

To: Attorney General Liz Murrill  
Attn: Department of Justice, Occupational Licensing Review Program

From: Jared B. Granier, MBA  
Executive Director, Louisiana Board of Veterinary Medicine

Date: May 19, 2026

Subject: Amendments to Various Rules Related to Renewal and Continuing Education Requirements for Licensure or Certification

The Louisiana Board of Veterinary Medicine has proposed amendments to LAC 46:LXXXV.Section 303 in Chapters 3 in accordance with the Administrative Procedure Act, R.S. 49:950 et seq.

To facilitate the Department of Justice's review of the proposed rule, Louisiana Board of Veterinary Medicine provides answers to the following questions.

1. Describe any relevant factual background to the occupational regulation and the purpose of the occupational regulation? *[Explain]*

There are no changes to application requirements for licensure or certification. Rather these changes would continue to limit candidates to no more than five attempts to take the NAVLE; however, any attempts made prior to December 1, 2025 would not be applied toward this five-attempt maximum. These changes align with the recently revised policy of the test vendor, ICVA.

The proposed rule changes would permit individuals who were previously deemed ineligible due to exceeding the maximum number of national examination attempts to retake the national examination and, if successful, regain eligibility to apply for licensure.

2. Is the occupational regulation within the scope of the occupational licensing board's general authority to regulate in a given occupation or industry? If so, identify the law that provides the authority for the rule and describe how the occupational regulation is within the scope. *[Explain]*

This Notice of Intent is within the Louisiana Board ("Board") of Veterinary Medicine's statutory authority to review the qualifications of candidates applying for licensure in accordance with La R.S. 37, section §1518, §1524, §1546, and §1555.

3. Check all of the following that apply as reasons the occupational regulation is subject to review:

- Creates a barrier to market competition
- Fixes prices, limits price competition, or results in high prices for a product or service provided by or to a license holder.
- Reduces competition or excludes present or potential competitors from the occupation regulated by the board
- Limits output or supply in this state of any good or service provided by the members of the regulated occupation.
- Reduces the number of providers that can serve a particular set of customers
- Other activity (please describe) – *[Explain]*

4. Identify the clearly articulated state policy (e.g., health, safety, welfare, or consumer protection) in state statute, or any supporting evidence of the harm the action/proposed action is intended to protect against? [Explain]

n/a

5. Do any less restrictive alternatives to the occupational regulation exist for addressing the same harm? If so, include a comparison of the occupational regulation to the alternatives and a justification for not pursuing a less restrictive alternative. If no less restrictive alternatives exist, explain why. [Explain]

No. The proposed rule changes would permit individuals who were previously deemed ineligible due to exceeding the maximum number of national examination attempts to retake the national examination and, if successful, regain eligibility to apply for licensure.

6. Describe the process that the occupational licensing board followed in developing the proposed rule, including any public hearings held, studies conducted, and data collected or analyzed. [Explain]

- [02-05-26] — Board discussed and voted to approve an amendment to section 303.B.7 concerning the maximum number of attempts a licensure candidate may take the NAVLE. The proposed amendment would align the rule with the International Council for Veterinary Assessment (ICVA) revised policy. If adopted, the amended rule would continue to limit candidates to no more than five attempts to take the NAVLE; however, any attempts made prior to Dec. 1, 2025, would not be applied toward this five-attempt maximum. [[View Meeting Minutes from 02-05-26](#)]
- [03-23-26] — Notice of Intent and Fiscal & Economic Impact Statements submitted to Legislative Fiscal Office for review.
- [04-06-26] — Legislative Fiscal Office approved Fiscal & Economic Impact Statements.
- [04-09-26] — First Report submitted to Senate and House Legislative Oversight Committees on Agriculture, Forestry, Aquaculture, and Rural Development.
- [04-09-26] — Notice of Intent submitted to the Governor's Office for review.
- [04-09-26] — Notice of Intent submitted for publication in 2026 Louisiana Register, Volume 52, April edition.
- [04-20-26] — Notice of Intent published in *2026 Louisiana Register*, Volume 52, April edition. [[View Notice of Intent](#)]
- [04-21-26] — Submission of written comments related to this rule proposal will be accepted only from April 21, 2026 to May 10, 2026.
- [05-10-26] — Deadline for submission of written comments to Board. See instructions for submitting comments in Notice of Intent.
- [05-14-26] — Notice of Intent submitted to Department of Justice's Occupational Licensing Review Program ([OLRP](#)) for review.

This rulemaking process can be found at [www.lsbvm.org/rulemaking-projects](http://www.lsbvm.org/rulemaking-projects).

7. Does the occupational regulation relate to a matter on which there is pending litigation or a final court order? *[Explain]*

No.

8. Please identify the board members voting in favor of this rule, and state whether the member is an active market participant. *[Explain]*

Drs. Christine McHughes Barr, Jesse Brandon, Christopher Morris, Larry Findley, Sr., and Trisha Marullo all voted in favor of this rule change, and all are currently practicing veterinarians and active market participants in the state of Louisiana.

9. Is there anything else that the occupational licensing board would like the Department to know about the proposed rule? *[Explain]*

No.