



MEMORANDUM

DATE	January 12, 2022
TO	Veterinary Medical Board (Board)
FROM	Jessica Sieferman, Executive Officer
SUBJECT	Agenda Item 10.C. Section 2036, Article 4, Division 20, Title 16 of the CCR Regarding Animal Health Care Tasks for Registered Veterinary Technicians

In recent meetings with the Board’s Executive Officer and during public comment portions of recent Board meetings, the California Registered Veterinary Technicians Association (CaRVTA) requested the Board consider expanding the scope of practice to allow registered veterinary technicians (RVTs) to perform animal health care tasks that an unlicensed pet owner would be able to perform without veterinarian supervision.

California Code of Regulations (CCR), title 16, section [2036](#) provides the following limitations on the animal health care tasks that may be performed by RVTs:

- (a) Unless specifically so provided by regulation, an R.V.T. shall not perform the following functions or any other activity which represents the practice of veterinary medicine or requires the knowledge, skill, and training of a licensed veterinarian:
 - (1) Surgery;
 - (2) Diagnosis and prognosis of animal diseases;
 - (3) Prescription of drugs, medicines, or appliances.

- (b) An R.V.T. may perform the following procedures only under the direct supervision of a licensed veterinarian:
 - (1) Induce anesthesia;
 - (2) Perform dental extractions;
 - (3) Suture cutaneous and subcutaneous tissues, gingiva, and oral mucous membranes;
 - (4) Create a relief hole in the skin to facilitate placement of an intravascular catheter;
 - (5) Drug compounding from bulk substances.

- (c) An R.V.T. may perform the following procedures under indirect supervision of a licensed veterinarian:
 - (1) Administer controlled substances;
 - (2) Apply casts and splints;
 - (3) Drug compounding from non-bulk substances.

(d) Subject to the provisions of subsections (a), (b), and (c) of this section, an R.V.T. may perform animal health care tasks under the direct or indirect supervision of a licensed veterinarian. The degree of supervision by a licensed veterinarian over an R.V.T. shall be consistent with standards of good veterinary medical practices.

Specifically, CaRVTA would like RVTs to be able to independently administer to animals outside of a veterinary premises environment prescribed medications, such as subcutaneous (SQ) fluids, insulin injections, and oral medications, without veterinarian supervision. It should be noted that RVTs currently can provide these services to animal owners without veterinarian supervision if the services are performed gratuitously (BPC, § [4827](#), subd. (a)(1)(B)).

In addition, some Board members have expressed interest in expanding the RVT scope of practice to address the shortage of veterinary services throughout California.

Action Requested

Please discuss the above information during the Board meeting. If the Board agrees CCR, title 16, section 2036 should be re-evaluated to allow RVTs to perform additional animal health care tasks without veterinarian supervision, please direct the MDC to research, discuss with stakeholders, and bring recommendations back to the Board at a future meeting.