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To: Mr. Jared B. Granier
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From: Jessica Weimer, Section Chief
Louisiana Department of Justice
Occupational Licensing Review Program

Date: December 29, 2025

Subject: OLRP File No. 2025.11.19 LSVM CE and Licensing
Proposed Amendments to LAC 46:LXXXV.305, 407, 811, 1213, and 1215
Regarding Renewal and Continuing Education Requirements for Licensure or
Certification

I. Summary

The Louisiana Board of Veterinary Medicine (the “**Board**”) has proposed to amend LAC 46: LXXXV §§305, 407, 811, 1213, and 1215 concerning licensing and continuing education (“**CE**”) requirements for Doctors of Veterinary Medicine (DVMs), Registered Veterinary Technicians (RVTs), and Certified Animal Euthanasia Technicians (CAETs) (collectively the “**Proposed Amendments**”)¹. The Board published a Notice of Intent to promulgate the Proposed Amendments in the Louisiana Register on October 20, 2025.² The notice invited written public comments and requests for oral presentation, argument, or a public hearing through November 10, 2025.³ The Board received no comments during the public comment period. The Board asserts the Proposed Amendments do not make substantive changes to the renewal or CE requirements for licensure or certification, but instead clarify, standardize, and improve consistency in the language.⁴

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 November 19, 2025. The OLRP reviews proposed occupational regulations promulgated by state occupational licensing board.⁵ The OLRP initiated its review on November 20, 2025. The OLRP invited public comments on the Proposed Amendments beginning November 20, 2025 through December 3, 2025 and received no comments.

¹ Louisiana Register Volume 51, No. 10 October 20, 2025 p. 1688-1691

² Id.

³ Id. at p. 1690

⁴ Id.

⁵ LA RS 49:260 (B)

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.”⁶ 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).⁷ 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.⁸

As set forth below, the OLRP has determined the Board’s Proposed Amendments to LAC LXXXV §§305, 407, 811, 1213, and 1215 adhere to clearly articulated state policy but are not occupational regulations with reasonably foreseeable anti-competitive effects requiring further review or input from the OLRP.

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.*”⁹

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.¹⁰ The Board is further authorized to issue, renew, deny, suspend, or revoke licenses and temporary permits to practice veterinary medicine in the state; establish fees for examinations, registrations, and renewals for licenses and certificates of DVMs, RVTs, and CAETS; and adopt rules requiring DVMs, RVTs, and CAETs licensed in this state to participate in a continuing education program as a condition of retaining licensure.¹¹

B. Proposed LAC 46:LXXXV.305 Regarding License Renewals

The Board proposes amending §305 concerning the renewal of veterinary licenses. The proposed amendment to this rule clarifies and reorganizes existing renewal procedures, including renewal deadlines, documentation requirements, payment of renewal and delinquent fees, late renewal penalties, and notice provisions. The Board is statutorily authorized to establish qualifications for licensure and renewal, as well as a schedule of fees within established statutory limits.¹²

⁶ LSA-R.S. 49:260 (G) (4)

⁷ LSA-R.S. 49:951 (8)

⁸ Black’s Law Dictionary, 12th Edition p. 116

⁹ LSA-R.S. 37:1511

¹⁰ LSA-R.S. 37:1518 (9), LSA-R.S. 37:1558

¹¹ LSA-R.S. 37:1518, LSA-R.S. 37:1549, and LSA-R.S. 37:1558

¹² LSA-R.S. 37:1518, LSA-R.S. 37:1524, LSA R.S. 37:1525

Licensure requirements and associated fees create barriers to market entry for individuals seeking to engage in a profession or occupation. However, this proposed amendment serves to clarify administrative renewal requirements applicable to licensees who are already authorized to practice. Accordingly, the proposed amendment is procedural in nature and does not constitute an occupational regulation. While the amendment specifies renewal deadlines, clarifies the standard for submission as “received” rather than postmarked, and establishes a defined late renewal fee within the statutory limits, these provisions do not operate as barriers to entry or continued practice. The proposed amendment does not create a new license or credential; alter the qualifications for licensure; expand or restrict the scope of practice; limit who may enter or remain in the veterinarian profession; or prohibit the lawful practice of veterinary medicine beyond existing statutory provisions. Therefore, the Board may proceed with promulgation of this rule without further input from the OLRP.

C. Proposed LAC 46:LXXXV.407 Regarding Expired License Requirements

The Board proposes amending §407 to clarify that any person who practices veterinary medicine following the expiration of his license and willfully or by neglect fails to renew the license, including submission of all satisfactory documentation of continuing education compliance, is guilty of unlicensed practice under La R.S. 37:1514. This rule implements and enforces continuing education requirements as a condition of licensure for each year the license was not previously renewed.

Continuing education requirements may function as a barrier to market participation. The Board is statutorily authorized to adopt rules requiring veterinarians licensed in this state to participate in a CE program as a condition of retaining licensure.¹³ However, this proposed amendment is administrative in nature and does not constitute an occupational regulation, as it does not impose new or expanded barriers to entry or participation in the veterinary profession. The Board may proceed with promulgation of the amendment to §407 in accordance with the Louisiana APA without further input from the OLRP.

D. Proposed LAC 46:LXXXV.811 Regarding Registered Veterinary Technicians Certificate Renewals

The Board recommends amending §811 to expand and clarify the existing renewal framework for Registered Veterinary Technicians. Under the current rule, certificates of approval for RVTs expire annually at midnight on September 30 and must be renewed by submitting a Board-provided re-registration form and paying the required annual fee. The Board is required to mail a renewal notice and re-registration form to each certificate holder 90 days prior to expiration. Annual renewal applications must be countersigned by the employing licensed veterinarian, and any renewal application or fee postmarked after September 30 is subject to all accrued fees and an additional late fee of \$20 per fiscal year.

The proposed amendment to §811 formalizes application completeness standards, adds continuing education compliance requirements, establishes procedures for renewing expired

¹³ LSA R.S. 37:1518(A)(11)

certificates, adds notice and record-maintenance provisions, and modernizes submission and deadline language. Specifically, the proposed amendment revises the renewal submission standard by requiring that renewal applications and fees be received by September 30, rather than merely postmarked by that date, and by introducing an explicit requirement that a renewal application be complete by the deadline. It further adds an express CE compliance requirement, mandating submission of satisfactory CE documentation for annual renewals and for all delinquent years when renewing an expired certificate, where no such requirement was previously specified. The amendment eliminates the requirement that renewal registrations be countersigned by an employing licensed veterinarian, thereby removing employment involvement from the renewal process. In addition, it establishes a defined pathway for renewing expired certificates by allowing renewal within two years of expiration, subject to payment of current and delinquent fees, applicable late fees, and completion of CE for all delinquent years.

While the \$20 late renewal fee per fiscal year is retained, the amendment clarifies that the fee applies when an application is not completed by the renewal deadline. The notice provisions are also revised by removing the requirement that the board mail renewal notices 90 days prior to expiration and instead requiring certified mail notice within 10 days after expiration and prior to permanent removal following two years of expiration. The amendment further clarifies that practicing after a certificate has expired constitutes a violation of La R.S. 37:1544 and adds an explicit obligation for certificate holders to maintain current contact information with the Board, modernizing administrative requirements and supporting effective notice and due process.

Based on the foregoing, §811 is administrative and procedural in nature and does not constitute an occupational regulation with reasonably foreseeable anticompetitive effects. As such, the Board may proceed with promulgation in accordance with the APA.

E. Proposed LAC 46:LXXXV.1213 Regarding Certified Animal Euthanasia Technicians Certificate Renewals

The proposed amendment to §1213 significantly expands and clarifies the existing certificate renewal framework for certified animal euthanasia technicians. Under the current rule, certificates expire annually at midnight on September 30 and may be renewed by submitting a Board provided re-registration form and paying the annual renewal fee. The Board is required to mail a renewal notice and form 90 days prior to expiration, and renewal materials postmarked after the expiration date are subject to a Board-established late fee. The current rule does not expressly address CE compliance, renewal of expired certificates, enforcement consequences or notice following expiration.

By contrast, the proposed amended rule establishes a comprehensive and structured renewal and reinstatement process. It requires that renewal applications, fees, and satisfactory CE documentation be received by September 30 and introduces an explicit complete application standard, including payment of any applicable late CE fees or disciplinary fines. The amendment adds a defined pathway for renewing expired certificates within one year of expiration and prior to permanent removal from the Board's rolls. Additionally, it expressly states that practicing after expiration constitutes a statutory violation and imposes an obligation on certificate holders to maintain current contact information with the Board. Overall, the amendment modernizes and

clarifies renewal, enforcement, and reinstatement procedures while preserving the annual expiration structure.

While licensure and CE requirements may function as barriers to market participation, this amendment is administrative and procedural in nature and does not constitute an occupational regulation with reasonably foreseeable anticompetitive effects. Accordingly, the Board may proceed with promulgation of §1213 without further input from the OLRP.

F. Proposed LAC 46:LXXXV.1215 Regarding Certified Animal Euthanasia Technicians Expired Certificates

§1215 currently governs the reinstatement of expired certificates for certified animal euthanasia technicians by permitting reinstatement within one year of expiration upon written application, payment of the current renewal fee along with all delinquent renewal and late fees, and completion of Board prescribed CE requirements. If a certificate is not renewed within one year of expiration, the rule requires the individual to reapply for a new certificate, which may only be issued upon approval by a majority of the Board's quorum. The rule further provides that the identifying number of an expired certificate may not be reassigned to any person other than the original holder.

The proposed amended §1213 incorporates the substantive reinstatement framework previously set forth in §1215, and the Board therefore proposes repealing §1215 in its entirety. The Board is statutorily authorized to adopt, amend, repeal, and establish all rules necessary for enforcement of the provisions governing CAETs.¹⁴ The repeal does not eliminate or reduce the ability of CAETs to renew or reinstate a certificate and does not impose any new or additional barriers to entry or participation in the occupation. Accordingly, the proposed repeal of §1215 is administrative and organizational in nature, serves to eliminate duplicative regulatory provisions, and does not constitute an occupational regulation with reasonably foreseeable anticompetitive effects. As such, the Board may proceed with promulgation of this amendment in accordance with the APA without further input from the OLRP.

III. Determination

The Board is a state regulatory body created to govern the professional conduct of the members of the veterinary profession in the state of Louisiana.¹⁵ The Board holds the statutory authority to adopt, amend, or repeal all rules necessary to ensure the standards of professional conduct for the practice of veterinary medicine are met and upheld.¹⁶ The Proposed Amendments are within the Board's statutory authority and adhere to clearly articulated state policy. Upon review, the OLRP has determined that the Proposed Amendments do not constitute occupational regulations with reasonably foreseeable anticompetitive effects on the practice of veterinary medicine. As such, the Board may proceed with promulgation of the Proposed Amendments without further input from the OLRP and in accordance with the APA.

¹⁴ LSA-R.S. 37:1558

¹⁵ LAC 46: LXXXV § 1001 (A)

¹⁶ LSA-R.S. 37:1518 (9)

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