



LOUISIANA BOARD OF VETERINARY MEDICINE

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April 25, 2025

Senator J. Cameron Henry, Jr.
President, Louisiana Senate
Via Email: APA.SenatePresident@legis.la.gov

**Electronic Mail – Delivery
Receipt Requested**

RE: Report No. 2 of 2 for Regulatory Project 2024-10
~ LAC 46LXXXV.301, 801, & 1201
~ Licensing Procedures

Dear Senator Henry:

In accordance with the provisions of the Administrative Procedure Act, the Board of Veterinary Medicine published the first Notice of Intent related to proposed amendments to LAC 46LXXXV.301, 801, and 1201 in the December 20, 2024 edition of the *Louisiana Register*. These amendments are proposed under the authority of the Louisiana Veterinary Practice Act, La. R.S. 37:1518, et seq and are fully explained in the Notice of Intent and Fiscal and Economic Impact Statement.

The period for submission of public comments was December 21, 2024 to January 9, 2025 during which time the Board received no public comments and no requests for a public hearing. The Notice of Intent was subsequently submitted on February 18, 2025 to the Department of Justice's Occupational Licensing Review Program (OLRP) for review. A favorable DOJ Opinion was received on April 23, 2025 from the OLRP review along with approval to move forward in the rulemaking process.

Pending no legislative oversight recommendations by either the House or Senate Agriculture, Forestry, Aquaculture, and Rural Development Committees, the Board intends to submit the Final Rule to the Office of the State Register for publication in the June 20, 2025 issue of the *Louisiana Register*.

Included in this Summary Report for Regulatory Project 2024-10 are the following documents:

- Notice of Intent
- Fiscal and Economic Impact Statement
- Opinion received from Department of Justice's OLRP

Please contact me directly at director@lsbvm.org or 225-925-6620 if the board may be of any assistance to you concerning this rule. More details regarding all rulemaking activity by the board may be found on the board's website at www.lsbvm.org/rulemaking.

For the Board:

Jared B. Granier, MBA
Executive Director

CC: Speaker, House of Representatives - Via Email: APA.HouseSpeaker@legis.la.gov
Chair, Senate Agriculture Committee - Via Email: APA.s-agri@legis.la.gov
Chair, House Agriculture Committee - Via Email: APA.h-agri@legis.la.gov
Commissioner of Agriculture, LDAF – Via Email: commissioner@ldaf.state.la.us
Editor, *Louisiana Register* - Via Email: Reg.Submission@la.gov
President, LBVM – Via Email: lfindley@lsbvm.org
Legal Counsel, LBVM – Via Email: shvogt@bellsouth.net

NOTICE OF INTENT

Department of Agriculture and Forestry Board of Veterinary Medicine

Licensing Procedures (LAC 46:LXXXV.301, 801, & 1201)

In accordance with the Administrative Procedure Act, R.S. 49:953 et seq., the Louisiana Board (“Board”) of Veterinary Medicine has amended LAC 46:LXXXV. Sections 301, 801, and 1201 in Chapters 3, 8 and 12 – respectively – in an effort to provide greater uniformity and clarity to the application for licensure language for veterinarians (DVMs), registered veterinary technicians (RVTs), and certified animal euthanasia technicians (CAETs). The amendments to sections 301.F, 801.F, and 1201.E changed the length of time for which an application is valid from two years to one year from the initial application submission date. The Board determined that this amendment is reasonable due to several changes which have accelerated the application process including: the Board’s transition to an online application process; the establishment of an online testing option for the required state jurisprudence exam; the repeal of the letters of recommendation requirement for licensure; the repeal of the eight-week preceptorship program requirement for DVM licensure; the addition of three total CAET trainings annually; and, the addition of a third testing window annually for the national exam (NAVLE) for DVMs.

Title 46

PROFESSIONAL AND OCCUPATIONAL STANDARDS

Part LXXXV. Veterinarians

Chapter 3. Licensure Procedures

§301. Applications for Licensure

A. The application for licensure to practice veterinary medicine in the state of Louisiana shall contain the information set forth in R.S. 37:1520.A, and shall include certification that the applicant has not practiced veterinary medicine in this state without a license, temporary permit, or exception from licensure as provided by R.S. 37:1514.

B. In addition to the above requirements, the board may also require that any applicant furnish the following information or documentation:

1. a current passport-type photograph of the applicant;
2. a copy of the applicant's diploma or official transcript from a veterinary medical school or college accredited or approved by the American Veterinary Medical Association;
3. prior to licensure in Louisiana, a graduate from a DVM program not accredited by the AVMA must provide to the board proof of completion of the Educational Commission for Foreign Veterinary Graduates (ECFVG) program offered through the American Veterinary Medical Association (AVMA) or

the Program for the Assessment of Veterinary Education Equivalence (PAVE) program offered through the American Association of Veterinary State Boards (AAVSB).

4. the certified score on any national examinations previously taken by the applicant;

5. a list of all licenses in a state, territory, or district of the United States or Canada that the applicant currently holds and has previously held;

6. certification from the applicant stating that he has not been convicted, pled guilty, or pled nolo contendere to either a felony or misdemeanor other than minor traffic violations, and, in the event that the applicant is unable to so certify, the board may require the applicant to explain in full and/or provide further documentation;

7. certification from the applicant stating that he has not been arrested or indicted for or been convicted, pled guilty, or pled nolo contendere to either a felony or misdemeanor, other than minor traffic violations; and, in the event that the applicant is unable to so certify, the board may require the applicant to explain in full and/or provide further documentation;

8. certification from the applicant stating that he has never had his or her license to practice veterinary medicine revoked, suspended or denied in any state, territory, or district of the United States; and, in the event that the applicant is unable to so certify, the board may request or require full explanation and/or documentation concerning such revocation, suspension, or denial;

C. The board may require such application to be sworn to by the applicant, notarized, or attested to by the applicant under penalty of perjury.

D. The board may reject any applications which do not contain full and complete answers or information as requested, and may reject any application, or take action against the license of any licensee, if any of the information furnished in the application is fabricated, false, misleading or incorrect.

E. The board shall reject the application of an applicant who has practiced veterinary medicine in this state without a license, temporary permit, or exception from licensure as provided by R.S. 37:1514, during the one-year period immediately prior to the initial application submission date.

F. An application shall become expired if not completed by the issuance of a license within one year from the initial application submission date. Once expired, the entire application process, including the payment of all applicable fees, shall begin anew.

AUTHORITY NOTE: Promulgated in accordance with R.S. 37:1518 et seq.

HISTORICAL NOTE: Promulgated by the Department of Health and Human Resources, Board of Veterinary Medicine, LR 8:66 (February 1982), amended LR 10:464 (June 1984), amended by the Department of Health and Hospitals, Board of Veterinary Medicine, LR 16:223 (March 1990), LR 19:343 (March 1993); LR 23:964 (August 1997), LR 25:2231 (November 1999), LR 28:1982 (September 2002), LR 40:308 (February 2014), LR 49:2074 (December 2023), amended by the Department of Agriculture and Forestry, Board of Veterinary Medicine, LR 50:

Chapter 8. Registered Veterinary Technicians

§801. Applications for Certificate of Approval

A. The application for a certificate of approval for a registered veterinary technician in the state of Louisiana shall contain the information set forth in R.S. 37:1543 and shall include certification that the applicant has not practiced veterinary medicine or veterinary technology in this state without a certificate of approval.

B. In addition to the above requirements, the board may also require that any applicant furnish all of the following information or documentation:

1. a current passport-type photograph of the applicant;

2. a copy of the applicant's diploma or official transcript from the veterinary technology school of graduation;

3. the certified score on any national examinations previously taken by the applicant;

4. a list of all certificates or licenses in a state, territory, or district of the United States or Canada that the applicant currently holds and has previously held;

5. certification from the applicant stating that he has not been arrested or indicted for or been convicted, pled guilty, or pled nolo contendere to either a felony or misdemeanor, other than minor traffic violations; and, in the event that the applicant is unable to so certify, the board may require the applicant to explain in full and/or provide further documentation;

6. certification from the applicant stating that he has never had his or her certificate as a registered veterinary technician in veterinary medicine revoked, suspended or denied and, in the event that the applicant is unable to so certify, the board may request or require full explanation and/or documentation concerning such revocation, suspension, or denial;

7. certification from the applicant stating that he has not violated or been subject to any of the grounds for denial of a certificate of approval as listed in R.S. 37:1544;

C. The board may require such application to be sworn to by the applicant, notarized, or attested to by the applicant under penalty of perjury.

D. The board may reject any applications which do not contain full and complete answers or information as requested and may reject any application, or take action against the certificate of approval of any registered veterinary technician, if any information furnished in the application is fabricated, false, misleading, or incorrect.

E. The board shall reject the application of an applicant who has practiced veterinary medicine or veterinary technology in this state without a certificate of approval during the one-year period immediately prior to the initial application submission date.

F. An application shall become expired if not completed by issuance of a certificate within one year from the initial application submission date. Once expired, the entire application process, including the payment of all applicable fees, shall begin anew.

AUTHORITY NOTE: Promulgated in accordance with R.S. 37:1549.

HISTORICAL NOTE: Promulgated by the Department of Health and Hospitals, Board of Veterinary Medicine, LR 16:226 (March 1990), amended LR 40:309 (February 2014), LR 49:2074 (December 2023), amended by the Department

Chapter 12. Certified Animal Euthanasia Technicians

§1201. Applications for Certificate of Approval

A. The application for a certificate of approval to perform euthanasia in the state of Louisiana shall contain the information set forth in R.S. 37:1553, and shall include certification that the applicant has not performed euthanasia in this state without a certificate of approval.

B. In addition to the above requirements, the board may also require that any applicant furnish the following information or documentation:

1. a current passport-type photograph of the applicant;

2. a copy of an official birth certificate or a copy of a current driver's license as proof of attaining the age of 18 years in order to commence the application process, attend the required training course, sit for the certification examination and receive certification as a CAET or Lead CAET;

3. an official transcript of the applicant's high school records or photocopy of the applicant's high school diploma or GED or an official transcript or copy of a diploma indicating attendance at an institution of higher learning;

4. unless otherwise already in possession of the board, evidence that the applicant has successfully completed a board-approved program in animal euthanasia, which shall include instruction in the proper methods of humanely euthanizing animals by injecting legal drugs in accordance with rules adopted by the board, in proper security precautions, in proper record keeping, and related skills identified by the board.

5. a list of all professional certificates or licenses that the applicant currently holds and has previously held;

6. certification by the applicant that he has never been convicted, pled guilty or pled nolo contendere to either a felony or misdemeanor, other than a minor traffic violation. In the event that the applicant is unable to so certify, the board shall require the applicant to explain in full and/or provide further documentation;

7. certification by the applicant that he has never had certification as a certified animal euthanasia technician revoked, suspended, or denied. In the event that the applicant is unable to so certify, the board shall require the applicant to explain in full and/or provide further documentation;

8. a release waiver form to authorize a background check regarding the applicant's history with dangerous and/or controlled substances to be performed by the Drug Enforcement Administration or other law enforcement agency at the board's request. A photostatic copy of the applicant's authorization is accepted with the same authorization as the original. The background check must be successfully passed, which means that the Drug Enforcement Administration or other law enforcement agency has indicated to the board that the applicant has no previous criminal convictions involving dangerous and/or controlled substances;

9. certification by the applicant that he has not violated or been subject to any of the grounds for denial of a certificate of approval as listed in R.S. 37:1554;

C. The board may require such application to be sworn to by the applicant, notarized, or attested to by the applicant under penalty of perjury.

D. The board may reject any applications which do not contain full and complete answers and/or information as requested and may reject any application, or take action against the certificate of approval of any certified animal euthanasia technician, if any information furnished in the application is fabricated, false, misleading, or incorrect.

E. The board shall reject the application of an applicant who has practiced veterinary medicine, veterinary technology, or euthanasia technology with sodium pentobarbital in this state without a certificate of approval during the one-year period immediately prior to the initial application submission date.

F. An application shall become expired if not completed by issuance of a certificate within one year from the initial application submission date. Once expired, the entire application process, including the payment of all applicable fees and completion of a board-approved course in animal euthanasia, shall begin anew.

AUTHORITY NOTE: Promulgated in accordance with R.S. 37:1558.

HISTORICAL NOTE: Promulgated by the Department of Health and Hospitals, Board of Veterinary Medicine, LR 19:1424 (November 1993), amended LR 26:317 (February 2000), LR 29:1479 (August 2003), LR 38:357 (February 2012), LR 40:310 (February 2014), amended by the Department of Agriculture and Forestry, Board of Veterinary Medicine, LR 50:

Family Impact Statement

The proposed Rule should not have any known or foreseeable impact on family formation, stability, and autonomy. In particular, the proposed Rule has no known or foreseeable impact on:

1. the stability of the family;

2. the authority and rights of persons regarding the education and supervision of their children;
3. the functioning of the family;
4. family earnings and family budget;
5. the behavior and personal responsibility of children;
6. the ability of the family or a local government to perform the function as contained in the proposed Rule.

Poverty Impact Statement

The proposed Rule should not have any known or foreseeable impact on any child, individual or family as defined by R.S. 49:973(B). In particular, there should be no known or foreseeable effect on:

1. the effect on household income, assets, and financial security;
2. the effect on early childhood development and preschool through postsecondary education development;
3. the effect on employment and workforce development;
4. the effect on taxes and tax credits;
5. the effect on child and dependent care, housing, health care, nutrition, transportation, and utilities assistance.

Small Business Analysis and Impact Statement

The proposed Rule should have no adverse impact on small businesses as defined in the Regulatory Flexibility Act.

Provider Impact Statement

The proposed Rule should not have any known or foreseeable impact on providers as defined by HCR 170 of the 2014 Regular Legislative Session. In particular, there should be no known or foreseeable effect on:

1. the effect on the staffing level requirements or qualifications required to provide the same level of service;
2. the total direct and indirect effect on the cost to the providers to provide the same level of service; or
3. the overall effect on the ability of the provider to provide the same level of service.

Public Comments

Interested parties may submit written comments to the Louisiana Board of Veterinary Medicine, Attention: Jared B. Granier, Executive Director, via U.S Mail at 5825 Florida Blvd, Baton Rouge, LA 70806 or via e-mail attachment to director@lsbvm.org or via hand delivery. Comments will be accepted until 3:00 p.m. on Thursday, January 9, 2025. All written comments must be dated and must include the first and last name, email address, mailing address, phone number, and the original signature of the person submitting the comments.

Public Hearing

Interested parties may submit a written request to conduct a public hearing to the Louisiana Board of

Veterinary Medicine, Attention: Jared B. Granier, Executive Director, via U.S Mail at 5825 Florida Blvd, Baton Rouge, LA 70806 or via e-mail attachment to director@lsbvm.org or via hand delivery; however, such request must be received by no later than 3:00 p.m. on Thursday, January 9, 2025. If the criteria set forth in R.S. 49:953(A)(2)(a) are satisfied, a public hearing will be conducted at 1:00p.m. on Friday, January 24, 2025 at 5825 Florida Blvd, Baton Rouge, LA 70806. To confirm whether or not a public hearing will be held, interested parties should visit www.lsbvm.org/rulemaking-projects after Friday, January 10, 2025. If a public hearing is to be held, all interested parties are invited to attend and present data, views, comments, or arguments, orally or in writing. In the event of a hearing, parking is available to the public in front of the Department of Agriculture and Forestry Building at 5825 Florida Blvd, Baton Rouge, LA 70806.

Jared B. Granier
Executive Director

FISCAL AND ECONOMIC IMPACT STATEMENT FOR ADMINISTRATIVE RULES RULE TITLE: LAC 46:LXXXV.301, 801, 1201

I. ESTIMATED IMPLEMENTATION COSTS (SAVINGS) TO STATE OR LOCAL GOVERNMENTAL UNITS

There will be no costs or savings to state or local governmental units resulting from the proposed rule change, except for the cost associated with publishing, which is included in the annual operating budget of the Board of Veterinary Medicine (Board).

The proposed rule change provides greater uniformity and clarity to the application process for licensure language for veterinarians (DVMs), registered veterinary technicians (RVTs), and certified animal euthanasia technicians (CAETs) and changes the application lifespan from two years to one year.

II. ESTIMATED EFFECT ON REVENUE COLLECTIONS OF STATE OR LOCAL GOVERNMENTAL UNITS

The proposed rule change will not affect revenue collections for state or local governmental units.

III. ESTIMATED COSTS AND/OR ECONOMIC BENEFITS TO DIRECTLY AFFECTED PERSONS, SMALL BUSINESSES, OR NON-GOVERNMENTAL GROUPS

The proposed rule change will help expedite the application review process and the issuance of licenses by the Board by ensuring all necessary supplemental documentation is submitted from the applicants in a more timely manner. The change in the application lifespan from two years to one year is possible due to

several changes which have accelerated the overall application process including: the Board's transition to an online application process; the establishment of an online testing option for the required state jurisprudence exam; the repeal of the letters of recommendation requirement for licensure; the repeal of the eight-week preceptorship program requirement for DVM licensure; the addition of three total Board-offered CAET trainings annually; and, the addition of a third testing window annually for the national exam (NAVLE) for DVMs.

IV. ESTIMATED EFFECT ON COMPETITION AND EMPLOYMENT

The proposed rule change is anticipated to have no effect on competition or employment.

FISCAL AND ECONOMIC IMPACT STATEMENT
FOR ADMINISTRATIVE RULES

Person Preparing Statement:	Jared B. Granier	Dept:	Dept. of Agriculture & Forestry
Phone:	225-925-6620	Office:	Board of Veterinary Medicine
		Rule Title:	
Return Address:			LAC 46:LXXXV. 301, 801, & 1201
	5825 Florida Blvd	Date Rule Takes Effect:	Upon Promulgation
	Baton Rouge, LA 70806		

SUMMARY
(Use complete sentences)

In accordance with Section 961 of Title 49 of the Louisiana Revised Statutes, there is hereby submitted a fiscal and economic impact statement on the rule proposed for adoption, repeal or amendment. THE FOLLOWING STATEMENTS SUMMARIZE ATTACHED WORKSHEETS, I THROUGH IV AND WILL BE PUBLISHED IN THE LOUISIANA REGISTER WITH THE PROPOSED AGENCY RULE.

I. ESTIMATED IMPLEMENTATION COSTS (SAVINGS) TO STATE OR LOCAL GOVERNMENTAL UNITS (Summary)

There will be no costs or savings to state or local governmental units resulting from the proposed rule change, except for the cost associated with publishing, which is included in the annual operating budget of the Board of Veterinary Medicine (Board).

The proposed rule change provides greater uniformity and clarity to the application process for licensure language for veterinarians (DVMs), registered veterinary technicians (RVTs), and certified animal euthanasia technicians (CAETs) and changes the application lifespan from two years to one year.

II. ESTIMATED EFFECT ON REVENUE COLLECTIONS OF STATE OR LOCAL GOVERNMENTAL UNITS (Summary)

The proposed rule change will not affect revenue collections for state or local governmental units.

III. ESTIMATED COSTS AND/OR ECONOMIC BENEFITS TO DIRECTLY AFFECTED PERSONS, SMALL BUSINESSES, OR NON-GOVERNMENTAL GROUPS (Summary)

The proposed rule change will help expedite the application review process and the issuance of licenses by the Board by ensuring all necessary supplemental documentation is submitted from the applicants in a more timely manner. The change in the application lifespan from two years to one year is possible due to several changes which have accelerated the overall application process including: the Board's transition to an online application process; the establishment of an online testing option for the required state jurisprudence exam; the repeal of the letters of recommendation requirement for licensure; the repeal of the eight-week preceptorship program requirement for DVM licensure; the addition of three total Board-offered CAET trainings annually; and, the addition of a third testing window annually for the national exam (NAVLE) for DVMs.

IV. ESTIMATED EFFECT ON COMPETITION AND EMPLOYMENT (Summary)

The proposed rule change is anticipated to have no effect on competition or employment.


Signature of Agency Head or Designee


Legislative Fiscal Officer or Designee

Jared B. Granier, MBA, Executive Director
Typed Name & Title of Agency Head or Designee

11/08/2024
Date of Signature

12/04/2024
Date of Signature

**FISCAL AND ECONOMIC IMPACT STATEMENT
FOR ADMINISTRATIVE RULES**

The following information is required in order to assist the Legislative Fiscal Office in its review of the fiscal and economic impact statement and to assist the appropriate legislative oversight subcommittee in its deliberation on the proposed rule.

- A. Provide a brief summary of the content of the rule (if proposed for adoption, or repeal) or a brief summary of the change in the rule (if proposed for amendment). Attach a copy of the notice of intent and a copy of the rule proposed for initial adoption or repeal (or, in the case of a rule change, copies of both the current and proposed rules with amended portions indicated).

The proposed rule change provides greater uniformity and clarity to the application process for licensure language for veterinarians (DVMs), registered veterinary technicians (RVTs), and certified animal euthanasia technicians (CAETs) and changes the application lifespan from two years to one year.

- B. Summarize the circumstances which require this action. If the Action is required by federal regulation, attach a copy of the applicable regulation.

The Board has determined that this rule change is reasonable due to several changes which have accelerated the application process including: the Board's transition to an online application process; the establishment of an online testing option for the required state jurisprudence exam; the repeal of the letters of recommendation requirement for licensure; the repeal of the eight-week preceptorship program requirement for DVM licensure; the addition of three total CAET trainings annually; and, the addition of a third testing window annually for the national exam (NAVLE) for DVMs.

- C. Compliance with Act 11 of the 1986 First Extraordinary Session

- (1) Will the proposed rule change result in any increase in the expenditure of funds? If so, specify amount and source of funding.

No, the proposed rule change will not result in any increase in the expenditure of funds.

- (2) If the answer to (1) above is yes, has the Legislature specifically appropriated the funds necessary for the associated expenditure increase?

(a) _____ Yes. If yes, attach documentation.

(b) _____ NO. If no, provide justification as to why this rule change should be published at this time

FISCAL AND ECONOMIC IMPACT STATEMENT
WORKSHEET

I. A. COSTS OR SAVINGS TO STATE AGENCIES RESULTING FROM THE ACTION PROPOSED

1. What is the anticipated increase (decrease) in costs to implement the proposed action?

The only anticipated operating cost for implementation of the proposed rule change is that associated with publishing the proposed rule change, which is included in the Board's annual operating budget (estimated at \$750 in FY 25).

COSTS	FY 25	FY 26	FY 27
Personal Services	\$0	\$0	\$0
Operating Expenses	\$750	\$0	\$0
Professional Services	\$0	\$0	\$0
Other Charges	\$0	\$0	\$0
Equipment	\$0	\$0	\$0
Major Repairs & Constr.	\$0	\$0	\$0
TOTAL	\$750	\$0	\$0
POSITIONS (#)	0	0	0

2. Provide a narrative explanation of the costs or savings shown in "A. 1.", including the increase or reduction in workload or additional paperwork (number of new forms, additional documentation, etc.) anticipated as a result of the implementation of the proposed action. Describe all data, assumptions, and methods used in calculating these costs.

There will be no costs or savings to state or local governmental units, except for the cost associated with publishing the proposed rule amendment, which is included in the annual operating budget of the Board of Veterinary Medicine (Board), which is estimated at \$750 in FY 2025.

3. Sources of funding for implementing the proposed rule or rule change.

The Board operates on self-generated funds received through licensing and annual renewal fees.

SOURCE	FY 25	FY 26	FY 27
State General Fund	\$0	\$0	\$0
Agency Self-Generated	\$750	\$0	\$0
Dedicated	\$0	\$0	\$0
Federal Funds	\$0	\$0	\$0
Other (Specify)	\$0	\$0	\$0
TOTAL	\$750	\$0	\$0

4. Does your agency currently have sufficient funds to implement the proposed action? If not, how and when do you anticipate obtaining such funds?

Yes, the Board has sufficient funds to implement the proposed rule change.

B. COST OR SAVINGS TO LOCAL GOVERNMENTAL UNITS RESULTING FROM THE ACTION PROPOSED

1. Provide an estimate of the anticipated impact of the proposed action on local governmental units, including adjustments in workload and paperwork requirements. Describe all data, assumptions and methods used in calculating this impact.

There will be no anticipated impact on local governmental units from the proposed rule change.

2. Indicate the sources of funding of the local governmental unit, which will be affected by these costs or savings.

No funding of local governmental units will be affected from the proposed rule change.

FISCAL AND ECONOMIC IMPACT STATEMENT
WORKSHEET

II. EFFECT ON REVENUE COLLECTIONS OF STATE AND LOCAL GOVERNMENTAL UNITS

A. What increase (decrease) in revenues can be anticipated from the proposed action?

The proposed rule change will not affect revenue collections for state or local governmental units.

REVENUE INCREASE/DECREASE	FY 25	FY 26	FY 27
State General Fund	\$0	\$0	\$0
Agency Self-Generated	\$0	\$0	\$0
Dedicated	\$0	\$0	\$0
Federal Funds *	\$0	\$0	\$0
Other (Specify)	\$0	\$0	\$0
TOTAL	\$0	\$0	\$0

*Specify the particular fund being impacted.

B. Provide a narrative explanation of each increase or decrease in revenues shown in "A." Describe all data, assumptions, and methods used in calculating these increases or decreases.

There is no anticipated effect on revenue from the proposed rule change.

III. COSTS AND/OR ECONOMIC BENEFITS TO DIRECTLY AFFECTED PERSONS, SMALL BUSINESSES, OR NONGOVERNMENTAL GROUPS

A. What persons, small businesses, or non-governmental groups would be directly affected by the proposed action? For each, provide an estimate and a narrative description of any effect on costs, including workload adjustments and additional paperwork (number of new forms, additional documentation, etc.), they may have to incur as a result of the proposed action.

The proposed rule change will help expedite the application review process and the issuance of licenses by the Board by ensuring all necessary supplemental documentation is submitted from the applicants in a more timely manner. The change in the application lifespan from two years to one year is possible due to several changes which have accelerated the overall application process including: the Board's transition to an online application process; the establishment of an online testing option for the required state jurisprudence exam; the repeal of the letters of recommendation requirement for licensure; the repeal of the eight-week preceptorship program requirement for DVM licensure; the addition of three total Board-offered CAET trainings annually; and, the addition of a third testing window annually for the national exam (NAVLE) for DVMs.

B. Also provide an estimate and a narrative description of any impact on receipts and/or income resulting from this rule or rule change to these groups.

No revenue impact is anticipated resulting from the proposed rule change.

IV. EFFECTS ON COMPETITION AND EMPLOYMENT

Identify and provide estimates of the impact of the proposed action on competition and employment in the public and private sectors. Include a summary of any data, assumptions and methods used in making these estimates.

The proposed rule change will have no effect on competition or employment.



LIZ MURRILL
ATTORNEY GENERAL

STATE OF LOUISIANA
DEPARTMENT OF JUSTICE
OFFICE OF THE ATTORNEY GENERAL
P.O. BOX 94005
BATON ROUGE, LA
70804-9005

To: Mr. Jared B. Granier
Executive Director
Louisiana Board of Veterinary Medicine

From: Jessica Weimer, Section Chief
Louisiana Department of Justice
Occupational Licensing Review Program

Date: April 23, 2025

Subject: Louisiana State Board of Veterinary Medicine
Proposed Amendments to LAC 46:LXXXV.301, 801, 1201
Regarding: Licensing Procedures

I. Summary

The Louisiana Board of Veterinary Medicine (the “**Board**”) has proposed to amend LAC 46: LXXXV §§301, 801, and 1201 regarding Licensing Procedures (collectively the “**Proposed Amendments**”). The Board published a Notice of Intent to promulgate the Proposed Amendments in the Louisiana Register on December 20, 2024.¹ The notice invited written public comments and requests for oral presentation, argument, or a public hearing through January 9, 2025.² The Board did not receive any public comments or request for public hearing prior to the deadline.

Pursuant to La. R.S. 49:260, the Board submitted the Proposed Amendments to the Louisiana Department of Justice’s Occupational Licensing Review Program (the “**OLRP**”) on February 18, 2025. The OLRP reviews proposed occupational regulations of participating state occupational licensing boards.³ An Occupational Regulation is a “rule defined in the Administrative Procedure Act that has reasonably foreseeable anti-competitive effects. Any license, permit, or regulation established by a ... board not composed of a controlling number of active market participants is excluded.”⁴ The Louisiana Administrative Procedure Act (“**APA**”) defines a rule as an agency (Board) requirement for conduct or action prescribing the procedure or practice requirements of the agency (Board).⁵ Anti-Competitive behavior is an act, or series of acts, that have the effect of harming the market or the process of competition among businesses, or a tendency to reduce or eliminate competition, with no legitimate business purpose.⁶

¹ Louisiana Register, Vol 50, No 12 December 20, 2025 p. 1863-1865

² Id. P 1865

³ LA RS 49:260 (B)

⁴ LSA-R.S. 49:260 (G) (4)

⁵ LSA-R.S. 49:951 (8)

⁶ Black’s Law Dictionary, 12th Edition p. 116

The OLRP invited public comments on the Proposed Amendments February 19- February 26, 2025 and received no comments. As set forth below, the OLRP has determined the Board’s Proposed Amendments to LAC LXXXV §§301, 801, and 1201 regarding licensing procedures are within the Board’s statutory authority and adhere to clearly articulated state policy.

II. Analysis

A. The Board’s Statutory Authority

The Board is a state regulatory body created “to promote the public health, safety, and welfare by safeguarding the people of this state against incompetent, dishonest, or unprincipled practitioners of veterinary medicine.”⁷

The Board has been granted the statutory authority to adopt, amend, or repeal all rules and regulations necessary to serve its purpose, including establishing standards of professional conduct for the practice of veterinary medicine, in accordance with the provisions of the APA.⁸ Additionally, the Board shall examine and determine the qualifications and fitness of applicants for licensure to practice veterinary medicine.⁹ Any person seeking licensure to practice veterinary medicine must submit a written application to the Board of Veterinary Medicine indicating they are at least 21 years old, possess a degree from an accredited veterinary school, and be of good moral character.¹⁰ The application must include the required information and any additional documentation as prescribed by board rules along with the applicable fees set and published by the Board.¹¹ The statutory authority given to the Board through the Louisiana Veterinary Practice Law (LA R.S. 37:1511 et al.) for the purpose of enabling the Board to effectively supervise the practice of veterinary medicine are to be construed liberally to accomplish this objective.¹² The Board may revoke or suspend a license for fraud, misrepresentation, or deception in obtaining a license.¹³

B. Proposed LAC 46:LXXXV §301 – Licensure Procedure; Application for Licensure

Currently §301 (A) requires application be in writing along with the following requirements (§301(B)):

- Sworn affidavit that the applicant has not practiced veterinary medicine in Louisiana without a license, temporary permit, or valid exception from licensure for a 2 year period immediate prior to the date of application;
- Current passport type photograph of applicant;
- Copy of applicant’s diploma from an American Veterinary Medical Association (“AMVA”) accredited or approved school;
- Certified scores on any previous national or state examinations previously taken by the applicant;

⁷ LSA-R.S. 37:1511

⁸ LSA-R.S. 37:1518 (A)(9)

⁹ LSA-R.S. 37:1518 (A)(1)

¹⁰ LSA-R.S. 37:1520 (A)

¹¹ Id.

¹² LSA-R.S. 37:1518 (C)

¹³ LSA-R.S. 37:1527(A)(1)

- Certificate by applicant that the applicant does not have a criminal record, other than minor traffic violations (including arrests, indictments, convictions, guilty or nolo contendere pleas); and
- Certificate from applicant that he has never had his license to practice veterinary medicine revoked, suspended, or denied in any state, territory, or district of the United States.

The proposed amendment to §301(A) removes the requirement the application be written, and the two year period an applicant must certify they have not practiced Veterinary medicine without a license, temporary permit or valid exception. The proposed amendments to the requirements for application in §301(B) change language regarding “Foreign Veterinary Schools” to “From a DVM program not accredited by the AVMA” and modifies language regarding documentation of a “certificate by the applicant” to “certification from the applicant stating that he...”

Further, the proposed amendment to §301(B) includes the following changes to the required documentation:

- Allows for an official transcript from a veterinary school accredited or approved by the AMVA as an alternative to the applicant’s diploma;
- Requires certified score on any national examinations taken by the applicant previously and removes the requirement for the certified score from any state (whether Louisiana, or other) examinations; and
- Adds that the applicant provide a list of all licenses in a state, territory, or district of the United States or Canada that the applicant currently holds or has previously held with the application to the Board.

The Board proposes amending §301(D) by replacing “and/or” with “or” when referring to required answers and information in an application. The change clarifies that the Board may reject an application if it lacks either full and complete answers or the requested information. While the wording is more precise, the Board’s authority to reject applicants or take action against the license based on false or misleading information remains the same.

Currently, under §301(E) the Board shall reject the application of an applicant who has practiced veterinary medicine without a license, temporary permit, or valid exception from licensure under LA R.S. 37:1514 during the two year period immediately prior to the date of application. The Board proposes reducing the period to a one-year period immediately prior to the initial application submission date. Further, the Board proposes reducing the expiration period of the license under §301(F) to one year from two years of the initial submission date. The Board indicates it has determined this change is reasonable due to several developments that have accelerated the application process. These include the transition to an online application system; the implementation of online testing for the required state jurisprudence exam; the repeal of the letters of recommendation requirement for licensure and eight-week preceptorship program requirement for DVM licensure; the addition of three annual CAET training sessions; and the introduction of a third testing window for the national exam (NAVLE) for DVMs.¹⁴

¹⁴ Louisiana Register, Vol 50, No 12 December 20, 2025 p. 1863

Licensing requirements are potential barriers to market entry and reduce competition, therefore the proposed amendment to §301 is properly considered an occupational regulation with reasonably foreseeable anti-competitive effects. However, qualifications for licensing requirements support the Board's duty to promote the public health, safety, and welfare by safeguarding the people of the state against incompetent, dishonest, or unprincipled practitioners of veterinary medicine.¹⁵

According to the Board, the lifespan of applications is reduced from two years to one year in order to ensure all application details submitted are as accurate and up to date as possible. Further, the requirement that all application material be submitted within one year, rather than two, ensures the Board may review and issue licenses and certificates more judiciously in order to protect the public and animals receiving veterinary care from unqualified individuals. As such, this proposed amendment furthers a legitimate public policy interest, does not present an unreasonable burden on the applicant, is within the Board's statutory authority, and adheres to clearly articulated state policy. The Board may proceed with promulgation of this amendment in accordance with the Louisiana APA.

C. Proposed LAC 46:LXXXV §801 – Registered Veterinary Technicians; Applications for Certificate of Approval

The Board proposes similar changes to §801 regarding applications for certificate of approval to a registered veterinary technician. Currently §801(A) requires an application in writing signed by the applicant, which shall include a sworn affidavit the applicant has not practiced veterinary medicine in Louisiana without a license, temporary permit or valid exception. The Board proposes amending this to remove the requirement of a written, signed application and modify the sworn affidavit to a certification that the applicant has not practiced veterinary medicine *or veterinary technology* in this state without a certificate of approval.

Currently §801(B) provides a list of information an applicant must provide to the Board in addition to the requirements set forth in §801(A). The applicant is required to furnish:

- A current passport-type photograph of the applicant;
- An official transcript of the applicant's high school records;
- An official transcript of the applicant's veterinary technology school records;
- A copy of the applicant's diploma from the veterinary technology school of graduation;
- A certified score on any national or state examinations (whether in Louisiana or other states) previously taken by the applicant;
- A list of all certificates or licenses the applicant currently holds and/or has previously held;
- A certificate by the applicant that he does not have a criminal record, other than minor traffic violations (including arrests, indictments, convictions, guilty or nolo contendere pleas);
- A certificate that the applicant has never had his/her certificate as a registered veterinary technician in veterinary medicine revoked, suspended or denied; and
- A certificate that the applicant has received and read the Louisiana Veterinary Practice Law and the rules and regulations promulgated by the Board.

¹⁵ LSA-R.S. 37:1511

The Board proposes adding a certification from the applicant stating he has not violated, or been subject to, any of the grounds for denial of a certificate of approval as listed in LA R.S. 37:1544. The Board further proposes removing a copy of an official transcript of high school records and a certificate that the applicant has received and read the Louisiana Veterinary Practice Law and the rules and regulations promulgated by the Board from the list of required documents. Further, the proposed amendment to §801(B) includes the following changes to the required documentation:

- A copy of an official transcript or diploma from the veterinary technology school of graduation as opposed to the current requirement of both documents;
- Requires the certified score on any national examinations taken by the applicant previously and removes the requirement for the certified score from any state (whether Louisiana, or other) examinations; and
- Adds clarification that the applicant provide a list of all licenses in a state, territory, or district of the United States or Canada that the applicant currently holds or has previously held with the application to the Board.

§801(D) currently permits the Board to reject applications that are incomplete or contain false, misleading, fabricated, or incorrect information. The Board proposes amending §801(D) to add that the Board may also take action against the certificate of approval of any registered veterinary technician under the same circumstances. This change explicitly extends the Board's disciplinary authority and the consequences for providing inaccurate or deceptive information beyond rejection of the application to include disciplinary action for existing registered veterinary technicians.

The Board proposes the same amendments to §801 (E) and (F) as seen in §301(E) and (F). Currently, under §801(E) the Board shall reject the application of an applicant who has practiced veterinary medicine without a license, temporary permit, or valid exception from licensure under LA R.S. 37:1514 during the two year period immediately prior to the date of application. The Board proposes reducing the period to a one-year period immediately prior to the initial application submission date. Further, the Board proposes reducing the expiration period of the license under §801(F) to one year from two years of the initial submission date. The Board indicates it has determined this change is reasonable due to several developments that have accelerated the application process. These include the transition to an online application system; the implementation of online testing for the required state jurisprudence exam; the repeal of the letters of recommendation requirement for licensure and eight-week preceptorship program requirement for DVM licensure; the addition of three annual CAET training sessions; and the introduction of a third testing window for the national exam (NAVLE) for DVMs.¹⁶

Licensing requirements are potential barriers to market entry and reduce competition, therefore the proposed amendment to §801 is properly considered an occupational regulation with reasonably foreseeable anti-competitive effects. However, qualifications for licensing requirements support the Board's duty to promote the public health, safety, and welfare by safeguarding the people of the state against incompetent, dishonest, or unprincipled practitioners of veterinary medicine.¹⁷

¹⁶ Louisiana Register, Vol 50, No 12 December 20, 2025 p. 1863

¹⁷ LSA-R.S. 37:1511

According to the Board, the lifespan of applications is reduced from two years to one year in order to ensure all application details submitted are as accurate and up to date as possible. Further, the requirement that all application material be submitted within one year, rather than two, ensures the Board may review and issue licenses and certificates more judiciously in order to protect the public and animals receiving veterinary care from unqualified individuals.

The Board has the disciplinary authority to issue, suspend, renew, deny, or revoke licenses and temporary permits to practice veterinary medicine in this state or discipline licensed veterinarians.¹⁸ The Board may also deny, suspend, or revoke the certificate of approval held by any registered veterinary technician upon a finding of fraud or misrepresentation in applying for or procuring a certificate of approval to perform as a registered veterinary technician in this state.¹⁹

As such, this proposed amendment is within the Board's statutory authority and adheres to clearly articulated state policy. The Board may proceed with promulgation of this amendment in accordance with the Louisiana APA.

D. Proposed LAC 46:LXXXV §1201 – Certified Animal Euthanasia Technicians; Applications for Certificate of Approval

Similar to §§301 and 801, the Board proposes amending the required documentation for a certified animal euthanasia technician to receive the certificate of approval. In order to provide proof of attaining the age of 18 years required to commence the application process, the Board proposes allowing a copy of an official birth certificate or a copy of the current driver's license. Under the current rule, the applicant is required to provide an official copy of a birth certificate or a notarized copy of a current driver's license. The Board also adds a copy of a diploma indicating attendance at a higher learning institution among the required education documents to be provided by the applicant. The Board proposes removing the certified scores on any previous examinations in animal euthanasia and/or proof of successful completion of a board approved course in animal euthanasia within a three-year period from the list of required documentation. The Board also adds that it may require such application to be sworn to by the applicant, notarized, or attested to by the applicant under penalty of perjury.

The Board also proposes reducing the period to a one-year period immediately prior to the initial application submission date. Further, the Board proposes reducing the expiration period of the issuance of the certificate to one year from two years of the initial submission date. Lastly, similarly to §801, the Board may currently reject any applications that are incomplete or contain false, misleading, fabricated, or incorrect information. The Board proposes amending §1201 to add that the Board may also take action against the certificate of approval of any certified animal euthanasia technician under the same circumstances.

As detailed previously, the Board is a regulatory and disciplinary body with the authority to adopt, amend, repeal and establish all rules necessary for its government and all regulations necessary to

¹⁸ LSA-R.S. 37:1518(A) (1).

¹⁹ LSA-R.S.37:1544(A)(6)

carry out its purpose and policy of the state of Louisiana.²⁰ Further, the Board is tasked with examining and determining the qualifications and fitness of applicants and issue, renew, deny, suspend, or revoke licenses and temporary permits to practice veterinary medicine.²¹ The Board may also discipline a licensee for fraud, misrepresentation, or deception in obtaining a license to practice.²² While licensing requirements may be a barrier to market entry, these proposed regulations are within the Board's statutory authority, adhere to clearly articulated state policy, and are not overly burdensome. Therefore, the Board may proceed with promulgation of this proposed amendment in accordance with the APA.

III. Determination

The Board is a state regulatory and disciplinary body created to promote the public health, safety, and welfare by safeguarding the state against incompetent, dishonest, or unprincipled practitioners of veterinary medicine.²³ The Board holds the statutory authority to adopt, amend, or repeal all rules necessary to ensure the policy of the state is met and upheld.²⁴ The Proposed Amendments are within the Board's statutory authority and adhere to clearly articulated state policy. As such, the Board may proceed with promulgation of the Proposed Amendments in accordance with the APA.

OFFICE OF THE ATTORNEY GENERAL
OCCUPATIONAL LICENSING REVIEW PROGRAM



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²⁰ LSA-R.S. 37:1558 (A)

²¹ LSA-R.S. 37:1518(A)(1)(2)

²² LSA-R.S. 37:1526(A)(1)

²³ LSA-R.S.37:1511

²⁴ LSA-R.S. 37:1518 (9)