

## NOTICE PUBLICATION/REGULATION SUBMISSION

STD. 400 (REV. 10/2019)

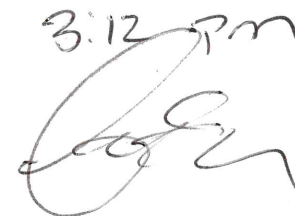
**REGULAR**PER AGENCY  
REQUEST  
MS

For use by Secretary of State only

OAL FILE NUMBERS	NOTICE FILE NUMBER <b>Z- 2025-0610-01</b>	REGULATORY ACTION NUMBER <b>2025-1112-01</b>	EMERGENCY NUMBER <b>SR</b>
For use by Office of Administrative Law (OAL) only			
NOTICE		REGULATIONS	

**ENDORSED - FILED**  
In the office of the Secretary of State  
of the State of California

DEC 29 2025

3:12 PM  
AGENCY WITH RULEMAKING AUTHORITY  
California Veterinary Medical Board

AGENCY FILE NUMBER (If any)

**A. PUBLICATION OF NOTICE (Complete for publication in Notice Register)**

1. SUBJECT OF NOTICE	TITLE(S)	FIRST SECTION AFFECTED	2. REQUESTED PUBLICATION DATE
3. NOTICE TYPE <input type="checkbox"/> Notice re Proposed Regulatory Action <input type="checkbox"/> Other	4. AGENCY CONTACT PERSON	TELEPHONE NUMBER	FAX NUMBER (Optional)
OAL USE ONLY <input type="checkbox"/> Approved as Submitted <input type="checkbox"/> Approved as Modified <input type="checkbox"/> Disapproved/Withdrawn	NOTICE REGISTER NUMBER <b>2025, 25-Z</b>	PUBLICATION DATE <b>6/20/25</b>	

**B. SUBMISSION OF REGULATIONS (Complete when submitting regulations)**

1a. SUBJECT OF REGULATION(S) Minimum Standards for Alternate Veterinary Premises	1b. ALL PREVIOUS RELATED OAL REGULATORY ACTION NUMBER(S) <b>2025-0815-02 S</b>
2. SPECIFY CALIFORNIA CODE OF REGULATIONS TITLE(S) AND SECTION(S) (Including title 26, if toxics related)	
SECTION(S) AFFECTED (List all section number(s) individually. Attach additional sheet if needed.)	ADOPT AMEND 2030, 2030.05, 2030.1, 2030.2, and 2030.3 REPEAL
3. TYPE OF FILING	
<input type="checkbox"/> Regular Rulemaking (Gov. Code §11346) <input checked="" type="checkbox"/> Resubmittal of disapproved or withdrawn nonemergency filing (Gov. Code §§11349.3, 11349.4) <input type="checkbox"/> Emergency (Gov. Code, §11346.1(b)) <input type="checkbox"/> Certificate of Compliance: The agency officer named below certifies that this agency complied with the provisions of Gov. Code §§11346.2-11347.3 either before the emergency regulation was adopted or within the time period required by statute. <input type="checkbox"/> Emergency Readopt (Gov. Code, §11346.1(h)) <input type="checkbox"/> File & Print <input type="checkbox"/> Other (Specify) _____ <input type="checkbox"/> Changes Without Regulatory Effect (Cal. Code Regs., title 1, §100) <input type="checkbox"/> Print Only	
4. ALL BEGINNING AND ENDING DATES OF AVAILABILITY OF MODIFIED REGULATIONS AND/OR MATERIAL ADDED TO THE RULEMAKING FILE (Cal. Code Regs. title 1, §44 and Gov. Code §11347.1) <b>10/17 - 11/23/2025</b>	
5. EFFECTIVE DATE OF CHANGES (Gov. Code, §§ 11343.4, 11346.1(d); Cal. Code Regs., title 1, §100) <input type="checkbox"/> Effective January 1, April 1, July 1, or October 1 (Gov. Code §11343.4(a)) <input type="checkbox"/> Effective on filing with Secretary of State <input type="checkbox"/> \$100 Changes Without Regulatory Effect <input checked="" type="checkbox"/> Effective other (Specify) <b>January 1, 2026</b>	
6. CHECK IF THESE REGULATIONS REQUIRE NOTICE TO, OR REVIEW, CONSULTATION, APPROVAL OR CONCURRENCE BY, ANOTHER AGENCY OR ENTITY <input type="checkbox"/> Department of Finance (Form STD. 399) (SAM §6660) <input type="checkbox"/> Fair Political Practices Commission <input type="checkbox"/> State Fire Marshal <input checked="" type="checkbox"/> Other (Specify) <b>Kimberly Kirchmeyer, Director, Department of Consumer Affairs</b>	
7. CONTACT PERSON Justin Sotelo	TELEPHONE NUMBER (916) 905-5511 FAX NUMBER (Optional) (916) 928-6849 E-MAIL ADDRESS (Optional) justin.sotelo@dca.ca.gov

8. I certify that the attached copy of the regulation(s) is a true and correct copy of the regulation(s) identified on this form, that the information specified on this form is true and correct, and that I am the head of the agency taking this action, or a designee of the head of the agency, and am authorized to make this certification.

SIGNATURE OF AGENCY HEAD OR DESIGNEE

DATE

08/14/2025

TYPED NAME AND TITLE OF SIGNATORY

Jessica Sieferman, Executive Officer

For use by Office of Administrative Law (OAL) only

**ENDORSED APPROVED**

DEC 29 2025

Office of Administrative Law

**TITLE 16. PROFESSIONAL AND VOCATIONAL REGULATIONS**  
**Division 20. Veterinary Medical Board**  
**Article 4. Practice**

**DEPARTMENT OF CONSUMER AFFAIRS**

**CALIFORNIA VETERINARY MEDICAL BOARD**

**Final Statement of Reasons**

**Subject Matter of Proposed Regulations:**

This Final Statement of Reasons addresses the regulations applicable to Minimum Standards for Alternate Veterinary Premises.

**Sections Affected:** Amend sections 2030, 2030.05, 2030.1, 2030.2, and 2030.3 of article 4 of division 20 of title 16 of the California Code of Regulations (CCR).

**Request for Regulatory Proposal to Take Effect on January 1, 2026:** The California Veterinary Medical Board (Board) requests that this regulatory proposal become effective on January 1, 2026 to implement the proposed amendments to CCR sections 2030, 2030.05, 2030.1, 2030.2, and 2030.3, related to Minimum Standards for Alternate Veterinary Premises. The request is made in order to implement Title 16 regulatory changes that align with Title 24 regulatory changes (related to building standards) that also take effect on January 1, 2026. This proposal would: consolidate existing and newly proposed minimum requirements for all premises types; provide new exemptions from minimum standards provided in CCR section 2030; standardize naming conventions; create definitions for premises types; remove all apparent building standards and exemptions to those standards, as they will be under Title 24 of the CCR; increase information to consumers through disclosure and signage requirements; and make other minor, technical changes.

**Updated Information:**

The Informative Digest and Initial Statement of Reasons are included in the rulemaking file and incorporated as though set forth herein.

The Board staff noticed the proposed rulemaking with a 45-day comment period ending on August 4, 2025. The Board received one question during the comment period and one letter during a regularly scheduled Board meeting. There were no requests for a public hearing and no separate public hearing was held.

On October 15, 2025, the Board approved Modified Text to address clarity issues and to

make other minor, technical changes.

## **Modified Text**

For the reasons set forth below, on October 17, 2025, the Board issued a 15-day Notice of Modified Text to:

1. Strike originally proposed new text, “if applicable”, from CCR section 2030, subsection (b)(3) because adding “if applicable” could present a clarity issued to the regulated community.
2. Add a strikethrough to the space between “fixed” and “veterinary” in the first sentence of CCR section 2030.1 in order to correctly denote that the space also needs to be struck.
3. Make the second sentence in CCR section 2030.1 a new paragraph in order to accurately reflect the regulation’s current format or structure.
4. Strike originally proposed new text, “as applicable”, from CCR section 2030.2, paragraph one, because adding “as applicable” could present a clarity issued to the regulated community.
5. Add the language “providing services within a unit or vehicle” and strike originally proposed new text, “as applicable”, from CCR section 2030.2, subsection (b) (renumbered to subsection (e) in Modified Text) in order to address potential clarity concerns.
6. Show the language “separate from other areas of the...” as added language to CCR section 2030.2, subsection (e)(2), as it was not shown as added language in the originally proposed text. Additionally, this language is consistent with language under CCR section 2030, subsection (c) (renumbered in Modified Text), which is being repealed because it mirrors existing language under Title 24, section 1251.3, Item 2.
7. Add a period (“.”) to the end of CCR section 2030.2, subsection (e)(3) (renumbered in Modified Text) in order to make a grammatical correction.
8. Show “mobile clinic” as struck language from CCR section 2030.2, subsection (c)(2) (renumbered in Modified Text), as that was omitted from the originally proposed text.
9. Correct references to subdivisions of Business and Professions Code (BPC) section 4825.1 (from (c) and (d) to (d) and (e)) in CCR section 2030.2, subsection (f) (renumbered in Modified Text).

10. Add BPC section 4854 to the Note/Authority cited for CCR section 2030.2.

**Note:** Additionally, the Board has noted that BPC section 4826.7 (specifically, subdivision (b)(1)) should be added as a reference citation to the Note for CCR section 2030.3 with regard to the requirement that a veterinarian be physically present at a registered veterinary premises when a veterinarian has authorized a registered veterinary technician (RVT) to act as an agent of the veterinarian for the purpose of establishing the veterinarian-client-patient relationship to administer preventive or prophylactic vaccines or medications for the control or eradication of apparent or anticipated internal or external parasites (see 15-day public Comment 2/Response to Comment 2 below). Upon approval of this rulemaking, the Board requests that this technical amendment be made to the CCR section 2030.3 Note.

The Board is providing additional rationale regarding the following:

- Striking CCR section 2030, subsection (b)(7): This provision was struck since CCR section 2030, subsection (a)(1) already requires all veterinary premises to be clean and sanitary at all times.
- Striking CCR section 2030.2, subsection (a)(3): This provision was struck as the standard is covered under CCR section 2030, subsection (a)(6).
- Striking CCR section 2030.2, subsection (a)(4): This provision was struck as the standard is covered under CCR section 2030.2, subsection (b)(2) (renumbered to subsection (e)(1) in Modified Text).
- Striking CCR section 2030.2, subsection (a)(5): This provision was struck since CCR section 2030, subsection (a)(1) already requires all veterinary premises to be clean and sanitary at all times.
- Striking CCR section 2030.2, subsection (a)(6): This provision was struck since “compartments” are addressed under new subsection (d)(1). Additionally, this language is consistent with language under CCR Title 24, section 1251.1, Item 7.A.
- Addition of CCR section 2030.2, subsection (e)(6): Language from subsection (a)(5) is being moved to new subsection (e)(6).

Additionally, the Board is addressing the following issues identified in the Initial Statement of Reasons (ISOR):

- Page 11 of the ISOR, Rationale regarding the repeal of CCR section 2030.2,

subsection (a)(2): The reference to CCR section 2030, subsection (a)(12) should have instead referenced CCR section 2030, subsection (a)(7) (renumbered from (f)(4)).

- Page 17 of the ISOR, Rationale regarding the repeal of CCR section 2030.3 subsections (c) through (g), (i) through (l), and renumbering of remaining subsections: The reference to CCR section 2032.1 should have instead referenced BPC section 4826.6, as CCR section 2032.1 was repealed on February 12, 2025 (OAL File No. 2024-1230-04) and all provisions related to the veterinarian-client-patient relationship are now found under BPC section 4826.6.

The 15-day public comment period closed on November 3, 2025.

During the 15-day public comment period, the Board received one inquiry and one public comment. The inquiry was not adverse and the public comment did not pertain to the Modified Text, nor did it pertain to the originally proposed text.

#### **Local Mandate:**

A mandate is not imposed on local agencies or school districts.

#### **Consideration of Alternatives:**

No reasonable alternative which was considered or that has otherwise been identified and brought to the attention of the Board would be more effective in carrying out the purpose for which it was proposed or would be as effective and less burdensome to affected private persons than the adopted regulations or would be more cost effective to affected private persons and equally effective in implementing the statutory policy or other provision of law. The Board incorporates by reference the alternatives identified in its Initial Statement of Reasons and did not receive any comments that altered its findings.

#### **Summary of Comments and Responses:**

The 45-day comment period began on June 20, 2025 and ended on August 4, 2025. The Board did not hold a hearing.

#### **Comments received during 45-day notice, but did not require an official response by the Board:**

During the 45-day public comment period, one question was received, and one letter was submitted during a regularly scheduled Board meeting. Neither item was adverse. The question that was received was germane to the language of the proposed regulation, and the commenter did not request that the question needed a formal



response. The letter did not speak directly to the language of the proposed regulation, nor was it submitted properly in accordance with the Administrative Procedures Act.

The Board summary of and response to the comment(s) received is presented below.

Comment 1: Aruna Noon Kampani, DVM, MBA, June 23, 2025

Summary of Comment 1:

The commenter asked the following clarifying questions and provided the following comment regarding the proposed rulemaking:

- *“Since this [CCR section 2030 (a)(7) and (a)(8)] is general for all veterinary premises and forms of veterinary medicine, would a mobile in-home euthanasia or acupuncture only service (for example) need #7 and #8? Or are those types of practice even considered for veterinary premises? If they are being included, I don't believe that #7 and #8 need to be included in this section or could use the words referral or outsource. Is that what is trying to be conveyed here by the wording? The examples I noted, wouldn't be expected to have the capacity, but I would expect they would be able to provide information or refer to a capable facility. Are those types of mobile practices being taken into account? Does Veterinary Premise exclude in-home care?”*
- *“The “4” in front of the 7 hasn't been crossed out.”*

Response to Comment 1:

The Board has reviewed and considered the comment/questions and clarified the regulatory provisions to the commenter. Additionally, the Board explained that the strikethrough for CCR section 2030, subsection (f)(4) was actually present, but that it was just difficult to see given its placement on the number “4”. The Board therefore declines to make any amendments to the proposed text based thereon.

Comment 2: Emma Clifford, Founder & Executive Director, Animal Balance, July 7, 2025

Summary of Comment 2:

The letter from Animal Balance (also submitted on behalf of the San Francisco Society for the Prevention of Cruelty of Animals [SFSPCA]) urged legislative or regulatory approval of High-Quality, High-Volume Spay/Neuter (HQHVSN) Clinics and Disaster Response Clinics. Animal Balance, an international organization dedicated to sterilization and support services, and the SFSPCA, a long-standing animal welfare organization, highlight the urgent need for accessible spay/neuter services in California.

They argue that current laws requiring specific structural features for surgery suites hinder the establishment of temporary clinics necessary for addressing overpopulation and disaster response. The letter proposes the use of Mobile Animal Sterilization Hospital (MASH) clinics, which can be set up in large community spaces and provide comprehensive, affordable spay/neuter services. Animal Balance claims that these clinics have been proven effective, with their organization successfully sterilizing over 60,000 animals in 12 countries, maintaining low complication and infection rates. The letter also emphasizes the financial benefits of reducing shelter impounds and euthanasia rates, ultimately calling for the Board to consider the proposed changes to enhance animal welfare and public health.

#### Response to Comment 2:

After initial conversations with the author of the letter, the Board staff was under the impression that the commenter would be responding to the currently proposed regulatory text. Board staff met with the author of the letter and explained the process for submitting comments during a Board meeting for items not on the agenda, as well as the process for submitting comments during the 45-day public comment period for a proposed regulation. The commenter submitted the above referenced letter during the July 2025 Board meeting, under the agenda item “Items Not on the Agenda.” However, the subject matter of the letter did not relate to the proposed regulatory language, nor did it reference the proposed regulatory language directly. Board staff followed up with the commenter during the 45-day public comment period to verify whether they wanted to submit an official letter in support or in opposition to the proposed regulation. The commenter only referenced the already submitted letter. Although, the Board is not required to respond to this commenter, the Board staff included a summary of this letter to provide full transparency to the regulatory process.

#### **Comments received during 15-day Notice of Modified Text, but did not require an official response by the Board:**

Comment 1: Dr. Werner, Voyager Equine, Inc., October 17, 2025

Summary of Comment 1: The commenter:

- Indicated that they were having difficulty locating “paragraph (10) of subsection (a) of section 2030” that their practice was supposed to be exempt from.
- Asked for clarification regarding complying with CCR section 2030, subsections (a)(1)-(3) with regard to the written disclosure requirements.

#### Response to Comment 1:

Board staff responded to the commenter, directing them to paragraph (10) of

subsection (a) of section 2030 and providing general compliance feedback regarding CCR section 2030, subsections (a)(1)-(3). Additionally, the commenter was informed that the Board would be releasing an informational document to help provide additional guidance for compliance once the regulations are approved and in effect. Since no suggested amendments were proposed, and the comment was only a request for clarification, no modifications to the proposed regulatory language were made or considered.

Comment 2: Darren M. Caputo, Esq., Scenic City Law, November 3, 2025

Summary of Comment 2: The commenter:

- Stated that the proposed amendments to CCR 2030.3, subsection (c)(2) conflicted with recently enacted Senate Bill (SB) 669. More specifically, the commenter stated that the requirement that a veterinarian be physically present during the operation of animal vaccination clinics thwarted the express statutory purpose of SB 669, to expand, and not contract, access to vaccination services. Additionally, the commenter stated that the regulatory proposal exceeded the Board's statutory authority and undermined the legislative intent of the bill.
- Ultimately requested that the Board withdraw the proposed amendments to CCR section 2030.3 in their current form; or, revise the regulation to explicitly affirm that RVTs may administer vaccines and parasite preventives under "indirect" supervision consistent with SB 669.

Response to Comment 2:

Board staff responded to the commenter, informing them that their comments were not related to the proposed regulatory changes, as indicated in the 15-Day Notice of Modified Text of Proposed Regulations, and in accordance with Government Code section 11346.9, subdivision (a)(3), which states that comments submitted during the 15-day public comment period should be "restricted to the most recent modifications made to the proposed regulations." Instead, the comment letter was directed at existing language in the regulatory provision – CCR section 2030.3, subsection (c)(2) (renumbered) – ("A veterinarian must remain on site..."; and that the comments were therefore not germane to the Modified Text, nor were they germane to the originally proposed text. It was further explained that this regulation, and the other regulations in this regulatory package, pertain to minimum standards for registered veterinary premises (i.e., general veterinary premises, small animal fixed veterinary premises, mobile veterinary premises, and animal vaccination premises).

Because veterinary premises, including animal vaccination veterinary premises, are required to be registered by the Board (per BPC section 4853), the regulatory provision in question is also tied to BPC section 4826.7, subdivisions (b) and (b)(1). This statutory



provision allows veterinarians to authorize RVTs “to act as an agent of the veterinarian for the purpose of establishing the veterinarian-client-patient relationship to administer preventive or prophylactic vaccines or medications for the control or eradication of apparent or anticipated internal or external parasites...” However, subdivision (b)(1) of BPC section 4826.7 specifies that when an RVT is authorized to act as an agent of the veterinarian to administer preventive or prophylactic vaccines or medications, a veterinarian must be “physically present at the registered veterinary premises” (existing statutory provision).

BPC section 4826.7, subdivision (b)(2), sets forth a different requirement (an exception) for locations “other than a registered veterinary premises” or registered veterinary premises that are a “public animal control agency or shelter, private animal shelter, humane society shelter, or society for the prevention of cruelty to animals shelter”. In these instances, a veterinarian may be “in the general vicinity or available by telephone” and “quickly and easily available”. Practically speaking, these events may be held at parks or major pet food distribution stores, where the intent is to provide vaccinations en masse.

But again, because the proposed regulations pertain to the types of registered veterinary premises identified above, a veterinarian must continue to be “physically present” or “on site” in those instances (existing requirements per BPC section 4826.7, subdivision (b)(1) and CCR section 2030.3, subsection (c)(2) (renumbered)). At this time, the Board has chosen not to exercise its broad regulatory authority as provided by BPC section 4808, for BPC 4826.7(b)(2) and instead has focused on regulating BPC section 4826.7, subdivision (b)(1). Therefore, the proposed regulatory changes are within the Board’s existing statutory authority and the commenter was informed that the comments provided did not necessitate any modifications to the proposed regulatory language.

As described on page one of the Initial Statement of Reasons, this regulatory proposal implements Business and Professions Code sections 4836, 4836.1, 4852, 4853, 4854, 4855, 4856, and 4883.