



# MEMORANDUM

<b>DATE</b>	January 13, 2021
<b>TO</b>	Veterinary Medical Board (Board)
<b>FROM</b>	Justin Sotelo, Lead Administrative & Policy Analyst
<b>SUBJECT</b>	<b>Agenda Item 11.D. Sections <a href="#">2070</a> and <a href="#">2071</a>, Article 7, Division 20, Title 16 of the CCR Regarding Board Fees</b>

## Background

At its [October 9, 2019](#) meeting, the Board approved emergency and general rulemaking proposals to raise veterinarian and registered veterinary technician (RVT) application, license, renewal, and delinquency fees to their statutory caps in California Code of Regulations (CCR), title 16, sections [2070](#) and [2071](#). This action was in response to the Board’s impending insolvency, as a result of significantly increased expenditures, a structural imbalance between revenues and expenditures, and a rapidly declining Contingent Fund (i.e., “savings account”) that threatened the performance of the Board’s core licensing, examination, enforcement, and inspection functions.

On January 10, 2020, the Board issued a [Notice of Intent](#) to File Emergency Regulations and the Office of Administrative Law (OAL) initiated the five-day public comment period on January 17, 2020. On January 27, 2020, the emergency regulations were [approved](#) by OAL and filed with the Secretary of State, and became effective immediately.

Staff worked with the DCA Regulations Unit to prepare the regular rulemaking package, which is known as the Certificate of Compliance, and is required to be filed at OAL within 180 days after an emergency action becomes effective. In early April 2020, after noting that an application fee for Board approval of RVT schools and programs had not yet been established in regulation, staff, after consulting with OAL, proposed adding that new fee under CCR, title 16, section 2071. On [April 23, 2020](#), the Board approved the addition of this new fee and approved modified regulatory text for the Certificate of Compliance package.

Staff again worked with the DCA Regulations Unit and Budget Office to update the Certificate of Compliance package. At that time, the Board was also able to invoke Governor Gavin Newsom’s COVID-19 related Executive Orders, [N-40-20](#) and [N-66-20](#), which extend Administrative Procedure Act deadlines by a total of 120 additional days. The package was approved by the DCA Director on August 1, 2020, and by Agency on

September 14, 2020. On September 15, 2020, the package was submitted to OAL and [published](#) on September 25, 2020, which initiated the 45-day public comment period. The Board received two requests for a public hearing. The public comment period closed on November 9, 2020, and the [public hearing](#) was held virtually via WebEx Events on November 10, 2020.

Concurrently, OAL recommended that the Board request a Re-Adoption of the Emergency Regulations given the November 24, 2020 Certificate of Compliance deadline. A re-adoption extends the effective date of emergency regulations by 90 days (plus two additional 60-day extensions are provided per the Governor's Executive Orders cited above), giving the Board additional time to finalize and submit the Certificate of Compliance package. On November 4, 2020, the Board issued a [Notice of Intent](#) to Re-Adopt Emergency Regulations and an updated [Finding of Emergency](#). On November 12, 2020, the Board filed the request for Re-Adoption of Emergency Regulations with OAL, and the 5-day public comment period closed on November 17, 2020. The Re-Adoption of Emergency Regulations was [approved](#) by OAL on November 18, 2020, and became effective on November 25, 2020 through June 26, 2021. The Certificate of Compliance package now is due to OAL no later than June 25, 2021.

During the 45-day public comment period on the Certificate of Compliance rulemaking, the Board received 57 written comments (or letters) with objections, concerns, or recommendations regarding the proposed regulations (**Attachment 1**). During the public hearing, the Board received one written comment with concerns and a recommendation (**Attachment 2**) and heard oral testimony from four individuals.

Upon addressing the public comments with objections, concerns, or recommendations, staff will incorporate the Board's responses into the Final Statement of Reasons (FSR), which will be included in the final Certificate of Compliance package.

**Summaries of Comments with Objections, Concerns, or Recommendations Regarding the Proposed Regulations and Proposed Responses for Board Consideration:**

In accordance with Government Code section [11346.9](#), subdivision (a)(3), the Board, in its FSR supporting the rulemaking, must summarize each objection or recommendation made regarding the specific adoption, amendment, or repeal proposed, together with an explanation of how the proposed action has been changed to accommodate each objection or recommendation, or the reasons for making no change.

The Board is asked to review and consider the comments received, which are organized into categories and summarized below, and the proposed responses thereto for inclusion in the Board's FSR for this rulemaking.

- **The Board states the many factors that have led to its current financial state; however, it does not take responsibility for its failure to be proactive against any of these factors. Mismanagement of funds should not be the responsibility of licensed professionals. Alternative cost management**

**measures have not been addressed or considered by the Board. The Board proposed raising fees without considering lowering expenses. Board staffing increases should not occur, if there is not enough money to fund current operating expenses.**

**The Board should: reorganize and reconsider its plan for “fixing” the deficit; and, seek help from federal or state government, or other sources of revenue or funding.**

**Proposed Response:** The Board has spent the last two years streamlining processes in its licensing, inspections, and enforcement units. In addition, the Board’s entire Enforcement Unit has been restructured to maximize efficiencies. However, due to factors beyond the Board’s control that have increased Board expenditures while not adequately increasing revenues, the Board’s core mission of consumer protection is threatened. The Board is committed to continuously seeking ways to reduce costs while not compromising consumer protection. Further, the Board is solely funded by licensees and does not have the ability to obtain alternative funding.

- **Prior to this regulatory proposal, Board fees had already been recently increased.**

**Proposed Response:** The Board filed an emergency fee increase in 2018 and subsequently filed a regular rulemaking, effective April 2019, to conservatively raise fees in an attempt to address the Board’s inadequate revenue and imminent insolvency. The Board intended to raise fees again in two years to the statutory maximum. However, the prior fee increase failed to meet the Board’s expectations – it did not adequately address the decreasing fund nor bring in the anticipated revenue. In addition, the fee increase proved even more inadequate due to abrupt and significant rate increases by the Office of the Attorney General (AG), an increase in enforcement workload, and a decrease in anticipated revenue.

- **These fee increases will result in the opposite of what the Board is trying to accomplish; increased fees will result in less renewals, and thus, less revenue for the Board.**

**Proposed Response:** The Board does not anticipate a significant decrease in renewals, as a result of the fee increase. The last emergency fee increase occurred in Fiscal Year (FY) 2017/2018 and the Board saw an increase in RVT and veterinarian renewals during the same year. In addition, more RVTs and veterinarians renewed their licenses the following year (FY 2018/2019) than had done so the prior renewal cycle (FY 2016/2017).

- **The fee increase places too much of the burden on RVTs, when comparing the salaries of RVTs and veterinarians; veterinarian renewal fees are being raised \$150, while RVT fees are being raised \$190; more than doubling RVT**

**fees is unacceptable; RVTs are relatively low-paid professionals and cannot afford higher fees; many practices do not reimburse RVTs for license and renewal fees or provide continuing education allowances; the Board is urged to review the RVT fees and consider other alternatives.**

**Proposed Response:** The Board recognizes the fee increases disproportionately impacted the RVT community. However, without raising all fees to their statutory caps, the Board would not raise enough revenue to sustain the fund. Throughout 2020, the Board's Multidisciplinary Advisory Committee (MDC) researched ways to raise statutory caps for veterinary premises registrations and veterinarian licenses so that the Board may lower the fees for RVTs without negatively impacting the fund. The Board plans to seek legislation in 2021 to address this concern.

- **These fee increases (i.e., for RVTs) cannot be justified when comparing them to the salaries and licensing fees of other licensed professionals, such as Registered Nurses, Professional Engineers, etc.**

**Proposed Response:** The Board recognizes the RVT community receives significantly lower salaries compared to other licensed professionals, such as registered nurses and professional engineers. However, without raising all fees to their statutory caps, the Board would not raise enough revenue to sustain the fund. Throughout 2020, the MDC researched ways to raise statutory caps for veterinary premises registrations and veterinarian licenses so that the Board may lower the fees for RVTs without negatively impacting the fund. The Board plans to seek legislation in 2021 to address this concern.

- **The veterinary field is already experiencing a shortage of RVTs because they cannot make a living doing the work they love; the fee increases will deter qualified individuals from pursuing careers in this field and will create a barrier to licensure for RVTs (will impact initial and renewed licenses); without RVTs working in the field, animal care, consumers, businesses, and communities will be negatively impacted; a shortage of RVTs could also result in the hiring of “unlicensed technicians” and the performance of illegal veterinary practices or tasks.**

**Proposed Response:** Over the past two and a half years, the Board has demonstrated its commitment to reducing unnecessary barriers to obtaining RVT registration. Most notably, the Board has eliminated the RVT state examination, resulting in \$200 cost savings for RVT applicants. In addition, the Board recently approved regulatory proposals to no longer expire education or experience and eliminated the need for applicants to reapply for examination eligibility review if the applicant fails the national examination. These changes remove barriers to RVT registration and result in direct cost savings for RVTs. The Board has no data to support the concern that the last fee increase resulted in an increase of unlicensed practice. The Board encourages the veterinary community to file complaints with the Board if unlicensed practice occurs.

- **Significant fee increases for RVTs will be an added burden to a profession that is already struggling with low wages, burnout, lack of recognition and career advancement, and competition with on-the-job trained assistants.**

**Proposed Response:** The Board recognizes the fee increases disproportionately impact the RVT community. However, without raising all fees to their statutory caps, the Board would not raise enough revenue to sustain the fund. Throughout 2020, the MDC researched ways to raise statutory caps for veterinary premises registrations and veterinarian licenses so that the Board may lower the fees for RVTs without negatively impacting the fund. The Board plans to seek legislation in 2021 to address this concern.

In addition, low wages, burnout, lack of recognition and career advancement, and competition with on-the-job trained assistants is outside of the Board's purview.

- **The fee increases would likely contribute to decreased availability and/or quality of veterinary services in sectors that traditionally receive salaries on the lower end of the professional ranges (i.e., mixed animal practice, those who service small farms, and those located in more rural locations).**

**Proposed Response:** The Board does not have data to indicate the last fee increase contributed to decreased access to specific veterinary care sectors. The Board does not anticipate a significant decrease in veterinary care or services as a result of the fee increase. The last emergency fee increase occurred in FY 2017/2018 and saw an increase in RVT and veterinarian renewals during the same year. In FY 2017/2018, the Board saw a 10% increase in active licensees compared to the prior year. In FY 2018/2019, the Board saw a 46% increase in licensees.

- **Some veterinary practices pay their employees' license fees, so these fee increases could have a significant impact on those practices; or, this could promote the hiring of more veterinary assistants (instead of RVTs), so that practices do not have to pay the higher fees.**

**Proposed Response:** The Board recognizes that practices who pay employee license fees will be more impacted than those who do not. While practices may hire veterinary assistants to perform certain duties, veterinary assistants are prohibited from performing any of the functions or activities specified in CCR, title 16, section 2036, except that a permit holder under the direct or indirect supervision of a licensed veterinarian may administer a controlled substance. If a veterinary assistant performs any services listed under CCR, title 16, section 2036, the veterinary assistant would be conducting unlicensed practice, a misdemeanor offense, and subject to an administrative citation of up to \$5,000. In addition, if a veterinarian knowingly allows unlicensed practice, the veterinarian's license is subject to discipline. The Board encourages the

veterinary community to file complaints with the Board if unlicensed practice occurs.

- **The following are possible solutions for the Board to consider:**

- a. **Raise RVT fees the same amount as veterinarian fees (percent-wise) or less.**

**Proposed Response:** To immediately sustain the fund, the Board had to raise all fees to their statutory cap. Throughout 2020, the MDC researched ways to raise statutory caps for veterinary premises registrations and veterinarian licenses so that the Board may lower the fees for RVTs without negatively impacting the fund. The Board plans to seek legislation in 2021 to lower RVT fees.

- b. **Allow RVTs to deduct fingerprinting costs from their initial biennial renewal.**

**Proposed Response:** While the Board collects the fee for fingerprinting on initial and renewal applications, all fingerprinting revenue is forwarded to the Department of Justice and the Federal Bureau of Investigation. The Board has no control over those costs. The Board's fund could not support deducting the fingerprint costs from the renewals.

- c. **Increase the fees across the board for all who receive licenses or permits from the Board.**

**Proposed Response:** Through this rulemaking, the Board raised all fees across the board to their statutory caps.

- d. **Allow RVTs payment plans this year to allow them to renew without the \$400 burden in one month, without a delinquency fee.**

**Proposed Response:** This alternative suggests a payment plan "this" year. However, this comment was received during the initial emergency fee increase comment period in January 2020. Thus, a year has already passed since the fee increase was imposed. In addition, pursuant to Business and Professions Code (BPC) section 4846.4, RVTs shall biennially apply for renewal on or before the last day of the applicant's birthday month. For the registration to be renewed, the fee must be paid, in full, at the time of renewal. The Board's system is not designed to allow payment plans for license renewals. The Board is not aware if this would be a system capability. However, if the system could be designed to allow for renewal payment plans, setting up such a system would take a significant amount of time to design and test.

- e. **Raise fees for those working in corporate settings.**

**Proposed Response:** The Board does not track the specific work settings of each licensee. In addition, to sustain the Board's fund, the Board needed to increase all fees to their statutory cap, regardless of practice setting.



- f. **1) increase the fees for universities from \$350-500 to over \$1,000; 2) increase the fee for Board approval of RVT schools from \$300 to over \$1,000; 3) increase the veterinary premises fees for “big box” veterinary clinics to over \$1,000 per location, while leaving the premises fees for the individual “mom and pop” veterinary clinics as it is at \$400.**

**Proposed Response:** To sustain the Board’s fund, the Board increased all fees to their statutory cap. The above-listed alternatives all require legislative changes. As directed by the Board, the MDC has researched the feasibility of increasing veterinary premises registration fees based on size, and veterinarian license fees, so that the Board may lower the RVT fees through legislation. The MDC anticipates proposing recommendations to the Board in April 2021.

- g. **Most of the costs incurred by the Board appear to be related to consumer complaints, which result in expensive expert witness and attorney fees; the consumer could bear some of the cost by paying a fee to the Board when filing a complaint.**

**Proposed Response:** The Board is a consumer protection agency. Requiring consumers to pay a fee to file a complaint with the Board would significantly deter consumers from filing complaints, even if egregious consumer harm occurred. This alternative is counter to the Board’s mission and is not a viable option.

- h. **A cost and profit analysis should be done to determine what other areas can afford more of an increase.**

**Proposed Response:** In December 2016, the Board contracted with a third party to conduct a fee audit of all Board fees. The audit analyzed how much each license type cost and the revenue being generated. However, the audit only recommended what was needed to maintain the status quo at the time. It did not evaluate whether additional revenue would be needed to cover future expenditure increases, such as AG rate increases, intradepartmental increases, or additional staffing costs. At that time, the Board opted for a tiered fee increase approach, where fees were phased in over a two-year period. To sustain the Board’s fund, the Board increased all fees to their statutory cap through this rulemaking. As previously stated, however, the Board recognizes RVTs were disproportionately impacted by the recent fee increase. To address this concern, the Board anticipates pursuing legislation to increase fees for veterinary premises registrations and veterinarian licenses so that the Board may lower the fees for RVTs.

- i. **Incremental fee increases over time would be more acceptable.**

**Proposed Response:** The Board initially pursued incremental fee increases in 2017. Since then, however, the Board’s fund continued to deteriorate and could not be sustained without raising all fees to their statutory cap through this rulemaking.

- j. **The Board should consider contract hiring for attorneys when there are spikes in the number of enforcement cases, and then release them when the numbers are normal.**

**Proposed Response:** The AG is required to represent the Board in all enforcement actions. The Board does not have authority to hire outside attorneys. However, the AG only charges for services rendered. As such, the Board's AG costs already fluctuate in an unpredictable manner as disciplinary cases fluctuate.

- k. **The Board should increase penalties/fines for individuals who commit violations and unlicensed individuals who perform illegal procedures; the Board should cite clinics that allow unlicensed technicians to perform RVT-only tasks.**

**Proposed Response:** The Board does issue citations and fines to licensees who commit less egregious violations of the Veterinary Medicine Practice Act and those individuals who conduct unlicensed practice. Pursuant to BPC section 125.9, the Board cannot assess a citation and fine over \$5,000 for each inspection or investigation. The Board does not have authority to increase those fines. In addition, citations and fines are tools used to incentivize compliance with the Veterinary Medicine Practice Act, not to generate revenue.

- **The Veterinary Assistant Controlled Substances Permit (VACSP) program is costing more than expected and not generating the revenue predicted; however, VACSP fees were not raised to the statutory maximum; RVTs cannot be expected to subsidize the VACSP program.**

**Proposed Response:** Pursuant to BPC section 4836.2, subdivision (b), the statutory cap for filing a VACSP application is \$100. CCR, title 16, section 2071.1, subsection (a), establishes the VACSP application fee at \$50, and subsection (b) establishes the initial VACSP fee at \$50.00; these fees total \$100 and cannot exceed the statutory cap established in BPC section 4836.2, subdivision (b). VACSP renewals and delinquency fees are already at their statutory caps.

- **AG costs have increased; however, RVTs represent an extremely small part of the Board's disciplinary caseload; RVTs cannot be expected to subsidize disciplinary cases against other licensing categories.**

**Proposed Response:** The Board has authority to collect cost recovery from disciplined licensees to prevent other licensees from absorbing costs of disciplinary cases. While most disciplinary cases include cost recovery, factors outside of the Board's control often result in lower cost recovery ordered than the amount spent on each case. When that occurs, the Board absorbs those costs, which impacts all licensees, registrants, and permit holders. However, the Board has spent the last two years streamlining enforcement processes and works closely with the AG to decrease costs wherever possible.



In addition, the Board recognizes the fee increases disproportionately impacted the RVT community. However, without raising all fees to their statutory caps, the Board would not raise enough revenue to sustain the fund. Throughout 2020, the MDC researched ways to raise statutory caps for veterinary premises registrations and veterinarian licenses so that the Board may lower the fees for RVTs without negatively impacting the fund. The Board plans to seek legislation in 2021 to address this concern.

Further, it should be noted that the AG recently increased its costs charged for services, which is one of many reasons for the fee increase.

- **Elimination of the California RVT exam should have eliminated all of the costs associated with it; it is highly inappropriate to use funds collected for the RVT exam to underwrite other expenses; one of the motivations for eliminating the RVT exam was that the high cost of applying to become an RVT was inhibiting graduates of RVT programs from becoming licensed; this fee increase will have the same effect; since the Board is no longer administering the RVT exam, there should be an opportunity to reduce the staff positions used to handle the exam duties, resulting in a salary savings.**

**Proposed Response:** The Board is solely funded by application, examination, licensing, and renewal fees. As such, those fees will be higher than the actual cost to process the applications or administer the examinations. The Board staff did not administer the RVT examination; rather, the Board contracted with a third party to administer that examination. In addition, staff must still review each examination eligibility application for the national examination to determine license eligibility. As such, the workload associated with RVT applications has not decreased.

- **The impacts of COVID-19 and the current economic climate must be considered (many veterinary professionals and practices have been and continue to be impacted); the Board should postpone any fee increases until the present pandemic is over and no longer impacting the profession; raising fees during this time is inappropriate, insensitive, and unacceptable.**

**Proposed Response:** The Board's fund would become insolvent if the fee increases were postponed. In addition, veterinary professionals are considered essential workers throughout the COVID-19 pandemic and can continue providing veterinary services. Further, the Board has heard through many members of the profession that the demand for veterinary services has increased during the pandemic, due to owners spending more time at home with their pets and recognizing signs that their pets may be ill.

**Action Requested:**

The Board is asked to consider and approve the proposed responses to comments received during the 45-day public comment period and during the public hearing, and direct staff to incorporate the responses into the FSR and proceed with the final rulemaking (Certificate of Compliance) package.

**Attachments:**

1. Written Comments Received During 45-Day Public Comment Period
2. Written Comment Received During Public Hearing
3. [Notice of Proposed Changes](#)
4. [Proposed Regulatory Language](#)
5. [Initial Statement of Reasons](#)

**45-Day Public Comment Period:  
September 25, 2020 through November 9, 2020**

Ann Jeghers <annjeghers@yahoo.com>  
Mon 11/9/2020 7:13 PM

To:

- Sotelo, Justin@DCA

Dear Justin,

The registration fee is a hardship for most technicians. According to Indeed (<https://www.indeed.com/career/veterinary-assistant/salaries/CA>), the average hourly rate for a technician in California is \$16.39/hr. At 160 hours a month x 12 months, it is a gross salary amount of \$31,468.80. The following states poverty guidelines for a single person living in Los Angeles:

[Poverty Guidelines for Los Angeles County, California](#)

Family Size (Persons in Family/Household)	Annual Family Income			
	HUD Low Income Level <sup>1</sup>	HUD Very Low Income Level <sup>2</sup>	HUD Extremely Low Income Level <sup>3</sup>	Federal Poverty Level
1	\$63,100	\$39,450	\$23,700	\$12,760

There is a shortage of technicians in California. Low pay for the variety of medical tasks we do is a part of this problem. It is also a burden to pay ever increasing licensing fees.

Sincerely,

Ann Jeghers  
RVT 1770

Summer Brooks <brooks.summer.l@gmail.com>  
Mon 11/9/2020 4:49 PM

To:

- Sotelo, Justin@DCA

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Hello Mr. Sotelo,

Attached is a letter regarding the proposed permanent RVT license fee increase.

Feel free to contact me any time for follow-up.

Thank you for your time,

Summer Brooks, RVT

Summer Brooks  
P.O. Box 178131  
San Diego, CA 92177

November 4, 2020

Justin Sotelo, Lead Administrative & Policy Analyst  
Veterinary Medical Board  
1747 North Market Blvd., Suite 230  
Sacramento, CA 95834

Dear Mr. Sotelo,

As a Registered Veterinary Technician (RVT) in California since 2014, I am very distraught at the proposed RVT initial license and renewal fee increase. This significant increase will be an incredible burden on a profession that is already struggling with low wages, burnout and competition for jobs by on-the-job trained assistants.

In 2016, the National Association of Veterinary Technicians in America (NAVTA) Demographic Survey<sup>1</sup> found that less than 50% of credential technicians have their license and renewal fees paid for by their employer. Although this statistic is not specific to California, it is reasonable to imagine that many RVTs in this state must pay their initial license and renewal fees out of their own pockets. According to the United States Bureau of Labor Statistics, the hourly mean wage for a Registered Veterinary Technician in California is \$20.90<sup>2</sup>. To pay the proposed permanent renewal fee, an RVT will need to work an average of 16.75 hours (before taxes) to pay the \$350 fee. To compare, the license renewal fees for Registered Nurses (RN) in California is \$190 every two years<sup>3</sup>. The Bureau of Labor Statistics states that a California RN's mean hourly wage is \$54.44<sup>4</sup>. They need to work approximately 3.5 hours (before taxes) to pay their renewal fee.

When researching the renewal fees for other states, the closest comparison I found (as not all states list their renewal fees without signing into the state portal) was Washington state, with a renewal fee of \$91 per year<sup>5</sup>. Some other states that list their renewal fees include: Hawaii \$179 every other year, Nevada \$75 yearly, Georgia \$70 yearly, Pennsylvania \$100 every other year. Please see last page of this document for a more extensive list of renewal fees by state.

As both a pet owner and as an RVT, I fully support the need for hospital inspections, processing of board complaints, and increased staffing. However expecting RVTs to shoulder a significant portion of the budget shortfall could be debilitating to workers who are already dealing with professional hardships. According to the NAVTA 2016 Demographic Survey, the top six problems that credential technicians face are:

*“low income, burnout, lack of recognition and career advancement, the underutilization of skills, and competition with on the job trained technicians (p. 5).”*

Each of these problems will be exacerbated by such a high renewal fee. Burnout is an occupational hazard for those in the healthcare field, due to our roles as caregivers and our constant exposure to emotional and environmental stress<sup>6</sup>. While there are many factors that cause burnout, studies have found that low income relative to high debt load<sup>7</sup> does have an effect

on personal well-being and susceptibility to burnout. Due to this fee increase, RVTs in California will also be less able to pay for continuing education and association memberships in their areas of interest. This impedes their ability to learn specialized skills and advance in their positions. RVTs have invested time, money and energy into pursuing a state license and high quality education, yet many veterinarians choose to hire and pay “on the job trained” technicians to fill roles that RVTs should occupy. The exorbitant initial license, exam, and renewal fees only worsen these issues.

In closing, I would like to tell you a personal story of how high licensing fees affected my co-worker. She scrimped and saved to afford tuition for the required education for RVT licensing in California. At the time she applied to the VMB, the total initial license and examination fee was approximately \$350. Our veterinarian/owner did not pay for exam and licensing fees. For my co-worker, who had spent all her savings on tuition and was stretched thin, that \$350 might as well have been \$3 million. She had to delay her application for months after graduation to save up for the fee. As her friends and co-workers, we decided that we had to get creative and help. *We sold chocolate bars and collected aluminum cans for recycling to get her that last \$350!!!*

Veterinary technicians do not have an abundance of disposable income. Some may think that a person should easily be able to save up a few hundred dollars every two years for a license renewal. However possessing an RVT license does not equate with a significantly higher wage than other non-licensed staff. Raising fees a little bit every few years is expected. Increasing a licensing fee by 120% is excessive and prohibitive. Such a large increase in fees will only be detrimental to our individual well-being, and the advancement of our profession.

We are RVTs because we are passionate about veterinary medicine, and we love making a difference in the lives of animals. Our jobs are often thankless, dirty, exhausting and heartbreaking. But they can also be fascinating, joyful and rewarding. Please allow us to keep doing great work, without the burden of excessive licensing fees.

Sincerely,

Summer Brooks, RVT

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<sup>1</sup> NAVTA 2016 Demographic Survey.

[https://cdn.ymaws.com/www.navta.net/resource/resmgr/docs/2016\\_demographic\\_results.pdf](https://cdn.ymaws.com/www.navta.net/resource/resmgr/docs/2016_demographic_results.pdf). Accessed November 4, 2020.

<sup>2</sup> Occupational Employment and Wages, May 2019, Veterinary Technologists and Technicians.

<https://www.bls.gov/oes/current/oes292056.htm#st>. Updated July 6, 2020. Accessed November 4, 2020.

<sup>3</sup> License/Certificate Renewal. <https://www.rn.ca.gov/consumers/fees.shtml#ren>. Accessed November 4, 2020.

<sup>4</sup> Occupational Employment and Wages, May 2019, Registered Nurses.

<https://www.bls.gov/oes/current/oes291141.htm#st> Accessed November 4, 2020.

<sup>5</sup> Veterinary Technician Fee Schedule.

<https://www.doh.wa.gov/LicensesPermitsandCertificates/ProfessionsNewReneworUpdate/VeterinaryTechnician/Fees>. Accessed November 4, 2020.

<sup>6</sup> Maslach CH, Schaufeli WB, Leiter MP. Job burnout. *Ann Rev Psych* 2001;52(1):397–422. Accessed November 4, 2020.

<sup>7</sup> Kogan LR, Wallace JE, Schoenfeld-Tacher R, Hellyer PW and Richards M (2020) Veterinary Technicians and Occupational Burnout. *Front. Vet. Sci.* 7:328. Accessed November 4, 2020.



## States with publicly listed veterinary technician license renewal fees

State	Fee	Cycle
<a href="#">Alaska</a>	\$100	Every 2 years
<a href="#">Florida</a>	\$55	Every 2 years
<a href="#">Georgia</a>	\$70	Every 2 years
<a href="#">Hawaii</a>	\$179	Every 2 years
<a href="#">Indiana</a>	\$15	Every 2 years
<a href="#">Kansas</a>	\$10	Each year
<a href="#">Kentucky</a>	\$30	Each year
<a href="#">Louisiana</a>	\$30	Each year
<a href="#">Maine</a>	\$50	Each year
<a href="#">Michigan</a>	\$122.40	Every 3 years
<a href="#">Minnesota</a>	\$90	Every 2 years
<a href="#">Mississippi</a>	\$35	Each year
<a href="#">Missouri</a>	\$20	Each year
<a href="#">Nevada</a>	\$75	Each year
<a href="#">New Mexico</a>	\$75	Each year
<a href="#">North Carolina</a>	\$50	Every 2 years
<a href="#">North Dakota</a>	\$15	Each year
<a href="#">Oklahoma</a>	\$45	Each year
<a href="#">Pennsylvania</a>	\$100	Every 2 years
<a href="#">South Carolina</a>	\$60	Every 2 years

Sandra Schatz <petsrn@gmail.com>  
Sun 11/8/2020 7:01 PM

To:

- Sotelo, Justin@DCA

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Hello Justin,

I am not able to make the Public Notice Hearing but I wish to share my input.

There is a huge shortage of Vet techs in California and nationally, mainly because we can't make a living doing the work we love. I saw the needs at your end, some very irrelevant to the "boots on the ground" para-professionals.

01/ Average wage for an RVT in CA is \$19/hr, but those rates tend to be in larger cities. The higher rates, around \$25/hr tend to be those who perform in a specialized practice, such as Sage.

The average salary annually in CA is \$32, 426. Compared to \$75-120K/yr for vets. Yet you are asking vets to pay \$500 and Vet techs to pay \$350. (\$150 difference between the two, yet look at salaries!)

Living in most urban centers in CA is very expensive, even just for housing. Add to that we have continued education needs and licensing.

I know you are thinking that all vet techs work for a Veterinary Corporation, practice or entity that pays for this fee, but for over 20 years in the field, I have had to pay out of pocket every renewal.

Our roles in the field vary, as do our places of work. To include rescue, non-profit, etc.

I believe this should be a clear differentiator in fee structure. Not all Techs can afford to pay such a high fee, nearly as much as a vet yet about 1/4 the pay scale.

Maybe raise the cost for those working in a Corporate setting and be gentler in the other areas of work. It would be a sad shame that your business needs to force more techs to leave this field to find work that they can make a living doing.

Thanks for hearing me.

Sandra Schatz  
RVT - California

Alison Mott <amott@saczoo.org>  
Sun 11/8/2020 1:27 PM

To:

- Sotelo, Justin@DCA

Alison Mott, RVT  
7421 S Land Park Dr. #55  
Sacramento, Ca. 95831

Dear Mr. Sotelo:

**re: RVT Fee Increases**

I am writing to strongly object to the massive fee increases for Registered Veterinary Technicians (RVT) and RVT candidates proposed by the Veterinary Medical Board. As a relatively low-paid profession, RVTs cannot afford such high fees. I am very concerned that the fee increase creates an artificial barrier to licensure for RVTs. The state of California will destroy any advances we have made in the veterinary profession for RVTs with this permanent fee increase.

The VMB states that the Veterinary Assistant Controlled Substance Permit program (VACSP) is costing more than expected and not generating the income predicted. For some inexplicable reason, they did not propose raising the fee for the VACSP to the statutory maximum as they have for all other licensing categories. The VMB also states that increases in fees from the Attorney General's Office create a burden on their budget. However, RVTs represent an extremely small part of the disciplinary case load. The VMB cannot expect RVTs to pay higher fees to subsidize the VACSP program that has nothing to do with RVTs, or disciplinary cases against other licensing categories. You are asking the RVTs of California to accept a **119% increase** in their fees to cover the legal costs for and against California veterinarians. Yet you are only asking them for a **43% increase** in their fees.

In California Registered Nurses (RN) pay a state licensing fee of \$190 every two years. Their educational requirements, licensing requirements, and continuing education requirements are the same for RVTs. The major difference is that on average an **RN makes \$102,700 annually or \$49.37 hourly**. The average salary for an **RVT in California is \$39,166 annually or \$18.83 hourly**. Yet you are asking RVTs to pay 100% more every two years while making 1/3 the salary.

The VMB also proposed raising the fees without considering lowering expenses. I appreciate that the VMB needs to maintain its fund at a reasonable level, but more than doubling RVT fees is completely unacceptable and will result in harm to RVTs, consumers and their animals. The VMB must find another way.

Yours truly,

**Alison Mott**  
**Hospital Manager / Senior Registered Veterinary Technician**

CaRVTA <info@carvta.org>  
Fri 11/6/2020 1:00 PM

To:

- Sotelo, Justin@DCA

Hi Justin,

Attached is CaRVTA's letter in opposition to the proposed fee increases.

Regards,  
Nancy Ehrlich, RVT  
Regulatory/Legislative Advocate, CaRVTA



November 6, 2020

Veterinary Medical Board  
1747 N Market Blvd Ste 230  
Sacramento CA 95834  
Justin.Sotelo@dca.ca.gov

Dear VMB:

re: RVT Fee Increases

I am writing on behalf of the California Registered Veterinary Technicians Association (CaRVTA) to strongly object to the proposed fee increases for Registered Veterinary Technicians (RVTs) and RVT candidates.

The RVT profession is relatively low-paid, with an average salary in California of \$18.56/hour, or \$38,600/year according to the US Department of Labor. By raising licensing fees for RVTs by \$200 and the application eligibility review fee for another \$200, the VMB is increasing the first time fee for an RVT license from \$300 to \$700, an astronomical increase. The VMB is increasing the biennial renewal fee for RVTs by over 100% from \$150 to \$350, thus creating the risk of decreasing the number of RVTs who apply for an initial license and RVTs failing to renew their licenses.

The VMB states that by eliminating the California RVT exam, they are generating less annual revenue than previously projected. Eliminating the exam should have eliminated all the costs associated with it. It is highly inappropriate to use funds collected for the

RVT exam to underwrite other expenses. In addition, one of the motivations for eliminating the California RVT exam was that the high cost of applying to become an RVT was inhibiting graduates of RVT programs from becoming licensed. Raising the fee by \$200 (over 100%) will have the exact same effect. Also, since the VMB is no longer administering the RVT exam, then there should be an opportunity to reduce the staff positions used to handle the exam duties, resulting in a salary savings.

The VMB also states that the Veterinary Assistant Controlled Substance Permit program (VACSP) is not bringing in the anticipated revenue. In spite of that, for some unexplained reason, the VMB is not proposing raising the VACSP fee to the statutory maximum. The VMB initially estimated the number of potential VACSPs to be 10,000. CaRVTA advised the VMB at the time that it would more likely be 1 VACSP per premise, or approximately 4000. There is no reason to assume that the number of VACSPs will increase substantially. It appears that the VMB hired more employees than needed and did not let them go when the numbers did not materialize. Additionally, there is no justification for raising RVT fees to cover the cost of the VACSP program, which has nothing to do with RVTs.

The VMB states that because the Attorney General's office is raising their fees, the VMB is justified in raising fees for RVTs. However, RVTs represent an extremely small part of disciplinary cases and should not bear the burden of those expenses.

In their Fiscal Impact Estimates, the VMB suggests that there would be no fiscal impact on veterinary premises and no significant impact on new jobs. However, such an astronomical increase is likely to have a significant economic impact on veterinary businesses. Some veterinary practices pay their employees license fees – veterinarians and RVTs, so increases in both license categories will have a very significant impact on those veterinary businesses. It is likely that some veterinary premises may opt to hire veterinary assistants rather than RVTs so they do not have to pay the higher fees. The VMB does admit that there could be an impact on individuals if the employer does not pay the fees. From past experience, we know that a significant number of RVT school graduates will not apply to become RVTs because they cannot afford the high fees.

We appreciate that the VMB needs to maintain a fiscally sound contingency fund. However, raising the fees so dramatically on RVTs is not acceptable. Doing so will harm the public and the veterinary profession by reducing the number of licensed RVTs.

Sincerely,

Nancy Ehrlich, RVT  
Regulatory/Legislative Advocate, CaRVTA

Domonique Lee Fortner <dlfortner@ucdavis.edu>  
Thu 11/5/2020 11:34 AM

To:

- Sotelo, Justin@DCA

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Domonique Fortner  
1826 H Street Apt  
Sacramento, CA 95811

Justin Sotelo, Lead Administrative & Policy Analyst  
Veterinary Medical Board  
1747 N Market Blvd Ste 230  
Sacramento CA 95834  
[Justin.Sotelo@dca.ca.gov](mailto:Justin.Sotelo@dca.ca.gov)

Dear Mr. Sotelo:

**re: RVT Fee Increases**

I am writing to strongly object to the unreasonable fee increases for Registered Veterinary Technicians (RVT) and RVT candidates proposed by the Veterinary Medical Board (VMB). I'm sure the VMB, dealing exclusively with veterinary professionals, is well aware that we are a relatively low-paid profession. This unreasonable increase in fees will undoubtedly create an artificial barrier to licensure for RVT candidates and RVTs already in the field. Many of us remain in this field despite enduring chronically low pay, long hours and understaffed hospitals simply for the love of what we do. The VMB's proposed fee increases will without a doubt discourage licensure of RVTs. This will only exacerbate the staffing issues already endemic to our field, thus leading to further burnout and a decrease in safety for consumers and their pets. I am also very concerned about a potential increase in the already frowned upon practice of hiring "unlicensed technicians". Many practices hire "unlicensed technicians" and illegally allow them to perform tasks under the scope of practice of RVTs. This frowned upon practice has already eroded consumer safety and diminished the small amount of respect that the RVT title garners from the public. Your fee increases will only help to diminish consumer safety and erode this respect further.

My husband and I are a two-earner household just making ends meet. We are both RVTs. Due to the nature of our jobs, we cannot decline to renew our licenses and continue to perform our job tasks without a license, as that would be illegal. We have license renewal due within one month of each other and we are concerned about how we would make this additional cost fit into our budget. Rather than push the VMB's budget deficit onto working families, perhaps it would behoove the VMB to increase penalties for individuals who commit violations. As the attorney general's fees from these violations are in part responsible for creating the VMB's budget deficit in the first place. RVTs represent an extremely small fraction of the disciplinary case load and



RVTs who abide by the law should not be penalized for the infractions of others, particularly those committed by individuals in other licensing categories.

The VMB also states that the Veterinary Assistant Controlled Substance Permit program (VACSP) is costing more than expected and not generating the income predicted. For some inexplicable reason, they did not propose raising the fee for the VACSP to the statutory maximum as they have for all other licensing categories. The VMB cannot expect RVTs to pay higher fees to subsidize the VACSP program that has nothing to do with RVTs.

The VMB also proposed raising the fees without considering lowering expenses. I appreciate that the VMB needs to maintain its fund at a reasonable level, but more than doubling RVT fees is completely unacceptable and will result in harm to RVTs, consumers and their animals. The VMB must find another way.

Concerned for RVTs,

Domonique Fortner, RVT

*Domonique Fortner, RVT*

Anesthesia Technician

William R. Pritchard Veterinary  
Medical Teaching Hospital  
University of California, Davis

Candice Corena Magdaleno <cmagdaleno@UCDAVIS.EDU>  
Thu 11/5/2020 11:15 AM

To:

- Sotelo, Justin@DCA

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Candice Magdaleno, RVT  
7584 South Parkway  
Sacramento, CA 95823  
916-835-8571  
[CMagdaleno@ucdavis.edu](mailto:CMagdaleno@ucdavis.edu)

November 5<sup>th</sup> 2020

California Veterinary Medical Board  
1747 N. Market Boulevard, Suite 230  
Sacramento, California 95834-2987

To whom it may concern:

I am writing in response to the proposed permanent fee increase for Registered Veterinary Technicians (RVTs) and Veterinarians.

I am extremely disappointed and concerned as this will place an additional burden on many RVTs, including myself. This increased fee would be equal to 2 days of pay for me, before taxes and insurance. Including the live scan fees that I had to pay this year, the total costs for my license were \$451.00. Did you know that 40% of Americans cannot afford an extra \$400 expense? I already must save a small amount each month to cover my current license fee which has almost doubled since I was originally licensed in 2005. This year I had to borrow money from family. This fee increase literally takes food out of my family's mouths.

I am a veterinary technician anesthetist at the U.C. Davis Veterinary Medical Teaching Hospital. I am required to maintain my license to keep my job. Simply not renewing it is not an option for me. However, it is an option for other RVTs. I personally know 3 people who have not renewed their licenses due to the increase in licensing fees. The costs outweighed the benefits for them. Please consider that this may backfire as an attempt to collect more revenue. Not only will the increased fee cause a hardship for myself and many of my colleagues, I also feel many potential applicants will be deterred from even applying in the first place. Many new RVT students graduate with thousands of dollars in debt and enter a low paying field with a high burn out rate. We should be encouraging new RVTs into the profession and supporting them, not putting one more roadblock in place.

“The average registered veterinary technician salary in California, United States is \$37,484 or an equivalent hourly rate of \$18.” [www.salaryexpert.com](http://www.salaryexpert.com) The average salary of an unregistered veterinary assistant in California is \$15.29 an hour. The average cost of living has increased 2.5% in the last year, and California continues to be one of the highest states for overall cost of living.

“In contrast, the renewal fee for a registered nurse in California is \$190.00. RNs in this state earn between \$64,430 and \$151,210 depending on several unique factors. Around 10% of RNs earn above \$151,210, which is the highest pay rate in the state.” [www.indeed.com](http://www.indeed.com)

It should not be our responsibility as licensed professionals to pay for mismanagement of funds. It is understood that there are increased accounts of criminal activity within the veterinary field and that because of this it has left you in a deficit. That said, the fines for these offenses should be increased. The people responsible for these acts should be held financially accountable for the deficit and not the hard-working underpaid professionals that you are proposing it should.

I would like to allow you to understand what it is like to be a veterinary technician. We know we didn't come into this field to make a lot of money. We hoped that the cost of living would be met with hard work, experience, continued education and dedication to our field. Sadly, the reality is that many of us hold multiple jobs to working six to seven days a week to supplement what our salaries lack. We love our jobs and our patients, so we get a second job, or a roommate, or both, and then we get burned out. From personal experience I have witnessed brilliant technicians that leave the field and move into human health care for the financial stability they need to succeed. Suicide is ever prevalent within the veterinary community. The increased debt/income ratio along with the stress of our careers and lack of mental health support are all contributing factors.

All these factors need to be carefully considered when making these fee increases. The increases will backfire. Registered technicians will no longer be able to afford to renew their licenses and either work unregistered (and possibly illegally) or leave the field. Please understand that your solution is not a solution. It will, in the end, cause a further decrease in registered technicians and ultimately end in lost revenue. I hope that you can find another way to get the funding you need to cushion your budget and that a resolution can be found. It is my hope that my letter will not fall on deaf ears. I truly feel that making the fee increase permanent will be detrimental to the profession and it will certainly cause undue hardship for my family and I.

Sincerely,

Candice Magdaleno, RVT

Jody Nugent-Deal <jpnugentdeal@gmail.com>  
Thu 11/5/2020 10:26 AM

To:

- Sotelo, Justin@DCA

Cc:

- Jody Nugent-Deal <jpnugentdeal@gmail.com>

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Jody Deal #5198  
2404 Ahern Street  
Marysville, CA. 95901

Justin Sotelo, Lead Administrative & Policy Analyst  
Veterinary Medical Board  
1747 N Market Blvd Ste 230  
Sacramento, CA. 95834  
[Justin.Sotelo@dca.ca.gov](mailto:Justin.Sotelo@dca.ca.gov)

Dear Mr. Sotelo:

re: Veterinary Medical Board (VMB) RVT Fee Increase

I was extremely concerned and disheartened by the recent "emergency" VMB fee increases to both veterinary technician and veterinary licenses. I strongly object to the massive permanent fee increases that are being suggested for Registered Veterinary Technicians (RVT) and RVT candidates proposed by the VMB. As a relatively low-paid profession, RVTs cannot afford such high fees. I am very concerned that this permanent fee increase will actually result in an emergency for consumers, veterinarians and the RVT profession by creating an artificial barrier to licensure for RVTs. Do you realize that a large percentage of RVTs work more than one job just to earn living wages and support themselves? Do you realize that many RVTs will choose to not renew their license due to this increase?

The Veterinary Medical Board (VMB) previously stated that the Veterinary Assistant Controlled Substance Permit program (VACSP) is costing more than expected and not generating the income predicted. For some inexplicable reason, they did not propose raising the fee for the VACSP to the statutory maximum as they have for all other licensing categories. The VMB also states that increases in fees from the Attorney General's Office create a burden on their budget. However, RVTs represent an extremely small part of the disciplinary case load. The VMB cannot expect RVTs to pay

higher fees to subsidize the VACSP program as this program has nothing to do with RVTs, or disciplinary cases against other licensing categories.

The VMB also proposed raising the fees without considering lowering expenses. I appreciate that the VMB needs to maintain its fund at a reasonable level, but more than doubling RVT fees is completely unacceptable and will result in harm to RVTs, consumers and their animals. The VMB must find another way. I know several RVTs that WILL NOT renew due to this type of fee increase. The result of your potential fee increases may in fact have an opposite effect. Less technicians renewing and sitting for the board examination means less fees to the VMB. Having less RVTs in California will result in illegal veterinary practices such as unlicensed assistants inducing anesthesia, placing casts and bandages, extracting teeth, suturing, etc. This can directly affect overall patient care.

Lastly, has the VMB looked at the license fees for other medical professionals? Have you evaluated the license fee for a Registered Nurse? How can you justify such an increase to our profession when the RN license fee is much less all while they earn \$75,000 to \$150,00+ annually. My husband is a Professional Engineer. He has a Masters Degree in mechanical engineering. He made \$150,000 last year. Want to take a guess at what his license fees are biannually? \$110.00!! Currently way less than the RVT license fee with more than double the average salary.

Your budgetary mismanagement should not fall on dedicated, overworked, and underpaid individuals. Registered Veterinary Technicians are literally the backbone of our profession. I urge you to reconsider your ludicrous proposal.

Sincerely,

Jody Deal

Jody Deal, RVT, VTS (Anesthesia/Analgesia)(CP - Exotics)  
William R. Pritchard Veterinary Medical Teaching Hospital  
University of California Davis, Davis CA 95616

davidm7316@aol.com  
Wed 11/4/2020 9:19 AM

To:

- Sotelo, Justin@DCA

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I am writing to oppose the proposed increase of fees. In the reasons I fail to understand why the state attorneys can set fees that are higher than outside counsel and they must be hired. If the department cannot control staff fees, they should look at contract hiring when the need occurs (such as a spike in cases) and then release them when the numbers are normal. In the world outside of government, we are doing more with less.

We have had a recent increase in fees while the service to me as a professional has decreased over the years. The impacts of covid must also be considered. Since the main function is to protect the public maybe the public should pay

Thank You

David McCrystle DVM



Kristen Hagler RVT CCRP <goldengaitk9@gmail.com>  
Tue 11/3/2020 10:04 PM

To:

- Sotelo, Justin@DCA

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Please find attached a letter of opposition for the proposed CA RVT license fee increases.

Thank you.

- Kristen

Kristen L. Hagler BS RVT VTS (Physical Rehabilitation) CCRP CVPP OACM CBW VCC

Kristen Hagler RVT  
1301 Gillpepper Lane  
Rohnert Park, CA 94928  
CA RVT Lic#6298

Justin Sotelo, Lead Administrative & Policy Analyst  
Veterinary Medical Board  
1747 N Market Blvd Ste 230  
Sacramento CA 95834  
[Justin.Sotelo@dca.ca.gov](mailto:Justin.Sotelo@dca.ca.gov)

Dear Mr. Sotelo:

**re: RVT Fee Increases**

I am writing to strongly object to the massive fee increases for Registered Veterinary Technicians (RVT) and RVT candidates proposed by the Veterinary Medical Board. As a relatively low-paid profession lacking broad support for licensing, continuing education and renewal fees from employers, RVTs cannot afford such high fees. I am very concerned that the fee increase creates an artificial barrier to licensure and renewals for RVTs residing in and out of California. Additionally, it is egregiarous to implement a license fee increase that is higher than other medical professional licensee fees, such as a CA RN, without looking into other alternative means. A prime example is actual implementation of a title protection AND enforcement task force to collect fees for violations of the use of Registered Veterinary Technician/Technician in veterinary medicine.

The VMB states that the Veterinary Assistant Controlled Substance Permit program (VACSP) is costing more than expected and not generating the income predicted. For some inexplicable reason, they did not propose raising the fee for the VACSP to the statutory maximum as they have for all other licensing categories. The VMB also states

that increases in fees from the Attorney General's Office create a burden on their budget. However, RVTs represent an extremely small part of the disciplinary case load. The VMB cannot expect RVTs to pay higher fees to subsidize the VACSP program that has nothing to do with RVTs, or disciplinary cases against other licensing categories..

The VMB also proposed raising the fees without considering lowering expenses. I appreciate that the VMB needs to maintain its fund at a reasonable level, but more than doubling RVT fees is completely unacceptable and will result in harm to RVTs, consumers and their animals. The VMB must find another way or the state will lose many great RVT's due to financial hardship.

Yours truly,

Kristen Hagler BS RVT VTS (Physical Rehabilitation) CCRP CVPP OCAM VCC

Candice Alfaro <cnalfaro@hotmail.com>  
Fri 10/30/2020 8:27 PM

To:

- Sotelo, Justin@DCA

Dear Veterinary Medical Board,

I am writing to strongly object to the massive fee increases for Registered Veterinary Technicians (RVT). As a relatively low-paid profession, RVTs cannot afford such high fees especially during a global pandemic, school closures and economic downturn. I am very concerned that the fee increase will actually result in an emergency for consumers, veterinarians and the RVT profession by creating an artificial barrier to licensure for RVTs.

The Veterinary Medical Board (VMB) states that the Veterinary Assistant Controlled Substance Permit program (VACSP) is costing more than expected and not generating the income predicted. For some inexplicable reason, they did not propose raising the fee for the VACSP to the statutory maximum as they have for all other licensing categories. The VMB also states that increases in fees from the Attorney General's Office create a burden on their budget. However, RVTs represent an extremely small part of the disciplinary case load. The VMB cannot expect RVTs to pay higher fees to subsidize the VACSP program that has nothing to do with RVTs, or disciplinary cases against other licensing categories.

The VMB also proposed raising the fees without considering lowering expenses. I appreciate that the VMB needs to maintain its fund at a reasonable level, but more than doubling RVT fees is completely unacceptable and will result in harm to RVTs, consumers and their animals. The VMB must find another way.

I am an RVT, a single mom and a veterinary professional in research. My RVT license is not required in my current position. When it comes to deciding what expenses are necessary and what are not while providing a life for my daughter and I, I will no longer be able to support the VMB and maintain my license. This is sad and concerning. How many people are in my shoes or in a worse situation? What will this decision do to the veterinary medical field? How many others will forego their license or worse not pursue a career as an RVT because the licensing costs are prohibitive? I understand that some programming is necessary and the need to support others. I spend so much of my life volunteering and supporting those who need help. I teach my daughter the same values. But the budget should not be balanced on the backs of the lowest paid licensed professionals. I help others, whether they be human or animal. Now I need help, and my fellow RVTs need help.

Thank you for your time and consideration.

Yours truly,  
Candice Alfaro, RVT

Ronald Koss <drkossvet@gmail.com>  
Fri 10/30/2020 4:18 PM

To:

- noreply@dca.ca.gov;
- Sotelo, Justin@DCA

---

RE.: Notice of Public Hearing - Proposed Regulatory Action Related to Fee Schedule -  
Certificate of Compliance

To whom it may concern:

I am of the opinion that the Veterinary Board should **consider a freeze of any increase (or even consider a decrease) in all license and permit fees.** This until the present catastrophic situation of COVID-19 is considered to be over and no longer affecting the profession. I feel that most veterinarians are suffering enough with the burden of maintaining business going and employees hired despite the general significant decrease in income.

Sincerely,

**Ronald J. Koss, DVM**

Janel Guerra <janeln06@gmail.com>  
Wed 10/28/2020 11:58 AM

To:

- Sotelo, Justin@dca

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Janel Guerra, BS, RVT  
1905 I Ave  
National City, CA 91950

Justin Sotelo, Lead Administrative & Policy Analyst  
Veterinary Medical Board  
1747 N Market Blvd Ste 230  
Sacramento CA 95834  
[Justin.Sotelo@dca.ca.gov](mailto:Justin.Sotelo@dca.ca.gov)

Dear Mr. Sotelo:

**re: RVT Fee Increases**

I am writing to strongly object to the massive fee increases for Registered Veterinary Technicians (RVT) and RVT candidates proposed by the Veterinary Medical Board. As a relatively low-paid profession, RVTs cannot afford such high fees! I am very concerned that the fee increase creates an artificial barrier to licensure for RVTs.

The VMB states that the Veterinary Assistant Controlled Substance Permit program (VACSP) is costing more than expected and not generating the income predicted. For some inexplicable reason, they did not propose raising the fee for the VACSP to the statutory maximum as they have for all other licensing categories. The VMB also states that increases in fees from the Attorney General's Office create a burden on their budget. However, RVTs represent an extremely small part of the disciplinary case load. The VMB cannot expect RVTs to pay higher fees to subsidize the VACSP program that has nothing to do with RVTs, or disciplinary cases against other licensing categories..

The VMB also proposed raising the fees without considering lowering expenses. I appreciate that the VMB needs to maintain its fund at a reasonable level, but more than doubling RVT fees is completely unacceptable and will result in harm to RVTs, consumers and their animals. The VMB must find another way.

Yours truly,

Janel Guerra, BS, RVT

Rachel Angel <speedy.gonzo12345@gmail.com>  
Sat 10/24/2020 11:40 AM

To:

- Sotelo, Justin@DCA

---

Dear Mr. Sotelo and the VMB,

I'm a current RVT in CA, and I strongly oppose such a large fee increase on RVTs. Please reconsider making it permanent. As a licensed professional we barely make above minimum wages in most cases. It is an incredible burden to place upon a drastically underpaid role in Veterinary Medicine. We as professionals are not opposed to a fee increase, and do understand it is necessary, however too much of the burden has been placed on the role with the least ability to financially rebound. DVMs renewal fees are being increased \$150, while our fees are being increased by \$200. So RVTs experienced an increase to 2.34 times what they were paying, while DVMs only experienced an increase to 1.43 times what their previous fees were. Our fees were more than doubled while DVMs, who earn far more than us, were only increased by less than half. This is very wrong, and needs to be corrected. An RN license renewal fee is only \$190, and they earn 2-3 times more than us on average.

I understand fee increases may be necessary for the VMB to continue functioning, I have had to balance budgets and payroll before. However a cost and profit analysis should be done to see what other areas can afford more of an increase. For instance Veterinarians and hospitals have a higher potential to increase hours, or take on additional cases and cover the fee increase cost, and we as technicians simply don't have the same options. Premises renewal fees are only \$400 and VA controlled substance permit renewals are only \$50. It seems as though these 2 fees could be increased and lessen the burden put on RVTs, since hospitals have a greater ability to increase costs to offset these 2 increases.

Again, please do not place the majority of the increase on RVTs, in an already understaffed and underpaid field this will only decrease qualified staff.

Rachel Angel, RVT  
San Diego, CA

Jessica Ehlers <Jessica.Ehlers@vca.com>  
Tue 10/20/2020 10:39 AM

To:

- Sotelo, Justin@DCA

Jessica Ehlers  
7644 9th Street  
Elverta, CA 95626

Justin Sotelo, Lead Administrative & Policy Analyst  
Veterinary Medical Board  
1747 N Market Blvd Ste 230  
Sacramento CA 95834 Justin.Sotelo@dca.ca.gov

Dear Mr. Sotelo: re: RVT Fee Increases

The field of veterinary medicine is already an emotionally and financially challenging one. This fee increase will make it more so. This increase will deter current and prospective RVTs from attaining a license. This will not improve patient care. This will further deter people from entering the field. If Veterinarians do not have support staff this will be detrimental to animal welfare in our community and detrimental to the mental health of veterinarians and support staff. Without appropriate technical support it will increase stress in the workplace and possibly increase suicide rates.

I am writing to strongly object to the massive fee increases for Registered Veterinary Technicians (RVT) and RVT candidates proposed by the Veterinary Medical Board. As a relatively low-paid profession, RVTs cannot afford such high fees. I am very concerned that the fee increase creates an artificial barrier to licensure for RVTs.

The VMB states that the Veterinary Assistant Controlled Substance Permit program (VACSP) is costing more than expected and not generating the income predicted. For some inexplicable reason, they did not propose raising the fee for the VACSP to the statutory maximum as they have for all other licensing categories. The VMB also states that increases in fees from the Attorney General's Office create a burden on their budget. However, RVTs represent an extremely small part of the disciplinary case load. The VMB cannot expect RVTs to pay higher fees to subsidize the VACSP program that has nothing to do with RVTs, or disciplinary cases against other licensing categories..

The VMB also proposed raising the fees without considering lowering expenses. I appreciate that the VMB needs to maintain its fund at a reasonable level, but more than doubling RVT fees is completely unacceptable and will result in harm to RVTs, consumers and their animals. The VMB must find another way.

Yours truly,

Jessica Ehlers, RVT  
VCA Sacramento Animal Medical Center



Sarah A Knapp <saknapp@ucdavis.edu>  
Fri 10/16/2020 11:19 AM

To:

- Sotelo, Justin@DCA

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October 16th, 2020

Sarah Knapp, RVT  
8883 Salmon Falls Dr. Unit A  
Sacramento CA 95826

Justin Sotelo, Lead Administrative & Policy Analyst  
Veterinary Medical Board  
1747 N Market Blvd Ste 230  
Sacramento CA 95834

Dear Mr. Sotelo,

I am writing you today to discuss my concerns for the fee increase for the Registered Veterinary Technician (RVT) license renewal. I would like to voice my concern as a Registered Veterinary Technician, and specifically address your reasonings as to why this increase may occur.

RVT's are one of the lowest paid professionals in the medical field. One of the things I found interesting on your argument for why there is a deficit in the budget is the reduction of new technicians becoming registered. Perhaps some facts about salaries and cost of living may shed light as to why this is happening.

“The average registered veterinary technician salary in California, United States is \$37,484 or an equivalent hourly rate of \$18. [www.salaryexpert.com](http://www.salaryexpert.com) The average salary of an unregistered veterinary assistant in California is \$15.29 and hour. The average cost of living has increased 2.5% in the last year, and California continues to be one of the highest states for overall cost of living.

The renewal fee for a registered nurse in California is \$190.00. RNs in this state earn between \$64,430 and \$151,210 depending on several unique factors. Around 10% of RNs earn above \$151,210, which is the highest pay rate in the state. [www.indeed.com](http://www.indeed.com)

It should not be our responsibility as licensed professionals to pay for mismanagement of funds. It is understood that there are increased accounts of criminal activity within the veterinary field and that because of this it has left you in a deficit. That said, the fines for these offenses should be increased. The people responsible for these acts should be

held financially accountable for the deficit and not the hard -working underpaid professionals that you are proposing it should.

I would like to allow you to understand what it is like to be a veterinary technician. We know we didn't come into this field to make a lot of money. We hoped that the cost of living would be met with hard work, experience, continued education and dedication to our field. Sadly, the reality is that many of us hold multiple jobs to working six to seven days a week to supplement what our salaries lack. We love our jobs and our patients, so we get a second job, or a roommate, or both, and then we get burned out. From personal experience I have witnessed brilliant technicians that leave the field and move into human health care for the financial stability they need to succeed. Suicide is ever prevalent within the veterinary community. The increased debt/income ratio along with the stress of our careers and lack of mental health support are all be attributing factors.

All of these things need to be carefully considered when making these fee increases. The increases will backfire. Registered technicians will no longer be able to afford to renew their licenses and either work unregistered or leave the field.

“The VACSP program has been registering veterinary assistants at a slower pace than projected, which has further reduced revenue estimates. The Board previously anticipated approximately 10,000 veterinary assistants working in the State would register with the Board over a two-year period beginning in FY 2016-17. However, because the VACSP registration requirement is new to the industry and because many current veterinary assistants are uncertain and/or unaware of the VACSP registration requirement, VACSP registration revenue has been slower to materialize than projected therefore resulting in less revenue than anticipated.” [vmb.ca.gov](http://vmb.ca.gov)

We will not stand for this. Find another way to fix your savings account. Charge the individuals or businesses that are being convicted higher fees. Seek help from the federal government or state. Reorganize your end of the business and reconsider your plan for “fixing” the deficit.

Please understand that your solution is not a solution. It will in the end cause a further decrease in registered technicians and ultimately end in you losing revenue. I hope that you can find another way to get the funding you need to cushion your budget and that a resolution can be found.

Concerned for the future of registered technicians in California,

Sarah Knapp RVT

Sonia A. Davis, RVT4364  
1391 Arlington Way  
Brentwood, CA 94513

Justin Sotelo, Lead Administrative & Policy Analyst  
Veterinary Medical Board  
1747 N Market Blvd Ste 230  
Sacramento CA 95834  
[Justin.Sotelo@dca.ca.gov](mailto:Justin.Sotelo@dca.ca.gov)

Dear Mr. Sotelo:

**re: RVT Fee Increases**

I am writing to strongly object to the massive fee increases for Registered Veterinary Technicians (RVT) and RVT candidates proposed by the Veterinary Medical Board. As a relatively low-paid profession, RVTs cannot afford such high fees. I am very concerned that the fee increase creates an artificial barrier to licensure for RVTs.

The VMB states that the Veterinary Assistant Controlled Substance Permit program (VACSP) is costing more than expected and not generating the income predicted. For some inexplicable reason, they did not propose raising the fee for the VACSP to the statutory maximum as they have for all other licensing categories. The VMB also states that increases in fees from the Attorney General's Office create a burden on their budget. However, RVTs represent an extremely small part of the disciplinary case load. The VMB cannot expect RVTs to pay higher fees to subsidize the VACSP program that that has nothing to do with RVTs, or disciplinary cases against other licensing categories..

The VMB also proposed raising the fees without considering lowering expenses. I appreciate that the VMB needs to maintain its fund at a reasonable level, but more than doubling RVT fees is completely unacceptable and will result in harm to RVTs, consumers and their animals. The VMB must find another way.

Yours truly,



Sonia A. Davis, RVT4364  
1391 Arlington Way  
Brentwood, CA 94513

Kelby Weaver, DVM  
VCA-Cordova Veterinary Hospital  
2939 Mather Field Road  
Rancho Cordova, CA 95670

Justin Sotelo, Lead Administrative & Policy Analyst  
Veterinary Medical Board  
1747 N Market Blvd Ste 230  
Sacramento CA 95834  
[Justin.Sotelo@dca.ca.gov](mailto:Justin.Sotelo@dca.ca.gov)

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Yours truly,

  
Kelby Weaver

DVM

Medical Director, VCA Cordova Veterinary Hospital



Andrea D Lynch <adlynch@ucdavis.edu>  
Wed 10/14/2020 2:56 PM

To:

- Sotelo, Justin@DCA

---

Hello,

Please see attached letter.

*Andrea Lynch*  
Registered Veterinary Technician

**Companion Exotic Animal Medicine and Surgery Service**

**UC Davis Veterinary Medical Teaching Hospital**

Andrea Lynch  
230 S Jackson St.  
Dixon, CA 95620

Justin Sotelo, Lead Administrative & Policy Analyst  
Veterinary Medical Board  
1747 N Market Blvd Ste 230  
Sacramento CA 95834  
[Justin.Sotelo@dca.ca.gov](mailto:Justin.Sotelo@dca.ca.gov)

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It is common knowledge that RVT's do not receive a decent salary. The most recent NAVTA survey found that in some areas RVT's make so little, they are only slightly above the poverty line. The survey also found that approximately 45% indicated they have left the veterinary profession (with low pay being the top reason), less than 40% receive paid licensing fees, and the veterinary industry has twice the rate of turnover as comparable industries. Indeed, the only reason I am able to maintain my career as a RVT is due to my husband's well-paying job; if I were not married, I would not be able to support myself on the pitiable paychecks. Not to mention, I have contemplated leaving

the profession numerous times as it truly is the epitome of a job underpaid, underappreciated, and over-worked. It is, without a doubt, a labor of love and I believe that is the *only* reason RVT's are able to rally and keep forging ahead. Substantially increasing licensure fees seems very unwise for a profession already fraught with strife and undergoing a significant exodus.

A comparable industry would be human medicine. According to the U.S. Bureau of Labor Statistics, the mean hourly wage for a Registered Nurse (RN) is \$37.24, as of May 2019. In California, the average hourly pay is \$54.44. According to the California Board of Registered Nursing, the cost for license renewal is \$150. By comparison, the mean hourly wage for RVT's is \$17.63; in California it is \$20.90. The VMB is now implementing a RVT license renewal fee of \$350. Firstly, let's just point out that the difference in pay between a RN and a RVT is extremely depressing. Secondly, the difference in the renewal fees, especially as a percentage of wages, between the two professions is astounding. It is adding insult to the RVT profession. This is simply deplorable.

The VMB states that the Veterinary Assistant Controlled Substance Permit program (VACSP) is costing more than expected and not generating the income predicted. For some inexplicable reason, they did not propose raising the fee for the VACSP to the statutory maximum as they have for all other licensing categories. The VMB also states that increases in fees from the Attorney General's Office create a burden on their budget. However, RVTs represent an extremely small part of the disciplinary case load. The VMB cannot expect RVTs to pay higher fees to subsidize the VACSP program that has nothing to do with RVTs, or disciplinary cases against other licensing categories.

The VMB also proposed raising the fees without considering lowering expenses. I appreciate that the VMB needs to maintain its fund at a reasonable level, but more than doubling RVT fees is completely unacceptable and will result in harm to RVTs, consumers and their animals. The VMB must find another way.

Sincerely,

Andrea Lynch

Jocelyn Velazquez <Jocelyn.Velazquez@vca.com>  
Tue 10/13/2020 12:48 PM

To:

- Sotelo, Justin@DCA

---

Please do not increase the amount on the test. This profession is hard to have due to being a low paid job for all the hard work we have put in.

Jocelyn Trujillo  
733 Mallard Drive Williams, CA, 95987

Justin Sotelo, Lead Administrative & Policy Analyst  
Veterinary Medical Board  
1747 N Market Blvd Ste 230  
Sacramento CA 95834  
[Justin.Sotelo@dca.ca.gov](mailto:Justin.Sotelo@dca.ca.gov)

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Yours truly,

Jocelyn Trujillo

Jennifer Bench <jennifer.bench@pathwayvets.com>  
Mon 10/12/2020 2:28 PM

To:

- Sotelo, Justin@DCA

---

Good afternoon Mr. Sotelo -

I am attaching a copy of my letter to try and stop the permanent increase for RVTs to renew their license. As it is right now we are losing people left and right out of this field due to compassion fatigue and burn out- these are partly caused by our lack of pay in this field where a lot of technicians are unable to earn a livable wage. Now the VMB wants to increase the renewal fees - this is unfair!

Please take this letter as a fight to go into battle to keep our profession solid- we need amazing technicians in this field - we need them to help those animals and their owners survive!

Thank you for your time.

Please feel free to contact me if necessary regarding this issue.

Jennifer Bench, RVT, VTS(ECC)

Jennifer Bench, RVT, VTS(ECC)  
15199 Camoli Court  
Chino Hills, CA 91709

Justin Sotelo, Lead Administrative & Policy Analyst  
Veterinary Medical Board  
1747 N Market Blvd Ste 230  
Sacramento CA 95834  
[Justin.Sotelo@dca.ca.gov](mailto:Justin.Sotelo@dca.ca.gov)

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Veterinary technicians overall do not make enough to be able to afford these fees, most hospitals do not cover the costs of the renewal fees or continuing education fees. The fee increase will result in more and more technicians leaving the field to be able to make a living wage.

Yours truly,

Jennifer Bench, RVT, VTS(ECC)

Leigh Ann Nilsson <laln@comcast.net>  
Fri 10/9/2020 5:04 PM

To:

- Sotelo, Justin@DCA

To: The California Veterinary Medical Board

RE: Proposed increases in fees regarding Registered Veterinary Technicians

I am STRONGLY OPPOSED to the proposed increases in fees regarding Registered Veterinary Technical in California.

RVTs in California are in short supply. RVT education is expensive. Most RVTs earn less than \$20.00 an hour.

Increasing the fees by more than double the current cost will be financially crippling to RVTs.

I know, as someone who worked for years as a Veterinary Assistant before earning my RVT license, the pay increase I received was not substantial: \$1.00/hour.

I am sure you have seen the proposed language but allow me to remind you:

Current application eligibility review fee = \$150.00

Proposed fee = \$350.00

Then the applicant must pay \$200.00 to take the California veterinary technician exam.

\*

Current initial registration fee = \$160.00

Proposed increase = \$350.00

Current biennial renewal fee = \$160.00

Proposed increase = \$350.00

That is a total increase to \$900.00 to become an RVT - not including education costs!

And an additional \$350.00 to renew my license every two years.

Our profession is already known to be underpaid. Please do not add the burden of huge fees.

Thank you for your attention to this matter,

Leigh Ann L. Nilsson, BS, RVT

Michael James  
1136 46<sup>th</sup> Street  
Sacramento, CA 95819

RECEIVED

OCT 08 2020

VMB/RVTC

Justin Sotelo, Lead Administrative & Policy Analyst  
Veterinary Medical Board  
1747 N Market Blvd Ste 230  
Sacramento CA 95834  
[Justin.Sotelo@dca.ca.gov](mailto:Justin.Sotelo@dca.ca.gov)

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Yours truly,



Michael James, MBA, ARRT(R)  
Hospital Administrator, VCA Loomis Basin Veterinary Clinic

Jesslyn Tilley <jesslyntilley.ndch@gmail.com>  
Thu 10/8/2020 1:33 PM

To:

- Sotelo, Justin@DCA

Boshart, Karen VMB letter.pdf  
299 KB

Abenido, Jenny VMB letter.pdf  
336 KB

Rice, Shelley VMB letter.pdf  
311 KB

Tilley, Jesslyn VMB letter.pdf

Karen Boshart  
525 Sandydale Drive  
Nipomo, CA 93444

Justin Sotelo, Lead Administrative & Policy Analyst  
Veterinary Medical Board  
1747 N Market Blvd Ste 230  
Sacramento CA 95834  
[Justin.Sotelo@dca.ca.gov](mailto:Justin.Sotelo@dca.ca.gov)

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Yours truly,

*Karen H. Boshart, RVT*

Karen Boshart, RVT  
License 4052 issued May 1993



Jenny Abenido  
525 Sandydale Drive  
Nipomo, CA 9344

Justin Sotelo, Lead Administrative & Policy Analyst  
Veterinary Medical Board  
1747 N Market Blvd Ste 230  
Sacramento CA 95834  
[Justin.Sotelo@dca.ca.gov](mailto:Justin.Sotelo@dca.ca.gov)

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In fact, I recently declined to renew my license due to the sharp increase in renewal fees. Given that I am not actively working as a Registered Veterinary Technician, I could not justify keeping my license active for such a high price tag.

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Yours truly,



Jennifer Abenido, RVT  
License 2768 issued May 1986

Shelley Rice  
525 Sandydale Drive  
Nipomo, CA 93444

Justin Sotelo, Lead Administrative & Policy Analyst  
Veterinary Medical Board  
1747 N Market Blvd Ste 230  
Sacramento CA 95834  
[Justin.Sotelo@dca.ca.gov](mailto:Justin.Sotelo@dca.ca.gov)

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Yours truly,



Shelley Rice, RVT  
License 10962 issued May 2015



Jesslyn Tilley  
525 Sandydale Drive  
Nipomo, CA 93444

Justin Sotelo, Lead Administrative & Policy Analyst  
Veterinary Medical Board  
1747 N Market Blvd Ste 230  
Sacramento CA 95834  
[Justin.Sotelo@dca.ca.gov](mailto:Justin.Sotelo@dca.ca.gov)

Dear Mr. Sotelo:

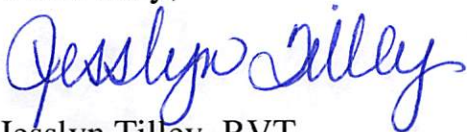
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Yours truly,



Jesslyn Tilley, RVT  
License 10928 issued April 2015



Brian Charn, DVM  
1111 Burr Street  
Davis, CA 95616

October 2, 2020

Justin Sotelo, Lead Administrative & Policy Analyst  
Veterinary Medical Board  
1747 N Market Blvd Ste 230  
Sacramento CA 95834  
Justin.Sotelo@dca.ca.gov

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Yours truly,



Brian Charn, DVM

Victoria Calebaugh <Victoria.Calebaugh@vca.com>  
Wed 10/7/2020 6:28 AM

To:

- Sotelo, Justin@DCA

---

Victoria Calebaugh  
5070 San Francisco St  
Rocklin, CA

Justin Sotelo, Lead Administrative & Policy Analyst  
Veterinary Medical Board  
1747 N Market Blvd Ste 230  
Sacramento CA 95834  
Justin.Sotelo@dca.ca.gov

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Thank you,

Victoria Calebaugh

Faviola Salinas <fav.salinas@gmail.com>  
Tue 10/6/2020 8:25 PM

To:

- Sotelo, Justin@DCA

---

F. Fabiola Salinas  
2839 Hyperion Ave  
Los Angeles CA. 90027

Justin Sotelo, Lead Administrative & Policy Analyst  
Veterinary Medical Board  
1747 N Market Blvd Ste 230  
Sacramento CA 95834  
[Justin.Sotelo@dca.ca.gov](mailto:Justin.Sotelo@dca.ca.gov)

**re: RVT Fee Increases**

Dear Mr. Sotelo:

I have been an RVT for 5 years. I graduated from Cal Poly Pomona with a BS in Animal Health. My road to becoming an RVT was filled with blood, sweat and tears. I had many people advise me against joining the profession for numerous reasons that have haunted the Veterinary field for many years and which I am sure you are aware about. One of them being low wages. I feel confident stating that all of us did not get into this field for the money. We did it because our love for animals and our drive to care for them was more powerful than making "more" money. I am writing to strongly object to the massive fee increases for Registered Veterinary Technicians (RVT) and RVT candidates proposed by the Veterinary Medical Board. As a relatively low-paid profession, RVTs simply cannot afford such high fees. Many of us are compelled to have more than one job in order to make ends meet. It is a shame our wages cannot cover cost of living. I fear that the fee increase creates an artificial barrier and discourages many to continue or get their license.

The VMB states that the Veterinary Assistant Controlled Substance Permit program (VACSP) is costing more than expected and not generating the income predicted. For some inexplicable reason, they did not propose raising the fee for the VACSP to the statutory maximum as they have for all other licensing categories. The VMB also states that increases in fees from the Attorney General's Office create a burden on their budget. However, RVTs represent an extremely small part of the disciplinary case load. The VMB cannot expect RVTs to pay higher fees to subsidize the VACSP program that has nothing to do with RVTs, or disciplinary cases against other licensing categories..

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RVT's are essential to our field and community. The fee increase will unquestionably detour new people from entering our profession and current people from staying in it. Many will leave the field as a result of this and undoubtedly negatively impact businesses and communities.

In order to prevent this mass exodus from occurring the VMB must reconsider.

Thank you for your time.

Yours truly,

F. Fabiola Salinas BS, RVT

James Champion <james.r.champion1976@gmail.com>  
Tue 10/6/2020 9:53 AM

To:

- Sotelo, Justin@DCA

Good day Mr. Sotelo,

Please find my opposition letter attached.

Best,  
James

James Champion  
337 Timberhead Lane  
Foster City, CA 94404

Justin Sotelo, Lead Administrative & Policy Analyst  
Veterinary Medical Board  
1747 N Market Blvd Ste 230  
Sacramento CA 95834  
[Justin.Sotelo@dca.ca.gov](mailto:Justin.Sotelo@dca.ca.gov)

Dear Mr. Sotelo:

**re: RVT Fee Increases**

I am writing to strongly object to the massive fee increases for Registered Veterinary Technicians (RVT) and RVT candidates proposed by the Veterinary Medical Board. As a relatively low-paid profession, RVTs cannot afford such high fees. I am very concerned that the fee increase creates an artificial barrier to licensure for RVTs.

The VMB states that the Veterinary Assistant Controlled Substance Permit program (VACSP) is costing more than expected and not generating the income predicted. For some inexplicable reason, they did not propose raising the fee for the VACSP to the statutory maximum as they have for all other licensing categories. The VMB also states that increases in fees from the Attorney General's Office create a burden on their budget. However, RVTs represent an extremely small part of the disciplinary case load. The VMB cannot expect RVTs to pay higher fees to subsidize the VACSP program that has nothing to do with RVTs, or disciplinary cases against other licensing categories..

The VMB also proposed raising the fees without considering lowering expenses. I appreciate that the VMB needs to maintain its fund at a reasonable level, but more than doubling RVT fees is completely unacceptable and will result in harm to RVTs, consumers and their animals. The VMB must find another way.

Yours truly,

James Champion

Sabine Roseman <sabine.roseman@pathwayvets.com>  
Tue 10/6/2020 8:11 AM

To:

- Sotelo, Justin@DCA

Please see Attachment

Thank you!

Sabine Roseman, RVT

**SAMPLE LETTER**

Sabine Roseman  
1454 Avon Terrace  
Los Angeles, CA 90026

Justin Sotelo, Lead Administrative & Policy Analyst  
Veterinary Medical Board  
1747 N Market Blvd Ste 230  
Sacramento CA 95834  
[Justin.Sotelo@dca.ca.gov](mailto:Justin.Sotelo@dca.ca.gov)

Dear Mr. Sotelo:

**re: RVT Fee Increases**

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Yours truly,

Sabine Roseman, RVT

Chris Taylor <c\_taylor@ix.netcom.com>  
Mon 10/5/2020 5:31 PM

To:

- Sotelo, Justin@DCA

---

Christopher Taylor, RVT  
2436 Cherry Ave  
San Jose, CA 95125-4715

Justin Sotelo, Lead Administrative & Policy Analyst  
Veterinary Medical Board  
1747 N Market Blvd Ste 230  
Sacramento CA 95834  
[Justin.Sotelo@dca.ca.gov](mailto:Justin.Sotelo@dca.ca.gov)

**re: RVT Fee Increases**

Dear Mr. Sotelo:

I am writing to strongly object to the massive fee increases for Registered Veterinary Technicians (RVTs) and RVT candidates proposed by the Veterinary Medical Board. As a relatively low-paid profession, RVTs cannot afford such high fees. I am very concerned that the fee increase creates an artificial barrier to licensure for RVTs and a burden to older RVTs who volunteer their experience and skills, financially maintaining their license on their own. The increased cost may be enough to change their mind about maintaining certification or letting their license lapse, hanging up their skills and experience. That would be an unfortunate loss to society and the veterinary field in California, especially during the unprecedented need for skilled livestock and companion animal care for wildfire displaced and injured animals.

The VMB states that the Veterinary Assistant Controlled Substance Permit program (VACSP) is costing more than expected and not generating the income predicted. For some inexplicable reason, they did not propose raising the fee for the VACSP to the statutory maximum as they have for all other licensing categories. The VMB also states that increases in fees from the Attorney General's Office create a burden on their budget. However, RVTs represent an extremely small part of the disciplinary case load. The VMB cannot expect RVTs to pay higher fees to subsidize the VACSP program that has nothing to do with RVTs, or disciplinary cases against other licensing categories..

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doubling RVT fees is completely unacceptable and will result in harm to RVTs, consumers and their animals. The VMB must find another way.

Yours truly,

-Signed -

Christopher Taylor, RVT  
TEC-7059



Jessica Tobar <jessie.n.tobar@gmail.com>  
Mon 10/5/2020 1:26 PM

To:

- Sotelo, Justin@DCA

Jessica Tobar  
14089 Janetdale St, La Puente, CA 91746

Justin Sotelo, Lead Administrative & Policy Analyst  
Veterinary Medical Board  
1747 N Market Blvd Ste 230  
Sacramento CA 95834  
[Justin.Sotelo@dca.ca.gov](mailto:Justin.Sotelo@dca.ca.gov)

Dear Mr. Sotelo:

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As a recent graduate, I've yet to take my licensing due to the fees now and increasing them would prolong me from getting my license. It is already hard enough to come out of school with no job lined up and expect us to pay more. Not everyone has the luxury to pay for RVT licensing fees.

The VMB states that the Veterinary Assistant Controlled Substance Permit program (VACSP) is costing more than expected and not generating the income predicted. For some inexplicable reason, they did not propose raising the fee for the VACSP to the statutory maximum as they have for all other licensing categories. The VMB also states that increases in fees from the Attorney General's Office create a burden on their budget. However, RVTs represent an extremely small part of the disciplinary case load. The VMB cannot expect RVTs to pay higher fees to subsidize the VACSP program that has nothing to do with RVTs, or disciplinary cases against other licensing categories..

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Yours truly,

Jessica Tobar

Kristy Veltri <kveltri@plattcollege.edu>  
Mon 10/5/2020 11:44 AM

To:

- Sotelo, Justin@DCA

Kristy Veltri  
24525 Trevino Drive, Unit U-5  
Valencia, CA 91355

Justin Sotelo, Lead Administrative & Policy Analyst  
Veterinary Medical Board  
1747 N Market Blvd Ste 230  
Sacramento CA 95834  
Justin.Sotelo@dca.ca.gov

Dear Mr. Sotelo: **re: RVT Fee Increases**

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Yours truly,

Kristy Veltri, BS, RVT, Fear Free Certified  
Program Director – Veterinary Technology  
Platt College Los Angeles  
kveltri@plattcollege.edu  
805-294-3038 *cell*

Jessica Ramos <Jessica.Ramos@vca.com>  
Mon 10/5/2020 8:49 AM

To:

- Sotelo, Justin@DCA

Jessica Ramos  
VCA Cordova Veterinary Hospital  
2939 Mather Field Rd  
Rancho Cordova, CA 95678

Justin Sotelo, Lead Administrative & Policy Analyst  
Veterinary Medical Board  
1747 N Market Blvd Ste 230  
Sacramento CA 95834  
[Justin.Sotelo@dca.ca.gov](mailto:Justin.Sotelo@dca.ca.gov)

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**re: RVT Fee Increases**

I am writing to strongly object to the massive fee increases for Registered Veterinary Technicians (RVT) and RVT candidates proposed by the Veterinary Medical Board. As a relatively low-paid profession, RVTs cannot afford such high fees. I am very concerned that the fee increase creates an artificial barrier to licensure for RVTs, as an assistant working towards becoming an RVT, I'm worried I won't be able to afford the licensing after graduation, let alone being able to renew the license.

The VMB states that the Veterinary Assistant Controlled Substance Permit program (VACSP) is costing more than expected and not generating the income predicted. For some inexplicable reason, they did not propose raising the fee for the VACSP to the statutory maximum as they have for all other licensing categories. The VMB also states that increases in fees from the Attorney General's Office create a burden on their budget. However, RVTs represent an extremely small part of the disciplinary case load. The VMB cannot expect RVTs to pay higher fees to subsidize the VACSP program that has nothing to do with RVTs, or disciplinary cases against other licensing categories..

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Yours truly,

Jessica Ramos

Benjamin Rendernick <Benjamin.Rendernick@vca.com>  
Mon 10/5/2020 7:20 AM

To:

- Sotelo, Justin@DCA

---

Benjamin Rendernick, RVT  
Oakland, Ca

Dear Mr. Sotelo: re: RVT Fee Increases

I am writing to strongly object to the massive fee increases for Registered Veterinary Technicians (RVT) and RVT candidates proposed by the Veterinary Medical Board. As a low-paid profession, RVTs cannot afford such high fees. I do not believe that the VMB's mismanagement of money should fall on the shoulders of RVT's, who are already carrying the burden of being underappreciated, under paid, and undervalued.

The VMB states that the Veterinary Assistant Controlled Substance Permit program (VACSP) is costing more than expected and not generating the income predicted. For some inexplicable reason, they did not propose raising the fee for the VACSP to the statutory maximum as they have for all other licensing categories. The VMB also states that increases in fees from the Attorney General's Office create a burden on their budget. However, RVTs represent an extremely small part of the disciplinary case load. The VMB cannot expect RVTs to pay higher fees to subsidize the VACSP program that has nothing to do with RVTs, or disciplinary cases against other licensing categories.

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Sincerely,

**Benjamin Rendernick, RVT**  
Emergency & Internal Medicine Departments  
VCA San Francisco Veterinary Specialists

Giovanna Torres <Giovanna.Torres@vca.com>  
Sun 10/4/2020 5:12 AM

To:

- Sotelo, Justin@DCA

---

To whom it may concern, my name is Giovanna Torres. I have been an RVT since 2008. Every 2 years, I have had to try desperately to save the money needed to take the required CE credits and renew my license. This is a daunting feat for me every single time. For the entirety of my career, I have barely been able to get by financially paycheck to paycheck. This among many other factors has made me greatly regret coming into this field. I am strongly considering leaving the field and California all together because I can barely support my family. I understand the reasoning behind raising the license renewal fees, but this is not sustainable for almost any RVT. We will lose people in droves if this increase is permanent. I would be one of them as I would have no choice. My family comes first and spending almost \$1,000 every 2 years is almost impossible. Please reconsider, and reduce the renewal fee for RVT's. Thank you.

Natasha Tworoski <Natasha.Tworoski@vca.com>  
Sun 10/4/2020 4:57 AM

To:

- Sotelo, Justin@DCA

Your Name  
Your Address

Natasha Tworoski  
Tworoski@gmail.com  
362 Alida Way Apt 16  
South San Francisco, CA 94080

Justin Sotelo, Lead Administrative & Policy Analyst  
Veterinary Medical Board  
1747 N Market Blvd Ste 230  
Sacramento CA 95834  
[Justin.Sotelo@dca.ca.gov](mailto:Justin.Sotelo@dca.ca.gov)

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Yours truly,  
Natasha Tworoski

**From:** Allison Vander Plaats <avp.dvm@gmail.com>  
**Sent:** Friday, October 2, 2020 11:09 AM  
**To:** VMB@DCA <VMB@dca.ca.gov>  
**Subject:** VMB License Fee Increases

---

Hello,

My name is Allison Vander Plaats, and I am a veterinarian currently operating in academia. I have reviewed the documents relating to the licensure fee increase and would like to speak out in opposition of this dramatic increase.

I graduated veterinary school with over \$250k in student loans. I had no debt from my undergraduate degree, but veterinary school is expensive no matter where you go. I took a job as a primarily dairy veterinarian immediately out of school with a starting salary of \$75k. I worked there for a few years, and am now working in academia and enjoying a better work-life balance and more fulfillment. However, my salary is very near where it was when I started as a veterinarian a few years ago.

I currently pay rent, loans, utilities, groceries, etc. each month with not a lot left over for retirement, savings, etc. I work hard and enjoy what I do, but my overwhelming debt load makes it difficult to get ahead. I also am responsible for my own association fees, continuing education, and veterinary supplies.

The fee increase due to fiscal mismanagement within the VMB should not fall on veterinarians who are forced to pay fees for licensure within California. Reading through the provided literature, it seems like salaries and benefits have increased, as well as positions within the VMB. With my basic understanding of how to create and manage a business, increases should not occur where there isn't enough money to fund current operating expenses. And a 40% increase in a single year? Absolutely not. This seems a convenient way for the VMB to make up poorly managed dollars while generating more bad blood between the VMB and the professionals they regulate, many of whom are financially stressed already. It also seems to be a conflict of interest.

In summary, I (and most other California veterinarians) oppose this huge licensure increase and am harshly suggesting the VMB find another funding source than the professionals they are regulating and supposed to be providing support for. Thank you for your time.

Allison Vander Plaats, DVM  
College of the Sequoias, Tulare Center

Stephen Atwater <Stephen.Atwater@vca.com>  
Fri 10/2/2020 3:47 PM

To:

- Sotelo, Justin@DCA

Please see my attached letter. It is very concerning that this fee increase is being considered, which is an unfair expense to a relatively underpaid and under-appreciated group of professionals in the veterinary medical field.

Stephen Atwater, DVM, MS, DACVIM  
VCA Encina Veterinary Medical Center

Dr. Stephen Atwater  
724 Rosewood Drive  
Walnut Creek, CA 94596

October 2, 2020

Justin Sotelo, Lead Administrative & Policy Analyst  
Veterinary Medical Board  
1747 N Market Blvd Ste 230  
Sacramento CA 95834  
[Justin.Sotelo@dca.ca.gov](mailto:Justin.Sotelo@dca.ca.gov)

Dear Mr. Sotelo:

re: RVT Fee Increases

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Yours truly,

Stephen Atwater, DVM, MS, DACVIM



Mike Saksen <saksen.mike@gmail.com>  
Fri 10/2/2020 3:18 PM

To:

- Sotelo, Justin@DCA

---

This increase is deplorable, please see my attached letter.

Mike Saksen, DVM  
Medical Director  
VCA Bradshaw Animal Hospital

Justin Sotelo, Lead Administrative & Policy Analyst  
Veterinary Medical Board  
1747 N Market Blvd Ste 230  
Sacramento CA 95834

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**re: RVT Fee Increases**

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I furthermore urge you to revisit site license fees – there are paid by business owners who are much more likely to have the resources to handle these increased fees.

Yours truly,



Mike Saksen, DVM  
Saksen.mike@gmail.com

Laressa Dimalanta <Laressa.Dimalanta@vca.com>  
Fri 10/2/2020 2:54 PM

To:

- Sotelo, Justin@DCA

---

Hello Mr. Sotelo,

Please see the attached letter regarding the higher RVT licensing fees.

Thank you very much,

Laressa

Laressa Dimalanta, RVT, RLATG | Hospital Manager II  
**VCA Vets and Pets Animal Hospital, AU203**

Laressa Dimalanta, RVT, RLATG  
1299 San Tomas Aquino Rd # 112  
San Jose, CA 95117

Justin Sotelo, Lead Administrative & Policy Analyst  
Veterinary Medical Board  
1747 N Market Blvd Ste 230  
Sacramento CA 95834  
[Justin.Sotelo@dca.ca.gov](mailto:Justin.Sotelo@dca.ca.gov)

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I have been on the CVMA RVT Committee representing the following areas: Research (Allied Industry), Education, and now District IX since 1999, as well as the HOD as an RVT delegate. While I appreciate the need to find ways to subsidize costs, I find that increasing RVT licensing fees is requiring much higher fees from a profession that is notorious for its low wages. In addition, many licensed RVTs across the state are still only making slightly more than minimum wage: it is typical for an RVT to make \$17/hour where \$15/hour is the minimum wage.

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some inexplicable reason, they did not propose raising the fee for the VACSP to the statutory maximum as they have for all other licensing categories. The VMB also states that increases in fees from the Attorney General's Office create a burden on their budget. However, RVTs represent an extremely small part of the disciplinary case load. The VMB cannot expect RVTs to pay higher fees to subsidize the VACSP program that has nothing to do with RVTs, or disciplinary cases against other licensing categories.

The VMB also proposed raising the fees without considering lowering expenses. I appreciate that the VMB needs to maintain its fund at a reasonable level, but more than doubling RVT fees is completely unacceptable and will result in subsequent harm to RVTs, consumers and their animals. The VMB must find another way.

If the VMB insists on keeping these higher licensing fees for RVTs, then I implore you to actually enforce the California Practice Act and tack significantly high fees to every non-RVT (aka Veterinary Assistant) who is illegally performing procedures that are legally reserved for RVTs only. If you were to do this and actually inspect and fine veterinarians and practice owners for infractions to the California Practice Act, I feel certain that you will have a more than sufficient financial pocket to then garner the funds needed to salvage your VACSP program.

Thank you for your time and consideration.

Yours truly,

Laressa Dimalanta, RVT, RLATG

Elizabeth Thompson <lizz.a.thompson@gmail.com>  
Fri 10/2/2020 12:48 PM

To:

- Sotelo, Justin@DCA

Please see attached.

Thank you,  
Lizz A. Thompson, BA, RVT  
Animal Shelter Consultant

Elizabeth Thompson  
1189 Slidell Park Ct.  
Galt, CA 95632

Justin Sotelo, Lead Administrative & Policy Analyst  
Veterinary Medical Board  
1747 N Market Blvd Ste 230  
Sacramento CA 95834  
[Justin.Sotelo@dca.ca.gov](mailto:Justin.Sotelo@dca.ca.gov)

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Yours truly,

Elizabeth Thompson, BA, RVT  
Animal Shelter Consultant

Jennifer Longman <Jennifer.Longman@vca.com>  
Fri 10/2/2020 11:26 AM

To:

- Sotelo, Justin@DCA

---

Justin Sotelo,

Hope this letter finds you well.

Please find attached my letter regarding the increase of RVT licensing fees.

Thank you

Jennifer Longman, MS, RVT  
VCA Sequoia Valley Animal Hospital

Justin Sotelo, Lead Administrative & Policy Analyst  
Veterinary Medical Board  
1747 N Market Blvd Ste 230  
Sacramento CA 95834  
[Justin.Sotelo@dca.ca.gov](mailto:Justin.Sotelo@dca.ca.gov)

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Yours truly,

Jennifer Longman

Stephanie Briseno <Stephanie.Briseno@vca.com>  
Fri 10/2/2020 10:36 AM

To:

- Sotelo, Justin@DCA

---

Stephanie Briseño | Veterinary Assistant  
VCA Animal Hospital of Los Gatos #202

Stephanie Briseño  
524 N. Santa Cruz Ave  
Los Gatos, CA 95030

Justin Sotelo, Lead Administrative & Policy Analyst  
Veterinary Medical Board  
1747 N Market Blvd Ste 230  
Sacramento CA 95834

Dear Mr. Sotelo:

**re: RVT Fee Increases**

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Yours truly,

Stephanie Briseño

Ofelia <gdrop.geo@yahoo.com>  
Fri 10/2/2020 8:54 AM

To:

- Sotelo, Justin@DCA

---

Dear Mr. Sotelo:

I am writing to strongly object to the massive fee increases for Registered Veterinary Technicians (RVT) and RVT candidates proposed by the Veterinary Medical Board. As a relatively low-paid profession, RVTs cannot afford such high fees. I am very concerned that the fee increase creates an artificial barrier to licensure for RVTs. During this Pandemic I had to renew my license as well as having to renew my fingerprints. This cost me over \$400 which is ridiculous. Our fees were more than doubled. I technically do not need to have my license current and valid for the job that I am in currently. I choose to because I have pride in our profession and I believe it is important to keep up with our education. I can see how these fee increase will discourage people from renewing. It is an unjust amount to pay for our profession.

The VMB states that the Veterinary Assistant Controlled Substance Permit program (VACSP) is costing more than expected and not generating the income predicted. For some inexplicable reason, they did not propose raising the fee for the VACSP to the statutory maximum as they have for all other licensing categories. The VMB also states that increases in fees from the Attorney General's Office create a burden on their budget. However, RVTs represent an extremely small part of the disciplinary case load. The VMB cannot expect RVTs to pay higher fees to subsidize the VACSP program that has nothing to do with RVTs, or disciplinary cases against other licensing categories..

The VMB also proposed raising the fees without considering lowering expenses. I appreciate that the VMB needs to maintain its fund at a reasonable level, but more than doubling RVT fees is completely unacceptable and will result in harm to RVTs, consumers and their animals. Please consider returning the fee to its original and reasonable state.

Yours truly,

Ofelia Satterfield #7187 RVT, RLATG, BS



Lexxiss Clayton <lclayton18@gmail.com>  
Fri 10/2/2020 7:43 AM

To:

- Sotelo, Justin@DCA

Lexxiss Clayton

*SAMPLE LETTER*

Your Name  
Your Address

Justin Sotelo, Lead Administrative & Policy Analyst  
Veterinary Medical Board  
1747 N Market Blvd Ste 230  
Sacramento CA 95834  
[Justin.Sotelo@dca.ca.gov](mailto:Justin.Sotelo@dca.ca.gov)

Dear Mr. Sotelo:

**re: RVT Fee Increases**

I am writing to strongly object to the massive fee increases for Registered Veterinary Technicians (RVT) and RVT candidates proposed by the Veterinary Medical Board. As a relatively low-paid profession, RVTs cannot afford such high fees. I am very concerned that the fee increase creates an artificial barrier to licensure for RVTs.

The VMB states that the Veterinary Assistant Controlled Substance Permit program (VACSP) is costing more than expected and not generating the income predicted. For some inexplicable reason, they did not propose raising the fee for the VACSP to the statutory maximum as they have for all other licensing categories. The VMB also states that increases in fees from the Attorney General's Office create a burden on their budget. However, RVTs represent an extremely small part of the disciplinary case load. The VMB cannot expect RVTs to pay higher fees to subsidize the VACSP program that has nothing to do with RVTs, or disciplinary cases against other licensing categories..

The VMB also proposed raising the fees without considering lowering expenses. I appreciate that the VMB needs to maintain its fund at a reasonable level, but more than doubling RVT fees is completely unacceptable and will result in harm to RVTs, consumers and their animals. The VMB must find another way.

Yours truly,

Your Name

Amy de Lorimier <amy\_delorimier@yahoo.com>  
Thu 10/1/2020 11:50 AM

To:

- Sotelo, Justin@DCA

---

Re:

Registration and Renewal Fees for Veterinarians, § 2070 Application  
Registration and Renewal Fees for Registered Veterinary Technicians, § 2071

Dear Mr. Sotelo,

With all due respect to the board, this is effing ridiculous. Most veterinarians are struggling to pay student loans and basic living expenses in the cut-throat California economy, This is absolutely inappropriate especially in the year of Covid, with all the interruptions in work and extra containment costs.

This is a big no on increasing the costs to veterinarians, who are already struggling under massive financial burdens.

Respectfully,

Dr. Amy de Lorimier

**From:** Lucy Cohen <lnmcohen@gmail.com>  
**Sent:** Sunday, September 27, 2020 9:42 PM  
**To:** VMB@DCA <VMB@dca.ca.gov>  
**Subject:** Comments on proposed regulatory changes

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Hi, I'm not sure where I need to submit comments about regulatory changes.

I'm against increasing the fee schedule for licensing as it will put an undue burden on privately owned clinics and independent veterinarians who are already suffering in the current economic climate. As Californians, we already pay higher fees than most other states. At a time when every other discussion in our profession is how to handle veterinarian stress and crushing student debt, we don't need to add another financial burden. More and more, I feel the AVMA is catering to corporations and private interest and I'm already tired of funding policies that do not represent my needs or desires.

Thank you,

Lucy Cohen

Kim Hayes <kimhayesdvm@gmail.com>  
Sun 9/27/2020 8:31 AM

To:

- Sotelo, Justin@DCA

Dear Mr. Sotelo:

I understand the reason for the licensing and testing fee changes and realize that it is important for the Veterinary Medical Board to remain fiscally solvent. However, most of the costs incurred by the board appear to be related to consumer complaints, which result in expensive expert witness and attorney's fees. In my professional opinion, since these services cannot be supported by the current fee structure, and since the service is actually to the consumers, doesn't it make sense that the consumer bear some of the cost? The fee could be fixed and charged at the time of the complaint. If the consumer was charged a \$25 processing fee for a complaint, and the number of complaints is approximately 1000 per year, that would increase revenues by \$25,000.

I look forward to hearing your thoughts on this.

Sincerely,

Kimberly Johnson, DVM  
California License 9235

**From:** n morales <nmorales@email.com>  
**Sent:** Saturday, September 26, 2020 9:28 PM  
**To:** VMB@DCA <VMB@dca.ca.gov>  
**Subject:** Comments: Proposed fee increase for Veterinarians

---

Greetings,

Below I include some comments regarding the proposed fee increase for Veterinarians. This was written quickly, please excuse typos and syntax errors.

I am already having trouble paying for CE this year with all the individual fees for remote courses adding up because we are unable to safely join conferences with many many more hours at a much more affordable fee/course ratio. Raising the fee for individual veterinary licenses for this year (2021) will make it incredibly hard for those of us that are working many less hours if at all during the pandemic. I believe that CA will see a significant loss of licensees in 2021, not because they are not excellent doctors, but because they cannot choose license fees over survival costs of water, shelter, food, utilities, health care, and for those that thought they could reach the CE requirements and so continued to spend on CE, increased CE costs, all while working less hours or being virtually unemployed. Once a license is lapsed further costs are incurred to reinstate, etc..

I personally do not object to some modest increase, especially if the VMB costs have risen as expected and further costs have increased due to pandemic measures, but such an increase should 1) be specified: The proposed change specifies ONLY 300 USD increase for training institutions for vet techs, and while it states increases for veterinarians and techs, it does not specify the increases on each; and 2) be DELAYED until 2023 see below.

Most importantly, such an increase as described in the above paragraph, must WAIT until the pandemic has been at the very least, 70 percent controlled. That will not happen until 1) hospitalization numbers drop dramatically and stay at low levels; 2) the testing is increased and includes repeated testing of ALL essential workers and anyone else allowed to go to work in public buildings and businesses, and anyone exposed to known Ag positive cases, and any symptomatically consistent cases, [NB we really only need to test for Ag--ie shedders/spreaders. Testing for protective Ab is helpful but not needed for control.]; 3) a safe and effective vaccine is actually administered to a vast percentage of the population, and is repeated as needed.

My expectation is that the vaccine when it is finally and truly available for public administration--and distribution systems are in place--won't be ready before late summer or autumn 2021. From there, expect at least one year to reach 50% population compliance, and the majority of 2022 to finally achieve 75% population immunization. During which time we will learn if the first vaccination was able to induce a lasting immunity of 4 months (currently suspected minimum length of immunity generated by

survival of wild caught disease), 6 months, and 1 year. With said data between first vaccination and 12 month survival/infection stats, the protocol for booster vaccinations can be crafted. Currently, only testing groups have any specific protocol: 2 doses at a certain interval. During all this time, pandemic situations will be in place and will decrease work hours/income and increase costs for many.

Again, I do not oppose an EVENTUAL modest increase to the individual veterinary license fee, but it must not be implemented until the year 2023. Modest to me would be 50 USD. An increase of 100 USD would be prohibitive, especially on top of all the increased costs of adaptive CE needed to keep the license valid for interim renewal.

Thank you for your time and consideration,

n morales DVM

Kim Neal <kneal426@gmail.com>  
Sat 9/26/2020 9:25 PM

To:

- Sotelo, Justin@DCA

---

Dear Mr. Sotelo,

I am a licensed California veterinarian. I oppose the proposed changes to Sections 2070 and 2071, Article 7, Division 20, Title 16 of the California Code of Regulations.

I oppose the increase in biennial renewal fees for veterinarians from \$350 to \$500 [Section 2070 (e)] as well as the increase in biennial renewal fees for veterinary technicians from \$160 to \$350 [Section 2071 (d)].

I, like other veterinarians and veterinary technicians, am paying for these fee increases out-of-pocket. I do not receive this as a benefits package. I am concerned the State is driving small business veterinarians and veterinary technicians out of California, while encouraging Corporate medicine.

Instead of your proposed fee increases, I recommend you increase the veterinary premise fees for corporate veterinary clinics (Banfield, VCA, Thrive, Vetco, VIP, etc.) to over \$1000 per location, while leaving the premise fees for small business vet clinics as is at \$400 [Section 2070 (j) and (k)].

Thank you for your consideration,

Kimberly B. Neal, DVM  
CA 20352



Naomi Turner <turnernaomi@hotmail.com>  
Sat 9/26/2020 6:13 PM

To:

- Sotelo, Justin@DCA

---

Dear Mr. Sotelo,

I am a CA licensed veterinarian and I am writing in response to the proposed changes to Sections 2070 and 2071, Article 7, Division 20, Title 16 of the California Code of Regulations. Below are my comments:

I am in OPPOSITION to the increase in biennial renewal fees for veterinarians from \$350 to \$500 [Section 2070 (e)].

I am also in OPPOSITION to the increase in biennial renewal fees for veterinary technicians from \$160 to \$350 [Section 2071 (d)].

These fees were just increased significantly last year. Does the State plan to increase fees by over \$100/year every year or is there an end in sight to these fee increases? Many veterinarians and veterinary technicians are paying for these fee increases out-of-pocket. I am concerned the State is driving good "mom and pop" veterinarians and veterinary technicians out of California, while encouraging "big box" medicine.

Instead of your proposed fee increases, I recommend the State:

1. Increase the fees for Universities from \$350-500 to over \$1000 [Section 2070(g) (h) and (i)].
2. Increase the fees for Board approval of the curriculum for training RVTs from \$300 to over \$1000 [Section 2071(f)].
3. Increase the veterinary premise fees for "big box" vet clinics (Banfield, VCA, Thrive, Vetco, VIP, etc.) to over \$1000 per location, while leaving the premise fees for the individual "mom and pop" vet clinics as is at \$400 [Section 2070 (j) and (k)].

Please email me back to confirm receipt and consideration of my comments.

Thank you,

**Naomi Turner, DVM**  
**CA lic #21369**  
turnernaomi@hotmail.com  
310-622-5846

Jasmine Matloob <jasminematloob@gmail.com>  
Fri 9/25/2020 10:59 AM

To:

- Sotelo, Justin@DCA;
- Rodda, Timothy@DCA

Dear Justin and Timothy,

Increasing the fees for licensing of veterinarians in practice during times of a recession and worldwide pandemic is completely insensitive and unacceptable. The failure of financial management of the VMB is not the responsibility of practicing veterinarians out on the front lines treating patients and seeing clients and serving public health initiatives.

There needs to be a strong re-evaluation of expensive and necessary costs as travel costs should be significantly decreased at this time of a pandemic. Virtual communication is standard and the norm at this time. Eliminating printed notices and publications can facilitate expense reduction.

This 300\$ fee increase is basically doubling the amount of licensing. An unfair and unacceptable increase. Especially in a single step. Incremental increases over time would be more acceptable.

I demand a public hearing for the board to answer any and all questions by myself and the veterinarians across California. This hearing must be facilitated virtually to ensure the safety of the veterinarians you serve.

I have copied several actively practicing veterinarians to ensure that you hold a public hearing and are held accountable.

I expect a response to this email by one of the two addressees in this email to know that you have received this written communication.

Jasmine Matloob, DVM

Sumeet Gupta <guptadvn@gmail.com>  
Thu 9/24/2020 6:09 PM

To:

- Sotelo, Justin@DCA;
- Rodda, Timothy@DCA

Increasing the fees for licensing of veterinarians in practice during times of a recession and worldwide pandemic is completely insensitive and unacceptable. The failure of financial management of the VMB is not the responsibility of practicing veterinarians out on the front lines treating patients and seeing clients and serving public health initiatives.

There needs to be a strong re-evaluation of expensive and necessary costs as travel costs should be significantly decreased at this time of a pandemic. Virtual communication is standard and the norm at this time. Eliminating printed notices and publications can facilitate expense reduction.

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I have copied several actively practicing veterinarians to ensure that you hold a public hearing and are held accountable.

I expect a response to this email by one of the two addressees in this email to know that you have received this written communication.

Sumeet Gupta DVM

ldevincenzi@antiochvet.com  
Thu 9/24/2020 5:59 PM

To:

- Sotelo, Justin@DCA

---

Hello Justin,

I am reaching out because I wanted to clarify what I am reading. Is this stating that the board is proposing to increase the RVT registration by \$300? Is this just for the initial registration or is this biennial with every renewal? Is this just for RVT or also DVM?

Where can I find the information regarding the exact reasoning for this because all I see in the proposal where it states how the board is in need of funds and revenue.

I am an RVT and a manager, I am proud of our profession but to find out that the Veterinary Medical Board is trying to increase the registration of literally one of the lowest paid and under-appreciated careers is extremely upsetting. I am legitimately embarrassed by this.

If what I read is true I would like to petition against this.

Thank you,

Linda

November 3, 2020

Justin Sotelo, Lead Administrative and Policy Analyst  
Veterinary Medical Board  
1747 North Market Blvd., Suite 230  
Sacramento, CA 95834

**RE: Registration and Renewal Fees for Veterinarians, § 2070 Application, Registration and Renewal Fees for Registered Veterinary Technicians, § 2071.**

Dear Mr. Sotelo,

The California Veterinary Medical Association, representing over 7,800 veterinary professionals in the state, including veterinarians, registered veterinary technicians, and veterinary students, is greatly concerned about the status of the Veterinary Medical Board (VMB) and the emergency fee increase that was enacted for all veterinary licensees, premises, and permit holders earlier this year.

In response to a statement of reasons for the emergency fee increase issued by the VMB at the beginning of the year, the CVMA submitted the attached January 15, 2020 comment letter. That letter describes the difficult position that the veterinary profession is placed in by the fee increases, which are extremely burdensome to veterinary professionals, and force them to absorb unanticipated expenses in order to avoid VMB insolvency. The increases for RVTs are of particular concern, as they result in total fees that are over two times the prior amounts.

Recently, the VMB Multidisciplinary Advisory Committee (MDC) began exploring fee structure alternatives that would lessen the financial burden on RVTs. The CVMA believes that research and discussion of all viable alternatives should continue with the goal of reducing RVT permit costs.

Sincerely,



Dirk Yelinek, DVM  
CVMA President

Attachment



January 15, 2020

Moneel Singh, Licensing Manager  
 Veterinary Medical Board  
 1747 North Market Blvd., Suite 230  
 Sacramento, CA 95834

1400 River Park Drive, Suite 100  
 Sacramento, CA 95815-4505  
 916-649-0599  
 fax 916-646-9156  
 staff@cvma.net  
 www.cvma.net

The California Veterinary Medical Association, representing over 7,800 veterinary professionals in the state, including veterinarians, registered veterinary technicians, and veterinary students, is greatly concerned about the status of the Veterinary Medical Board (VMB) and the need for immediate action on a proposed fee increase that will impact all veterinary licensees in California.

According to the findings for the proposed fee increase, the specific need for immediate action to increase fees is to avoid the imminent shutdown of the VMB's licensing and enforcement activity and the projected insolvency of the VMB that would result in serious harm to the public and their animals. This leaves the veterinary profession in the difficult position of accepting a severe fee increase in order to continue doing business in California. If veterinarian and registered veterinary technicians licenses are not issued and renewed due to a shutdown of VMB divisions, veterinary practices, the public, and animals will all suffer.

The California system for funding regulatory boards is the underlying problem for this dilemma. When expenses are increased by the state, such as with the recent increases by the Attorney General's Office, the boards are put in the position of a budget deficit due to increased expenditures. Lengthy and costly enforcement action against veterinary professionals add considerable costs to an already tight budget. Legislative mandates to increase premises inspections, the inefficiency of the BreEZe system, slower than projected revenues from the VACSP program, lack of sufficient staff and more unanticipated expenditures are not the fault of licensees but of a system that continues to strain the Veterinary Medical Board with unanticipated expenses.

The proposed fee increases will be extremely burdensome to veterinary professionals. They will be put in a position of absorbing these unanticipated expenses. The fee increase for registered veterinary technicians are of particular concern as they are more than doubling in amount. The CVMA urges the VMB to review the RVT fees and consider other alternatives.

Will this fee increase guarantee solvency for the board and a return to timely licensing and other critical activities? If not, there must be a hard look at the system, funding support, and legislative mandates that fall short of projected revenues.

Sincerely,

Bryan Halteman, DVM, MBA  
 CVMA President

**TITLE 16. PROFESSIONAL AND VOCATIONAL REGULATIONS  
DIVISION 20. VETERINARY MEDICAL BOARD**

**NOTICE OF PROPOSED CHANGES  
Registration and Renewal Fees for Veterinarians, § 2070  
Application, Registration and Renewal Fees for  
Registered Veterinary Technicians, § 2071**

**NOTICE IS HEREBY GIVEN** that the Veterinary Medical Board (“Board”) is proposing to take the action described in the Informative Digest, below.

**PUBLIC HEARING**

The Board has not scheduled a public hearing on this proposed action. However, the Board will hold a hearing if it receives a written request for a public hearing from any interested person, or his or her authorized representative, no later than 15 days prior to the close of the written comment period. A hearing may be requested by making such request in writing addressed to the individuals listed under “Contact Person” in this notice.

**WRITTEN COMMENT PERIOD**

Written comments, including those sent by mail, facsimile, or e-mail to the addresses listed under “Contact Person” in this Notice, must be **received by the Board at its office no later than November 9, 2020**, or must be received by the Board at the hearing, should one be scheduled.

**AVAILABILITY OF MODIFICATIONS**

The Board, upon its own motion or at the request of any interested party, may thereafter adopt the proposals substantially as described below or may modify such proposals if such modifications are sufficiently related to the original text. With the exception of technical or grammatical changes, the full text of any modified proposal will be available for 15 days prior to its adoption from the person designated in this Notice as the contact person, and will be mailed to those persons who submit written or oral testimony related to this proposal or who have requested notification of any changes to the proposal.

**AUTHORITY AND REFERENCE**

Pursuant to the authority vested by section 4808 of the Business and Professions Code (BPC), and to implement, interpret, or make specific sections 4842.5, 4843, and 4905 of the BPC, the Board is proposing changes to sections 2070 and 2071 of Article 7 of Division 20 of Title 16 of the California Code of Regulations (CCR).

**INFORMATIVE DIGEST**

**A. Informative Digest**

BPC section 4808 authorizes the Board to adopt, amend, or repeal such rules and regulations as may be reasonably necessary to enable it to carry into effect the provisions



of the Veterinary Medicine Practice Act (VMPA), which is contained in BPC sections 4800 through 4917.

Existing laws, BPC sections 4842.5 and 4905, authorize the Board to charge fees associated with veterinarian licensure, premises permit registration, and registered veterinary technician registration. These sections require the Board to set the amount of the fees associated with licensure and registration at amounts the Board determines are reasonably necessary to provide sufficient funds to carry out the purpose of the VMPA. The sections also set specified limits on the amount of fees that may be charged.

BPC 4843 authorizes the Board to approve schools or institutions offering a curriculum for training registered veterinary technicians. Schools must request approval from the Board by submitting an application form and fee and must reapply for approval on a biennial basis.

#### Amend Sections 2070 and 2071

The statutory fees are set in regulation under sections 2070 (veterinarian and premises permit registration) and 2071 (registered veterinary technician registration). The Board is proposing to amend CCR sections 2070 and 2071 to increase certain fees associated with veterinarian and university licensure, and veterinary technician registration, and add a new fee associated with the approval of schools and institutions offering a curriculum for training registered veterinary technicians.

### **B. Policy Statement Overview**

In accordance with BPC section 4800.1, the Board's highest priority is protection of the public in exercising its regulatory, licensing, inspection, and disciplinary functions.

The Board is a self-supporting, special fund agency that generates its revenues from licensing and registration fees. In order to perform its regulatory, licensing, inspection, and disciplinary functions, the Board must generate sufficient revenues from fees associated with licensing and registration. The Board is also required to maintain a Fund Condition reserve of no less than three (3) months and no more than ten (10) months of annual authorized expenditures. As the Board's costs associated with performing its core functions have risen sharply, the Board is currently experiencing a severe fiscal imbalance. This proposal would increase fees associated with veterinarian and university licensure, and veterinary technician registration, and add a new \$300 fee associated with the approval of schools and institutions offering a curriculum for training registered veterinary technicians, so that the Board can continue to perform its core functions and properly protect the public.

### **C. Anticipated Benefits of Proposed Regulatory Action**

By increasing licensing and registration fees, and adding the new application fee, this proposal would generate sufficient funds for the Board to resolve its fiscal imbalance. In

turn, the Board will be able to appropriate additional funds toward inspections and enforcement, which will protect California consumers and their animals by ensuring that licensees are complying with the VMPA and allowing for the prosecution of those licensees that are violating the VMPA. In addition to this, by amending sections 2070 and 2071, the Board will be complying with BPC section 4905, which requires the Board to maintain a reserve of at least three (3) months and no more than ten (10) months of annual authorized expenditures.

#### **D. Consistency and Compatibility with Existing State Regulations**

During the process of developing this proposal, the Board has conducted a search of any similar regulations on this topic. The Board has evaluated this regulatory proposal and found that it is neither inconsistent nor incompatible with existing state regulations.

#### **FISCAL IMPACT ESTIMATES:**

Fiscal Impact on Public Agencies Including Costs or Savings to State Agencies or Costs/Savings in Federal Funding to the State: The anticipated additional revenue from the proposed fee increase will increase the Board's revenue from current levels by approximately \$2,302,020 per fiscal year ongoing.

With the new application fee for approving Registered Veterinary Technician (RVT) schools/institutions, the Board will review and approve 25 California schools every two years. Additionally, some programs will be subject to on-site inspections every four years. The Board estimates the costs associated with this workload would range from between \$8,100 to \$24,000 every two years. The revenue generated from this specific application fee would be approximately \$7,500 every two years. The anticipated workload and costs related to approving RVT schools/institutions would be temporarily absorbed within existing resources until the Board pursues legislation to raise the statutory fee cap.

There are no expected costs or savings to any other state agency or costs/savings in federal funding.

Nondiscretionary Costs/Savings to Local Agencies: None

Local Mandate: None

Cost to Any Local Agency or School District for Which Government Code Sections 17500 - 17630 Require Reimbursement: None

Business Impact: The Board has initially determined that the proposed regulation will not have a significant, statewide adverse economic impact directly affecting business, including the ability of California businesses to compete with businesses in other states.

Since there are no proposed fee increases for veterinary premises (hospitals), there is no direct economic impact anticipated for businesses. However, some businesses may pay

application, licensing, or renewal fees for their veterinarian or RVT employees. Schools and institutions that offer a curriculum for training registered veterinary technicians and request approval by the Board would be required to pay an application fee on a biennial basis.

**Cost Impact on Representative Private Person or Business:**

This regulation may have an economic impact on private persons, specifically, veterinarians, university licensees, and registered veterinary technicians. The proposal may impact private businesses if those businesses pay the costs of application, licensing, or renewal fees for its veterinarian, university licensee, or RVT employees. Additionally, schools and institutions that offer a curriculum for training registered veterinary technicians and request approval by the Board would be required to pay an application fee on a biennial basis.

**Effect on Housing Costs:** None

**EFFECT ON SMALL BUSINESS**

The Board has determined that the proposed regulations may affect small businesses, similar to the business impact that is stated above.

**RESULTS OF ECONOMIC IMPACT ASSESSMENT/ANALYSIS:**

**Impact on Jobs/Businesses:**

The proposed rulemaking will neither create businesses or jobs nor eliminate existing businesses or jobs within California because the proposed fees are anticipated to have minimal impact on businesses. The proposed rulemaking will not affect the expansion of businesses currently doing business within the state. The impact on businesses will be minimal and absorbable, as this regulation specifically affects individual licensees and schools/institutions offering a curriculum for training registered veterinary technicians. This regulation may have an economic impact on private persons or businesses, specifically, veterinarians, registered veterinary technicians, and specified schools/institutions. The regulation would increase fees associated with veterinarian and university licensure, and veterinary technician registration, and add a new fee associated with the approval of the specified schools/institutions.

**Benefits of Regulation:**

The Board has determined that this regulatory proposal will have the following benefits to the health and welfare of California residents, worker safety, and the state's environment:

- It will benefit the health and welfare of California residents because the proposal will increase the Board's revenue and funding available to continue uninterrupted the Board's enforcement, investigative, licensing, examination, and public outreach operations.

- The proposed regulations would increase the Board's revenue, resolving the fiscal imbalance and allow the Board to continue with inspections and prosecuting individuals violating the VMPA through enforcement measures. By continuing these tasks, the Board will be protecting California consumers and their animals.
- Renewal fees are the Board's main source of revenue (approximately 78%) and are primarily allocated to funding enforcement activities that proactively and reactively address professional misconduct and disreputable or incompetent business practices within the profession, as well as unlicensed activity. These enforcement efforts help protect the health and welfare of California residents and consumers, particularly those who utilize the professional services of the 12,400 licensed veterinarians and 7,200 RVTs.
- While the proposal does not directly affect worker safety or the environment in the state, the increased fees will fund increased enforcement activities that can lead to greater protection of worker safety and the environment.
- In addition, these fee increases are necessary to fulfill the Board's priority of consumer protection and the legislative mandates expressed in the applicable statutes.

### **CONSIDERATION OF ALTERNATIVES**

The Board must determine that no reasonable alternative it considered or that has otherwise been identified and brought to its attention would be more effective in carrying out the purpose for which the action is proposed, would be as effective and less burdensome to affected private persons than the proposed action, or would be more cost effective to affected private persons and equally effective in implementing the statutory policy or other provision of law.

Any interested person may submit comments to the Board in writing relevant to the above determinations at 1747 N. Market Blvd, Suite 230, Sacramento, California 95834.

### **INITIAL STATEMENT OF REASONS AND INFORMATION**

The Board has prepared an initial statement of the reasons for the proposed action and has available all the information upon which the proposal is based.

### **TEXT OF PROPOSAL**

Copies of the exact language of the proposed regulations, and any document incorporated by reference, and of the initial statement of reasons, and all of the information upon which the proposal is based, may be obtained upon request from the Board at 1747 North Market Blvd., Suite 230, Sacramento, California 95834.

### **AVAILABILITY AND LOCATION OF THE FINAL STATEMENT OF REASONS AND RULEMAKING FILE**

All the information upon which the proposed regulations are based is contained in the

rulemaking file which is available for public inspection by contacting the person named below.

You may obtain a copy of the final statement of reasons once it has been prepared, by making a written request to the contact person named below or by accessing the website listed below.

**CONTACT PERSON**

Inquiries or comments concerning the proposed rulemaking action may be addressed to:

Name: Justin Sotelo, Lead Administrative & Policy Analyst  
Address: Veterinary Medical Board  
1747 North Market Blvd., Suite 230  
Sacramento, CA 95834  
Telephone No.: 916-515-5238  
Fax No.: 916-928-6849  
E-Mail Address: Justin.Sotelo@dca.ca.gov

The backup contact person is:

Name: Timothy Rodda, Administration/Licensing Manager  
Address: Veterinary Medical Board  
1747 North Market Blvd., Suite 230  
Sacramento, CA 95834  
Telephone No.: 916-515-5227  
Fax No.: 916-928-6849  
E-Mail Address: Timothy.Rodda@dca.ca.gov

**WEBSITE ACCESS:**

Materials regarding this proposal can be found at:  
[www.vmb.ca.gov/laws\\_regs/proposed\\_regs.shtml](http://www.vmb.ca.gov/laws_regs/proposed_regs.shtml).

**TITLE 16. PROFESSIONAL AND VOCATIONAL REGULATIONS**  
**Division 20. Veterinary Medical Board**

**Proposed Language**

*Changes to existing language are shown in single underline for new text and single strikethrough for deleted text.*

Amend Section 2070, Article 7, Division 20, Title 16 of the California Code of Regulations to read as follows:

**§ 2070. Registration and Renewal Fees for Veterinarians, Veterinary Premises, and Diversion Program.**

Pursuant to the provisions of Section 4905 of the code, the following fees are fixed by the board:

- (a) The application eligibility review fee for all examinations shall be ~~\$150.00~~\$350.00.
- (b) The fee for the California state board examination shall be ~~\$235.00~~\$350.00.
- (c) The fee for the veterinary law examination shall be \$100.00.
- (d) The initial license fee for licenses issued for one year or more from the date on which they will expire shall be ~~\$350.00~~\$500.00.
- (e) The biennial renewal fee shall be ~~\$350.00~~\$500.00.
- (f) The fee for a temporary license shall be ~~\$175.00~~\$250.00.
- (g) The university license application fee shall be \$350.00.
- (h) The initial license fee for a university license shall be \$500.00.
- (i) The biennial renewal fee for a university license shall be \$500.00.
- (j) The initial fee for registration of a veterinary premises shall be \$400.00.
- ~~(k)~~ The annual renewal fee for registration of a veterinary premises shall be \$400.00.
- ~~(l)~~ The fee for the Board's Diversion Program shall be \$2,000 per participant.
- (m) The delinquency fee shall be ~~\$35.00~~\$50.00.

Note: Authority cited: Section 4808, Business and Professions Code.

Reference: Section 4905, Business and Professions Code.

Amend Section 2071, Article 7, Division 20, Title 16 of the California Code of Regulations to read as follows:

**§ 2071. Application, Registration and Renewal Fees for Regarding Registered Veterinary Technicians.**

Pursuant to the provisions of Section 4842.5 of the code, the following fees are fixed by the board:

- (a) The application eligibility review fee shall be ~~\$150.00~~\$350.00.
- (b) The fee for the registered California veterinary technician examination shall be \$200.00.

- (c) The initial registration fee for registrations issued for one year or more from the date on which it will expire shall be ~~\$160.00~~350.00.
- (d) The biennial renewal fee shall be ~~\$160.00~~350.00.
- (e) The delinquency fee shall be ~~\$35.00~~50.00.
- (f) The application fee for Board approval of the curriculum for training registered veterinary technicians by a school, institution, degree program, or practical experience and education equivalent program shall be \$300.

Note: Authority cited: Section 4808, Business and Professions Code.  
Reference: Section 4842.5 and 4843, Business and Professions Code.



**TITLE 16. PROFESSIONAL AND VOCATIONAL REGULATIONS**  
**Division 20. Veterinary Medical Board**

**Initial Statement of Reasons**

**Hearing Date:** The Veterinary Medical Board (Board) has not scheduled a hearing on the proposed changes. However, a hearing will be scheduled upon request by any interested party if the request is received no later than 15 days prior to the close of the written comment period.

**Subject Matter of Proposed Regulations:** Fee Schedule

**Emergency Regulations approved January 27, 2020, OAL File Number 2020-0117-01E**

**Sections Affected:** Sections 2070 and 2071, Article 7, Division 20, Title 16 of the California Code of Regulations (CCR).

**Background and Introduction:**

The Veterinary Medical Board enforces the Veterinary Medicine Practice Act (Act) and oversees veterinary licensees, veterinary technician registrants, veterinary assistant controlled substance permit holders, and veterinary premises permits for the protection of the public and their animals. The Board submitted an Emergency Rulemaking File to the Office of Administrative Law (OAL) in January of 2020, which was approved on January 27, 2020. The Board is now submitting a new fee increase that was not a part of the Emergency rulemaking, along with the adopted Emergency rulemaking, rulemaking file, and certificate of compliance in accordance with the requirements of Government Code section 11346.1, subdivision (e).

In accordance with Business and Professions Code (BPC) Section 4800.1, the Board's highest priority is protection of the public in exercising its regulatory, licensing, inspection, and disciplinary functions. The Board is a self-supporting, special fund agency that generates its revenues from fees charged for licensing and registration. In order to perform its regulatory, licensing, inspection, and disciplinary functions, the Board must generate sufficient revenues from fees associated with licensing and registration. The Board is also required to maintain a Fund Condition reserve of no less than three (3) months and no more than ten (10) months of annual authorized expenditures. (BPC section 4905(o).)

Since Fiscal Year (FY) 2014-2015, Board revenue has not kept pace with its authorized expenditures, thereby creating a structural imbalance where the Board's Contingent Fund (i.e. "savings account") is declining. That is, the Board's revenues, on a FY basis, are less than its expenditures, creating a budget deficit. In order to make up for the operating budget deficit, the Board subsidizes its structural imbalance via funds from its Contingent Fund, which, in its current state, is declining and unable to subsidize the structural imbalance.

Despite a recent fee increase in 2018, the Board dropped below its statutorily mandated floor of not less than three months of annual authorized expenditures in FY 2017-2018, and it was projected to be completely insolvent in FY 2020-2021.

In its 2018 rulemaking package, the Board noted that the prior fee schedule increase was needed due to the following:

- *“Almost a 100% increase in consumer complaint volume and case processing from FY 2013-2014 to FY 2016-2017.*
- *Interdepartmental fee increases for the Attorney General’s Office (AG) and Office of Administrative Hearings (OAH).*
- *Legislative mandates to increase veterinary premises inspections to 20% of premises per year and to enact the Veterinary Assistant Controlled Substances Permit (VACSP) program.*
- *Revenues from the VACSP program have materialized at a slower rate than projected leading to a deficiency in needed revenue from the program.*
- *Increases to Personnel Services including general salary increases negotiated by the State and mandated health care and retirement contributions.*
- *Intradepartmental increases in pro rata including the Division of Investigation (DOI), Office of Professional Examination Services, and BreEZe database costs.*
- *Increases in Subject Matter Expert and Hospital Inspector contracted compensation.*
- *Increases in authorized staff positions from 12.8 in FY 2013-2014 to 23.8 in FY 2014-2015 and ongoing for the enforcement, premises inspection, and VACSP programs.”*

In addition, the Board explained that costs attributed to personnel, DOI, AG, and other general costs continued to climb, while increased enforcement workload contributed to higher expenditures specific to DOI, AG, and OAH.

With its 2018 fee increase, the Board attempted to conservatively raise fees in order to address its inadequate revenue and imminent insolvency. The Board intended to raise fees again in two years to the statutory maximum. However, that fee increase failed to meet the Board’s expectations, as it did not adequately address the decreasing fund, nor did it bring in the anticipated revenue. In addition, the fee increase proved even more inadequate due to abrupt and significant AG rate increases and an increase in enforcement workload.

As the Board’s costs associated with performing its core functions have risen sharply since that 2018 fee increase, the Board continues to experience a severe fiscal imbalance. This proposal would increase fees associated with veterinarian and university licensure and registered veterinary technician registrations so that the Board can continue to perform its core functions and properly protect the public.

**Problem being addressed:**

Typically, a board's revenue funds its total authorized expenditures for each FY<sup>1</sup>. The majority of the Board's revenue is generated by charging fees for certain services provided by the Board, including application review fees, examination fees, miscellaneous fees, initial license fees, and license renewal fees. This revenue funds Board operations that include staffing, examination development, administrative and licensing operations, veterinary hospital inspections, and enforcement operations. The Board does not receive General Fund monies to support its operations.

In addition to revenue generated to fund its expenditures, the Board collects revenue to deposit into a Contingent Fund. The Board's Contingent Fund is mandated by the BPC<sup>2</sup> and funds operations when authorized expenditures are higher than revenue generated by fees.

Not all Board operations generate revenue for expenditures. For example, enforcement operations account for more than 60% of the Board's overall expenditures; however, there is no directly correlated revenue generated to fund these expenditures. For licensing boards, generally, licensing and renewal fees are charged at an appropriate level to fund licensing, administrative, and enforcement operations.

As noted above, with its 2018 fee increase, the Board explained the need for the increase. Additionally, in 2018, the Board provided the following detailed reasons for increased fees, which continue to support the Board's need for more revenue:

**"Consumer Complaint Volume:**

*Between FY 2012-2013 and FY 2016-2017, the Board has seen a 100% increase in consumer complaints submitted annually against Board licensees from approximately 450 complaints filed in FY 2012-2013 to over 1,000 complaints submitted in FY 2016-2017. These additional consumer complaints have directly led to increased expenditures for investigations by DOI, filings of formal discipline with the AG, and conducting disciplinary hearings with OAH.*

*These additional expenditures required the Board to request (using a provision in the Governor's budget to request and obtain mid-FY increases to AG and OAH appropriations) and obtain a mid-FY 2016-2017 increase of an additional \$324,000 to its AG and OAH appropriations. Additionally, the Board was approved for a permanent appropriation increase of \$176,000 beginning in FY 2017-2018 and ongoing to its AG and OAH appropriations, in an attempt to satisfy increased expenditures and workload.*

*Increases to the Board's AG and OAH appropriations, however, have proven insufficient to fund the Board's growing workload and expenditures in FY 2017-2018 and beyond. For example, AG expenditures are projected at more than*

<sup>1</sup> The State FY is July 1 through June 30.

<sup>2</sup> In accordance with BPC Section 4905, the Board's Contingent Fund shall not have less than 3 months or more than 10 months reserve of annual authorized expenditures in the Fund.

\$840,000 in the current fiscal year, whereas the Board has only appropriated \$560,000 for these expenditures. AG expenditures are projected to be fully expended by March 2018 and the Board is unable to redirect resources to fund the rising AG, OAH, and DOI costs, as the Board will fully expend all appropriated funding for all other cost areas.

Without additional revenue provided by a permanent fee schedule increase, the Board is severely limited in its ability to seek a mid-FY increase to its AG and OAH appropriations, similar to the Board's request and approval in FY 2016-2017, as there are inadequate funds in its Contingent Fund to support the adjustment. Consequently, the Board expects to exhaust its current enforcement appropriation as soon as March 2018 and will be forced to cease its disciplinary enforcement activities at that time, absent the proposed fee increase. By ceasing disciplinary proceedings, the Board will be unable to forward formal disciplinary complaints to DOI for investigation and cases to the AG's office for discipline. Investigations and cases sent to DOI and the AG's office include the most egregious violations of the Veterinary Medicine Practice Act that lead to license suspensions, probation, and license revocations. The Board will further be forced to cancel all Office of Administrative Law hearings that are scheduled 6-8 months in advance, delaying the adjudication of the most serious cases of consumer and animal harm and allowing dangerous practitioners to continue practicing veterinary medicine.

BreEZe Database Costs:

In FY 2011-2012, the Department of Consumer Affairs (DCA) contracted with an information technology vendor to provide all boards and bureaus within DCA a new integrated licensing, inspections, and enforcement database, BreEZe. BreEZe costs are paid by each board or bureau using the database. Through FY 2016-2017, BreEZe program costs to the Board have been approximately \$795,000, with an additional \$675,000 in project costs projected through FY 2019-2020. There has been no additional revenue to offset expenditures for the new integrated database. The extent of total BreEZe costs to the Board was unanticipated as project costs early in the project life-cycle were unknown and have increased considerably from initial projections.

Increase in Authorized Staff Positions:

In FY 2014-2015, the Board was approved for an additional 11.0 staff (doubling the Board's staffing) for the Board's enforcement program, inspections program, and the new VACSP program. The additional staff added a \$937,000 expenditure ongoing to be paid from the Board's Fund. To fund a part of this expenditure, the Board projected additional revenue from VACSP program fees upon implementation of the new license and, at the time, the Board's Fund Condition was healthy with no additional revenue necessary to fund the additional staff. However, the Board was unable to begin accepting VACSP applications until October of 2016 due to the timeline to promulgate regulations and the delayed implementation of the new BreEZe database. By the time VACSP applications were accepted and program revenues were beginning to be collected in October

of 2016, the Board's Contingent Fund had shrunk to approximately four (4) months of annual authorized expenditures.

VACSP Program Revenue:

*The VACSP program has been registering veterinary assistants at a slower pace than projected, which reduced revenue, and continues to provide revenue below the Board's estimates. The Board previously anticipated approximately 10,000 veterinary assistants working in the State would register with the Board over a two-year period beginning in FY 2016-17. However, because the VACSP registration requirement is new to the industry and because many current veterinary assistants are uncertain and/or unaware of the VACSP registration requirement, VACSP registration revenue has been slower to materialize than projected, therefore resulted in less revenue than anticipated.*

Fee Audit:

*To assess the extent of the Board's structural imbalance and need for additional revenue, staff contracted with Capitol Accounting Partners (CAP) in December of 2016 to conduct a comprehensive fee audit and report that included a cost analysis of the Board's Administrative, Licensing, Premises, and Enforcement programs, as well as prepare fee and revenue projections and recommendations...The CAP audit report recommended that to be structurally solvent, the Board must immediately generate at least \$5.3 million in total revenue each Fiscal Year to fund its operational costs and maintain the mandatory healthy reserve of 3-10 months in its Contingent Fund. Currently, the Board's fees generate approximately \$4.3 million in revenues, leaving a shortfall of approximately \$1 million. The Board's fee schedule increase proposal focuses on those fees that generate 97% of the Board's revenue by drawing from fee categories with a larger volume of fees as opposed to smaller fee sources where the impact to the fee, and, ultimately, the number of individual applicants or licensees, must be greater to make up the requisite revenue. Specific fees were calculated based on total additional revenue required to maintain fund solvency, the Board's fee audit, a review of each licensee's ability to absorb an increase to individual fees, and comparative analysis of similar professional fees."*

The CAP audit report only recommended what was needed to maintain the status quo at the time. The report did not evaluate whether additional revenue would be needed to cover future expenditure increases, such as AG rate increases, intradepartmental increases (pro-rata), or additional staffing costs.

The report presented two implementation options: "a one-time increase to meet existing operations costs and reserve needs, or a tiered approach where the fees are phased in over a two-year period." Board staff recommended the latter, so licensees would be less impacted with the gradual increase rather than a one-time increase to the statutory caps. With this option, the Board needed to pursue another increase within two years. After careful deliberation, the Board agreed with the staff recommendation and pursued rulemaking in order to increase existing fees.



At the Board's December 11, 2017 meeting, Board staff presented the need to pursue emergency rulemaking in order for the fees to take effect immediately (stating that a regular rulemaking could take up to 12 months to effectuate). The Board agreed and approved pursuing emergency rulemaking. The new fees took effect in March 2018. Since then, however, the Board's fund has continued to deteriorate, as detailed below.

### **Decrease in Anticipated Revenue**

In addition to the continuous decrease in anticipated revenue from the VACSP noted above, the Board is currently collecting less revenue in several line items than previously anticipated. Most notably, the Board is no longer collecting revenue from California registered veterinary technician (RVT) examination fees. After a thorough review of the California RVT examination, the existing statute, the occupational analysis, an analysis from American Association of Veterinary State Boards, and input from stakeholders, the Board unapproved the examination at its April 2019 Board meeting. Since the exam is no longer required, the Board will not be collecting that revenue. While the Board is saving roughly \$50,000 in annual expenditures to develop and implement the exam, the Board now generates roughly \$180,000 less annual revenue than previously projected.

The Board also regularly experiences uneven month-to-month revenue fluctuations. The chart below illustrates the type of revenue fluctuations the Board experienced in the last fiscal year.

### **Monthly Revenue FY 2018-2019**

Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun
\$368,284	\$423,315	\$325,006	\$451,692	\$345,664	\$342,946	\$386,655	\$360,346	\$687,805	\$676,618	\$642,993	\$670,348

As the chart shows, the Board experienced month-to-month revenue decreases last fiscal year as large as \$106,028. If such revenue drops were to occur in consecutive months this year, the Board's entire budget reserve would be nearly exhausted and the Board would be at risk of not being able to pay its bills.

### **2019 AG Rate Increase**

In a June 28, 2019 client notification letter distributed on July 3, 2019, the AG's office notified the Department of Consumer Affairs of significant rate increases effective July 1, 2019. The new rates are as follows:

- Attorney services from \$170 to \$220, resulting in a 30% increase
- Paralegal services from \$120 to \$205, resulting in a 71% increase

In a subsequent letter, dated July 12, 2019, the AG's office clarified the new rate increases would take effect on September 1, 2019. Based on this increase, the Board is projected to be completely insolvent in FY 2020-2021.

As with the Board's revenue, its expenditures are subject to significant month-to-month fluctuation. The charts below show the Board's AG and OAH monthly costs for the 2018-2019 fiscal year.

#### Monthly AG Costs FY 2018-2019

Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun
\$45,962	\$69,887	\$81,037	\$57,645	\$72,335	\$49,161	\$61,682	\$43,205	\$67,415	\$51,806	\$63,543	\$41,687

#### Monthly OAH Costs FY 2018-2019

Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun
\$4,500	\$6,570	\$26,530	\$31,760	\$12,190	\$5,630	\$24,450	\$28,620	\$13,740	\$42,370	\$31,390	\$5,870

As shown in the above charts, the Board experiences month-to-month cost fluctuations as large as \$23,925 in AG costs, and \$28,630 in OAH costs. Moreover, due to the AG's increased rate, a monthly AG cost of \$23,925 at the former rate of \$170 per hour would now equate to a cost increase of \$30,962 at the AG's new \$220 rate.

If the Board were to experience the same substantial cost increases that it previously experienced in consecutive months, or in combination with a low revenue month, or if other unexpected costs arise, the Board's current budget reserve would be depleted, the Board could not pay its bills, and the Board would need to immediately cease enforcement activity and paying for other critical expenses.

#### Significant Need for Increased Enforcement Staff

The last Board enforcement staff increase was based on increased workload through FY 2013-2014. Since that time, complaints submitted to the Board have increased by 83% (through FY 2018-2019). The Board currently has four enforcement analysts and has over 1,900 pending cases. Each enforcement analyst has over 475 cases, which is unmanageable and inadequate for effectively provide consumer protection. The only way to adequately protect the public is to increase staff to properly manage the increased workload. However, The Board cannot afford to hire additional enforcement staff without additional revenue to pay for them.



**Fund Condition Statements:**

With this regulation proposal, the Board is providing a fund condition statement, as follows:

- 1) Projected Budget – Projected Fund Condition with fee schedule increase – effective January 27, 2020 (dated June 25, 2020)

The Projected Fund Condition Statement with fee schedule increase reflects the emergency fee increases that took effect January 27, 2020 and assumes that those same fee increases carry over to FY 2020/21 and ongoing. It also includes increased AG costs based on the 2019 AG rate increase. As shown on this statement, the fee increase eliminates the Board's structural imbalance and maintains a healthy reserve of not less than 3 months to no more than 10 months in its Contingent Fund.

**Specific Purpose, Anticipated Benefit, and Factual Basis/Rationale:**

Amend Section 2070 (Registration and Renewal Fees for Veterinarians) and 2071 (Application, Registration and Renewal Fees for Registered Veterinary Technicians) of Article 16 of Division 20 of Title 16 of the CCR

Purpose: The Board is proposing to amend CCR section 2070 and 2071 regarding application and renewal fees for veterinarians and RVTs, and a new application fee for approving schools and institutions that offer a curriculum for training RVTs. Application and renewal fees generate Board revenue to support Board operating expenditures.

**Amend Section 2070 and Section 2070**

The Board is currently operating with a structural imbalance, and there is a deficiency of revenues to fund ongoing expenditures. Additionally, the Board is not able to generate enough revenue to bolster its Contingent Fund as required in BPC Section 4905. Due to these factors, the Board is proposing to increase fees to a level that would fund its ongoing expenditures, as well as complying with its statutorily mandated Contingent Fund.

**Fee Increases**

The Board is proposing to increase the following fees under CCR sections 2070 and 2071 to their statutory maximums (and add one fee at its statutory maximum), as reflected in Table 1 below:

**Table 1. Fee Schedule**

Revenue Category	Fees	
	CURRENT	NEW
<b>Section 2070</b>		
Application Eligibility Review - Veterinarian	\$150.00	\$350.00
California State Board Exam	\$235.00	\$350.00
Initial License - Veterinarian	\$350.00	\$500.00
Biennial Renewal - Veterinarian	\$350.00	\$500.00
Temporary License - Veterinarian	\$175.00	\$250.00
Application Review - University	\$125.00	\$350.00
Initial License – University	\$290.00	\$500.00
Biennial Renewal - University	\$290.00	\$500.00
Delinquent Renewal - Veterinarian	\$35.00	\$50.00
Delinquent Renewal - Veterinary Premises	\$35.00	\$50.00
<b>Section 2071</b>		
Application Eligibility Review - Veterinary Technician	\$150.00	\$350.00
Initial Registration - Veterinary Technician	\$160.00	\$350.00
Biennial Renewal - Veterinary Technician	\$160.00	\$350.00
Delinquent Renewal - Veterinary Technician	\$35.00	\$50.00
Approval of Veterinarian Technician School/Institution (new fee)	N/A	\$300

**Anticipated Benefits and Rationale**

Based on the Board's fund condition, CAP audit report, and staff research, it was determined that an all-inclusive fee increase was necessary to maintain the Board's structural solvency and increase the statutorily mandated Contingent Fund. Without a fee increase, a structural imbalance would otherwise occur, continuing on into future fiscal years, and putting the Board at risk of insolvency and severely impacting its mandate of consumer protection.

As captured in the CAP audit report, 45% of the Board's revenue comes from initial application, licensing, and examination fees. Approximately 52% of revenue is generated by renewal fees, and 3% of miscellaneous transactions such as delinquency fees, duplicate license fees, and address fine fees. Enforcement operations were shown to be increasing and are a significant portion of the Board's overall expenditure authority at greater than 60% of the Board's overall expenditures.

While some Enforcement cost recovery / reimbursement may occur after a disciplinary action, that percentage is very low. For instance, in Fiscal Year 2018/19, \$110,000 was collected in cost recovery, compared to almost \$2.5 million in total Enforcement expenditures (approximately 4.5% of total expenditures). Further, such recovery occurs

only on an order from an administrative law judge or as part of a stipulated settlement, which would occur only when a formal accusation has been filed. Costs would not be recovered for complaints that determine no violation occurred or on dismissal of an action.

The CAP audit report concludes and recommends that to be structurally solvent, the Board must generate at least \$5.3 million in revenue each year to fund its operational costs while maintaining a healthy reserve of 3-10 months in its Contingent Fund. As noted previously, the audit showed fees generate approximately \$4.3 million in revenue, leaving a shortfall of approximately \$1 million below the CAP audit report's recommended revenue.

Based on the Board's Fund Condition Statement, CAP audit report, and staff research, the Board proposes to increase fees that generate 97% of the Board's revenue (45% revenue from initial application fees, licensing, and examination fees, plus 52% revenue from renewal fees); the miscellaneous transaction fees are largely already at their statutory maximums and cannot be increased. Additionally, the Board is adding a new application fee associated with the approval of schools and institutions offering a curriculum for training RVTs, pursuant to BPC 4842.5 (g) and 4843.

The Board's proposal factors in the total workload volume of each fee. For example, renewal fees will always generate a larger percentage of revenue due to the exponentially larger number of renewal applications received versus initial eligibility applications, so the proposal increases renewal fees to cover the greater amount of work necessary to process those renewal applications. This methodology more equitably distributes the overall fee increase across applicants and licensees.

Additionally, the Board chose specific fee increases based on other similar Department board fees. The fees from boards with licensees similar to the Board reflect that the Board has one of the smaller fees per license type and consequently, staff used the fee structure from other boards as a basis for modifying the proposed increase to Board fees. These proposed fee increases resolve a structural imbalance of the Board that would otherwise occur, while maintaining compliance with BPC section 4905.

The Board has been able to operate within its existing budget by carefully monitoring expenditures and being conservative on purchases. However, due to the increasing costs outside the Board's control as noted above, the Board's budget analyst's projections over the next five years show the need for a fee increase. The Board is very aware of the current fiscal climate in California, and the proposed fee increases are designed to be as conservative as possible while creating a solvent Contingent Fund to ensure that the Board has funds to carry out its consumer protection mandate.

The Board's highest priority is consumer protection. The Board achieves this important priority by ensuring applicants meet education and training requirements for licensure, inspecting veterinary premises, investigating complaints against applicants and licensees, and disciplining applicants and licensees for violations of the Veterinary

Medicine Practice Act (Act). The Board is fully funded by application and licensing fees, and without adequate financial resources, the Board is unable to operate at a capacity that fulfills its highest priority of consumer protection.

Due to recent dramatic increases in consumer complaint volume that has led to higher AG and Office of Administrative Hearings expenditures, continued high BreZE database system administration costs, recent significant AG rate increases, decreases in anticipated revenue, and the need to hire additional enforcement staff, the Board's Contingent Fund is below the mandated three-month reserve for annual expenditures and will be insolvent in FY 2020-2021. The Board's current revenues are unable to bridge the shortfall between yearly revenues and expenditures.

Immediate action to increase the regulatory fees collected by the Board is required. The increased fees will increase the Board's revenues and funding available to continue uninterrupted the Board's enforcement, premises inspections, and licensing operations.

The proposed fee increase will provide the Board with resources necessary to fund its operations and fulfill its mission of consumer protection. Absent an increase in fees, the Board would need to restrict its core operations, including slowing its ability to process applications, reducing the inspection of veterinary premises, curtailing investigations, and limiting the Board's ability to adjudicate violations of the Act in an expedient manner. This restriction to the operational functions of the Board would threaten the Board's ability to achieve its mission and statutory mandate of consumer protection and would place the public in jeopardy of being harmed by allowing dangerous practitioners to continue practicing veterinary medicine.

### **Underlying Data**

- a) June 28, 2019 AG client notification letter
- b) July 12, 2019 AG clarification letter
- c) Projected Budget – Projected Fund Condition with fee schedule increase – effective January 27, 2020 (dated June 25, 2020)
- d) October 9-11, 2019 Board Meeting Agenda; Relevant Meeting Materials; and Meeting Minutes
- e) January 27, 2020 Office of Administrative Law (OAL) Emergency Rulemaking File Approval
- f) April 23, 2020 Board Meeting Agenda; Relevant Meeting Materials; and Draft Meeting Minutes
- g) Capital Accounting Partners, LLC – July 2017 Audit Report

### **Business Impact**

The Board has made an initial determination that the proposed regulations will not have a significant adverse economic impact directly affecting businesses. The proposal would increase fees associated with veterinarian and university licensure, and veterinary technician registration, and add a new fee associated with the approval of schools and institutions offering a curriculum for training registered veterinary technicians. The proposed fee increases are expected to be absorbable by impacted licensees and

schools. Both the licensees and schools generate sufficient revenue in their respective professions and institutions that the impact of the increase is not expected to be significant.

### **Economic Impact Assessment**

The regulatory proposal will have the following effects:

The proposed rulemaking will neither create businesses or jobs nor eliminate existing businesses or jobs within California because the proposed fees are anticipated to have minimal impact on businesses. The proposed rulemaking will not affect the expansion of businesses currently doing business within the state. The impact on businesses will be minimal and absorbable as this regulation specifically affects individual licensees and specified RVT schools/institutions. This regulation may have an economic impact on private persons or businesses, specifically, veterinarian and veterinary technician applicants and licensees, and specified RVT schools/institutions. The regulation would increase fees associated with veterinarian and university licensure, and veterinary technician registration, and add a new fee associated with the approval of schools and institutions offering a curriculum for training registered veterinary technicians.

Specific annual applicant and licensee cost impacts ongoing are shown in Table 2 below.

**Table 2. Cost Impact – Applicant, License, and School/Institution Population**

<b>Revenue Category</b>	<b>Population</b>	<b>Fee Increase Amount</b>	<b>Annual Increase Amount</b>
Application Review - Veterinary	786	\$200.00	\$157,200
California State Board Exam	671	\$115.00	\$77,165
Initial License - Veterinary	634	\$150.00	\$95,100
Biennial Renewal - Veterinary	6,200	\$150.00	\$930,000
Temporary License - Veterinary	82	\$75.00	\$6,150
Application Review - University	75	\$225.00	\$16,875
Initial License - University	63	\$210.00	\$13,230
Biennial Renewal - University	5	\$210.00	\$1,050
Delinquent Renewal - Veterinary	225	\$15.00	\$3,375
Application Review - Veterinary Technician	914	\$200.00	\$182,800
Initial Registration - Veterinary Technician	675	\$190.00	\$128,250
Biennial Renewal - Veterinary Technician	3,600	\$190.00	\$684,000
Delinquent Renewal - Veterinary Technician	205	\$15.00	\$3,075
Approval of Veterinarian Technician School/Institution (new application fee)	25	\$300 (new)	*\$3,750
		Total	\$2,302,020

\*\$3,750 is a two-year average. The new fee would occur biennially – 25 schools @ \$300 each is \$7,500 every two years.

An all-inclusive fee increase resolves a structural imbalance that would otherwise occur, allowing the Board to continue with inspections and prosecuting individuals violating the Act through enforcement measures. By continuing these tasks, the Board will be protecting California consumers and their animals.

This regulatory proposal focuses on an increase in fee schedules in order to resolve the structural insolvency of the Board's Contingent Fund and does not affect worker safety.

This regulatory proposal focuses on an increase in fee schedules in order to resolve the structural insolvency of the Board's Contingent Fund and does not affect the state's environment.

### **Requirements for Specific Technologies or Equipment**

This regulatory proposal does not mandate the use of specific technologies or equipment.

### **Consideration of Alternatives**

No reasonable alternative to the regulatory proposal would be either more effective in carrying out the purpose for which the action is proposed or would be as effective or less burdensome to affected private persons and equally effective in achieving the purposes of the regulation in a manner that ensures full compliance with the law being implemented or made specific.