



MEMORANDUM

DATE	April 8, 2025
TO	California Veterinary Medical Board (Board)
FROM	Justin Sotelo, Policy Specialist
SUBJECT	Agenda Item 7.A. Status on Pending Regulations

Regular Rulemaking Packages

A Regular rulemaking moves through various phases, including Concept, Production, Initial Filing Phase, and Final Filing Phase.

Since the January 2025 meeting, one Regular rulemaking was approved. Five Regular rulemaking packages are pending in various phases of the rulemaking process, as described in more detail below.

1. Veterinary Facilities—California Code of Regulations (CCR), Title 24, Section 1251

Status: APPROVED; Effective Date: January 1, 2026

Summary: This building standards proposal moves existing building standards and related exemptions from the Minimum Standards for Alternate Veterinary Premises proposal to CCR, title 24, section 1251 and moves from that section any practice management standards to title 16.

Update: On December 17, 2024, this regulatory proposal was approved by the California Building Standards Commission (CBSC). On January 10, 2025, the approved rulemaking was filed with the Office of the Secretary of State. On January 13, 2025, a formal hardcopy of the rulemaking was submitted to the CBSC. On January 22, 2025, the approved regulations were posted to the Board's "Approved Regulations" [web page](#).

The CBSC has been working with the International Code Council to publish all approved code changes into the 2025 California Building Code. On March 12, 2025, a first proof of the Board's changes was approved by Regulations Counsel and Board staff. Board staff anticipates receiving a second proof for review during the week of April 7, 2025.

As part of the CBSC's Triennial Code Adoption Cycle, the regulatory amendments will become effective January 1, 2026.

2. Minimum Standards for Alternate Veterinary Premises—CCR, Title 16, Sections 2030, 2030.05, 2030.1, 2030.2, and 2030.3 – PRIORITY

Phase: Production

Summary: The regulatory proposal would standardize language utilized in modern veterinary practice and update the requirements for fixed veterinary premises, mobile veterinary premises, vaccination veterinary premises, and shelter premises. Additionally, the proposal would remove all apparent building standards, including any exemptions to those standards, from title 16.

The proposed language also:

1. Provides for the needs of large animal practitioners and limitations they have for equipment or movement of large animals.
2. Provides for the various mobile veterinary premises types, including house calls and services for equines or food animals/livestock.
3. Clarifies personnel authorized to provide vaccinations at a veterinary premises and the veterinarian's responsibilities.
4. Sets specified requirements for animal shelters.

Update: On March 25, 2025, Board staff resubmitted the package to Regulations Counsel for additional review. Upon receiving Department of Consumer Affairs (DCA) Director and Business, Consumer Services and Housing Agency (Agency) approvals, Board staff anticipates submitting the package to the Office of Administrative Law (OAL) by the end of May, which will begin the initial filing (publication and public comment) phase.

3. Records—CCR, Title 16, Section 2032.3

Phase: Production

Summary: This regulatory proposal addresses the following:

1. Changes the logical order of the required information that makes up an animal patient record to follow a SOAP (Subjective, Objective, Assessment, and Plan) format for recording patient medical encounters and medical record documentation, which is taught in the majority of veterinary schools.
2. Addresses animal patient record keeping requirements for single patient records and group records.
3. Makes animal patient record keeping requirements less prescriptive.
4. Addresses when a copy or a summary of records must be provided to the client, or the client's authorized agent.

Update: In July 2024, corresponding legislative amendments to Business and Professions Code (BPC) sections 4826.6 and 4855 were approved by the Board. In anticipation of those amendments being enacted, this regulatory package is in the production phase of the rulemaking process and is being prepared for DCA Director and Agency approval. Board staff will submit this package to Regulations Counsel between now and the next Board meeting to initiate the review process and to obtain initial approvals before submitting to OAL for publication and public comment (initial filing phase). However, this regulatory package is contingent on the approval and enactment of the legislative proposals.

4. Drug Compounding—CCR, Title 16, Sections 2036.5, 2090, 2091, 2092, 2093, and 2094

Phase: Production

Summary: This regulatory proposal would:

1. Make technical revisions regarding animal health care tasks performed by permit holders and veterinary assistants.
2. Make technical revisions regarding Registered Veterinary Technician (RVT) drug compounding under the supervision of a veterinarian in a registered veterinary premises.
3. Add a definition for “immediate use”.
4. Clarify the definition of “office stock” regarding administration and dispensing of the office stock.
5. Clarify the policy and procedure and master formula document requirements and documentation requirements for animal patient specific compounded drug preparations.
6. Establish documentation requirements for immediate use compounded drug preparations.
7. Clarify compounded drug preparation documentation requirements in animal patient medical records.
8. Make technical corrections regarding drug compounding training requirements.
9. Establish expiration of non-immediate use intravenous (IV) or subcutaneous (SQ) compounded drug preparations.
10. Clarify drug compounding labeling requirements for office stock, establish labeling requirements for IV, intramuscular, and SQ drug preparations, and establishing labeling requirements for compounded drugs requiring refrigeration.

Update: This regulatory package is in the production phase of the rulemaking process and is being prepared for DCA Director and Agency approval. It is anticipated that Board staff will submit this package to Regulations Counsel between now and the next Board meeting to initiate the review process and to obtain initial approvals before submitting to OAL for publication and public comment (initial filing phase).

5. Civil Penalties for Citation—CCR, Title 16, Section 2043

Phase: Production

Summary: This regulatory proposal is contingent on the approval and enactment of the legislative proposal to amend BPC section 4875.2 and add Section 4875.7 regarding unlicensed practice citations. This proposal would remove references to unlicensed practice citations, as there would no longer be a need for unlicensed practice citations to be assigned a classification, if the related legislative proposal is successful.

Update: At the January 2025 meetings, the Multidisciplinary Advisory Committee (MDC) and Board approved this regulatory proposal.

6. Out of State Registration as Equivalent—CCR, Title 16, Section 2068.6

Phase: Production

Summary: The regulatory proposal would repeal CCR, title 16, section 2068.6 and would thus, eliminate the experience only pathway for RVT registration that currently only exists for out-of-state applicants.

Update: At the January 2025 meetings, the MDC and Board approved this regulatory proposal.

Section 100 Rulemaking Packages

A Section 100 rulemaking is one with no regulatory effect, does not require Board approval, and follows a much faster path to OAL. The following Section 100 packages were approved since the last Board meeting:

1. California Examinations, Temporary License, California Curriculum, and Appeals Process of Examination Results—CCR, Title 16, Sections 2009, 2010, 2014, 2014.1, 2015, 2015.1, 2015.2, 2016, 2020, 2021-2021.10, 2068.6, and 2086.4

Status: APPROVED; Effective Date: February 12, 2025

Summary: This Section 100 regulatory package was intended to conform the regulations to changes in statute related to California state board and veterinary technician examinations, temporary licenses, California curriculum, appeals of examination results, and RVT continuing education credit.

Update: On February 12, 2025, this Section 100 regulatory package was approved by OAL and filed with the Office of the Secretary of State. The approved regulations are posted on the Board's "Approved Regulations" [web page](#).

Two proposed changes in this regulatory package (to repeal what were formerly CCR sections 2014 (b) and 2015.2 (a)) were deemed substantive by OAL and were not approved as part of this package. These provisions deal with the grading method for the national veterinarian examination (Angoff criterion-referenced method) and the administration of the Veterinary Law Examination (VLE) (currently the regulation states that the VLE shall be administered by mail, although is it only administered electronically).

It was recommended that the Board pursue these changes via the regular rulemaking process. The Board is therefore being asked to approve the proposed rulemaking under Agenda Item 7.B.

2. Location of Office / Wellness Evaluation Committee Name Update—CCR, Title 16, Sections 2000, 2070, 2075, 2076, 2077, 2079, 2080, 2081, 2082, and 2085.4

Status: APPROVED; Effective Date: February 5, 2025

Summary: This Section 100 regulatory package was intended to update the Board's physical address in regulation and update references of the Diversion Committee to refer to the retitled Wellness Evaluation Committee.

Update: On February 5, 2025, this Section 100 regulatory package was approved by OAL and filed with the Office of the Secretary of State. The approved regulations are posted on the Board's "Approved Regulations" [web page](#).

3. VCPR—CCR 2032.1, 2032.25, and 2038.5

Status: APPROVED; Effective Date: February 12, 2025

Summary: Repealed CCR section 2032.1 and amended CCR sections 2032.25 and 2038.5.

Update: Due to statutory changes that resulted from Senate Bill 669 (Cortese, Chapter 882, Statutes of 2023) and Assembly Bill 1399 (Friedman, Chapter 475, Statutes of 2023), it was determined that CCR section 2032.1 should be repealed, as it duplicated veterinarian-client-patient relationship (VCPR) provisions found under statute.

Amendments to CCR sections 2032.25 and 2038.5 update references to the VCPR provisions under new BPC section 4826.6.

On February 12, 2025, this Section 100 regulatory package was approved by OAL and filed with the Office of the Secretary of State. The approved regulations are posted on the Board's "Approved Regulations" [web page](#).

Attachment

1. Status of Pending Board Regulations – Updated April 2, 2025

Status of Pending Board Regulations

Rulemaking Title	Current Status	INITIAL PHASE										FINAL PHASE					
		Concept Date(s)	Board Approval	Submitted to DCA for PRE-Review	Submitted to DCA for INITIAL Review	DCA Director Approval	Submitted to Agency/Agency Approval	Notice Submitted to OAL & Notice Published by OAL	45-Day Comment Period	Public Hearing (Optional)	15-Day Comment Period (Modified Text), if applicable	Submitted to DCA for FINAL Review	DCA Director FINAL Approval	Submitted to Agency/ FINAL Agency Approval	Submitted to DOF/ DOF Approval	Submitted to OAL/ OAL Approval	Effective Date
Drug Compounding	Staff preparing regulatory package for initial phase	4/19/2022 10/18/2023 01/16/2024	01/25/2023 Re-Approved on 04/17/2024														
Minimum Standards for Alternate Veterinary Premises	Staff working with Regulations Counsel to move package forward for DCA initial review	2017-2024	11/14/2018 04/19/2023 10/18/2023 Combined with the Minimum Standards for Shelter Premises Package Re-Approved on 04/17/2024	7/11/2024 Re-Approved by Budget Office on 08/01/2024 Resubmitted to Regulations Unit on 03/25/2025													
Veterinary Facilities	Approved by CBSC on 12/17/2024; effective 01/01/2026	12/08/2023	04/17/2024	07/08/2024	08/02/2024	08/02/2024	08/02/2024 Submitted to Agency/CBSC 08/21/2024 Approved	08/09/2024 Submitted 08/23/2024 Published	08/23/2024 through 10/07/2024	N/A	N/A	10/28/2024	11/05/2024	N/A	N/A	11/06/2024 Submitted to CBSC 12/17/2024 Approved by CBSC	01/01/2026
Records	Once legislative amendments are enacted, staff can proceed with initial phase of the rulemaking process	06/26/2023 08/29/2023	07/24/2024														
California Examinations, Temporary License, California Curriculum, and Appeals Process of Examination Results (Section 100)	Approved by OAL and effective 02/12/2025	N/A	01/28/2021	N/A	12/16/2024	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	12/30/2024 Submitted 02/12/2025 Approved	02/12/2025
Location of Office/Wellness Evaluation Committee Name Update (Section 100)	Approved by OAL and effective 02/05/2025	N/A	N/A	N/A	12/16/2024	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	12/30/2024 Submitted 02/05/2025 Approved	02/05/2025
VCPR (Section 100)	Approved by OAL and effective 02/12/2025	N/A	N/A	N/A	12/16/2024	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	12/30/2024 Submitted 02/12/2025 Approved	02/12/2025

Red Text = Updates since last meeting

= Completed

= Current Status/ Pending

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		Concept Date(s)	Board Approval	Submitted to DCA for PRE-Review	Submitted to DCA for INITIAL Review	DCA Director Approval	Submitted to Agency/Agency Approval	Notice Submitted to OAL & Notice Published by OAL	45-Day Comment Period	Public Hearing (Optional)	15-Day Comment Period (Modified Text), if applicable	Submitted to DCA for FINAL Review	DCA Director FINAL Approval	Submitted to Agency/ FINAL Agency Approval	Submitted to DOF/ DOF Approval	Submitted to OAL/ OAL Approval	Effective Date
Civil Penalties for Citation	Approved by Board on 01/15/2025	09/16/2024 11/18/2024	01/15/2025														
Out of State Registration as Equivalent	Approved by Board on 01/15/2025	09/16/2024 11/18/2024	01/15/2025														