



**CALIFORNIA VETERINARY MEDICAL BOARD
MULTIDISCIPLINARY ADVISORY COMMITTEE
MEETING MINUTES
April 15, 2025**

In accordance with Government Code section 11122.5, subdivision (a), 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, April 15, 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 Links:

- Agenda Items 1-5 (<https://youtu.be/vcwatCZ-QLI>)
- Agenda Items 6-12 (<https://youtu.be/b7fcUt-aGE8>)

10:00 a.m., Tuesday, April 15, 2025

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

Committee Chair, Marie Ussery, Registered Veterinary Technician (RVT), called the meeting to order at 10:00 a.m. Executive Officer (EO), Jessica Sieferman, called roll, and seven members of the Committee were present; a quorum was established. Kathy Bowler and Richard Sullivan, Doctor of Veterinary Medicine (DVM), were absent from the meeting.

Members Present

Marie Ussery, RVT, Chair
Cheryl Waterhouse, DVM, Vice Chair
Jeni Goedken, DVM
Barrie Grant, DVM, Board Liaison
Mark Nunez, DVM
Kristi Pawlowski, RVT, Board Liaison
Leah Shufelt, RVT

Staff Present

Jessica Sieferman, EO

Matt McKinney, Deputy EO
Alicia Hernandez, Administration/Licensing Manager
Ashley Sanchez, Enforcement Manager
Justin Sotelo, Policy Specialist
Rob Stephanopoulos, Enforcement Manager
Amber Kruse, Enforcement Analyst
Anh-Thu Le, Enforcement Analyst

Department of Consumer Affairs (DCA) Staff Present

David Bouilly, Moderator, DCA, Strategic Organizational Leadership and Individual Development (SOLID)
Elizabeth Dietzen-Olsen, Regulations Counsel, Attorney III, DCA, Legal Affairs Division
Trisha St. Clair, Moderator, DCA, SOLID
Christi Van Eyken, Legislative Analyst, DCA, Legislative Affairs Division
Cesar Victoria, Television Specialist, DCA, Office of Public Affairs
Matthew Wainwright, Legislative and Regulatory Manager, DCA, Legislative Affairs Division
Tara Welch, Board Counsel, Attorney IV, DCA, Legal Affairs Division

Guests Present

Dan Baxter, Executive Director, California Veterinary Medical Association (CVMA)
Amber Bernhard, Executive/Legislative Assistant, CVMA
Christina Bradbury, DVM, Board Member
Carrie Ann Calay
Pamela Collier, RVT
Nancy Ehrlich, RVT, California Registered Veterinary Technicians Association (CaRVTA)
Chazney Johnson
Bonnie Lutz, Esq., Klinedinst
Steven Manyak, DVM, Board Member
Grant Miller, DVM, Director of Regulatory Affairs, CVMA
Maria Solacito, DVM, Board Member
TTY
Bruce Wagman, Esq., Riley Safer Holmes & Cancila, LLP
Pamela Wittenberg, DVM, Santa Rosa Junior College
Scott Young, Summit / Pharma Policy Center

2. Public Comment on Items Not on the Agenda

Public Comment: Ms. Ussery requested public comment on this item. The following public comment was made on this item:

- [Bonnie Lutz](#), Esq., provided the following public comment:

Scanning for a Microchip as Part of the Standard Procedure for Physical Examinations

Ms. Lutz stated that she has been asked frequently by veterinarians in her area about whether scanning for a microchip should be part of the standard procedure for a physical examination. She noted that, while she can understand where a lot of these individuals are coming from, her concern is what is done with the information and going too far with potentially disclosing confidential information if they get too immersed in what the situation is with the ownership of the animal. She stated that she told the people in Southern California that she would bring this topic up at this meeting.

3. [Review and Approval of January 14, 2025 Committee Meeting Minutes](#)

Ms. Siefertman stated that Ms. Pawlowski had provided corrections to the [January 14, 2025 meeting minutes](#) and that staff had incorporated those corrections. Deputy EO, Matt McKinney, added that the corrections were shown with track changes on the document presented during the meeting. Dr. Waterhouse provided additional minor revisions to the meeting minutes.

[Motion:](#) Ms. Ussery requested a motion. Mark Nunez, DVM, moved and Kristi Pawlowski, RVT, seconded a motion to approve the January 14, 2025 meeting minutes, as amended.

[Public Comment:](#) Ms. Ussery requested public comment on the motion. There were no public comments made on the motion.

[Roll Call Vote:](#) Ms. Ussery called for the vote on the motion. Ms. Siefertman took a roll call vote on the motion. The motion carried 7-0.

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

4. Update, Discussion, and Potential Action on Recommendations from the Unlicensed Practice Subcommittee—Barrie Grant, DVM and Mark Nunez, DVM

A. Proposed Legislation to Amend Business and Professions (BPC) Sections 4825.1 and 4827 Regarding Veterinary Medicine Practice Exemptions

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

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

Ms. Sieferman stated that, during the stakeholder meetings discussed in the meeting memo, the food animal stakeholders recognized that a lot of unlicensed practice (i.e., reproductive services) is occurring and that they do not want it to occur. However, she explained that they also recognize that there are not enough food animal veterinarians in practice to provide the necessary services. She stated that the unlicensed individuals are predominantly the people who the food animal veterinarians have trained.

Ms. Sieferman added that the stakeholders indicated that the Board could consider creating some type of certification, based on education, that would allow individuals to provide these services and that there would at least be some sort of oversight.

She noted that the stakeholders also indicated that they appreciated the Committee's/Board's proposal to increase the citation amount as well. She added that they indicated that unlicensed individuals can easily make up to \$70,000 per weekend and that a \$5,000 citation is not a deterrent.

Ms. Sieferman also emphasized that the proposed legislation is not targeting rescue groups. She explained that, although the Board receives many complaints involving rescue groups, there are reports of unlicensed practice in other areas, such as the equine industry. She added that the Board especially sees a lot of reports of unlicensed practice in Southern California. She explained that there are individuals claiming to be veterinarians from other countries or from other states, but there is very little information available to conduct an investigation. She also stated that the individuals practicing claim that they own the animals, but the Board cannot prove otherwise. There are also individuals claiming that they provided services gratuitously and that the Board does not have jurisdiction over them because of how the owner exemption is written.

Ms. Sieferman added that there are animals being harmed in the equine industry and there is a lot of frustration because individuals see this as the Board not

acting. She stated that the Board would like to take action, but because of how the owner exemption is written, the Board is unable.

She stated that, with regard to individuals performing services gratuitously, consumers are not willing to say otherwise because they appreciate the services they are getting at a lower cost. She noted that the Board believes these consumers are paying for the services, but they are not cooperating with the Board's investigations. She added that these consumers will sometimes take their animal to a veterinarian after an animal is harmed and the veterinarians will try to report the unlicensed practice; however, consumers are not willing to come forward and indicate that services were paid for and the Board has nothing to go on.

Ms. Sieferman also clarified that the definition of "herd" within the legislative proposal, under BPC section 4825.1, subdivision (e), had already been approved by the Board, and that it was not part of this discussion.

Ms. Welch stated that, on [page nine](#) of the legislative proposal, the proposed amendment to BPC section 4827, subdivision (a)(5), subparagraph (C), to add "or rescue group" was incorrect due to the explanation provided on [page four](#) of the meeting memo ("rescue groups would not be added to subdivision (a)(5)(C) because rescue groups are not registered veterinary premises with a supply of medications that otherwise would be tracked or dispensed pursuant to regulatory requirements"). So, she stated that if the Committee moved forward with this legislative proposal, she would recommend striking "or rescue group" from subparagraph (C) of the proposal.

Ms. Welch also stated that she was hoping the Committee would consider clarifying some other items within the proposal. She noted that on [page eight](#) of the proposal, under BPC section 4827, subdivision (a)(5), subparagraphs (A) and (B), it would add "a university veterinary medicine program". She explained that this could be any program in the world. She stated that she would remind the Committee that most of the time, in terms of reciprocity, the Board would only accept licensure in states and territories of the United States (U.S.) and Canadian provinces. She explained that she would be concerned with the Board accepting protocols written by a university veterinary medicine program outside of those accepted jurisdictions. She asked that the Committee consider clarifying or limiting that provision.

Dr. Nunez asked if "American Veterinary Medical Association (AVMA) accredited" could be added in front of "university veterinary medicine program." Ms. Welch indicated that could work.

Ms. Welch also stated that, under subdivision (a)(5), subparagraphs (A) and (B), protocols written by "a reputable shelter medicine textbook" was ambiguous. She

indicated that it leaves open a lot of argument as to what is a “reputable shelter medicine textbook” on which staff can rely for written protocols. She noted that what could be more specific would be to strike “reputable shelter medicine textbook” and instead insert “veterinary medicine textbook commonly used in California animal shelters”. She stated this language would be more specific to California, but also inclusive enough to allow shelters to rely on protocols written in these types of textbooks that are commonly used. She added that she was also open to other ideas on how to clarify the language.

Dr. Nunez noted that, even though a textbook is commonly used, it does not necessarily guarantee that it is good. Dr. Nunez also asked if textbooks were peer-reviewed like journal articles are. Ms. Welch responded that she did not know the answer to that question. Ms. Pawlowski responded that she thought textbooks were peer-reviewed.

Ms. Welch then added that she did not understand why “reputable shelter medicine textbook” was being added to the statute. She explained that the proposal is trying to provide the ability to use written protocols outside of those written by a California licensed veterinarian because the Board is potentially going to allow rescue groups to qualify under this exemption. She added that she was not sure what “textbook” accomplishes and that it perhaps goes too far. She noted that she was just raising questions for the Committee’s consideration.

Dr. Nunez responded that was a good point, and if individuals are looking for resources, they can also go online; a textbook, specifically, may not be necessary to mention in the statute.

Dr. Goedken also added that a textbook would need to be current and asked how “current” would be defined. She also noted that textbooks are not being published as much, as a lot of literature is moving online. She stated that just adding “textbooks” would be vague and open to interpretation. Dr. Nunez responded that good points were raised about the credibility of that resource. Dr. Nunez also stated that, with regard to textbooks, he thought that they should perhaps be textbooks used by accredited veterinary programs.

Dr. Goedken responded that she agreed. She added that she thought that the Koret Shelter Medicine Program at the University of California, Davis (UC Davis) was by far the leader in this area. She also stated that her preference was to only have protocols written by a California-licensed veterinarian or an AVMA accredited program identified in the statute.

Dr. Nunez noted that not all licensed veterinarians may be up to speed with shelter medicine. Dr. Goedken responded that she agreed, but also added that not all textbooks may be up to speed with current California shelter and rescue veterinary needs.

Ms. Welch stated that existing law authorizes shelters to utilize written protocols written by a “veterinarian licensed in this state,” and the proposal essentially tweaks the language.

Ms. Pawlowski asked if “peer-reviewed” or “approved resources” could be used in the language because journals and publication are forgotten. Ms. Welch asked how a rescue group would know if something was peer-reviewed. Dr. Nunez stated that it was also mentioned in the meeting memo that the Board or CVMA could establish protocols. He added that he could also see the point that textbooks might not be up to standards.

Ms. Sieferman asked if the Committee wanted to only have protocols written by a California-licensed veterinarian or an AVMA accredited program identified in the statute. Dr. Nunez responded that he thought that was where the Committee was at.

Given the public comments received by the Committee raising significant concerns with changing the current owner exemption, Ms. Welch asked if the Committee wanted to discuss those concerns and whether it may be more efficient to restructure the ownership exemption to specifically prohibit certain conduct. She explained that the restructure could be directed at the conduct and unlicensed practice that the Board is receiving complaints on. She further stated that, instead of moving forward with a more limited approach that has raised serious concerns by shelter groups, perhaps it would be a better pivot to maintain the existing owner exemption and instead list prohibited activities or actual actions that are not included in the owner exemption (i.e., surgery, insemination practices, dental services, etc.). She stated that she was just bringing this up for consideration.

Dr. Grant asked if there was a way to include a general statement about common animal husbandry, common sense practices. He stated that there was a whole list of examples that was provided in one of the letters attached to the meeting memo. He explained that the Subcommittee is trying to address more serious matters.

Ms. Pawlowski stated that, being at the front of animal welfare and playing such an integral role, animal welfare organizations should ensure that the public is properly informed and educated. She added that spreading partial information does not help anyone. She stated that she thought the Board and the organizations are both on the side of pets and consumers and that communication and transparency is important in this process. She added that she did not feel the Board was receiving complete information. Ms. Pawlowski acknowledged what Ms. Welch was proposing; however, she stated that she did not feel the Board knows exactly what the organizations want. She added that

she wants to help the organizations, but there needs to be full communication with this matter.

Dr. Goedken referenced the letter attached to the meeting memo from Jennifer Scarlett, DVM, San Francisco Society for the Prevention of Cruelty to Animals. She stated that, when talking about complaints the Board receives, she would like to see some data. She asked how many complaints the Board receives fall into this category and what are the procedures being done that are egregious enough to require a change in law. She added that getting hard data might help with the communication between both sides.

Ms. Sieferman stated that it was challenging to get that specific with the data because it is not collected that way. She explained that complaints come in as allegations of negligence or unlicensed practice. She noted that staff could attempt to do some searches of things that are mentioned specifically. However, she added that, for complaints the Board has not taken action on, they are not public information. She also stated that a search for this data might be challenging and time consuming because the data is not that specific in terms of what is collected. She added that the Board directed the Committee, through its Strategic Plan, to look at changing the owner exemption to narrow it to its intended purpose. Ms. Sieferman stated that staff can try to obtain more specific numbers, but that the actual cases cannot be disclosed.

Ms. Pawlowski added that it has been said before that action is not pursued for various reasons and complaints do not go forward. Therefore, she stated that the Board will not have data.

Dr. Nunez stated that a comment was made regarding what the organizations want. He referenced page 19 of the meeting materials, which stated that approximately 344,000 California shelter animals are housed in shelters that do not have adequate access to veterinary care, 40% of animal shelters cannot provide consistent access to spay and neuter services, and 68% of shelters cannot consistently provide complete veterinary care. Therefore, he stated that there are not enough veterinarians. He then stated he believed that the strongest opposition to the owner exemption is so that non-veterinarians can provide these unmet veterinary services. He added that he does not disagree that this is a need that needs to be addressed. Dr. Nunez stated that this Board is here to regulate the practice of veterinary medicine and that a group of animals just cannot be exempted from the Practice Act just because they belong to rescue groups.

Dr. Waterhouse thanked Dr. Nunez and Dr. Grant for all of their hard work. She stated that what she knows of Board staff is that they work hard and that she believes them when they say they have this overview of what is happening. Therefore, she indicated that the Board should go forward with the proposal.

Public Comment: Ms. Ussery requested public comment on the agenda item.

The following public comments were made regarding the agenda item:

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

Sources for Written Protocols

Dr. Miller referenced page 8 of the meeting materials, [BPC section 4827, subdivision (a)], paragraph (5), subsections (A) and (B), where the Committee was discussing the sources by which written protocols could be derived. He stated that the big player that was being overlooked was the American Association of Shelter Veterinarians. He noted that they have a publication, which is what the Committee might be looking for in terms of terminology. He explained that they have a publication that provides standard of care protocols for shelters. He added that the second edition of the publication was available for free on their website.

Dr. Miller stated that he believed that there is a value to having a California veterinarian involved at shelters because there are certain diseases that are prevalent in certain parts of the state that are not in others.

Dr. Miller also stated that the Committee may want to consider adding a state or national shelter medicine association publication as one of sources for potential protocols.

- [Bonnie Lutz](#), Esq., provided the following public comment:

Addressing Sanctuaries and Other Potentially Affected Organizations

Ms. Lutz stated that one of her major comments was that rescues do not include sanctuaries. She added that she happens to be involved with a very well-run sanctuary in Laguna Beach. She explained that the definition of a rescue group did not include sanctuaries. Therefore, she stated that is something that needed to be looked at if the Board is going to pursue this legislation.

Ms. Lutz added that she understood why the Board is pursuing the legislation, but that it is a very difficult issue. She stated that she gets a lot of calls about bad things happening out there, like what Ms. Sieferman referred to. She added that, in her 24 years of doing the work that she does, she has only had two actual cases that she worked on, so people do not complain to the Board.

Ms. Lutz asked if the Board had talked to the American Kennel Club or the American Zoological Association. She stated that Dr. Scarlett referenced

these groups in her letter as potentially being affected by the legislation. She added that she also knew some top quality dog breeders who, while they probably cross the line, they do not cross the line as much as the low quality dog breeders. She explained that it is a tough issue to deal with.

Because of all of these reasons, Ms. Lutz stated that she kind of understood what Ms. Welch was getting at, in that maybe there is another way to approach this issue. She added that she gives the members a lot of credit because this is a very difficult issue. She stated that she knows why the Board wants to deal with it and that she agrees with what everyone has said.

She concluded that there are these situations, like an animal sanctuary, where you have to understand that those people, either because they cannot afford it or because it is not available, might not be able to always have a veterinarian available, and they do not fit the definition of a rescue group.

- [Carrie Ann Calay](#) provided the following public comment:

Listing Types of Prohibited Activities/Treatments

Ms. Calay stated that she has addressed the Board previously. She added that what she wanted to say is what she has been saying all along. She stated that she did not like bringing up the subject of choice, but she wanted to mention the suggestion about listing types of prohibited activities, and that would be a much simpler way to address this situation.

Ms. Calay stated that the proposed legislation was growing by leaps and bounds and becoming convoluted. She added that she was shocked between what she read in the last Board meeting minutes and what she was seeing now. She stated that she was advocating listing types of prohibited treatments. She added that it was also important to say that there are other types of treatments that might come under this legislation, such as acupuncture, massage, etc., that are in a gray area that people can make complaints about.

Data is Needed

Ms. Calay also stated that she is becoming increasingly averse to the use of the words “a lot” and “many” and that is what she has been complaining about. She added that it is difficult to discriminate the data that is collected by Board staff, but perhaps the way it is collected can be retooled, so that numbers can be provided. She stated that it is not as important to listen to horror stories, of which she was quite sure they exist, but numbers are needed. She again stated that the words “a lot” and “many” are meaningless.

Response to Public Comment/Additional Discussion: The following responses to public comment and additional discussion occurred:

Dr. Nunez stated that he appreciated the public comments.

Dr. Grant stated that one of his reasons for wanting to address unlicensed practice was due to the fact that there are out of state and out of country veterinarians coming in and doing procedures on horses. He explained that horses are harmed and that owners begin to realize that things are being done improperly and treatment becomes more costly. He stated that, because there has been so much argument over the owner exemption, he wondered how much clarification the legislation would provide. He added that, besides the legislation, the Board needs to consider how it is going to obtain more resources, so that there are more investigators attending horse events. With regard to data, Dr. Grant asked if a survey could be sent to California veterinarians in all areas of practice, asking about various unlicensed practice concerns.

With regard to the legislation addressing issues in the equine industry, Ms. Sieferman stated that it would address when individuals practicing are claiming the owner exemption or when they are performing services gratuitously. She added that when veterinarians are coming forward and the Board does have the evidence, it would be able to take action rather than close the complaints due to lack of authority.

With regard to the Board having more of a presence at horse events, Ms. Sieferman stated that was something the Subcommittee has discussed, specifically having more investigators present at events. She added that this would be part of the Board's plan, and that having a presence at racetracks, polo events, and dog shows had been discussed.

With regard to obtaining information from licensees, Ms. Sieferman agreed that having more information is better. She explained that the Subcommittee did obtain information from small and large animal stakeholders, food animal stakeholders, the Cattlemen's Association, and the California Department of Food and Agriculture (CDFA) to hear from all facets of the profession and to learn about what types of unlicensed practice they are seeing. She added that unlicensed practice was being seen across the board. Ms. Sieferman explained that the Subcommittee has a good understanding of what is occurring and that it is just a matter of what can be done about it.

Dr. Waterhouse asked whether "equine" was meant to be included with "livestock" and "food animals" under BPC section 4827, [subdivision (a), paragraph (3)]. Ms. Sieferman stated that "equine" was part of current law. Dr. Waterhouse asked whether the word should be struck, as part of the proposal. Ms. Sieferman responded that could be part of the discussion.

Ms. Sieferman asked what the rationale would be to strike “equine” from that provision. Dr. Waterhouse responded that “equine” was not being included any other time, along with “livestock” and “food animals”.

Dr. Nunez stated that the equine practitioners say that there are employees who do inseminations, pregnancy checks, etc., while they are employed by the owner of the horses. However, they explained that once they form their own business, that is when they start providing services as unlicensed individuals. He added that he did not think it was necessary to remove “equine” from this provision. He also stated that, if these individuals provided reproductive services outside of their employment with the owner, then that is unlicensed activity.

Ms. Sieferman clarified that paragraph (3) was separate from the owner exemption. Ms. Welch also pointed out that the paragraph was about making a determination as to the “status of pregnancy, sterility, or infertility” and not necessarily authorizing insemination.

Dr. Waterhouse asked whether making a determination could mean doing a rectal on a horse. Dr. Grant concurred that could be the case, but that it could also involve an ultrasound. He stated that the provision should not even imply that an individual can do a rectal on a horse. Dr. Nunez stated that was a fair point.

Dr. Nunez stated that, to Ms. Welch’s suggestion to list prohibited activities by unlicensed individuals, perhaps having rectal examinations to determine the status of pregnancy, etc., could be on this list if the Committee decided to go in that direction. He added that making such a list may be difficult.

Ms. Welch responded that a list of practices that are OK could be created, or a list of practices that are not allowed under the owner exemption. She added that, if the Committee is trying to limit the scope of the existing owner exemption, a path needs to be chosen. Dr. Nunez responded that it would probably be easier to create a list of practices that are not allowed.

Dr. Nunez also stated that he did not agree with the comments in the letters, alleging that this action would result in the death of hundred of thousands of animals. He also acknowledged that the groups that submitted the letter were probably not going to back down. He asked that if creating a list of prohibited activities would allow the Board to address the various complaints that are received.

Ms. Sieferman responded that making lists concerns her because it would risk not being specific enough or leaving things out that are not thought about at the time. However, she added that she would accept any change that provides an improvement.

Ms. Pawlowski stated that she was very concerned about creating any sort of list because they have been down that road before with other issues (i.e., RVT tasks). She added that, when creating a list, something is always forgotten and that gives somebody permission to do something that was forgotten from the list. She also stated that the Board is trying to do what is best for pets and consumers right now and that it is difficult to get it right for everyone. Ms. Shufelt concurred that creating lists is difficult and may not help the situation.

Dr. Nunez indicated that he liked Dr. Miller's idea of adding the American Association of Shelter Veterinarians to the proposal.

Ms. Welch noted that the intent was to try to find more than one way for individuals to rely on protocols and that if there is something that is a bit more verifiable and easier to point to, that would be a huge improvement over "reputable textbook."

Dr. Nunez asked if they could say "Board-approved" textbooks. Ms. Welch responded that would not be advisable, as the Board would then have to review and approve textbooks for use by shelters and rescue groups, which would be time consuming.

Ms. Ussery stated that she thought the suggestion was to add a state or national shelter medicine association publication. Dr. Nunez responded he would be in favor of that.

Dr. Waterhouse reiterated that she would recommend striking "equine" from paragraph (3) [of subdivision (a)] of BPC section 4827. Ms. Siefertman responded that if that was the Committee's prerogative, she asked if more specificity could be provided about how the amendment addresses consumer protection and animal harm. She explained that the rationale would need to be provided to the Board and the Legislature.

Dr. Waterhouse explained that her concern was that doing a rectal on a horse is much different than doing a rectal on a cow. Dr. Grant added that making a determination on the status of pregnancy, sterility, or infertility on a horse involves a manual rectal examination and that it is a dangerous technique that needs to be performed by trained personnel. He also stated that the examination can be harmful to the operator, the animal, and the owner.

Dr. Waterhouse asked if rectal examinations on horses was one of the major causes for malpractice suits. Dr. Grant concurred. Dr. Nunez stated that he was not convinced about striking "equine" from paragraph (3) and that he would like to hear more from the stakeholders about this proposed amendment.

Public Comment: Ms. Ussery requested public comment, specific to striking “equine” from paragraph (3) of subdivision (a) of BPC section 4827.

The following public comment was made:

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

Striking “Equine” from Paragraph (3) of Subdivision (a) of BPC Section 4827

Dr. Miller stated that, by striking “equine” from paragraph (3), it is not going to stop anybody from doing breeding practices because this specific provision is in relation to the time of artificial insemination. He explained that it was written in there originally because artificial inseminators, which are their own business, needed protection in the law to be able to make a diagnosis of pregnancy to tell the owner that their mare or cow was already pregnant and that the animal could therefore not be inseminated. He clarified that that was all that paragraph (3) did and that, by striking “equine”, it would just be eliminating the individual’s ability to do that at the time of insemination. He stated that the amendment would not change anything in relation to the spectrum of equine breeding.

Response to Public Comment/Additional Discussion: The following responses to public comment and additional discussion occurred:

Ms. Pawlowski stated she was not sure if she was in favor of removing “equine” from paragraph (3). She added that it was not presented to the stakeholders, it probably has not been discussed enough, it was already there in existing law, and that she was not sure if that was where the Board was having issues. She concluded that she was concerned about striking the word.

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 amend BPC sections 4825.1 and 4827, including the amendments made at the meeting (without striking “equine” from paragraph (3) of subdivision (a) of BPC section 4827), regarding veterinary medicine practice exemptions.

Public Comment: Ms. Ussery requested public comment on the motion. The following public comments were made on the motion:

The following public comments were made on the motion:

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

Intent of Paragraph (6) of Subdivision (a) of BPC Section 4827

Dr. Miller asked if he could bring the Committee's attention to page 9 of the meeting memo, [BPC section 4827, subdivision (a),] paragraph (6), which was new language. He stated that he understood the intent of the language; if you go to your veterinarian and they send you home with medications, it is not considered the practice of veterinary medicine for an owner to administer those medications pursuant to what the veterinarian told the owner to do. However, he noted that paragraph (6) did not say that. He clarified that the language says that if a veterinarian writes out a treatment plan and somebody is using that, it is exempted.

He added that, in this scenario, the intent is that the veterinarian has a veterinarian-client-patient relationship (VCPR) for the condition(s) that is being treated. He stated that, if that is the intent, then that should be specified in the language.

- [Bonnie Lutz](#), Esq., provided the following public comment:

Support for Comments Made Regarding Intent of Paragraph (6) of Subdivision (a) of BPC Section 4817

Ms. Lutz supported Dr. Miller's public comments. She explained that, with regard to the issue about sanctuaries, this might also be something that would apply to them.

Tailor Definition of Rescue Group to Include Sanctuary

With regard to sanctuaries, she requested that the Board tailor the definition of a rescue group so that it would include a sanctuary. She explained that sanctuaries do not sell or place animals, and they do not get them from shelters. She added that they do get animals from owners. She stated that the definition of rescue group would apply, except they do not bring the animals in to place them, they bring them in to keep them.

Response to Public Comment/Additional Discussion: The following responses to public comment and additional discussion occurred:

Dr. Nunez stated that he believed Dr. Miller was correct and that the VCPR language should be added to paragraph (6).

During a break, Ms. Siefertman noted that Ms. Welch assisted with some language to address the public comments about tying the administration of prescription medications to the veterinarian with the VCPR. However, she added that they were not able to address the public comment regarding sanctuaries.

She stated that the Committee could move forward with the proposal, as is, or discuss the sanctuary piece more.

With regard to the proposed language in paragraph (6) (“administering a prescription drug or medication”), Ms. Welch asked if they needed to be particular about what can be administered to the animal under the exemption. She explained that replacing “a” with “the” would tie the language more to the written treatment plan.

Dr. Nunez and Ms. Pawlowski accepted the amendments to paragraph (6) of subdivision (a) of BPC section 4827.

With regard to incorporating sanctuary into the definition of rescue group, Ms. Pawlowski stated that she believed sanctuary would need its own definition and might require additional time and consideration. She added that she was not against the suggestion, but that it would just require additional consideration. Dr. Nunez stated that he did not believe adding sanctuary to the definition was necessary. Dr. Goedken concurred that “sanctuary” might be too broad of a term.

Ms. Sieferman stated that she did not believe sanctuaries would fall under the definition of rescue groups because, under current definition, it states that at least one of the purposes is either the sale or placement of animals that have been removed from public shelters and there are sanctuaries out there where that is not the case.

Ms. Sieferman also stated that, if adding sanctuaries to the language was considered, adding it in paragraph (5) might not be the appropriate location because of how the paragraph is written and that the language is intended for shelters and rescue groups that are removing animals from shelters to help with the pet overpopulation; with sanctuaries, that is not the case.

Dr. Nunez added that he was not hearing an outcry from the sanctuary community that they need to be able to do more to complete their mission. Therefore, he stated he did not think it was necessary to add sanctuary to the definition.

Revisions to the Proposed Legislation

Revisions to the Proposed Legislation: Following, are revisions to the proposed legislation after all discussion:

§ 4827.

(a) Nothing in this chapter prohibits any person from:

[...]

(5) Providing the following care to animals lawfully deposited with or impounded by a shelter not registered with the board pursuant to Section 4853 or removed from such shelter by, and in the current care of, a rescue group:

(A) Administering preventative or prophylactic nonprescription vaccinations to the animal pursuant to protocols written by a California-licensed veterinarian licensed in this state, an American Veterinary Medical Association (AVMA) accredited university veterinary medicine program, or a ~~reputable shelter medicine textbook,~~ state or national veterinary shelter medicine association, for the purposes of preventing the spread of communicable diseases, without the presence of a veterinarian when the person has received proper training in the administration of the nonprescription preventative or prophylactic vaccinations.

(B) Administering nonprescription medications to the animal pursuant to protocols written by a California-licensed veterinarian licensed in this state, an AVMA accredited university program, or a ~~reputable shelter medicine textbook,~~ state or national veterinary shelter medicine association, for the control or eradication of apparent or anticipated internal or external parasites, including, but not limited to, fleas, ticks, or worms, without the presence of a veterinarian when the person has received proper training in the administration of the nonprescription medications for the control or eradication of those internal or external parasites. A person's decision to administer these medications shall not be construed to mean the person has made a diagnosis of the animal's medical condition.

(C) Administering medications prescribed by a veterinarian licensed in the state to the animal without the presence of a veterinarian when the shelter ~~or rescue group~~ has received a written treatment plan from the licensed veterinarian for that specific animal and has a dispensing protocol in place for the tracking of dispensed prescribed medications and when the person has received proper training in the administration of prescription medications.

(6) Pursuant to a written treatment plan ~~prepared by a licensed veterinarian~~ that includes the route and/or method of administration and dosage and/or frequency of use ~~prepared by a licensed veterinarian with whom the owner has a veterinarian-client-patient relationship to treat the animal,~~ administering ~~a~~the prescription drug or medication, other than anesthesia, to an animal by the owner of the animal, an employee of the owner, or a designated caretaker of the animal.

[...]

Public Comment: Ms. Ussery requested public comment on the amendment to the motion (amending paragraph (6) of subdivision (a) of BPC section 4827). There were no public comments made on the amendment to the motion.

Roll Call Vote: Ms. Ussery called for the vote on the motion. Ms. Sieferman took a roll call vote on the motion. The motion carried 7-0.

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

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

A. [Discussion and Possible Action to Initiate a Rulemaking to Amend California Code of Regulations \(CCR\), Title 16, Section 2068.5 Regarding Practical Experience and Education as Equivalent Curriculum](#)

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

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

With regard to the equivalent education requirements under subsection (a) of CCR, title 16, section 2068.5 and the proposed amendment to that subsection, Dr. Nunez asked if the only accepted instructors would be those from postsecondary academic institutions. Ms. Sieferman confirmed that was the case.

Dr. Nunez also asked if it needed to be specified that the institutions were accredited. Ms. Sieferman responded that did not need to be added because the alternate path is for those institutions that are not accredited. She explained that, in statute, the Board already accepts accredited programs and that the regulation addresses non-accredited programs. She further clarified that the non-accredited programs are approved through other means, such as through the California Bureau for Private Postsecondary Education (BPPE) or the Accrediting Commission for Community and Junior Colleges. Ms. Sieferman added that, in the [meeting memo](#), a [link](#) was provided to the list of current programs approved by BPPE.

With regard to subsection (f), Dr. Grant asked about limiting directed clinical practice to states or territories of the U.S. or Canadian provinces. He asked if it

would matter that strong programs, such as the Royal Veterinary College in England, would not be recognized.

Ms. Shufelt mentioned the American Association of Veterinary State Boards (AAVSB) Program for the Assessment of Veterinary Education Equivalence (PAVE) program; however, Ms. Pawlowski and Ms. Sieferman responded that AAVSB is no longer offering that pathway.

Ms. Pawlowski stated that this was one of the things considered when limiting language to the U.S. and Canadian provinces. She acknowledged that there are a lot of good educational programs outside of the U.S. and Canada. However, she added that this is where the Subcommittee got stuck and that they were asking for guidance from the Committee.

Dr. Grant asked for confirmation that the AVMA accredits a number of veterinary colleges in different countries. He asked if these programs are somewhat equivalent to those in the U.S. or Canada. Ms. Sieferman clarified that they were currently talking about clinical practice hours and not education.

Dr. Nunez asked where the number 2,500 hours (proposed change from 4,416 hours) came from. Ms. Pawlowski responded that this number was mirrored from the veterinarian language. Dr. Nunez noted that made sense.

Revisions to the Proposed Text

Revisions to the Proposed Text: Ms. Welch offered the following clarifying revisions to the proposed text:

§ 2068.5.

[...]

~~(d) The candidate shall provide the board with a syllabus or an outline for each course. The candidate shall provide documentation of attendance for each course in the form of one of the following:~~

~~(1) a certificate of attendance,~~

~~(2) an official transcript, or~~

~~(3) a letter on official stationery signed by the course instructor documenting that the candidate attended a particular course.~~ Proof of completion of education specified under subsection (a) shall be submitted directly to the board by the postsecondary institution, or American Association of Veterinary State Boards, as applicable.

[...]

She explained that a comma could be removed and that adding “as applicable” would add some clarity, so that the applicant knows they have to get submission of proof of completion of education directly from the postsecondary institution or AAVSB, as applicable; so it is not “either/or” or “both” – it is whichever one applies to their application. She explained that she was making this recommendation now because, as the language moves through the process, minor or technical corrections like this can get overlooked.

Ms. Welch added that if the legislative proposal to make this addition in statute is successful, then this provision would not need to be added in the regulation because it would be redundant.

Direct Supervision of Clinical Practice Experience

Dr. Nunez asked for clarification regarding the three options provided within the regulatory proposal pertaining to where the supervising veterinarian should be licensed and/or where the RVT registration applicant’s clinical practice should occur.

Ms. Sieferman explained that Option 1 was specific to where the supervisor is licensed; Option 2 is specific to where the RVT registration applicant’s clinical practice should occur; and Option 3 is the combination of Options 1 and 2.

Dr. Nunez stated that he would prefer Option 3 because the goal is to not be punitive about where applicants get their clinical experience.

Ms. Sieferman further explained that, in Option 3, the supervising veterinarian would have to be licensed in any state or territory of the U.S. or Canadian province and the RVT registration applicant’s clinical practice hours would also have to occur in any state or territory of the U.S. or Canadian province. She stated that other countries would not be accepted under Option 3. She added that, in response to Dr. Grant’s comment, an Option 4 could be considered that would not limit the clinical practice experience and licensure to states or territories of the U.S. or Canadian provinces.

Ms. Sieferman also added that the Subcommittee had discussed the concern that, in other countries, the standard of care is much lower than the standard of care in the U.S. or Canada.

Eliminating the RVT Task List – Proof of Experience (Checklist)

Dr. Nunez stated that the checklist says that, if a veterinarian is going to sign off that the applicant is proficient in the clinical practice experience, the veterinarian needs to be the individual who was supervising the applicant. Ms. Sieferman

confirmed that was the case. She added that the veterinarian can also attest to the experience at the time it occurs. She noted that the proposed changes pertaining to the checklist were found under subsection (g).

Ms. Shufelt stated that the Subcommittee looked at the checklist, specifically, and thought that it was somewhat outdated. She explained that the recommended amendment would allow the supervising veterinarian to sign off on clinical practice experience in the broad categories identified in the regulation and not on each individual skill.

Dr. Waterhouse stated that the problem with checklists is that they can get outdated quickly.

Motion: Mark Nunez, DVM, moved and Cheryl Waterhouse, DVM, seconded a motion to take the following actions:

- Approve the regulatory text in Attachment 1 [as revised at this meeting] to amend CCR, title 16, Section 2068.5, using [Option 3] for subsection (f).
- 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 2068.5.

Public Comment: Ms. Ussery requested public comment on the motion. The following public comments were made on the motion:

- Grant Miller, DVM, Director of Regulatory Affairs, CVMA, provided the following public comment:

Removing Qualified Instructor Qualifications from CCR, Title 16, Sections 2068.5 and 2085.7

Dr. Miller stated that he had constructive comments that needed to be made.

Regarding an individual who turned in their RVT co-worker's continuing education (CE) certificate, he noted that that was fraudulent and not possible. He explained that there is a statute that says that CE can only be provided from an approved body, which is the CVMA, the AVMA, a government agency, or an academic institution. Dr. Miller added that there is a list, in statute, that says that, unless you get your CE at a recognized conference or something that is Registry of Approved Continuing Education (RACE)-approved, it is not going to work.

Setting that aside, Dr. Miller stated that he did not have an opposition to the Board removing course instructor qualifications because, at these conferences, everyone knows that course instructors are qualified. He added that these conferences have entire committees that look through those instructors. He noted that it is probably fine to just trust that the conferences and the RACE-approved courses are going to have instructors who are qualified.

He added that, if the Board moves to repeal the course instructor qualifications in CCR, title 16, section 2068.5, then it stands to reason that the Board should also remove them from CCR, title 16, section 2085.7 because there is identical language in that regulation pertaining to course instructor qualifications for veterinarian CE. He added that if the Board is going to make changes to one regulation, then it should probably make changes to the other one.

RVT Task List – Proof of Experience (Checklist)

Dr. Miller stated that the CVMA has always been supportive of the RVT alternate route program. He explained they believe that, from its inception, it has shown tried and true that it really provides a great pathway for people who otherwise could not attend a traditional program to become an RVT in California.

Dr. Miller further explained that the RVT alternate route program was made to prove that if you went to an RVT school, you were essentially going to have the same education if you did an alternate pathway. He added that the checklist is part of that pathway.

He noted that the actual checklist may not be incorporated into the regulation, but the concepts they want the RVT to show as being proficient in are listed in subsection (g). He added that if the checklist is out of date, it is understandable that the Board may not want to utilize that particular checklist. Instead, he stated that the Board may want to consider aligning its requirement with the skill and proficiency checklist provided by the AVMA Committee on Veterinary Technician Education and Activities (CVTEA).

Dr. Miller explained that the CVTEA is the national accrediting body through the AVMA that accredits RVT schools.

Dr. Miller stated that he looked at their checklist and noted that the broad headings of the subjects they have on the checklist are almost synonymous with what is written in subsection (g). He noted that he believed subsection (g) was better and more applicable, but that if the spirit was to ensure that alternate route students have the same education as a traditional route student, then it would make sense to align the regulation with the CVTEA checklist.

Dr. Miller added that he would not recommend eliminating the checklist because it is known that alternate route RVTs get a bad rap. He explained that people say that alternate route RVTs do not know as much and that they have less education. He stated that if the Board leaves the applicant's clinical skills up to the supervising veterinarian, then that will create a wide disparity in their education because not all veterinarians do things the same way.

He explained that the checklist helps to ensure uniformity, which is what is wanted in the profession. He added that the RVT profession has struggled because it has been such a patchwork quilt over the years. He noted that the checklist helps with integrity and standardization.

Dr. Miller stated that if the Board does not want its own checklist, then that is not a problem. However, if the Board is going to amend subsection (g), rather than repealing the checklist, he would recommend that the Board make reference to the CVTEA checklist and let them shield the load of keeping it current and up to date because that is what they do.

Dr. Miller thanked the Committee for giving him the opportunity to share all of his comments.

- [Nancy Ehrlich](#), RVT, CaRVTA, provided the following public comment:

Alternate Route Applications

Ms. Ehrlich stated that she had comments on various sections.

She noted that someone had mentioned that alternate route applications go directly to the AAVSB, but she was under the impression that the applications were going to the Board first. She explained that she thought the AAVSB was just accepting the applications and not reviewing them for completeness. She added that Ms. Sieferman could clarify that question.

Elimination of Education Routes

Ms. Ehrlich stated that she was a bit alarmed about the idea of eliminating all education routes except through formal programs. She explained that, through the years, many RVT candidates have used the alternate route pathway. She also stated that many candidates have been getting their education through conferences and that this amendment would remove that option. She added that this did not make sense.

She stated that, when they were getting statistics on the alternate route versus other routes, the alternate route candidates were doing quite well. Therefore, she did not see any reason to change where they can get their instruction.

Proof of Completion of Education

Ms. Ehrlich noted that her other question had to do with the requirement that providers send proof of education directly to AAVSB. She stated that the AAVSB would not even know why they are getting such a transcript because they would not have an application to go with it. She stated that this did not make sense. She explained that she believed that the proof of education needed to be part of the complete application; otherwise, no one is going to know what to do with it.

She stated that she was concerned that some of these changes would result in fewer candidates, which is what is not needed.

Response to Public Comment/Additional Discussion: The following responses to public comment and additional discussion occurred:

Ms. Pawlowski asked if she could clarify one thing that was referenced. She stated that she believed the veterinary language in CCR, title 16, section 2086 addresses definitions of CE and that the issue being discussed was practical experience and education as equivalent curriculum. She stated that she believed two different things were being defined. She further noted that the two topics should not be compared when the Committee is talking about veterinarian courses versus RVT alternate route courses.

Dr. Goedken stated that she wanted to make a comment about the checklist. She noted that a checklist is helpful and provides a sense of clarity for the supervising veterinarian, as opposed to signing off broadly on the different topics. She added that, in glancing over the current Board checklist and the CVTEA checklist, she thinks they are helpful because supervising veterinarians are not necessarily doing RVT tasks. She noted that, in looking over the CVTEA guidelines, she also noticed that it was a lot more inclusive of multiple species versus just a term for animal patient.

Ms. Sieferman stated that she wanted to make a few clarifications. She noted that, with the current checklist that was linked to in the meeting memo, there are headers that have the general categories and that those headers match what is in subsection (g). However, she explained that there are subtasks under each header and that is where it can be said that the Board has an underground regulation because those subtasks are not supported.

Ms. Sieferman further explained that the RVT Subcommittee looked at those subtasks because there are the options of updating the checklist and incorporating it by reference through regulation or eliminating the checklist and just aligning with what current law is. She stated that, because the subtasks are not supported by law, Board staff accept if a supervising veterinarian checks off on an overall category. She added that, if the checklist is eliminated, the supervising veterinarian would still be attesting to the knowledge, skills, and abilities that are required for the categories identified in subsection (g). She further explained that the amendments would allow supervising veterinarians to only attest to certain categories, and not all of the categories.

Ms. Sieferman stated that if the Committee wants to be more specific, that could be done and a new, more specific checklist could be created. She added that the Board would just need to come up with rationale to notify the public and the Office of Administrative Law for why each subtask is necessary. Additionally, she noted that the Board would need to make sure the checklist is updated on a regular basis, which would be a new rulemaking every time the checklist changes.

Dr. Waterhouse asked if there could be a reference to the CVTEA checklist in the regulation. Ms. Sieferman responded that the Board could do that. Ms. Sieferman added that the alternate route programs are not CVTEA accredited and so they might not have the same categories listed for CVTEA.

Ms. Sieferman also confirmed that the discussion was not about CE and that it was about education for the RVT programs. And, regarding the individual who did submit documentation and said that they qualified, she stated that she disagreed that that would be considered fraud because the individual said that they qualified because their co-worker met the two requirements under the qualified instructor. She explained that they are not creating CE requirements under CE to renew their license. She added that there were other things that happened that did not make this person successful. Ms. Sieferman also stated that when reading how the law is written, the individual would then be qualified under subsection (e)(1).

Regarding the comment about requiring education to be provided to AAVSB, Ms. Sieferman clarified that that is not what the proposed amendment is doing. The amendment is instead mirroring what the Board currently accepts for

veterinarian applicants as the proof of education. She stated that what the Board accepts would have to come from the postsecondary institution or AAVSB. She added that sometimes proof of education is sent directly to AAVSB to qualify for the examination and the Board would accept that from AAVSB.

Regarding the comment about applying to the Board before applying to AAVSB to take the examination, Ms. Sieferman explained that that is no longer the case. She stated that applicants go directly to AAVSB to apply, even alternate route applicants. She added that applicants do not apply with the Board until they are ready to apply for registration after they have passed the examination.

Ms. Shufelt asked if some applicants could pass the examination and then be denied registration by the Board. Ms. Sieferman responded that that could happen for not meeting other requirements. She added that she did know that AAVSB, when they are reviewing applications, is wanting to make sure that there is a path forward in the desired state prior to approving the applicant's application. For California and other states that have alternate route pathways, she explained that AAVSB ensures that specific state requirements (i.e., clinical practice hours and required education) are met before an applicant is approved to take the examination.

Regarding the checklist, Ms. Dietzen-Olsen stated that if the categories are too broad, another option would be to provide more specificity in the regulation, but then the Committee would have to justify the additional language.

Ms. Shufelt stated that her biggest problem with the checklist is that it has become outdated and that an applicant cannot necessarily do all of those things during their clinical practice hours. She added that if the CVTEA checklist is updated on a regular basis, that would be very helpful. She also stated that, if the categories are provided in regulation, a regulatory change would have to be pursued any time an update is needed.

Dr. Goedken stated that, if the CTVEA checklist is directly referenced in regulation, there are very specific or detailed tasks that are not going to get checked off by 99% of supervising veterinarians. She also added that the checklist is very specific with multiple species, which would be a huge barrier.

Ms. Sieferman stated that subsection (g) lists several items that the supervising veterinarian is attesting to – that the applicant would have the knowledge, skills and abilities in each category. She added that the question for the Committee would be - is the regulation not specific enough? And, if something additional is needed, it would have to be incorporated by reference.

Dr. Nunez stated that the main goal of the regulatory proposal is to make sure the applicant is qualified, educationally and clinically, to be an RVT. He added

that the argument he is hearing is that subsection (g) does cover the clinical experience that the Board wants them to have, but by eliminating the checklist, it only makes the alternate path applicants feel just as good as the traditional path applicants because they have the same checklist. He concluded that he was still in favor of eliminating the checklist if subsection (g) covers the required clinical practice.

Dr. Grant stated that he was a little concerned if an applicant went and worked for a licensed veterinarian in a Canadian province and all they did was equine work, then there would be a lot of tasks that would not get checked off. Dr. Nunez responded that the applicant would have to go and get more clinical experience.

Dr. Goedken also responded that the applicant's knowledge is tested on the examination. Ms. Sieferman concurred.

Dr. Nunez stated that he was not convinced that continuing to have a checklist is going to protect consumers more.

Ms. Welch noted that, in response to Ms. Ehrlich's concern about eliminating the ability for RVT applicants using the alternate route pathway to attend conferences, she wondered if any members had thoughts on that concern. She asked if it would be appropriate to add an additional pathway to obtaining the education credit by using more valid methods of courses, like courses offered through CVMA conferences or something similar.

Ms. Shufelt responded that that was available previously and it was called the ad hoc route. However, the problem with that was that it put a lot of strain on the Board staff because then they had to take all of those courses and put them together and decide if they were equivalent to the education pieces of a postsecondary education.

Ms. Sieferman confirmed that there was a pathway for CE previously and the Board did repeal that because of the stated reason and because the course description on the certificate was not always sufficient.

Dr. Goedken stated that when she thinks of CE, she thinks the majority of it is building on baseline knowledge that applicants need to get.

Ms. Pawlowski stated that addressing the mentioned concern might be going backwards, but that she appreciated the comment and suggestion to address it. She added that the alternate pathway is sometimes criticized, but that she wants it to be understood that applicants are still getting an education and the information they need. She noted that the Board stopped that form of getting information years ago for various reasons. She explained that, when the regulation was written, it was not intended to allow a form of being able to

provide applicants with information through a CE route. She further explained that it was intended to help those individuals who could not go to school through the traditional education route and that the Board was just trying to assist those individuals. She added that there are so many other pathways to get education now and that is why the regulation is being looked at.

Roll Call Vote: Ms. Ussery called for the vote on the motion. Ms. Sieferman took a roll call vote on the motion. The motion carried 6-0-1 with Dr. Goedken abstaining.

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

6. **Update, Discussion, and Potential Action on Recommendations for Proposed Legislation to Amend BPC Section 4905 Regarding the Board's Fee Structure**—*Richard Sullivan, DVM, and Marie Ussery, RVT*

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

Discussion: The Committee had no comments.

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 (Option 2) to amend BPC section 4905 regarding the Board's fee structure.

Public Comment: Ms. Ussery requested public comment on the motion. The following public comments were made on the motion:

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

Support for Proactive Planning and Long-Term Stability

Dr. Miller thanked the Board for engaging with CVMA on the matter and acknowledged the Board's thoughtful, dedicated, and detailed work. He emphasized the importance of taking a proactive approach to ensure the long-term stability of the profession. By looking ahead and projecting future needs, he stated that he believed the Board can make informed decisions that will benefit the profession over time, and he expressed support for such forward-thinking efforts.

Suggestions Regarding License Reprinting

He also addressed the issue of duplicate license fees, agreeing that the \$25 fee should not be assessed. However, he raised concerns about the accessibility of license reprints through the BreZE system, noting his own difficulty in locating the option. Dr. Miller suggested that if the fee is eliminated, the Board should provide clear guidance or education on how license reprinting is expected to work. He offered potential assistance in disseminating this information to ensure licensees are informed about the process.

Dr. Waterhouse stated that the Board needs to plan for the variables that can happen and the questions that will be asked. She inquired about what would happen if she were completing her veterinary premises renewal right now and had eight veterinarians currently employed, but three veterinarians have been hired to start employment over the summer.

Ms. Sieferman indicated that there will be several different scenarios that will come up. She stated that the Board's goal was to come up with a fee structure that will have a tiered approach. She explained that, when renewing a veterinary premises registration, the registrant would take into account how many full-time equivalent veterinarians are employed at the premises at the time of renewal. She stated that if the number of veterinarians employed changes between renewal cycles, the new fee, if different, would not be paid until the next renewal.

- [Nancy Ehrlich](#), RVT, CaRVTA, provided the following public comment:

Ms. Ehrlich noted that she was a little confused because the notes she had from her conversation with Ms. Sieferman did not match the numbers provided in the meeting materials. She then indicated that she was mistaken and that her comment could be disregarded.

Dr. Nunez noted that the meeting materials indicated that many Veterinary Assistant Controlled Substance Permit applicants have an existing criminal history, and once they receive their permits, they tend to have more subsequent arrests than their RVT

counterparts. He asked whether there was a correlation between number of arrests and access to drugs.

Ms. Sieferman responded that there was no correlation.

Roll Call Vote: Ms. Ussery called for the vote on the motion. Ms. Sieferman took a roll call vote on the motion. The motion carried 7-0.

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

7. **Update, Discussion, and Potential Action on Recommendations from the Complaint Audit Subcommittee—Jeni Goedken, DVM, and Cheryl Waterhouse, DVM**

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

A. **Proposed Legislation to Amend BPC Section 4875.1 Regarding Complaint Prioritization**

Dr. Goedken also presented the proposed legislation to the Committee. Ms. Sieferman clarified that the proposed amendment to paragraph (1) of subdivision (a) had already been approved by the Committee; however, the current proposal also included an amendment to subdivision (a) to provide consistent language within the statute.

Discussion: The Committee had no comments.

Motion: Kristi Pawlowski, RVT, moved and Mark Nunez, DVM, seconded a motion to recommend to the Board submission to the California State Legislature the legislative proposal to amend BPC section 4875.1 regarding prioritization of cases.

Public Comment: Ms. Ussery requested public comment on the motion. The following public comment was made on this item:

- [Dan Baxter](#) of CVMA provided the following public comment (not related to the motion):

Spectrum of Care

Mr. Baxter made a comment referencing the February 26, 2025 Consultant Round Table mentioned in the agenda item report, particularly about the discussion on spectrum of care and how it affects opinion on standard of care. He provided context by mentioning CVMA's 2025-2026 strategic plan, which includes initiatives related to spectrum of care, contextualized care, and incremental care. One of the key elements of the plan is to better educate CVMA members on the importance of documenting declined care. Additionally, Mr. Baxter emphasized the importance of engaging with the Board on the issue of spectrum of care, and he expressed a desire for ongoing collaboration to refine these concepts. He offered the CVMA as a resource for further discussions on how these ideas impact standard of care and expert opinions.

Response to Public Comment: The following responses to public comment were made:

Dr. Goedken stated that, in response to Mr. Baxter's comment, she expressed support for keeping spectrum of care in mind. She raised a concern about what newer veterinarians are being taught regarding spectrum of care, noting that many consultants have been out of school for decades. She emphasized the need for broader input on this topic from all generations and perspectives.

Ms. Sieferman shared that the Outreach Subcommittee has been tasked with writing more outreach materials about spectrum of care. She reported that the Subcommittee had met with Western University of Health Services and UC Davis to discuss what is being taught about spectrum of care. The consensus from these discussions was that the concept is being taught, though it may not be specifically called out in the course outlines. The schools are looking for ways to bring it to the forefront and emphasize it more clearly, even though the varying care options have always been included in the curriculum. She noted that the Outreach Subcommittee continues to look at this topic.

Roll Call Vote: Ms. Ussery called for the vote on the motion. Ms. Sieferman took a roll call vote on the motion. The motion carried 7-0.

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

8. [Update, Discussion, and Potential Action on Recommendations from the Inspections Subcommittee](#)—*Jeni Goedken, DVM, and Kristi Pawlowski, RVT*

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

Discussion: The Committee had no comments.

Public Comment: Ms. Ussery 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*

Dr. Waterhouse noted that the Outreach Subcommittee is working primarily in two areas (Spectrum of Care and Unlicensed Activity). She and Ms. Sieferman presented the following updates to the Committee:

- **Spectrum of Care:** The Subcommittee recently met with a professor from UC Davis and discussed how the school approaches spectrum of care. Additionally, Dr. Waterhouse provided comments and suggested edits for an article that is being prepared by AAVSB on the topic of spectrum of care. It was noted that both UC Davis and AAVSB remarked that spectrum of care is not a new concept, meaning that clients are given all options, the options are discussed, and the best course of action is decided upon. One topic that needs to be emphasized more these days is the importance of medical records – everything needs to be documented, including what clients accept and decline.
- **Unlicensed Activity:** The Subcommittee recently met with a veterinarian who specializes in reproduction, a theriogenologist. He shared with the Subcommittee some of the things he sees at dog shows. The veterinarian has also provided some educational materials for the Subcommittee to review. These materials were first geared at the management of dog shows; however, the Subcommittee is looking at having them tailored to consumers as well. Additionally, Ms. Bowler and Ms. Sieferman recently attended two local dog shows to look at how dog shows are set up and what type of education should be provided to consumers

and licensees at these dog shows. Additionally, the Subcommittee is looking at scheduling a meeting with the management of dog shows to share concerns, similar to what the Unlicensed Subcommittee did with individuals who oversee horse shows and polo clubs. It was further explained that the education materials the Subcommittee is looking at will be tailored to more educated consumers (who are more familiar with reproductive services) and the management of dog shows. The Subcommittee will provide additional updates, going forward.

Discussion: The Committee had no comments.

Public Comment: Ms. Ussery 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*

Dr. Waterhouse and Ms. Ussery presented the following updates to the Committee based on a recent meeting with the CDFA:

- **Blood Banks:** It was noted that the CDFA blood bank regulations had recently been approved. CDFA indicated that they really appreciated the Board's assistance in distributing information regarding the regulations to consumers.
- **Highly Pathogenic Avian Influenza (HPAI):** HPAI is still overwhelming multiple state departments. CDFA indicated that the strategy ranges, based on what area of California the dairies are in. It was noted that most dairies in California are affected, with the exception of some of the coastal and northern regions.

Discussion: The Committee had no comments.

Public Comment: Ms. Ussery requested public comment on this item. There were no public comments made on this item.

11. Future Agenda Items and Meeting Dates

Ms. Siefertman presented this item. She indicated that the following 2025 meeting dates were posted on the Board's website:

- July 15, 2025
- October 14, 2025

Additionally, she noted that the following 2026 meeting dates were reported at the last Committee meeting:

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

Ms. Siefertman then noted the Committee would have the following future agenda items:

- Proposed Hospital Standards Self-Evaluation Checklist updates from the Inspections Subcommittee
- Proposed legislative and regulatory changes from the Inspections Subcommittee

Public Comment: Ms. Ussery requested public comment on this item. There were no public comments made on this item.

Ms. Ussery stated that this meeting was Dr. Grant's last Committee meeting and that she wanted to thank him for his service and dedication.

Dr. Grant stated that it has been an honor to be involved with the Committee. He shared that he has been in veterinary medicine for 58 years. He added that he has been impressed with the work of Board staff and the members who volunteer their time to serve on the Committee.

12. Adjournment

Ms. Ussery adjourned the meeting at 3:18 p.m.

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