

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: November 18, 2025

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. Sections 305, 407, 811, 1213, and 1215 in Chapters 3, 4, 8, and 12 – respectively – 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 substantive changes to the renewal or continuing education requirements for licensure or certification. The proposed rule changes clarify guidelines regarding continuing education and late fees for veterinarians who fail to renew their license. The proposed rule change expressly states that a veterinarian who fails to renew their license is subject to a \$150 fine, this is the current practice and is being codified.

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]*

There are no substantive changes to the renewal or continuing education requirements for licensure or certification. The proposed rule changes clarify guidelines regarding continuing education and late fees for veterinarians who fail to renew their license. The proposed rule change expressly states that a veterinarian who fails to renew their license is subject to a \$150 fine, this is the current practice and is being codified.

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 are clarifying guidelines for the annual renewal of licenses and certificates and further illuminating the possible penalties for licensees who fail to renew their license by the statutory deadline.

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]*

- 08-05-2025 Board discussed and voted on amendments to listed sections.
- 09-05-2025 Notice of Intent and Fiscal & Economic Impact Statements submitted to Legislative Fiscal Office for review.
- 10-01-2025 Legislative Fiscal Office approved Fiscal & Economic Impact Statements.
- 10-01-2025 First Report submitted to Senate and House Legislative Oversight Committees on Agriculture, Forestry, Aquaculture, and Rural Development.
- 10-01-2025 Notice of Intent submitted to the Governor's Office for review.
- 10-01-2025 Notice of Intent submitted for publication in 2025 Louisiana Register, Volume 51, October edition.
- 10-20-2025 Notice of Intent published in 2025 Louisiana Register, Volume 51, October edition.
- 10-21-2025 Submission of written comments related to this rule proposal will be accepted only from Oct. 21st, 2025 to Nov. 10th, 2025.
- 11-10-2025 Deadline for submission of written comments to Board.\* See instructions for submitting comments in Notice of Intent.
- NO PUBLIC HEARING SCHEDULED — \* As there were no requests within twenty days (by January 9th, 2025) for a public hearing in accordance with §953.A(2)(b)(i), the Board will NOT hold a public hearing and will move forward with the rulemaking process.
- 11-18-2025 Notice of Intent will be 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.