

MEMORANDUM

DATE	October 1, 2026
TO	California Veterinary Medical Board (Board)
FROM	Justin Sotelo, Policy Specialist
SUBJECT	Agenda Item 7. Update and Discussion on Pending Regulations

Regular Rulemaking Process

A regular rulemaking package moves through the following phases:

- **Concept Phase:** a program identifies the need for a new regulation or a need for clarification or revisions to an existing regulation.
- **Production Phase:** the preparation of an entire rulemaking package for initial approval by the Department of Consumer Affairs (DCA) and the California Business and Consumer Services Agency (Agency)¹ and initial submission to the Office of Administrative Law (OAL).
- **Initial Filing Phase:** upon initial approval by Agency, submission of rulemaking package to OAL for publication and public comment.
- **Final Filing Phase:** the preparation of the final rulemaking package for final DCA, Agency, and Department of Finance (if there is a fiscal impact) approvals and submission to OAL for final approval.

Five regular rulemaking packages are pending in various phases of the rulemaking process, as described in more detail below.

1. Records—California Code of Regulations (CCR), Title 16, Section 2032.3

Phase: Production

Summary: This regulatory proposal would:

¹ As of July 1, 2026, the Business, Consumer Services and Housing Agency was reorganized into two agencies – the California Housing and Homelessness Agency (CHHA) and the California Business and Consumer Services Agency (BCSA). DCA became a department under BCSA, which reviews Board rulemaking packages.

1. Clearly define two sets of requirements for animal patient medical records – individual animal patient records and group of animal patient records;
2. Change 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; and
3. Make record keeping requirements less prescriptive and allow veterinarians, in their professional judgment and in accordance with generally accepted standards for practice in the community, the flexibility to add other types of information besides the Board-mandated content.

Status: Corresponding legislative amendments to Business and Professions Code (BPC) sections [4826.6](#) and [4855](#) were included in the Board’s Sunset Bill, Assembly Bill (AB) [1502](#) (Berman, Chapter 195, Statutes of 2025), which was approved by Governor Gavin Newsom on October 1, 2025. These amendments became effective on January 1, 2026.

As a result of the legislative amendments, this regulatory package is in the production phase of the rulemaking process. Since the July 2026 Board meeting, the package was approved by DCA’s Acting Director on September 13, 2026. On September 14, 2026, the package was sent to Agency for review. Upon Agency approval, the package will be submitted to OAL for publication and to begin the 45-day public comment period (initial filing phase).

2. Licensing and Registration Examinations—CCR, Title 16, Sections 2014, 2015, and 2015.2

Phase: Production

Summary: This regulatory proposal would repeal CCR, title 16, sections 2014, 2015, and 2015.2. Section 2014 (previously, CCR, title 16, section 2014, subsection (b)), which deals with the grading method for the national veterinarian examination, and section 2015.2, which deals with the administration of the Veterinary Law Examination (VLE), were originally proposed to be repealed via a Section 100 rulemaking package in 2025; however, they were deemed substantive by OAL and, therefore, had to be excluded from the Section 100 package.

Prior to the April 2025 Board meeting, it was also determined that CCR, title 16, section 2015 could be repealed for the following reasons: 1) BPC section 4846 sufficiently ensures veterinarian license applicants have demonstrated they are competent to practice regardless of the period between the national examination and the VLE; and 2) subsections (c), (d), and (e) are obsolete (due to the elimination of the California examinations) and should have previously been repealed in the Section 100 rulemaking package, as there are no longer two examinations (national/California) to mark the beginning and end of the 60-month period before applicants are required to retake and pass all examinations.

Status: This regulatory package is currently in the production phase of the rulemaking process. Since the July 2026 Board meeting, the package was approved by DCA's Acting Director on August 30, 2026. The package was then sent to Agency for review on September 1, 2026, and was approved on September 28, 2026. On September 29, 2026, the package was submitted to OAL for publication and to begin the 45-day public comment period (initial filing phase) on October 9, 2026. The comment period will conclude on November 23, 2026.

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

Phase: Production

Summary: This regulatory proposal was also contingent on the approval and enactment of legislative changes - amending BPC section [4875.2](#) and adding section [4875.7](#) regarding unlicensed practice citations (also included in AB [1502](#)), which became effective on January 1, 2026. This proposal would remove references to unlicensed practice citations, as there will no longer be a need for unlicensed practice citations to be assigned a classification, as a result of the legislative changes.

Status: This regulatory package is in the production phase of the rulemaking process. Since the July 2026 Board meeting, the package was approved by DCA's Acting Director on August 30, 2026. On September 1, 2026, the package was sent to Agency for review and was approved on September 30, 2026. On October 6, 2026, the package will be submitted to OAL for publication and to begin the 45-day public comment period (initial filing phase) on October 16, 2026. The comment period is anticipated to conclude on November 30, 2026.

4. Registered Veterinary Technician (RVT) Pathways—CCR, Title 16, Sections 2068.5 and 2068.6

Phase: Production

Summary: The Board tasked the Multidisciplinary Advisory Committee's (MDC) RVT Subcommittee with evaluating all RVT registration pathways and making recommendations to the MDC and the Board. As a result, regulatory proposals to amend CCR, title 16, section 2068.5 and repeal section 2068.6 were approved by the Board in January and July of 2025. Prior to the July 2025 Board meeting, it was determined that the proposals would be merged into one regulatory package.

Together, the proposals would: address concerns related to “qualified instructors,” the number and location of required clinical practice hours for RVT applicants, supervising veterinarian license requirements, and how supervising veterinarians attest to the clinical practice experience of RVT applicants; and, eliminate the

experience only pathway for RVT registration that currently only exists for out-of-state applicants.

Status: This regulatory package is in the production phase of the rulemaking process. Since the July 2026 Board meeting, the package was approved by DCA's Acting Director on September 13, 2026. On September 14, 2026, the package was sent to Agency for review. Upon Agency approval, the package will be submitted to OAL for publication and to begin the 45-day public comment period (initial filing phase).

5. Handling Animal Remains—CCR, Title 16, Section 2030.1

Phase: Production

Summary: This regulatory proposal would:

1. Shift responsibility for retaining a deceased animal from the individual veterinarian to the veterinary premises, update terminology to "deceased animal," and clarify that the 14-day holding period begins when the veterinary premises documents its attempt to contact the client;
2. Prohibit cremation or any unauthorized use of remains during the holding period without the client's explicit consent;
3. Establish standardized labeling, identification, and tracking requirements for deceased animals to prevent mislabeling or mishandling;
4. Create a mandatory transfer-of-custody log for remains sent to cremation or other services and require the veterinary premises to retain this log for three years;
5. Require veterinary premises to inform clients of alternative disposition options and release remains to the client's chosen service, if requested; and
6. Require veterinary premises to retain cremains for at least six months after attempting to contact the client, after which unclaimed cremains may be disposed of.

Status: This regulatory package is in the production phase of the rulemaking process. Since the July 2026 Board meeting, the package was approved by DCA's Acting Director on September 13, 2026. On September 14, 2026, the package was sent to Agency for review. We anticipate Agency approval by early October. Upon Agency approval, the package will be submitted to OAL for publication and to begin the 45-day public comment period (initial filing phase).

Attachment

1. Status of Pending Board Regulations – Updated October 1, 2026

Status of Pending CVMB 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 Public 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
Records	Production Phase	06/26/2023 08/29/2023	07/24/2024	04/23/2026	06/12/2026	09/13/2026	Submitted: 09/14/2026										
Licensing and Registration Examinations	Production Phase	N/A	04/16/2025	04/23/2026	05/19/2026	08/30/2026	Submitted: 09/01/2026 Approved: 09/28/2026	Submitted: 09/29/2026 To Be Published: 10/09/2026	10/09/2026 through 11/23/2026								
Civil Penalties for Citation	Production Phase	09/16/2024 11/18/2024	01/15/2025	05/08/2026	05/29/2026	08/30/2026	Submitted: 09/01/2026 Approved: 09/30/2026	Plan to submit 10/6/2026 To be published: 10/16/2026	10/16/2026 through 11/30/2026								
RVT Pathways: Out of State Registration as Equivalent (Repeal CCR 2068.6) Education and Clinical Practice Experience (CCR 2068.5)	Production Phase Merged with revised CCR 2068.5 proposal	09/16/2024 11/18/2024	1/15/2025 (Repeal CCR 2068.6) Revised CCR 2068.5 proposal approved by Board at July 2025 meeting	06/15/2026	07/29/2026	09/13/2026	Submitted: 09/14/2026	Red Text = Updates since last meeting = Completed = Current Status/ Pending									
Handling Animal Remains	Production Phase	04/15/2026	04/15/2026	06/03/2026	07/01/2026	09/13/2026	Submitted: 09/14/2026										