

DEPARTMENT OF CONSUMER AFFAIRS
TITLE 16. PROFESSIONAL AND VOCATIONAL REGULATIONS
DIVISION 20. VETERINARY MEDICAL BOARD

INITIAL STATEMENT OF REASONS

RVT Pathways

Hearing Date: No hearing has been scheduled for the proposed action.

Subject Matter of Proposed Regulations: RVT Pathways

Section(s) Affected: Amend section 2068.5 and repeal section 2068.6 of article 6 of division 20 of title 16 of the California Code of Regulations (CCR).

Background and Statement of the Problem:

The California Veterinary Medical Board (Board) licenses, regulates, and investigates complaints against five different license categories in California, totaling approximately 48,000 licensees. These licensing categories include veterinary premises, veterinarians, university veterinarians, registered veterinary technicians (RVTs), and veterinary assistant controlled substance permit holders. It is the Board's duty to enforce and administer the California Veterinary Medicine Practice Act (Chapter 11 (commencing with section 4800) of Division 2 of the Business and Professions Code (BPC) (Practice Act). The Board is authorized to establish reasonably necessary regulations for the enforcement of the Practice Act (BPC section 4808).

The Board's Multidisciplinary Advisory Committee's (MDC) RVT Subcommittee was tasked with reviewing all current statutory and regulatory pathways for RVT registration and recommending changes to ensure consistency and adequate consumer protection. Following stakeholder meetings and MDC discussion, the Board voted in January 2025 to repeal the out-of-state registration pathway that allowed applicants to qualify without any education component and directed staff to initiate rulemaking (proposed repeal of CCR section 2068.6 discussed below).

During the January 14, 2025 MDC meeting, the Subcommittee also identified concerns with CCR section 2068.5, including the adequacy of the "qualified instructor" criteria, the number and location of required clinical practice hours, and the supervising veterinarian's license and attestation requirements. The Board authorized the MDC to further evaluate these issues. In April 2025, the Subcommittee recommended - and the MDC agreed - that amendments to CCR section 2068.5 were warranted to strengthen and clarify these requirements, while retaining the existing minimum education hours.

When presenting these recommendations, the Board requested additional review of the current "checklist" used by supervising veterinarians, expressing concern that eliminating the checklist entirely could reduce clarity regarding required competencies. The Board directed the MDC to compare the existing checklist with the American Veterinary Medical Association (AVMA) Center for Veterinary Technician Education Accreditation (CVTEA) Veterinary Technology Student Essential and Recommended Skills List.

After meeting multiple times, the Subcommittee concluded that while the CVTEA categories align generally with the regulation, the specific task lists need not be codified and should remain within the professional judgment of supervising veterinarians. The Subcommittee therefore recommended amending CCR section 2068.5 to better align the regulatory categories with CVTEA, relocate and clarify the checklist requirements, and require only minimal applicant and supervisor information necessary for attestation. The Board accepted the Subcommittee's recommendation and approved the text at the July 2025 meeting.

These amendments are intended to ensure that all RVT applicants - regardless of pathway - meet consistent baseline education and competency standards, and to clarify supervisory and documentation requirements for clinical experience.

More details regarding the proposed amendments are discussed below:

Amend CCR section 2068.5:

Education Requirements

The proposal would remove the "qualified instructor" option (as an educational option for alternate pathway RVT applicants), and the related subsections (e)(1) and (e)(2), because it has been misused and no longer reflects current conditions. With many accredited and online veterinary technician programs now available statewide, all required education would instead need to come from formal postsecondary institutions to ensure consistent educational quality.

Clinical Practice Hours

The required clinical practice experience would be reduced from 4,416 hours to 2,500 hours. This change aligns the alternate RVT pathway (education-plus-experience) with similar updates for veterinarians and addresses concerns that the current hour requirement is excessive and disproportionately burdens applicants with family or work constraints.

Supervision Standards

The proposal would remove the requirement that all clinical practice hours be completed under a California-licensed veterinarian. Proposed changes would allow hours to occur in any U.S. state/territory or Canadian province under the direct supervision of a veterinarian(s) licensed in any U.S. state/territory or Canadian province, making the pathway more accessible for out-of-state applicants and reducing unnecessary repetition of experience.

Attestation Requirements

Supervising veterinarians would no longer be required to attest to clinical hours at the time of application, allowing them to sign off as hours are completed. They would also be allowed to attest only to the categories they directly supervised, addressing practical barriers for applicants who work under multiple veterinarians.

Competency Categories and Checklist Updates

The proposed amendments would replace the outdated and overly detailed Board-created checklist with competency categories aligned with the AVMA CVTEA) standards. This ensures clarity, modernizes expectations, and relies on the supervising veterinarian's professional judgment without imposing unnecessary or outdated task requirements.

Proof of Education

To ensure document integrity, the proposal would require proof of completed education to be sent directly to the Board by the postsecondary institution or the American Association of Veterinary State Boards, rather than by the applicant. This change mirrors standards already applied to other education-based pathways.

Repeal CCR section 2068.6:

During prior Board meetings, members expressed concern that the various registration pathways for RVT applicants may not provide equivalent levels of education or preparation. Under BPC section 4841.5, applicants may qualify by completing an approved two-year veterinary technology program, a board-approved combination of education and clinical experience, or an American Association of Veterinary State Boards (AAVSB)-certified education equivalency. Through CCR section 2068.5, the Board has defined the education-plus-experience pathway as 20 semester units (or equivalent) coupled with 4,416 hours of directed clinical practice (proposed to be reduced to 2,500 as part of this proposal).

CCR section 2068.6, however, allows out-of-state registrants to obtain California RVT registration without any formal education requirement, provided they hold a registration in another jurisdiction, have completed 4,416 hours of supervised clinical practice, demonstrate competency across required skill areas, and have no disciplinary or adverse legal history. When this pathway was adopted in 1989, there were states that offered "on-the-job training" (OJT) routes to registration, and some - including Wisconsin, Alaska, Utah, and Montana - continue to do so. As a result, applicants may gain experience in any state, obtain OJT-based registration elsewhere, and then immediately qualify for California RVT registration under this provision.

Board members noted that this may create inconsistency compared to applicants who must meet education or education-and-experience requirements under CCR section 2068.5. The Board's MDC and the MDC's RVT Subcommittee was therefore tasked with reviewing all RVT pathways to determine whether a uniform education requirement is necessary to ensure competency and patient safety.

Feedback from stakeholder meetings showed broad agreement that formal education is essential for patient safety, professional competence, and maintaining consistent standards, even among those who acknowledged access and cost barriers. Professional organizations also supported eliminating the experience-only pathway to standardize RVT qualifications.

After the RVT Subcommittee's work on this matter, a recommendation was made to the MDC to repeal CCR section 2068.6; the same recommendation was presented by the MDC to the Board on January 15, 2025.

At the January 2025 meeting, the Board voted to repeal CCR section 2068.6 because the out-of-state registration equivalency pathway has allowed applicants to qualify as RVTs without education, creating an inconsistency with California's education-based pathways and sometimes allowing in-state residents to bypass schooling.

The Board also concluded that retaining the regulation undermined fairness and diluted the expected standard of an RVT.

Nonsubstantive edits made to the text after Board approval include:

- CCR section 2068.5 in the Introductory paragraph, underline the new quotation mark (").
- CCR section 2068.5 in new subsection (e) delete the duplicative term "directed clinical practice."

Anticipated benefits from this regulatory action:

This regulatory proposal will benefit RVT applicants, veterinarians, and consumers by strengthening the RVT education-and-experience pathway and ensuring consistent, education-based standards for all RVT applicants.

More specifically, the proposed regulations will:

- Ensure all applicants receive formal, verifiable education;
- Reduce required clinical hours to improve pathway accessibility;
- Remove non-veterinarian training supervisors to strengthen oversight;
- Expand supervision options to veterinarians licensed across the U.S. and Canada;
- Clarify attestation by limiting certification to tasks directly observed;
- Modernize competency assessment by adopting a CVTEA-aligned skills framework;
- Require primary-source verification of education to enhance consumer protection;
- Eliminate an equivalency pathway that allowed qualification without formal education;
- Uphold uniform, education-based standards across all RVT pathways; and
- Protect patient and client safety by ensuring consistent competency requirements.

The proposed regulations are not expected to benefit worker safety or the state's environment.

Specific purpose of, and rationale for, each adoption, amendment, or repeal:

1. Amend Title of CCR Section 2068.5

Purpose: The purpose of the proposed change is to align the regulation title with the RVT registration pathway language found in BPC section 4841.5(a)(4)(B) – “education and clinical practice experience”. The proposed change also strikes the words “as equivalent curriculum.”

Rationale: Aligning the regulation title with statutory language provides consistency and clearly indicates that the regulation pertains to the specific “education and clinical practice experience” pathway for RVT registration (BPC section 4841.5(a)(4)(B)). Striking “as equivalent curriculum” also makes the title more concise and eliminates an unnecessary comparison, as there are five (5) established pathways for RVT registration under BPC section 4841(a)(4)(A-E).

2. Amend Opening Paragraph of CCR Section 2068.5

Purpose: The purpose of the proposed change is to eliminate the comparison of the “education and clinical experience” pathway to the two-year curriculum pathway and to, again, align the regulatory language with the RVT registration pathway found in BPC section 4841.5(a)(4)(B). The proposed change also specifically cites subdivision (a)(4)(B) of BPC section 4841.5 for improved clarity.

Rationale: Again, the proposed changes provide consistency with statutory language and improved clarity, and eliminate an unnecessary comparison to the two-year curriculum pathway.

3. Amend CCR Section 2068.5, Subsection (a)

Purpose: The purpose of the proposed change is to strike the reference to the “qualified instructor” educational option.

Rationale: As noted above, the option has been misused and no longer reflects current conditions. With many accredited and online veterinary technician programs now available statewide, all required education would instead need to come from formal postsecondary institutions to ensure consistent educational quality.

4. Strike All Existing Language in CCR Section 2068.5, Subsection (d)(1)-(3) and Add New Language for Subsection (d)

Purpose: The purpose of the proposed change is to eliminate the option for candidates to directly provide to the Board a course syllabus, outline, and documentation of course attendance and to instead require that proof of completion of education be submitted directly to the Board by a postsecondary institution or the AAVSB.

Rationale: As noted above, eliminating the option for candidates to submit documentation directly to the Board and to instead require that proof of completion of education be submitted directly by a postsecondary institution or the AAVSB will ensure document integrity. This change also mirrors standards already applied to other

education-based pathways.

5. Strike CCR Section 2068.5, Subsections (e)(1)(A)-(D) and (e)(2)

Purpose: The purpose of the proposed change is to strike provisions related to the “qualified instructor” option discussed above.

Rational: As noted above, the “qualified instructor” option (as an educational option for alternate pathway RVT applicants), and the related subsections (e)(1) and (e)(2), are being removed because the option has been misused and no longer reflects current conditions. With many accredited and online veterinary technician programs now available statewide, all required education would instead need to come from formal postsecondary institutions to ensure consistent educational quality.

6. Amend Re-Lettered CCR Section 2068.5, Subsection (e)

Purpose: The purpose of the proposed change is to: reduce the required clinical practice experience hours from 4,416 hours to 2,500 hours; allow clinical practice hours to occur in any U.S. state/territory or Canadian province; and, remove the requirement that all clinical practice hours be completed under a California-licensed veterinarian.

Rationale: As noted above, the amendment would make the registration pathway more accessible for out-of-state applicants and would reduce unnecessary repetition of experience.

7. Amend Re-Lettered CCR Section 2068.5, Subsection (f) and Add Language for New Subsections (f)(1)-(7)

Purpose: The purpose of the proposed change is to: update the reference to re-lettered subsection (e); strike references to outdated competency categories; and, add competency categories that align with the AVMA CVTEA Accreditation standards. This ensures clarity, modernizes expectations, and relies on the supervising veterinarian’s professional judgment without imposing unnecessary or outdated task requirements.

Rationale: The amendment would modernize competency category expectations, with added detail and clarity, that align with the AVMA CVTEA Accreditation standards.

8. Amend CCR Section 2068.5, Subsection (g)

Purpose: The purpose of the proposed change is to make the final existing sentence of subsection (g) the new subsection (g) and to provide clarifying amendments. The addition of the new final sentence also adds detail with regard to what the supervising veterinarian’s checklist should include.

Rationale: The proposed change makes clarifying amendments and specifies basic supervising veterinarian checklist requirements to ensure accountability and traceability.

9. Repeal CCR Section 2068.6

Purpose: The purpose of the proposed change is to eliminate the out-of-state registration equivalency pathway.

Rationale: The current pathway under the regulation allows applicants to qualify for registration without any formal education, creating an inconsistency with California's established education and education-plus-experience pathways, lowering professional standards, and allowing a pathway used by in-state residents to bypass education.

Underlying Data:

- January 14, 2025 MDC Meeting Agenda, Relevant Materials, and Minutes
- January 15-16, 2025 Board Meeting Agenda, Relevant Materials, and Minutes
- April 15, 2025 MDC Meeting Agenda, Relevant Materials, and Minutes
- April 16-17, 2025 Board Meeting Agenda, Relevant Materials, and Minutes
- July 15, 2025 Meeting Agenda, Relevant Materials, and Minutes
- July 16-17, 2025 Meeting Agenda, Relevant Materials, and Minutes

Business Impact:

The Board has made the initial determination that the proposed regulatory action will not have a significant statewide adverse economic impact directly affecting businesses, including the inability of California businesses to compete with businesses in other states.

This initial determination is based on the following facts:

- The regulatory proposal is intended to strengthen the RVT education-and-experience pathway and ensure consistent, education-based standards for all RVT applicants.
- Any individual registered as a veterinary technician in another state based on an experience only pathway could be impacted. In the event these individuals opt to relocate and complete their education to attain RVT registration, they would be required to fulfill educational requirements.

The Board estimates this proposal could impact up to 38 out-of-state individuals applying for RVT registration per year with estimated costs and savings as follows:

There are currently three educational options for RVT registration with costs as follows:

1. Associate Degree (traditional 2-Yr): \$4,000 to \$6,000
2. Alternate Pathway: \$3,500 to \$5,000
3. Accelerated Associate Degree: \$8,000 to \$45,000

The Board anticipates most out-of-state individuals to opt for the Associate Degree (#1) or Alternate Pathway (#2), in lieu of the accelerated Associate Degree (#3) due to the

higher costs but is nonetheless reporting all three options for awareness.

Assuming all 38 individuals enroll in an Associate Degree (#1) or Alternate Pathway (#2) educational program the Board estimates costs to these individuals and tuition fee revenues to educational programs ranging from \$133,000 to \$228,000 per year and up to \$1,330,000 to 2,280,000 over a ten-year period as follows:

CA Veterinary Medical Board													
Registered Veterinary Technician - Economic Impact (Education Costs & Revenues)													
Type	Applicants Per Year	Costs Range	Years Ongoing										Total
			1	2	3	4	5	6	7	8	9	10	
Associate Degree (Option #1)	38	\$4,000	\$152,000	\$152,000	\$152,000	\$152,000	\$152,000	\$152,000	\$152,000	\$152,000	\$152,000	\$152,000	\$1,520,000
		\$6,000	\$228,000	\$228,000	\$228,000	\$228,000	\$228,000	\$228,000	\$228,000	\$228,000	\$228,000	\$228,000	\$2,280,000
Alternate Pathway (Option #2)	38	\$3,500	\$133,000	\$133,000	\$133,000	\$133,000	\$133,000	\$133,000	\$133,000	\$133,000	\$133,000	\$133,000	\$1,330,000
		\$5,000	\$190,000	\$190,000	\$190,000	\$190,000	\$190,000	\$190,000	\$190,000	\$190,000	\$190,000	\$190,000	\$1,900,000

The Board notes, out-of-state individuals may decide not to relocate to California and seek RVT registration because they do not want to fulfill the educational requirements. The Board does not have a total cost (savings) estimate because the number of individuals that may forgo moving to California and seeking RVT registration is unknown.

Any out-of-state individual opting not to seek RVT registration in California would realize cost (savings) as follows:

- Fingerprint Background Check: \$75
 - Department of Justice (\$32), Federal Bureau of Investigations (\$17); Vendor (\$26)
- Initial Application Fee: \$225
- Initial RVT Registration Fee: \$225
- Biennial RVT Renewal Registration Fee: \$225
 - Continuing Education (20 hours) upon renewal: \$300 – \$500

Additionally, any individual residing in a state that does not require an RVT to take and pass the Veterinary Technician National Exam would save \$365 (current exam cost).

Economic Impact Assessment:

The Board has determined that this regulatory proposal:

- Will not create but may eliminate jobs within the State of California because it establishes fair and level educational requirements for any individual seeking RVT registration;
- Will not create new businesses or eliminate existing businesses within the State of California because it establishes fair and level educational requirements for any individual seeking RVT registration;
- Will not affect the expansion of businesses currently doing business within the State of California because it establishes fair and level educational requirements for any

individual seeking RVT registration;

- Does not relate to health and welfare or describe benefits consistent with anticipated benefits section;
- Does not involve worker safety or describe benefits consistent with anticipated benefits section; and
- Does not involve the environment or describe benefits consistent with anticipated benefits section.

The proposed regulations will benefit RVT applicants, veterinarians, and consumers by strengthening the RVT education-and-experience pathway and ensuring consistent, education-based standards for all RVT applicants. The proposed regulations are not expected to benefit worker safety or the state's environment.

Specific Technologies or Equipment:

This regulation 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.

No such alternatives have been proposed, however, the Board welcomes comments from the public.

Description of reasonable alternatives to the regulation that would lessen any adverse impact on small business:

No such alternatives have been proposed, however, the Board welcomes comments from the public.