** Regarding changes to “facility and mobile unit” comment from Dr. Miller, Ms. Welch suggested “facility or mobile unit that is registered” be replaced with “veterinary premises registered.” The Committee accepted the suggested revisions to BPC section 4858.2(b)(2)(B)(i).
- **Reduced CE Hours for RVTs Under Subdivision (b)(4) and (5):** In addition, the Committee discussed the proportional issues between maximum CE hours permitted for RVTs versus veterinarians. The Committee discussed the equity challenges for RVTs who provided 16 hours of CE for participating as an expert under (b)(4), but determined that individuals providing this service were doing so for the betterment of the profession rather than to earn CE credit. The Committee agreed it made sense to make the hours proportional by reducing the credit for RVTs, so they accepted the following changes:
 - Reducing “16” hours to “nine” hours under subdivision (b)(4).
 - Reducing “15” hours to “13” hours under subdivision (b)(5).

Add BPC Section 4858.3

- The Committee discussed and made revisions to the [proposed addition of BPC section 4858.3](#) as follows.

Public Comment: Dr. Sullivan requested public comment on this item. The following public comment was made on this item:

- During public comment for BPC section 4858.2, [Dr. Miller](#) noted BPC section 4858.3(b) was a great idea. However, he thought one part could be reworded to make it a little bit more plausible for CVMA as a provider. He noted Ms. Siefertman had mentioned that when an individual goes to a big

CE event, the individual receives a certificate that has all the courses, and the individual checks off the ones they took.

Maximum Number of Hours Offered at the CE Event

Dr. Miller said [BPC section 4858.3](b)(2) states “the maximum number of hours that an individual attendee *can earn*...” He stated that is hard to predict; it is easier to state, “the maximum number of hours *offered at this CE event*.” He provided an example where an individual could go to a breakfast symposium at 7 a.m., go all day long and not take a break, and go to a night symposium; this individual could potentially claim they earned 12 units in a day. He did not think that was what the Board wanted. He thought the Board wants to know how many CE units are offered [at the CE event]. He provided another example of a person claiming they did 36 units, while only 30 [units] were offered at the event. He requested the Committee consider changing the words “that an individual attendee can earn” to “offered at the CE event” because [CE providers] do not have the clairvoyance to tell [an attendee] what they can earn. He noted if there was something else the Committee is trying to get out there and the CVMA is misunderstanding, then he requested looking at the wording a little bit and deciding what it is the Committee is actually after.

Response to Public Comment: The Committee considered public comment and made the following remarks:

- **Replacing “Can Earn” with “Offered at the CE Event”:** Regarding Dr. Miller’s suggestion, Ms. Welch’s only revision was to spell out “continuing education.” Ms. Siefertman advised there was a difference between how many hours offered versus hours that were approved by organizations, such as the American Association of Veterinary State Board’s (AAVSB’s) Registry of Approved Continuing Education (RACE) provider. She noted a provider might offers 20 hours of CE, but only 10 hours are approved by RACE.

The Committee discussed and accepted the suggested revisions to BPC section 4858.3(b)(2).

Revisions to the Text: The Committee approved the following revisions to the proposed text (proposed additions are in double underline blue text; proposed deletions are in ~~double red strikethrough text~~):

§ 4858.1.

[...]

- (b) ~~(1) Notwithstanding any other law, e~~ Continuing education hours for veterinarians shall be earned as follows:

- (1) ~~by a~~ Attending courses relevant to veterinary medicine and sponsored or cosponsored by any of the following:

[...]

- (2) ~~Notwithstanding paragraph (1), a~~ total of six hours or less of the required 36 hours of continuing education may be earned by doing either of the following, or a combination thereof:

[...]

- (B) (i) The services shall be performed at a ~~facility or mobile unit that is~~ veterinary premises registered with the board pursuant to Section 4853.

[...]

- (5) ~~For purposes of paragraph (1), u~~ up to 24 hours of continuing education credit may be earned for completing courses in business practice management or ~~stress seminars~~ licensee mental health and wellness and its impact on the delivery of veterinary services.

[...]

§ 4858.2.

[...]

- (b) ~~(1)~~ Continuing education hours for registered veterinary technicians shall be earned as follows:

- (1) ~~by a~~ Attending courses provided by those specified in subparagraphs (A) through (D) of paragraph (1) of subdivision (b) of Section 4858.1 or sponsored or cosponsored by one of the following:

[...]

- (2) ~~Notwithstanding paragraph (1), u~~Up to four hours of the required 20 hours of continuing education may be earned by doing either of the following, or a combination thereof:

[...]

- (B) (i) The services shall be performed under the [direct](#) supervision of a licensed veterinarian at a ~~facility or mobile unit that is~~ [veterinary premises](#) registered with the board pursuant to Section 4853.

[...]

- (4) Up to ~~16~~ [nine](#) hours of continuing education credit may be earned by participating as an expert in an examination preparation workshop for the national licensing examination.
- (5) [For purposes of paragraph \(1\), U](#) ~~up to 15~~ [13](#) hours of continuing education credit may be earned for completing courses in business practice management or ~~stress seminars~~ [mental health and wellness and its impact on the delivery of veterinary services](#).

[...]

§ 4858.3.

[...]

- (b) (2) The maximum number of hours ~~that an individual attendee can earn~~ [offered at the continuing education event](#), accompanied by a log of the actual courses attended by the attendee. The log of courses attended shall be completed by either the provider or the attendee.

[...]

Motion: Dr. Sullivan requested a motion. Kristi Pawlowski, RVT, moved and Cheryl Waterhouse, DVM, seconded a motion to recommend to the Board submission to the California State Legislature the legislative proposal as amended to repeal BPC sections 4838 and 4846.5 and add Article 3.1 (sections 4858, 4858.1, 4858.2, and 4858.3) regarding continuing education.

Public Comment: Dr. Sullivan requested public comment on the motion. There were no public comments made on the motion.

Roll Call Vote: Dr. Sullivan called for the vote on the motion. Ms. Sieferman took a roll call vote on the motion. The motion carried 9-0.

Members	Vote			
	Yea	Nay	Abstain	Absent
Richard Sullivan, DVM, Chair	X			
Marie Ussery, RVT, Vice Chair	X			
Kathy Bowler	X			
Jeni Goedken, DVM	X			
Barrie Grant, DVM	X			
Mark Nunez, DVM	X			
Kristi Pawlowski, RVT	X			
Leah Shufelt, RVT	X			
Cheryl Waterhouse, DVM	X			

B. [Proposed Legislation to Further Amend Section 4841.5 Regarding Continuing Education](#)

Ms. Ussery presented the [meeting materials](#), including the [legislative proposal](#), to the Committee.

Discussion: The Committee reviewed the meeting materials and accepted the legislative proposal without any changes.

Motion: Mark Nunez, DVM, moved and Kristi Pawlowski, RVT, seconded a motion to recommend to the Board submission to the California State Legislature the legislative proposal to further amend BPC section 4841.5 regarding veterinary technician registration examination requirements.

Public Comment: Dr. Sullivan requested public comment on the motion. There were no public comments made on the motion.

Roll Call Vote: Dr. Sullivan called for the vote on the motion. Ms. Sieferman took a roll call vote on the motion. The motion carried 9-0.

Members	Vote			
	Yea	Nay	Abstain	Absent
Richard Sullivan, DVM, Chair	X			
Marie Ussery, RVT, Vice Chair	X			
Kathy Bowler	X			
Jeni Goedken, DVM	X			
Barrie Grant, DVM	X			
Mark Nunez, DVM	X			
Kristi Pawlowski, RVT	X			
Leah Shufelt, RVT	X			
Cheryl Waterhouse, DVM	X			

C. [Proposed Legislation to Amend BPC Sections 4846 and 4848.1 Regarding Veterinarian License Requirements](#)

Ms. Ussery presented the [meeting materials](#), including the [legislative proposal](#), to the Committee.

Discussion: The Committee reviewed the meeting materials and accepted the legislative proposal without any changes.

Motion: Mark Nunez, DVM, moved and Jeni Goedken, DVM, seconded a motion to recommend to the Board submission to the California State Legislature the legislative proposal to amend BPC sections 4846 and 4848.1 regarding veterinarian license requirements.

Public Comment: Dr. Sullivan requested public comment on the motion. There were no public comments made on the motion.

Roll Call Vote: Dr. Sullivan called for the vote on the motion. Ms. Sieferman took a roll call vote on the motion. The motion carried 9-0.

Members	Vote			
	Yea	Nay	Abstain	Absent
Richard Sullivan, DVM, Chair	X			
Marie Ussery, RVT, Vice Chair	X			
Kathy Bowler	X			
Jeni Goedken, DVM	X			
Barrie Grant, DVM	X			
Mark Nunez, DVM	X			
Kristi Pawlowski, RVT	X			
Leah Shufelt, RVT	X			
Cheryl Waterhouse, DVM	X			

D. [Proposed Legislation to Amend BPC Section 4883 Regarding Disciplinary Action](#)

Ms. Ussery presented the [meeting materials](#) to the Committee. Ms. Sieferman noted the language was moved from the authority from BPC section 4846.5(g) to BPC section 4883(k).

Discussion: The Committee reviewed the meeting materials and accepted the legislative proposal without any changes.

Motion: Dr. Sullivan requested a motion. Mark Nunez, DVM, moved and Jeni Goedken, DVM, seconded a motion to recommend to the Board submission to

the California State Legislature the legislative proposal to amend BPC section 4883 regarding disciplinary action.

Public Comment: Dr. Sullivan requested public comment on the motion. There were no public comments made on the motion.

Roll Call Vote: Dr. Sullivan called for the vote on the motion. Ms. Sieferman took a roll call vote on the motion. The motion carried 9-0.

Members	Vote			
	Yea	Nay	Abstain	Absent
Richard Sullivan, DVM, Chair	X			
Marie Ussery, RVT, Vice Chair	X			
Kathy Bowler	X			
Jeni Goedken, DVM	X			
Barrie Grant, DVM	X			
Mark Nunez, DVM	X			
Kristi Pawlowski, RVT	X			
Leah Shufelt, RVT	X			
Cheryl Waterhouse, DVM	X			

5. **Update, Discussion, and Potential Recommendation from the Telemedicine Subcommittee—Richard Sullivan, DVM, and Kristi Pawlowski, RVT**

A. **[Proposed Legislation to Amend BPC Sections 4825.1 and 4826.6 Regarding Veterinary Medicine Definitions and Telehealth](#)**

Dr. Sullivan stated the Subcommittee decided to postpone the item in order to have a larger discussion with the stakeholders and hope to present the item at the April 2025 Committee meeting.

6. **Update, Discussion, and Potential Recommendations from the Unlicensed Practice Subcommittee—Barrie Grant, DVM, and Mark Nunez, DVM**

A. **[Proposed Legislation to Amend BPC Section 4827 Regarding Veterinary Medicine Practice Exemptions](#)**

Dr. Nunez and Dr. Grant presented the [meeting materials](#), including the [legislative proposal](#), to the Committee.

Discussion: The Committee reviewed the meeting materials, discussed the legislative proposal, and received public comment after discussion as follows:

- **Clarifying the Term “Livestock” for Equines in Teams:** In discussion of proposed revisions to BPC section 4825.1, subdivision (e), the Committee

discussed several challenges for defining the word “livestock.” Dr. Grant suggested the sentence providing for exclusion of certain species from the definition of “livestock” be amended to include instances where equines were a part of a team. He noted equines could be part of polo teams or Olympic jump teams.

- **Commercial Equines:** The Committee discussed commercial equines and how they have been used in the U.S. and/or Canada, including commercial equines used in feed lots for slaughter (no longer permitted), for a collection of pregnant mares serum, mares for the collection of urine, and pharmaceutical use with progesterone. It was also noted that commercial equines might be considered part of a herd.
- **Equines Managed by the Federal Government:** The Committee discussed wild horses that are managed by the U.S. Bureau of Land Management (BLM) and how it might impact the definition of livestock. The Committee discussed concerns over the term “for profit” based on wild horses managed by BLM. The Committee ultimately determined that equines managed by the federal government would not be subject to California’s laws.
- **Considered Language:** The Committee discussed the proposed language in the meeting materials for BPC section 4825.1(e), which states:

“Livestock” includes all animals, poultry, aquatic and amphibian species that are raised, kept, or used for profit. It does not include those species that are usually kept as pets, such as dogs, cats, and pet birds, ~~or companion animals, including equines~~ any animal in individual training, or any animal that competes as an individual.

The Committee considered the following changes to the language to address examples of equines in a team, group, or used for competition:

- “~~...including equines~~ any animal in individual training, or any animal that competes as an individual ~~or team.~~”
- “~~...including equines~~ any animal in individual training, or any animal that competes as an individual ~~or on a team.~~”
- “~~...including equines~~ any animal in individual training, or any animal that competes ~~as an individual.~~”

When discussing the proposed changes, Ms. Siefertman noted that the Board receives enforcement cases related to rescues, which include rescuing equines. The rescues perform surgeries on equine(s) without licensed individuals. In the scenarios, it was thought the equines would be considered companion animals. She added it was a request from the

Board, during its strategic planning session, to include equine in the definition of livestock.

Ms. Welch noted some of Dr. Grant's examples (polo teams or Olympic jump teams) did not appear to be competition, but rather equines participating in an exhibition event. To reduce confusion, she suggested the following language:

- "...including equines any animal ~~in individual training, or any animal that competes as an individual~~ that competes or is used in an athletic or entertainment event."

The Committee considered Ms. Welch's proposed language, but also considered the following:

- "...including equines any animal ~~in individual training, or any animal that competes as an individual~~ involved in exhibition or competition activities."
- "...including equines any animal ~~in individual training, or any animal that competes as an individual~~ at some point was used in exhibition or competition."

- **Challenges of Including Equines in the Livestock Definition:** The Committee discussed the challenges of including equines under "livestock" due to the following circumstances:
 - Equines not being defined by the federal government as livestock.
 - Ranchers keeping a group of horses to work their livestock, where the horses were treated similar to cattle.
- **Exemptions for "Livestock" and "Food Animals":** Ms. Welch noted the legislative proposal to amend BPC section 4825.1 was not part of this agenda item; while the Committee could discuss potential revisions to this section, the Committee could not take action on such amendments. She also noted the Board's prior approval of a definition of "herd" that may be appropriate to incorporate for equines not used for profit that are maintained at a single location but not otherwise a companion animal, used in individual training or involved in competition or exhibition. The previously approved definition of herd was "any group of two or more animals of the same species and located at the same geographical location." Under the amendments to BPC section 4827, livestock and food animals would be exempt from the California Veterinary Medicine Practice Act (Practice Act); veterinary treatment provided to all other animals would be required to follow the terms of the Practice Act.

- **Owner Pushback:** The Committee discussed owner pushback when the owner feels they can do what they want to their own horse(s).
- **Other Non-Equine Animals:** The Committee discussed various animals, including ornamental aquatic animals, pet sheep, pet cows, and pet goats and how those animals would fall under the law. The Committee determined that as long as the animals were not used for profit, the animals would not be considered livestock.
- **Federal Definition of “Livestock”:** Ms. Welch provided the federal definition of “livestock” under the [Code of Federal Regulations \(CFR\), title 29, section 780.328](#). She noted if the Committee starts to change the definition of livestock to be aimed at certain species, then it is creating more work to define other exempt species.
- **Re-Examining the Proposed Language:** The Committee considered Ms. Welch’s remarks. It also contemplated the term “used for profit.” It discussed dog breeders performing surgeries on animals because they believe they are exempt due to the animals being bred are for profit. It was noted the second sentence of BPC section 4825.1(e) clarifies those certain animals would not be covered under the exemption.
- **Considering all Equines as Companion Animals:** The Committee noted different categories of animals but focused on the horses. Dr. Waterhouse suggested that 99% of horses are considered as companion animals, and she recommended placing all horses as companion animals.

Ms. Sieferman noted that all horses are currently considered as companion animals. She said there was not much discussion on the topic during the Board’s strategic planning session, but one member thought horses should be included as livestock; there was no objection to the comment, and it became an objective. She noted the Committee could make a recommendation to keep the original language.

- **“Alternative Livestock” Definition:** The Committee discussed the option of using an additional term based on Montana’s “alternative livestock” definition under [Montana Fish and Wildlife Code section 87-6-101\(1\)](#).
- **Impact on Veterinary Medical Records:** The Committee discussed the difficulty of clarifying the definition due to its use as a definition of unlicensed activity, impact on veterinary medical records, and application as a definition to the whole Practice Act.
- **Unlicensed Activity in Reproduction and Dentistry:** Dr. Nunez pointed out that in the first stakeholder meeting with equine practitioners, they did

have an issue with unlicensed activity occurring in the areas of reproduction and dentistry. He was sure the intent was for horses to not be included under the exemption category.

Public Comment: Dr. Sullivan requested public comment on this item. The following public comment was made on this item:

- [Julianna Tetlow](#) of the San Diego Humane Society, the nonprofit animal care and control agency for most of the San Diego region, provided the following public comment:

Advocated Against Eliminating the Ownership Exemption

Ms. Tetlow urged the Committee to reconsider eliminating the ownership exemption in the Practice Act. She stated the ownership exemption is critical for ensuring timely and affordable care for animals in situations where licensed veterinary services are unavailable or inaccessible. This exemption allows animal owners and caretakers to provide basic and necessary care without facing legal barriers. Eliminating this exemption could disproportionately harm individuals in rural or underserved areas where access to licensed veterinarians is already limited. Animal shelters and other nonprofits often rely on this exemption to provide care as well. She asserted that removing [the exemption] would not only strain these organizations but could lead to delays in care and suffering. Furthermore, she stated the ownership exemption does not shield individuals who commit acts of cruelty under the guise of veterinary care.

Utilizing Existing Law

Ms. Tetlow stated existing law already allows for criminal prosecution in cases where individuals harm animals through neglect, cruelty, or unqualified procedures. Eliminating the exemption would penalize well intentioned caretakers while doing little to address the actual cases of abuse, which are already enforceable under current animal cruelty statutes. She noted there were frequent references to instances of operations on animals during the Committee discussion, which is just one part of veterinary medicine. She said veterinary medicine also includes treating and preventing health issues. She stated the San Diego Humane Society appreciated the addition of [BPC section 4827(a)](7), but it did not address the concerns.

Recommended Alternatives

Ms. Tetlow stated instead of removing the exemption, she urged the Committee to consider identifying deficiencies in the enforcement process,

additional oversight, or providing additional education and support to ensure care remains ethical and safe; striking a balance between professional regulation and the practical necessity is key to safeguarding animal welfare without creating unnecessary burdens.

- [Bruce Wagman](#), Esq., an attorney with an exclusive practice in animal law for the last 20 years representing 55 animal shelters, 35 animal rescues around the State of California, dozens of companion animal owners, and a legal policy program for companion animals, provided the following public comment:

Opposed to Removing the Ownership Exemption

Mr. Wagman stated the proposal to remove the ownership exemption under the Code will have devastating effects long term on access to care for California pets and their owners, on the public at large, and on shelter populations and shelter managers. There will be strong opposition to any effort to get the [proposed legislation] passed. Crucially, the ownership exemption has been applied to equivalence for pets, just as for the agriculture industry to allow intervention to prevent, relieve, diagnose, and treat illness and injury. He stated 36 states have identical laws, and none of them are trying to take away the exemption as far as he knows.

Impact on Law Abiding Citizens

Mr. Wagman claimed it was stated that the Board does not intend to go into homes, but this is exactly what this law will do; it will impact law abiding citizens and not the law breakers. He said the proposal will seriously harm access to care. He added virtually every pet owner in California practices some form of what would now be prohibited veterinary medicine sometime during their animal's lives. He provided the following examples:

- An owner's dog or cat gets into a fight with other pets either inside or outside. The animal has a superficial wound, and the animal is bleeding. When the owner treats the wound, wipes away the blood, or washes it with soap, the owner is practicing veterinary medicine and would be in violation without the ownership exemption because it would be treatment and even diagnosis.
- Kittens who are rescued often come in with crusty eyes and merely need a warm soak to get that crust off of them because they have got some possible underlying infection. The owner could not even apply warm compresses to stop this suffering.
- Pets with obvious [upper respiratory infections] URIs who are congested could not have a dehumidifier.

Mr. Wagman claimed there are dozens more examples that owners do all the time.

Impact on Shelters

Mr. Wagman asserted shelters all over California would be heavily impacted because (1) consumers will turn in more of their pets they could not help, and (2) even if the shelters have a veterinarian, the shelters cannot possibly address all the health and wellness tasks needed to keep the population as safe and healthy as possible. He noted the Board has an excellent resource in Dr. Solacito, but he encouraged the Committee to talk to Dr. Hurley. He said Dr. Hurley is more or less the shelter veterinarian for the State of California for her input. He stated they agree there are unfortunate examples of harmful things happening, but [the legislative proposal] was not the way to do it; it goes far beyond the owner exemption.

Request to Drop the Proposal

Mr. Wagman urged the Board to drop the legislative proposal.

- [Michael Manno](#), DVM, equine veterinarian in Southern California, provided the following public comment:

Current Legal Definition of “Livestock”

Dr. Manno stated he was also one of the stakeholders in the unlicensed equine practice meeting. He stated while he understood the attempt to try and define “livestock” for this specific purpose of the owner exemption, there are several laws on the books that already define “livestock.” He referenced the previously mentioned CFR, title 29, section 780.328 law, read out [California Civil Code section 3080\(a\)](#), and referenced the Food and Agriculture Code defined livestock as any cattle, sheep, swine, goat, or any horse, mule, or other equine whether live or dead.

Suggested the Committee Reconsider Defining “Livestock”

Dr. Manno thought if the Committee continued on its desire to redefine livestock for a specific purpose, it would make the definition more complicated and confusing. He stated a lot of issues in this meeting concerned unlicensed activity. He understood the Committee was trying to protect the practice of veterinary medicine from people who should not be providing veterinary services. He suggested the Committee might consider taking a step back and try to redefine the whole process of giving another definition to “livestock” for equine specifically. He thought if equine owners and equine practitioners were asked, very few of them would agree that horses are companion animals at any level. He provided an example of a

pet pony and how it may not act like a companion animal all the time or show companionship to their owners. He understood if the idea was to redefine “livestock” to make it fit the owner exemption, but he was not sure it was the right path for the Committee to take.

- [Karen Atlas](#), President, APTC, representing veterinarians, physical therapists, RVTs, and the animal owning public, provided the following public comment:

APTC Suggestions Not Incorporated

Ms. Atlas stated on behalf of the groups she represents, she attended meetings, provided public comment during the meetings, and attempted to engage in discussion. She sent in two letters on behalf of APTC for the Board to consider for each of the small animal and large animal stakeholder meetings on unlicensed activity. She stated that despite their comments and discussion points offering alternative options and exemptions that the Legislature could consider to remedy this issue and others for the State of California relating to unlicensed activity and access to care, their ideas were not incorporated whatsoever. She stated because the Committee proposal to the Board relating to unlicensed activity does not include any of the alternative solutions they offered to the Subcommittee, it made them wonder if the public stakeholder meetings even meant anything to the Board. She added, it has been extremely disappointing to spend hours preparing alternative solutions for this Board only for the suggestions to be ignored time and again.

The Committee discussed that it was seeking ways to protect the consumer not the veterinarian, and noted the following:

- **Unlicensed Activities for Equines:** Ms. Sieferman noted the Board receives complaints from the equine community regarding unlicensed individuals performing services, such as equine surgeries or dentistry.
- **Unlicensed Activities for Small Animals:** Ms. Sieferman stated the Board receives complaints about unlicensed individuals, including breeders, performing cesarean sections (C-sections) and dentistry on small animals.
- **Owner Exemption Claims:** Ms. Sieferman stated that during Board investigations of unlicensed activity, owners will claim “owner exemption” and they can provide services on their own animals.
- **Animal Cruelty and the District Attorney (DA):** Ms. Sieferman noted the issue with animal cruelty claims is that even if a case is accepted by the DA’s office, there are many legal hurdles to overcome in order to prove

animal cruelty. Often, cases are not accepted by the DA's office for prosecution, making it difficult to take action against unlicensed individuals.

- **Gratuitous Services:** Ms. Sieferman noted when the Board investigates unlicensed activity, sometimes the services are claimed to be performed "gratuitously." She stated it is challenging to prove that payment was made for those services. Often, the person providing the service will claim they did it for free, and the complainants are unwilling to cooperate because they prefer receiving cheaper services than those provided by a licensed veterinarian. Despite having evidence, including videos of the harmful practices, the lack of cooperation with complainants and the difficulty in proving that services were paid for makes it hard to take legal action, and as a result, animals continue to be harmed by these unlicensed practitioners.
- **Minor Non-Medical Care Not Targeted:** Dr. Nunez emphasized the intent was not to punish minor, non-medical care. He noted common actions, such as wiping mucus from a kitten's eyes, cleaning a wound, or applying pressure to stop bleeding would not be considered the practice of veterinary medicine and will not be targeted.

Dr. Nunez noted the goal is to protect the animal, and he disagreed with the notion that the changes will have the negative consequences mentioned. He also acknowledged the needs of rural communities where access to veterinary care is limited.

- **Considered Language:** The Committee discussed the following ways to amend the proposed language for BPC section 4827(a)(1), which states:

Practicing veterinary medicine as a bona fide owner of one's own animal livestock or food animals. This exemption applies to the following:

The Committee considered the following changes to the language to address the concerns raised above:

- "...owner of one's own ~~animal livestock or~~ food animals..."

Ms. Welch emphasizes the importance of consulting with the [California Department of Food and Agriculture (CDFA)] to understand how the proposed changes might affect the treatment of livestock. She expressed concern about the potential impact on businesses in California, particularly in the livestock industry and suggested gathering more information before moving forward with any proposals to remove livestock from the exemption.

- **Designated Caretaker Duties and Impact to RVTs:** The Committee noted “designated caretaker” under the proposed language for BPC section 4827(a)(6) would allow for RVTs to provide pet sitting services.

Referred for Future Discussion: The Committee was in favor of the change to BPC section 4827(a)(1) made during discussion, but determined the Subcommittee needed to take the following action:

- Research and reach out to the CDFA or any other stakeholder government entity on the impacts of removing livestock from the exemption.
- Keep the proposed definition of “livestock” under BPC section 4825.1(e) unchanged, but research how it would impact the CDFA.
- Keep the changes in the meeting materials to BPC section 4827(a)(6) and (7).

B. [Proposed Legislation to Amend BPC Section 4875.2 and Add Section 4875.7 Regarding Unlicensed Practice Citations](#)

Dr. Nunez presented the [meeting materials](#) to the Committee.

Discussion: The Committee reviewed the meeting materials and discussed the legislative proposal:

Motion: Dr. Sullivan requested a motion. Kristi Pawlowski, RVT, moved and Jeni Goedken, DVM, seconded a motion to recommend to the Board submission to the California State Legislature the attached legislative proposal to amend BPC section 4875.2 and add Section 4875.7 regarding unlicensed practice citations.

Public Comment: Dr. Sullivan requested public comment on the motion. The following public comment was made on the motion:

- [Karen Atlas](#), President, APTC, provided the following public comment:

Disagreement with Fee Increases

Ms. Atlas stated it was not true that all the stakeholders agreed to increased fines. She stated it was written that way, and it seemed that people thought the public agreed with increasing the fines, but it was not agreed upon by all the stakeholders in that meeting. She asked for her comments to be heard and considered.

Roll Call Vote: Dr. Sullivan called for the vote on the motion. Ms. Sieferman took a roll call vote on the motion. The motion carried 9-0.

Members	Vote			
	Yea	Nay	Abstain	Absent
Richard Sullivan, DVM, Chair	X			
Marie Ussery, RVT, Vice Chair	X			
Kathy Bowler	X			
Jeni Goedken, DVM	X			
Barrie Grant, DVM	X			
Mark Nunez, DVM	X			
Kristi Pawlowski, RVT	X			
Leah Shufelt, RVT	X			
Cheryl Waterhouse, DVM	X			

C. [Proposed Rulemaking to Amend California Code of Regulations \(CCR\), Title 16, Section 2043 Regarding Unlicensed Practice Citations](#)

Dr. Nunez and Ms. Sieferman presented the [meeting materials](#) to the Committee.

Discussion: The Committee reviewed the meeting materials and discussed the regulatory proposal.

Motion: Dr. Sullivan requested a motion. Kristi Pawlowski, RVT, moved and Kathy Bowler seconded a motion to recommend the Board take the following actions:

- Approve the regulatory text for CCR, title 16, section 2043.
- 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 2043.

Public Comment: Dr. Sullivan requested public comment on the motion. There were no public comments made on the motion.

Roll Call Vote: Dr. Sullivan called for the vote on the motion. Ms. Sieferman took a roll call vote on the motion. The motion carried 9-0.

Members	Vote			
	Yea	Nay	Abstain	Absent
Richard Sullivan, DVM, Chair	X			
Marie Ussery, RVT, Vice Chair	X			
Kathy Bowler	X			
Jeni Goedken, DVM	X			
Barrie Grant, DVM	X			
Mark Nunez, DVM	X			
Kristi Pawlowski, RVT	X			
Leah Shufelt, RVT	X			
Cheryl Waterhouse, DVM	X			

7. Update, Discussion, and Potential Recommendations from the Registered Veterinary Technician (RVT) Subcommittee—*Leah Shufelt, RVT, and Kristi Pawlowski, RVT*

A. [Proposed Rulemaking to Repeal CCR, Title 16, Section 2068.6 Regarding Out of State Registration as Equivalent](#)

Ms. Pawlowski presented the [meeting materials](#) to the Committee, and Ms. Shufelt provided additional comments.

Discussion: The Committee reviewed the meeting materials and discussed the regulatory proposal as follows:

Repeal CCR, Title 16, Section 2068.6

- **Workforce Concerns:** The Committee expressed concerns over the [proposed repeal of CCR section 2068.6](#) and inquired about its impact of removing the work experience only pathway for RVTs with an out-of-state registration. The Committee inquired about how many applicants applied through this pathway.

Ms. Sieferman responded data was not entered until 2019, and the pathway has been an option since [1989]. She noted the current percentage is unknown for individuals who earned an RVT registration through this pathway.

- **Provisional Registration:** Dr. Nunez inquired if provisional registration could be an option. The provisional registration would require an out-of-state registrant to fulfill an education component in order to fulfill the requirements for a regular RVT registration.

Ms. Sieferman responded the Board could not retroactively require provisional RVT registration to individuals already registered, but the Committee could decide it as a policy recommendation to the Board. She also advised a provisional registration may be interpreted as the RVT provisional registration is a danger for a certain period of time until the individual can meet the education requirement and earn a regular RVT registration.

Ms. Pawlowski noted it would take a lot of Board staff resources to implement a provisional RVT registration. In addition, based on feedback during stakeholder meetings, registrants who earned a registration through this pathway felt they needed education.

- **Veterinary Technician National Examination (VTNE) Requirement:** The Committee inquired if applicants in this pathway to RVT registration had to pass the VTNE. Ms. Sieferman responded all California RVTs must pass the VTNE regardless of education or experience.
- **Consumer Protection Issues:** The Committee inquired if there were any consumer protection issues with allowing these RVTs to practice, and if the extent of the potential problem was known.

Ms. Pawlowski responded that based on feedback during stakeholder meetings, RVTs claim they had to go back to school to be able to give client education and provide therapies. She noted just because an individual could pass a test, it did not mean the person had the knowledge to provide those services.

The Committee also noted many of the individuals applying through this pathway were California individuals applying out-of-state with no intent to practice out-of-state, but then applied for a California RVT registration.

Dr. Sullivan noted as far as disciplinary cases, if a veterinarian delegates the task to an RVT and something goes wrong, the veterinarian is going to take the blame. The veterinarian is not going to include the RVT because then the veterinarian will have two violations: (1) delegating a task to an individual who was not competent; and (2) the negative result that came from it.

Motion: Dr. Sullivan requested a motion. Kristi Pawlowski, RVT, moved and Kathy Bowler seconded a motion to recommend the Board take the following actions:

- Approve repealing all regulatory text for CCR, title 16, section 2068.6.

- 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 repeal the regulation as described in the text notice for CCR, title 16, section 2068.6.

Public Comment: Dr. Sullivan requested public comment on the motion. There were no public comments made on the motion.

Roll Call Vote: Dr. Sullivan called for the vote on the motion. Ms. Sieferman took a roll call vote on the motion. The motion carried 9-0.

Members	Vote			
	Yea	Nay	Abstain	Absent
Richard Sullivan, DVM, Chair	X			
Marie Ussery, RVT, Vice Chair	X			
Kathy Bowler	X			
Jeni Goedken, DVM	X			
Barrie Grant, DVM	X			
Mark Nunez, DVM	X			
Kristi Pawlowski, RVT	X			
Leah Shufelt, RVT	X			
Cheryl Waterhouse, DVM	X			

B. Proposed Direction Regarding Veterinary Technician Registration Education Requirements

Ms. Shufelt presented the [meeting materials](#) to the Committee.

Discussion: The Committee reviewed the meeting materials and discussed the following issues:

- **Instructor Definition:** The Committee felt the instructor definition in CCR, title 16, section 2068.5 needed to be revised.

Ms. Sieferman noted some individuals were creative in meeting the instructor qualifications, including utilizing online courses, CE courses, or the minimum of two years of experience in a subject area (not necessary as an RVT). She added, these individuals have created and written their own transcripts and certificates based on CCR, title 16, section 2068.5(e)(1).

- **Hours Required for Work Experience:** The Subcommittee noted it was reviewing the number of hours needed for the alternate route pathway. The current requirement of 4,416 hours was a conversion between number of hours in the classroom to work experience hours.
- **Education No Longer Expires:** The Subcommittee also noted the education component no longer expires.

Public Comment: Dr. Sullivan requested public comment on the item. There were no public comments made on the item.

8. **Update and Discussion from the Complaint Audit Subcommittee—**
Jeni Goedken, DVM, and Cheryl Waterhouse, DVM

Dr. Goedken and Dr. Waterhouse presented the [meeting materials](#) to the Committee. Ms. Sieferman noted the action requested in the memorandum was already approved by the Board at its October meeting.

Discussion: The Committee reviewed the meeting materials and had no comments.

Public Comment: Dr. Sullivan requested public comment on this item. There were no public comments made on this item.

9. **Update and Discussion from the Outreach Subcommittee—**
Kathy Bowler and Cheryl Waterhouse, DVM

Ms. Bowler presented the following updates to the Committee:

- **Spectrum of Care:** Mid-November, the Subcommittee met with Dr. Dear and Dr. McCobb from the University of California, Davis (UC Davis) to discuss spectrum of care resources, tools, and educational practices. The Subcommittee sought to use these resources in its outreach for students.
- **Webinar Discussion with Students:** The Subcommittee discussed having the Board conduct Zoom interaction with students to discuss spectrum of care options and the role of the Board.

- **Unlicensed Practice Stakeholder Meetings:** The Subcommittee noted they have opportunities to educate the public based on the unlicensed practice stakeholder meetings.

Public Comment: Dr. Sullivan requested public comment on this item. There were no public comments made on this item.

10. **Update and Discussion from the California Department of Food and Agriculture Subcommittee**—*Marie Ussery, RVT and Cheryl Waterhouse, DVM*

Ms. Ussery, Dr. Waterhouse, and Ms. Sieferman presented the following updates to the Committee:

- **Southern California Fires:** The CDFA's California Animal Response Emergency Support (CARES) program coordinated volunteer resources for animal care during natural disasters, and a program coordinator was onsite; only local resources were needed and no state resources were requested.
- **Blood Banks:** There was an update on both closed colonies and community blood banks. Closed colonies are producing less than previously, while community blood banks have seen a slight increase in production. Currently, community blood banks are producing 3–4% of the total blood produced.
- **Highly Pathogenic Avian Influenza (HPAI):** The CDFA discussed outreach efforts regarding feline diets in relation to HPAI. The CDFA also banned both dairy and poultry from fairs and exhibitions due to HPAI.
- **Telehealth:** The Board requested the CDFA to consider changing language in the Food and Agriculture Code to address telehealth requirements set by state and federal laws. The CDFA is seeking the change through an Omnibus Bill.
- **Blood Sales Inquiry:** The CDFA received an inquiry about whether veterinarians could sell blood directly (e.g., to individuals, dog breeders, for personal use) without involving a veterinarian.
- **Fraudulent Activity:** The CDFA had a case where an individual forged a veterinarian's signature on a Veterinary Feed Directive (VFD).

Discussion: The Committee discussed the following issues:

- **Meeting Target Dates for Blood Production:** The Committee noted recent press articles and if there was any expectation the target date for banning all closed colony blood banks would be met. The Committee noted a large closed colony blood bank, Hemopet, had closed in Southern California.

Ms. Sieferman responded there was no date, and it did not appear it was close to the possibility of closing the closed colony blood banks.

Public Comment: Dr. Sullivan requested public comment on this item. There were no public comments made on this item.

11. **Election of 2025 Officers**

Ms. Pawlowski nominated Ms. Ussery, RVT, for the position of 2025 Committee Chair. Ms. Ussery accepted the nomination. There were no other nominations.

Motion: Kristi Pawlowski, RVT, moved and Mark Nunez, DVM, seconded a motion to appoint Marie Ussery, RVT, as the 2025 Committee Chair.

Public Comment: Dr. Sullivan requested public comment on the motion. There were no public comments made on the motion.

Roll Call Vote: Dr. Sullivan called for the vote on the motion. Ms. Sieferman took a roll call vote on the motion. The motion carried 8-0-1 with Ms. Ussery abstaining.

Members	Vote			
	Yea	Nay	Abstain	Absent
Richard Sullivan, DVM, Chair	X			
Marie Ussery, RVT, Vice Chair			X	
Kathy Bowler	X			
Jeni Goedken, DVM	X			
Barrie Grant, DVM	X			
Mark Nunez, DVM	X			
Kristi Pawlowski, RVT	X			
Leah Shufelt, RVT	X			
Cheryl Waterhouse, DVM	X			

Dr. Sullivan nominated Cheryl Waterhouse, DVM, for the position of 2025 Committee Vice Chair. Dr. Waterhouse accepted the nomination. Dr. Nunez nominated Dr. Sullivan for the position, which he declined.

Motion: Richard Sullivan, DVM, moved and Marie Ussery, RVT, seconded a motion to appoint Cheryl Waterhouse, DVM, as the 2025 Committee Vice Chair.

Public Comment: Dr. Sullivan requested public comment on the motion. There were no public comments made on the motion.

Roll Call Vote: Dr. Sullivan called for the vote on the motion. Ms. Sieferman took a roll call vote on the motion. The motion carried 9-0.

Members	Vote			
	Yea	Nay	Abstain	Absent
Richard Sullivan, DVM, Chair	X			
Marie Ussery, RVT, Vice Chair	X			
Kathy Bowler	X			
Jeni Goedken, DVM	X			
Barrie Grant, DVM	X			
Mark Nunez, DVM	X			
Kristi Pawlowski, RVT	X			
Leah Shufelt, RVT	X			
Cheryl Waterhouse, DVM	X			

12. [Future Agenda Items and Meeting Dates](#)

Ms. Siefertman presented this item and noted the Committee will have the following agenda items in the future:

- **Veterinary Medicine Definitions:** Review the definitions of “livestock” and “telehealth.”
- **Owner Exemptions:** Review owner exemptions
- **Alternate Route Pathway:** Review the requirements under CCR, title 16, section 2068.5.

She provided the following proposed future meeting dates:

- April 15, 2025
- July 15, 2025
- October 14, 2025
- January 20, 2026
- April 14, 2026
- July 14, 2026
- October 13, 2026

Discussion: The Committee discussed this item as follows:

- Ms. Pawlowski requested that Subcommittee meetings occur within 30 days after the Committee meeting, the Subcommittees create their own memorandums, and timely provide meeting materials to Board staff for posting.
- The Committee thanked Dr. Sullivan for his service.

Public Comment: Dr. Sullivan requested public comment on this item. There were no public comments made on this item.

13. Adjournment

Dr. Sullivan adjourned the meeting at 3:51 p.m.

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