

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

NOTICE OF PROPOSED REGULATORY ACTION CONCERNING:
RVT Pathways

NOTICE IS HEREBY GIVEN that the California Veterinary Medical Board (Board) is proposing to take the action described in the Informative Digest below, after considering all comments, objections, and recommendations regarding the proposed action.

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 their 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 Persons" in this notice.

WRITTEN COMMENT PERIOD

Written comments relevant to the action proposed, including those sent by mail, facsimile, or e-mail to the addresses listed under "Contact Persons" in this Notice, must be **received by the Board at its office no later than December 14, 2026** or must be received by the Board at the hearing, should one be scheduled.

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 section 4841.5 of said code, the Board is considering amending section 2068.5 and repealing section 2068.6 of article 6 of division 20 of title 16 of the California Code of Regulations (CCR¹).

INFORMATIVE DIGEST / POLICY STATEMENT OVERVIEW

BPC section 4800.1 mandates that the protection of the public shall be the highest priority of the Board in exercising its licensing, regulatory, and disciplinary functions. Whenever the protection of the public is inconsistent with other interests sought to be promoted, the protection of the public shall be paramount. BPC section 4808 authorizes the Board, in accordance with the Administrative Procedure Act (Government Code section 11400, et seq.), 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 (Practice Act) (BPC section 4800, et seq.).

¹ All CCR references are to title 16 unless otherwise noted

BPC section 4841.5 outlines the requirements for obtaining registration as a Registered Veterinary Technician (RVT). It mandates submitting a Board-issued application and applicable fees, a criminal background check via fingerprints, and proof of qualifying education or experience - through accredited programs, recognized veterinary colleges, or equivalency certifications from the American Association of Veterinary State Boards (AAVSB) Program for the Assessment of Veterinary Education Equivalence or the Educational Commission for Foreign Veterinary Graduates - with verifiable documentation directly from primary sources. Applicants must also pass the national RVT licensing examination; if the examination was passed more than five years prior, they must either retake it, show at least two years and 2,500 hours of recent clinical practice elsewhere, or complete recent continuing education. Additionally, applicants must disclose and verify any veterinary licenses held in other jurisdictions, and applications may be denied under specified regulatory provisions.

CCR section 2068.5 establishes an alternate pathway for becoming an RVT by defining what qualifies as the “equivalent” of a two-year animal health technology program. It requires applicants to complete a specified amount of formal education - at least 20 semester units, 30 quarter units, or 300 instructional hours - in core veterinary subjects, delivered either by a postsecondary institution or an instructor meeting defined qualification standards. It also requires coursework in foundational sciences; allows interactive distance learning if assessment standards are met; and mandates submission of syllabi and proof of course attendance. In addition, applicants must complete at least 4,416 hours of directed clinical practice under the supervision of a California-licensed veterinarian, who must attest to the applicant’s completion of hours and proficiency in a wide range of clinical skills, documented through a checklist covering areas such as client communication, examinations, emergency care, anesthesia, surgery, radiography, nursing, dentistry, behavior, and pharmacology.

This regulatory proposal to amend CCR section 2068.5 would do the following:

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

- 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.
- It would replace the outdated and overly detailed Board-created checklist with competency categories aligned with the American Veterinary Medical Association Center for Veterinary Technician Education Accreditation (CVTEA) standards. This ensures clarity, modernizes expectations, and relies on the supervising veterinarian's professional judgment without imposing unnecessary or outdated task requirements.
- 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 AAVSB, rather than by the applicant. This change mirrors standards already applied to other education-based pathways.

CCR section 2068.6 was intended to create a pathway for applicants already registered as veterinary technicians in another U.S. state/territory or Canadian province to obtain California RVT registration. It requires that the applicant be in good standing and have passed the national or an equivalent licensing examination, and that they have completed at least 4,416 hours of supervised clinical practice over a minimum of 24 months under a veterinarian licensed in the U.S. or Canada. The clinical experience must provide competency across key veterinary skill areas, documented through a supervisor-completed checklist. The Board must also confirm that the applicant has no disciplinary history or civil/criminal findings indicating negligence or incompetence before granting registration.

This proposal would repeal CCR section 2068.6 for the following reasons:

- The Board voted to repeal the regulation 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.
- 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 pathway to standardize RVT qualifications.

The Board concluded that retaining the regulation undermined fairness and diluted the expected standard of an RVT, and therefore voted to repeal it.

ANTICIPATED BENEFITS OF PROPOSAL

The proposed regulations will benefit RVT applicants, veterinarians, and consumers.

Regarding the proposed amendments to CCR section 2068.5, the Board's goal is to strengthen the RVT education-and-experience pathway by requiring formal, verifiable education; reducing clinical practice hours from 4,416 to 2,500; removing the "qualified instructor" option; allowing supervision by veterinarians licensed in any U.S. state/territory or Canadian province; updating attestation rules so supervisors certify only the areas they oversaw; replacing the outdated task checklist with a streamlined, CVTEA-aligned skills framework; and requiring proof of education to come directly from primary sources, all to improve consumer protection, expand workforce access, and ensure applicant competency.

Regarding the proposed repeal of CCR section 2068.6, the Board's goal is to ensure consistent, education-based standards for all RVT applicants so that every pathway to registration upholds the same level of competency and protects patient and client safety. To achieve this, the Board's objective is to eliminate the out-of-state registration equivalency pathway in CCR section 2068.6 because it allows applicants to qualify 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.

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

Evaluation of Consistency and Compatibility with Existing State Regulations

After conducting a review for any related regulations, the Board has found that these are the only regulations relating to RVT pathways. Therefore, the proposed regulations are not inconsistent or incompatible with existing state regulations.

INCORPORATION BY REFERENCE

N/A.

DISCLOSURES REGARDING THIS PROPOSED ACTION

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 Board estimates this proposal could impact up to 38 out-of-state individuals applying for RVT registration per year. Assuming all 38 applicants fulfill the education requirements and are granted RVT registration, the proposed regulations will not have a fiscal impact to the Board.

However, in the event an out-of-state individual opts not to relocate to California and seek RVT registration, there would be a decrease in RVT registration workload and

revenues, as well as a reduction in fingerprint background checks. Because the number of individuals opting not to relocate to California and seek RVT registration is unknown, the Board does not have a total cost (savings) or revenue (loss) estimate at this time but estimates the impact per individual as follows:

- Initial Application Fee: \$225
- Initial RVT Registration Fee: \$225
- Biennial RVT Renewal Registration Fee: \$225
- Fingerprints: \$32 to the Department of Justice (DOJ) and \$17 to the Federal Bureau of Investigations (FBI).

Nondiscretionary Costs/Savings to Local Agencies: None.

Cost to any Local Agency or School District for which Government Code Sections 17500 - 17630 Require Reimbursement: None.

Mandate Imposed on Local Agencies or School Districts: None.

Significant Effect on Housing Costs None.

BUSINESS IMPACT ESTIMATES

The Board has made the initial determination that the proposed regulatory action would have no significant statewide adverse economic impact directly affecting business, including the ability 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.

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 to not seek RVT registration in California would realize cost (savings) as follows:

- Fingerprint Background Check: \$75
 - DOJ (\$32), FBI (\$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).

Cost Impact on Representative Private Person or Business

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

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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.

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 to not seek RVT registration in California would realize cost (savings) as follows:

- Fingerprint Background Check: \$75
 - DOJ (\$32), FBI (\$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).

RESULTS OF ECONOMIC IMPACT ASSESSMENT / ANALYSIS

Impact on Jobs / Businesses:

The Board has determined that this regulatory proposal may have any impact on the following:

- The creation or elimination of jobs within the state;

The Board has determined that this regulatory proposal will not any impact on the following:

- The creation of new businesses or the elimination of existing businesses within the state
- The expansion of businesses currently doing business within the state.

This proposal would not have any of the above-referenced impacts, as explained in the “Business Impact Estimates” section of this notice.

Benefits of Regulation to the Health and Welfare of California Residents, Worker Safety, and the State’s Environment:

The proposed regulations will benefit RVT applicants, veterinarians, and consumers.

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.

Business Reporting Requirements:

The regulatory action does not require businesses to file a report with the Board.

Effect on Small Business:

The Board has determined that the proposed regulations may affect small businesses. Although small businesses owned by licensees of the Board would likely not be impacted significantly and educational providers would likely not be classified as a small business.

However, in the event an out-of-state applicant decides not to relocate to California and seek RVT registration, small businesses providing fingerprint background checks could have a reduction in fingerprint revenues estimated at \$26 per check. The Board does not have a total revenue loss estimate at this time.

CONSIDERATION OF ALTERNATIVES

In accordance with Government Code section 11346.5, subdivision (a)(13), the Board must determine that no reasonable alternative it considered to the regulation 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 proposal described in this Notice; 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 North Market Blvd., Suite 230, Sacramento, California 95834 during the written comment period, or at the hearing if one is scheduled or requested.

AVAILABILITY OF STATEMENT OF REASONS AND RULEMAKING FILE

The Board has compiled a record for this regulatory action, which includes the Initial Statement of Reasons (ISOR), proposed regulatory text, and all the information on which this proposal is based. This material is contained in the rulemaking file and is available for public inspection upon request to the contact persons named in this notice.

TEXT OF PROPOSAL

Copies of the exact language of the proposed regulations, and any document incorporated by reference, and of ISOR, 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 OF CHANGED OR MODIFIED TEXT

After considering all timely and relevant comments, 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, with the modifications clearly indicated, will be available for review and written comment for 15 days prior to its adoption from the persons designated in this Notice as the Contact Persons and will be mailed to those persons who submit written comments or oral testimony related to this proposal or who have requested notification of any changes to the proposal.

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

All of 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 Persons named below or by accessing the website listed below.

CONTACT PERSONS

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

Name: Justin Sotelo
Address: California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834
Telephone No. (916) 905-5511
Fax No.: (916) 928-6849
E-Mail Address: Justin.Sotelo@dca.ca.gov

The backup contact person is:

Name: Matt McKinney
Address: California Veterinary Medical Board
1747 North Market Blvd., Suite 230
Sacramento, CA 95834
Telephone No.: (916) 282-3529
Fax No.: (916) 928-6849
E-Mail Address: Matthew.McKinney@dca.ca.gov

AVAILABILITY OF DOCUMENTS ON THE INTERNET

Copies of the Notice of Proposed Regulatory Action, ISOR, Proposed Regulatory Language of the regulations with modifications noted, as well as the Final Statement of Reasons when completed, and modified text, if any, can be accessed through the Board's website at:

https://www.vmb.ca.gov/laws_regs/proposed_regs.shtml