



MEMORANDUM

DATE	January 14, 2026
TO	Multidisciplinary Advisory Committee (MDC)
FROM	<u>Veterinary Practice Subcommittee (Subcommittee)</u> Richard Sullivan, DVM Marie Ussery, RVT
SUBJECT	Agenda Item 5.B. Legislative Proposal to Add BPC Sections 4846.3, 4846.4, and 4848.2, Amend BPC Sections 4827, 4858, 4858.1, 4858.2, 4900, 4901, 4902, and 4905, and Repeal BPC Sections 4843.5 and 4844 Regarding Veterinary Medicine Practice Exemptions, Retired and Retired Volunteer Statuses, and Shelter Veterinarian Licenses

Background

During the October 2025 Board meeting, the MDC Chair presented the [MDC's recommendation](#) that the Board submit to the California State Legislature the legislative proposal to amend Business and Professions Code (BPC) section 4827 regarding unlicensed practice.

In addition, the MDC Chair provided an overview of the Animal Balance presentation regarding Mobile Animal Sterilization Hospital (MASH) Clinics and the input received from the animal shelter community regarding the challenges related to licensure and practice requirements.

After discussing the information provided, the Board approved the legislative proposal to amend BPC section 4827. In addition, the Board directed the MDC to draft a legislative proposal creating a limited shelter license that helps address the shelter workforce challenges while maintaining adequate consumer protection.

Subcommittee Recommendation

In response, the Subcommittee drafted the attached legislative proposal. Aside from the owner exemption and other administrative amendments, this proposal creates retired and retired volunteer statuses for veterinarians and registered veterinary technicians (RVTs). The retired-volunteer status allows retired veterinarians and RVTs to practice within their full scope of practice so long as they do so for free and solely for animal control shelters/humane societies. In addition, the proposal creates a streamlined shelter veterinarian license for out-of-state/Canadian province veterinarians.

In addition to including the Board-approved BPC section 4827 amendment, this legislative proposal specifically does the following:

Administrative Amendments (BPC, §§ 4843.5, 4844, 4900)

This legislative proposal would repeal BPC sections 4843.5 and 4844 as they would be covered under BPC sections 4901 and 4902.

In addition, it would amend BPC section 4900 to require premises registration renewal applications to collect the same owner or operator information collected on initial premises registration applications.

Retired Status (BPC, § 4846.3)

This proposal creates a retired status for veterinarians and RVTs. When licensees and registrants retire from practice, they often prefer a retired status be shown to the public rather than an expired, delinquent, or canceled status due to the negative connotations those latter statuses imply. Key points include:

- **Application and Fees:** To obtain retired status, an applicant must complete a Board-provided application and pay the specified fee.
- **Conditions for Denial:** Retired status will not be granted if there is a pending complaint, investigation, or enforcement action against the applicant, or if their license/registration is revoked, surrendered, or under probation.
- **Prohibition on Practice:** Individuals with retired status are strictly prohibited from practicing veterinary medicine.
- **Professional Title Usage:** They must use their professional title only with the word "retired" either directly before or directly after it (e.g., "Retired Veterinarian" or "Veterinarian, Retired").
- **Board Oversight:** The Board retains the right to investigate potential violations of the Veterinary Medicine Practice Act and take action against a retired license or registration.
- **Exemption from Renewal:** Licensees or registrants with retired status are exempt from renewal requirements and will not be subject to delinquency or unpaid renewal fees.

Retired-Volunteer Status (BPC, § 4846.4)

This proposal creates a "retired volunteer status" for veterinarians and RVTs to provide voluntary, unpaid veterinary services for animal control shelters or humane societies.

Since individuals with this status would practice within their full scope of practice without pay, they would have significantly reduced application and renewal fees. In addition, the application process would be streamlined, as it would not require proof of education or passing the national examinations that would otherwise be required for out-of-state licensees to practice in California.

The proposal includes necessary consumer protection guardrails by specifying applications can be denied based on existing grounds for application denial (BPC, §§ 480 and 4883), will not be granted while enforcement matters are pending, and that retired volunteer status is strictly limited to services for animal control shelters/humane societies or specific other authorized sections.

It also clarifies that an out-of-state veterinarian license or veterinary technician registration with retired volunteer status would not qualify for license restoration under BPC sections 4901 or 4902.

Shelter Veterinarian License (BPC, § 4842.2)

This new section creates a "shelter veterinarian license" for out-of-state licensed veterinarians to practice veterinary medicine exclusively for animal control shelters or humane societies.

Like the retired-volunteer status, the application process is streamlined by not requiring proof of graduation be submitted by the veterinary college or proof of passing the national examination. All other requirements mirror the requirements for a standard veterinarian license (e.g., apply, pay the applicable, fee, submit to fingerprints, pass the Veterinary Law Examination (VLE), etc.).

Unlike the retired-volunteer status, the shelter veterinarian license allows veterinarians to be paid for their services.

Does Not Extend to RVTs

The Subcommittee did not extend this license to RVTs because license technician requirements and scopes of practice are vastly different throughout the United States and Canadian provinces. Some states do not even regulate technicians. As such, the Board cannot be assured the RVT applicant met the Board's education and national examination requirements in another jurisdiction.

Does Not Extend to Foreign Graduate

The Subcommittee did not extend this limited license to foreign graduates due to the concerns raised by the Board during its October 2025 meeting regarding the existing foreign graduate pathway.

During that meeting, the Board heard a presentation from the American Veterinary Medical Association (AVMA) regarding their Educational Commission for Foreign Veterinary Graduates (ECFVG) certification program. The Board also heard a presentation from the American Association of Veterinary State Boards (AAVSB) regarding their Program for the Assessment of Veterinary Education Equivalence (PAVE). Concerns were raised related to how foreign educational programs are added to the ECFVG list.

In addition, the Board discussed enforcement and disciplinary data related to AVMA accredited and non-AVMA accredited veterinary education. That memo

can be found [here](#). As a result of that meeting, the Board's Executive Committee directed the Executive Officer to further research the ECVFG list and analyze all disciplinary actions related to foreign graduates.

Until that research is presented to the Board and the Board determines what, if anything, should be done to address the consumer protection concerns raised, the Subcommittee does not recommend extending the shelter license to foreign graduates.

Restoration, Renewals, and Fees (BPC, §§ 4858, 4858.1, 4858.2, 4900, 4901, 4902, 4905)

This proposal would update applicable statutes to specify how retired statuses can be renewed and/or restored to active status and adds applicable fees.

The Subcommittee believes this legislative proposal not only accomplishes the Board's October directive, but also aligns with the Legislature's directive to the Board in [Assembly Concurrent Resolution \(ACR\) 86](#) (Res. Chapter 51, Statutes of 2024). ACR 86 encouraged the state and local municipalities to develop and fund high-volume spay and neuter clinics across the state to provide sterilization services, and encouraged other actions relating to pets, including actions to control animal breeding and encourage spaying and neutering, as specified.

ACR 86 stated, in pertinent part, "That the [California] Veterinary Medical Board with support from the Governor, other state boards and agencies, and interested stakeholders, should encourage out-of-state licensed veterinarians and registered veterinary technicians to become licensed in California to perform or assist with the necessary spay and neuter surgeries and other medical services in order to address pet overpopulation."

[Social Compassion in Legislation](#) (SCIL) sponsored ACR 86 to help address animal overpopulation. In addition, SCIL previously expressed concerns with the owner exemption and was also exploring creating temporary licenses for spay and neutering services. As such, the Board's Executive Officer reached out to SCIL to see if they would consider co-sponsoring this legislative proposal, and they agreed.

Stakeholder Feedback

The Subcommittee and SCIL met with representatives from the California Veterinary Medical Association (CVMA) and the shelter community to receive their feedback on the legislative proposal.

Overall, the feedback was positive, and the stakeholders agreed this was a step in the right direction. The main request from the group was to consider extending the retired-volunteer status to veterinarians and RVTs who are employed by or contracted with non-profit organizations that provide low cost or no cost services to the public.

The Board directed the MDC to create a limited license specifically for shelters. It did not discuss extending to other organizations. As such, the Subcommittee did not include this in the legislative proposal. The Subcommittee believes the MDC and the Board should consider this request carefully to prevent any unintended consequences if extended further.

The stakeholders also requested that veterinarians and RVTs with the retired status not be subjected to delinquency fees and accrued, unpaid renewal fees if they choose to restore their license to active status or obtain a retired-volunteer status. As this aligned with the Subcommittee's intent, the Subcommittee made a minor tweak to the proposal for clarity.

In addition, the stakeholders suggested there may be a better way to reference "animal control shelter or humane society." This terminology can be updated during the meeting depending on whether the Board would like to extend to non-profit organizations.

The stakeholders wanted to make sure veterinarians and RVTs with the retired-volunteer status would be able to be reimbursed for any travel expenses. The Subcommittee believes reimbursement for travel expenses are not the same as payment for services. As such, no changes are necessary.

Action Requested:

If the MDC agrees with the Subcommittee's recommendation, please entertain a motion to recommend to the Board submission to the California State Legislature the attached legislative proposal to add BPC sections 4846.3, 4846.4, and 4848.2, amend BPC sections 4827, 4858, 4858.1, 4858.2, 4900, 4901, 4902, and 4905, and repeal BPC sections 4843.5 and 4844.

Attachment:

1. Legislative Proposal to Add BPC Sections 4846.3, 4846.4, and 4848.2, Amend BPC Sections 4827, 4858, 4858.1, 4858.2, 4900, 4901, 4902, and 4905, and Repeal BPC Sections 4843.5 and 4844 Regarding Veterinary Medicine Practice Exemptions, Retired and Retired Volunteer Statuses, and Shelter Veterinarian Licenses

CALIFORNIA VETERINARY MEDICAL BOARD

LEGISLATIVE PROPOSAL TO ADD BUSINESS AND PROFESSIONS CODE (BPC) SECTIONS 4846.3, 4846.4, AND 4848.2, AMEND BPC SECTIONS 4827, 4858, 4858.1, 4858.2, 4900, 4901, 4902, AND 4905, AND REPEAL BPC SECTIONS 4843.5 AND 4844 REGARDING VETERINARY MEDICINE PRACTICE EXEMPTIONS, RETIRED AND RETIRED VOLUNTEER STATUSES, AND SHELTER VETERINARIAN LICENSES

Additions are shown in single underlined text, and deletions are shown in single strikethrough text.

4827. (a) Nothing in this chapter prohibits any person from:

(1) (A) Practicing veterinary medicine as a bona fide owner of one's own animals, except for the procedures specified in Section 4826.8. This exemption applies to the following:

(A*i*) The owner's bona fide employees.

(A*ii*) Any person assisting the owner, provided that the practice is performed gratuitously.

(B) The exemption authorized under subparagraph (A) does not include a dental or surgical operation upon an animal under subdivision (d) of Section 4826.

(C) For purposes of this paragraph, "surgical operation" means any procedure performed on an animal in which the skin or tissue of the animal is penetrated or severed, but does not include:

(i) Administration of injectable drugs.

(ii) Artificial insemination.

(iii) Castrating male livestock or dehorning or branding animals.

(iv) Insertion of a microchip for identifying an animal.

(v) Ear tag or tattoo placement for identifying an animal.

(vi) Venipuncture for diagnostic purposes.

[...]

4843.5. ~~Except as otherwise provided in this article, an expired certificate of registration may be renewed at any time within five years after its expiration on filing of an application for renewal on a form prescribed by the board, and payment of all accrued and unpaid renewal fees. If the certificate of registration is renewed more than 30 days~~

after its expiration, the registrant, as a condition precedent to renewal, shall also pay the delinquency fee prescribed by this article. Renewal under this section shall be effective on the date on which the application is filed, on the date all renewal fees are paid, or on the date on which the delinquency fee, if any, is paid, whichever occurs last.

be effective on the date on which the application is filed, on the date all renewal fees are paid, or on the date on which the delinquency fee, if any, is paid, whichever occurs last.

4844. A person who fails to renew his certificate of registration within five years after its expiration may not renew it, and it shall not be restored, reissued, or reinstated thereafter, but that person may apply for and obtain a new certificate of registration if:

(a) He or she is not subject to denial of registration under Section 480.

(b) No fact, circumstance, or condition exists which, if the certificate of registration were issued, would justify its revocation or suspension.

(c) He or she takes and passes the examination, if any, that would be required of him or her if he or she were then applying for a certificate of registration for the first time, or otherwise establishes to the satisfaction of the board that, with due regard for the public interest, he or she is qualified to be a registered veterinary technician.

(d) He or she pays all of the fees that would be required of him or her if he or she were applying for the certificate of registration for the first time.

The board may, by regulation, provide for the waiver or refund of all or any part of the examination fee when a certificate of registration is issued without an examination pursuant to this section.

4846.3. (a) To obtain a retired status, a veterinarian or registered veterinary technician shall complete a board provided application and pay the applicable fee specified in Section 4905.

(b) A retired status shall not be granted while there is a pending complaint, investigation, or enforcement action against the licensee or registrant, or the license or registration is revoked, surrendered, or subject to terms and conditions of probation.

(c) A licensee or registrant with retired status shall not practice veterinary medicine.

(d) A licensee or registrant with retired status shall utilize their professional title only with the unabbreviated word "retired" directly preceding or directly following the professional title.

(e) The board may investigate potential violations or take action against a license or registration in retired status for a violation of this chapter.

(f) A licensee or registrant with retired status shall be exempt from renewal requirements and shall not be subject to delinquency fees or accrued and unpaid renewal fees pursuant to Section 121.5.

4846.4. (a) To obtain a retired volunteer status, a veterinarian or registered veterinary technician shall meet the following requirements:

(1) Complete a board provided application.

(2) Certify that the sole purpose of the retired volunteer status is to provide voluntary, unpaid veterinary medical services to an animal control shelter or humane society.

(3) Pay the applicable fee specified in Section 4905.

(4) Disclose each state, Canadian province, or United States territory in which the applicant currently holds or has ever held a license, registration, permit, or certificate to practice veterinary medicine. License, registration, permit, or certificate verification, including any disciplinary or enforcement history, shall be confirmed through electronic means or direct submission from each state, Canadian province, or United States territory in which the applicant has identified the applicant holds or has ever held a license, registration, permit, or certificate to practice veterinary medicine.

(5) Hold one of the following:

(A) A California license or registration that is active or was placed in retired or expired status within the last five years.

(B) A California license or registration placed in retired or expired status more than five years ago or a veterinarian license or veterinary technician registration in any state, Canadian province, or United States territory. Applicants applying under this subparagraph shall also meet the following:

(i) Submit a full set of fingerprints for the purpose of conducting a criminal history record check and undergo a state and federal criminal offender record information search conducted through the Department of Justice, pursuant to subdivision (u) of Section 11105 of the Penal Code. The Department of Justice shall provide a state or federal response to the board pursuant to paragraph (1) of subdivision (p) of Section 11105 of the Penal Code.

(ii) Certify completion of the required number of continuing education hours pursuant to Article 3.1.

(iii) For veterinarians, pass an examination administered by the board concerning the statutes and regulations of this chapter pursuant to subparagraph (B) of paragraph (5) of subdivision (a) of Section 4846.

(b) The application for retired volunteer status shall be subject to denial pursuant to Sections 480 and 4883.

(c) An application for retired volunteer status shall not be granted while there is a pending complaint, investigation, or enforcement action against the licensee or registrant.

(d) A licensee or registrant with retired volunteer status shall not practice veterinary medicine in any circumstance other than for an animal control shelter or humane society or pursuant to Sections 4826.1, 4826.4, 4840.5, or 4840.6, as applicable. A licensee or registrant with retired volunteer status shall only practice veterinary medicine within their scope of practice authorized by this chapter.

(e) In addition to complying with the renewal requirements specified in Section 4900, the licensee or registrant with retired volunteer status shall certify that the sole purpose of the retired volunteer status is to provide voluntary, unpaid veterinary medical services for an animal control shelter or humane society.

(f) An out-of-state veterinarian license or veterinary technician registration with retired volunteer status pursuant to subparagraph (B) of paragraph (5) of subdivision (a) shall not qualify for license restoration under Sections 4901 or 4902.

4848.2. (a) An individual engaged in the practice of veterinary medicine, as defined in Section 4826, as a veterinarian for an animal control shelter or humane society shall hold a shelter veterinarian license issued pursuant to this section or a license to practice veterinary medicine issued pursuant to Section 4846.

(b) To obtain a shelter veterinarian license, an individual shall meet the following requirements:

(1) Be employed by or contract with an animal control shelter or humane society to provide veterinary medical services.

(2) Complete a board approved application.

(3) Certify that the sole purpose of the shelter veterinarian license is to practice veterinary medicine for an animal control shelter or humane society.

(4) Pay the applicable fee specified in Section 4905.

(5) Submit a full set of fingerprints for the purpose of conducting a criminal history record check and undergo a state and federal criminal offender record information

search conducted through the Department of Justice, pursuant to subdivision (u) of Section 11105 of the Penal Code. The Department of Justice shall provide a state or federal response to the board pursuant to paragraph (1) of subdivision (p) of Section 11105 of the Penal Code.

(6) Pass an examination concerning the statutes and regulations of this chapter, administered by the board, pursuant to subparagraph (B) of paragraph (5) of subdivision (a) of Section 4846.

(7) Disclose each state, Canadian province, or United States territory in which the applicant currently holds or has ever held a license, registration, permit, or certificate to practice veterinary medicine. License, registration, permit, or certificate verification, including any disciplinary or enforcement history, shall be confirmed through electronic means or direct submission from each state, Canadian province, or United States territory in which the applicant has identified the applicant holds or has ever held a license, registration, permit, or certificate to practice veterinary medicine.

(8) Hold a current, valid veterinarian license in any state, Canadian province or United States territory.

(c) A shelter veterinarian license:

(1) Shall be subject to denial, revocation, or suspension pursuant to Sections 480 and 4883.

(2) May be renewed if all of the following are met:

(A) License renewal provisions in Section 4900.

(B) Payment of the renewal fee pursuant to Section 4905.

(C) Completion of continuing education required under Article 3.1 (commencing with Section 4858).

(D) Certification that the sole purpose of the shelter veterinarian license is to practice veterinary medicine for an animal control shelter or humane society.

(d) A shelter veterinarian licensee shall not practice veterinary medicine in any circumstance other than for an animal control shelter or humane society or pursuant to Section 4826.1 or 4826.4.

4858. (a) Except for the first renewal period, all holders of veterinarian licenses and veterinary technician registrations issued under the provisions of this chapter shall obtain continuing education relevant to developments in the practice of veterinary medicine.

(b) A person applying for renewal or restoration of their license or registration into active status shall certify, under penalty of perjury, that they are in compliance with this article, as applicable.

[...]

4858.1. (a) The board shall issue renewed or restored veterinarian licenses only to those applicants who have completed a minimum of 36 hours of continuing education in the preceding two years.

[...]

4858.2. (a) The board shall issue renewed or restored veterinary technician registrations only to those applicants who have completed a minimum of 20 hours of continuing education in the preceding two years.

[...]

4900. (a) All veterinary~~veterinarian~~ licenses, veterinary technician registrations, and veterinary assistant controlled substance permits, shall expire at 12 midnight of the last day of the month in which the license was issued during the second year of a two-year term if not renewed.

(b) (1) All premises registrations shall expire annually at 12 midnight of the last day of the month in which the license premises registration was issued, unless renewed.

(2) To renew a premises registration, the premises registration holder shall satisfy the requirements of subdivisions (c), (d), and (e) of Section 4853 and confirm that the information provided to the Board is current and valid.

(c) To renew an unexpired license, registration, or permit, the licensee, registrant, or permitholder shall, on or before the date of expiration of the license or registration, apply for renewal on a form provided by the board, accompanied by the prescribed renewal fee. The renewal application shall contain a statement to the effect that the applicant has not been convicted of a felony or misdemeanor, has not been the subject of professional disciplinary action taken by any public agency in California or any other state or territory, and has not violated any of the provisions of this chapter. If the applicant is unable to make that statement, the application shall contain a statement of the conviction, professional discipline, or violation.

(d) Each licensee, registrant, and permitholder who has an electronic mail address shall report to the board that electronic mail address during the time of renewal and confirm that the electronic mail address and address of record is current and valid. The electronic mail address shall be considered confidential and not subject to public disclosure.

4901. Except as otherwise provided in this chapter, an expired or retired license, or registration, or permit may be renewed or restored to active status at any time within

five years after its expiration ~~or by filing of~~ an application for renewal or restoration on a form prescribed by the board, and payment of ~~paying~~ all accrued and unpaid renewal fees ~~or the restoration fee, and complying with the continuing education requirements pursuant to Article 3.1 (commencing with Section 4858)~~. If the license, or registration, or permit is renewed more than 30 days after its expiration, the licensee, or registrant, or permitholder as a condition precedent to renewal, shall also pay the delinquency fee prescribed by this chapter. Renewal or restoration to active status under this section shall be effective on the date on which the application is filed, on the date on which all renewal fees are paid, or on the date on which the delinquency fee, if any, is paid, whichever last occurs ~~all renewal or restoration requirements, as applicable, are satisfied~~. If so renewed or restored to active status, the license, or registration or permitholder shall continue in effect through the expiration date as provided in Section 4900 that next occurs after the effective date of the renewal, when it shall expire if it is not again renewed.

4902. (a) A license, registration, or permit that is not renewed within five years after its expiration shall be canceled and shall not be renewed, restored, reissued, or reinstated, ~~unless the licensee, registrant, or permitholder thereafter, but the licensee, registrant, or permitholder may apply for and obtain a new license, registration, or permit if the person applies for a license, registration, or permit as a new applicant and meets all of the requirements for initial issuance of the license, registration, or permit.~~

(b) A license or registration that has been assigned retired status pursuant to Section 4846.3 for five years or more shall not be restored to active status unless the licensee or registrant meets all of the requirements for initial issuance of the license or registration.

4905. (a) For purposes of this section, the following definitions apply:

[...]

(b) The following fees shall be collected by the board and shall be credited to the California Veterinary Medical Board Contingent Fund:

[...]

(21) The application fee for retired status of a veterinarian license or veterinary technician registration shall be no less than twenty-five dollars (\$25) and not exceed fifty dollars (\$50).

(22) The application fee for retired volunteer status shall be no less than fifty dollars (\$50) and not exceed one hundred dollars (\$100).

(23) The biennial renewal fee for a license or registration with retired volunteer status shall be no less than fifty dollars (\$50) and not exceed one hundred dollars (\$100).

(24) The fee to restore a license or registration from retired status or retired volunteer status to active status shall be no less than fifty dollars (\$50) and not exceed one hundred dollars (\$100).

(25) The shelter veterinarian license application fee shall be no less than three hundred fifty dollars (\$350) and not exceed five hundred forty dollars (\$540).

(26) The initial shelter veterinarian license fee shall be no less than five hundred dollars (\$500) and not exceed eight hundred dollars (\$800).

(27) The biennial shelter veterinarian license renewal fee shall be no less than five hundred dollars (\$500) and not exceed eight hundred dollars (\$800).