
SENATE COMMITTEE ON BUSINESS, PROFESSIONS AND ECONOMIC DEVELOPMENT

Senator Dr. Aisha Wahab, Chair
2025 - 2026 Regular

Bill No:	AB 2010	Hearing Date:	June 15, 2026
Author:	Soria		
Version:	April 22, 2026		
Urgency:	No	Fiscal:	Yes
Consultant:	Elissa Silva		

Subject: Veterinary medicine: veterinary surgery premises: spay and neuter services

SUMMARY: Exempts a premises where “high-quality, high-volume” spay and neuter services (HQHVSN) are performed in a registered veterinary premises from specified regulatory standards, including the requirement for a separate room for aseptic surgeries.

Existing law:

- 1) Establishes the Veterinary Medical Board (VMB), under the jurisdiction of the Department of Consumer Affairs to license and regulate veterinarians, registered veterinary technicians (RVTs), register veterinary premises (premises) and issue veterinary assistant-controlled substance permits (VACSPs) and sunsets the VMB and its authority to appoint an EO January 1, 2030. (Business and Professions Code (BPC) § 4800, et. seq.)
- 2) Prohibits a veterinarian from prescribing, dispensing, or administering a drug, medicine, application, or treatment of whatever nature for the prevention, cure, relief of a wound, fracture, bodily injury, or disease of animals unless a veterinarian-client patient relationship (VCPR) exists and specifies the conditions under which a VCPR is established, as specified. (BPC § 4826.6)
- 3) Specifies that a person practices veterinary medicine, surgery, and dentistry, and the various branches thereof, when the person does any one of the following:
 - a) Represents oneself as engaged in the practice of veterinary medicine, veterinary surgery, or veterinary dentistry in any of its branches.
 - b) Diagnoses or prescribes a drug, medicine, appliance, application, or treatment of whatever nature for the prevention, cure, or relief of a wound, fracture, bodily injury, or disease of animals.
 - c) Administers a drug, medicine, appliance, application, or treatment of whatever nature for the prevention, cure, or relief of a wound, fracture, bodily injury, or disease of animals, except where the medicine, appliance, application, or treatment is administered by a RVT or a veterinary assistant at the direction of and under the direct supervision of a licensed veterinarian or where the drug, including, but not limited to, a drug that is a controlled substance, is administered by a registered veterinary technician or a veterinary assistant. However, no person, other than a licensed veterinarian, may induce anesthesia unless

authorized by regulation of the board.

- d) Performs a surgical or dental operation upon an animal.
 - e) Performs a tendonectomy, onychectomy, or any type of claw removal on a feline.
 - f) Performs any manual procedure for the diagnosis of pregnancy, sterility, or infertility upon livestock or Equidae.
 - g) Collects blood from an animal for the purpose of transferring or selling that blood and blood component products to a licensed veterinarian at a registered premises, as specified.
 - h) Uses any words, letters, or titles in such connection or under such circumstances as to induce the belief that the person using them is engaged in the practice of veterinary medicine, veterinary surgery, or veterinary dentistry. (BPC § 4826)
- 4) Requires all veterinary premises to be registered with the VMB. (BPC § 4853)
 - 5) Authorizes the VMB at any time to inspect the premises in which veterinary medicine, veterinary dentistry, or veterinary surgery is being practiced. Specifies the board's inspection authority does not extend to premises that are not registered with the VMB. (BPC § 4809.5)
 - 6) Requires the VMB to establish a regular inspection program that will provide for random announced or unannounced inspections of veterinary premises and must make every reasonable effort to ensure veterinary premises are inspected in a timely manner. (BPC § 4809.7)
 - 7) Defines "premises" as the location of operation where veterinary medicine, veterinary dentistry, veterinary surgery, and the various branches thereof is being practiced and includes a building, kennel, mobile unit, or vehicle. (BPC § 4853(b))
 - 8) Requires that all premises where veterinary medicine, dentistry, or surgery are practiced, and all instruments, apparatus and apparel used in connection with those practices, to be always kept clean and sanitary, and conform to those minimum standards established by the VMB. (BPC § 4854)

Current Regulations.

- 1) Establishes minimum standards that veterinary premises shall maintain, including but not limited to:
 - a) A requirement that veterinary medical equipment used to perform aseptic procedures shall be sterilized and maintained in a sterile condition,
 - b) A requirement that anesthetic equipment in accordance with the procedures performed shall be maintained in proper working condition and available at all times, and

- c) A requirement that appropriate drugs and equipment shall be readily available to treat an animal emergency. (California Code of Regulations, Title 16 (16 CCR) § 2030(a))
- 2) Specifies additional standards for veterinary premises that perform aseptic surgical services which includes:
 - a) A prohibition on open shelving in the surgical room,
 - b) A requirement to provide a means for viewing diagnostic imaging during surgery, and
 - c) A requirement that, in any sterile procedure, a separate sterile pack shall be used for each animal. (16 CCR § 2030(b))
- 3) Compliance with current building standards as specified in 24 CCR, § 1251 of Part 2, as specified. (16 CCR § 2030(e))
- 4) Establishes minimum standards for mobile veterinary premises including mobile veterinary premises that provide aseptic surgical services shall have a room, separate and distinct from other rooms, reserved for aseptic surgical procedures which require aseptic preparation. (16 CCR § 2030.2(c)(1))

This bill:

- 1) Exempts HGHVSN services performed either in a registered veterinary premises, or by a veterinarian employed or contracted with a veterinary premises in a temporary setting from a requirement that it take place in a facility that complies with any of the following standards:
 - a) A requirement for a separate room that is reserved for aseptic surgical procedures that require aseptic preparation;
 - b) A prohibition on open shelving in the area in which the aseptic surgical sterilization procedure is performed;
 - c) A requirement for equipment for viewing radiographs.
- 2) Defines for purposes of this bill HGHVSN to mean the aseptic surgical sterilization by a veterinarian, including the supervision by the veterinarian of presurgical preparation and recovery of the animals, of 20 or more dogs, cats, or rabbits, or any combination thereof, within 12 consecutive hours.

FISCAL EFFECT: According to the Assembly Committee on Appropriations VMB anticipates minor and absorbable costs to revise regulations; update inspection procedures, materials, and training; and provide education and outreach to licensees.

COMMENTS:

1. **Purpose.** The American Society for the Prevention of Cruelty to Animals, San Diego Humane Society, San Francisco Society for the Prevention of Cruelty to Animals, and Animal Balance are the sponsors of this bill. According to the Author, “California’s pet overpopulation crisis continues to strain communities across the state. The challenge is particularly acute in rural regions throughout the Central Valley, where access to affordable spay and neuter services may be hours away and out of reach for many families. While advancements in veterinary surgical practices offer hope in addressing this growing crisis, California regulations prevent High-Quality, High-Volume Spay and Neuter (HQHVSN) services from being used to its maximum potential, dramatically limiting its ability to provide relief to the communities that need it the most. AB 2010 provides a practical solution by removing unnecessary regulatory barriers to HQHVSN, while still upholding high standards of care and safety. This provides a simple, common-sense fix to allow HQHVSN at the scale needed to meet the public need, relieve our overcrowded shelters and save the lives of countless animals.”

2. **Background.**

The Act and the Veterinary Medical Board (VMB). The VMB is the regulatory entity responsible for the licensure and regulation of veterinarians, RVT, schools and programs along with veterinary premises through the enforcement of the California Veterinary Medicine Practice Act (Act). The VMB develops and enforces the standards for examinations, licensing, and premises inspections. Additionally, the VMB is authorized to enforce against both licensed and unlicensed persons for any violation of the Act, which includes unlicensed veterinary practice. The VMB may also take enforcement actions against a registered premise for violations of the Act.

The practice of veterinary medicine is specified in statute (BPC § 4826) and includes actions such as diagnosing or prescribing a drug, medicine, appliance, application, treatment of whatever nature, for the cure or relief of a wound, fracture, bodily injury or disease of animals (including those actions of an RVT or a veterinary assistant under the supervision of a licensed veterinarian). Further, the Act requires that any premises where veterinary medicine, dentistry, or surgery is being practiced to obtain a premises permit from the VMB. A premises includes any building, kennel, mobile unit or vehicle (BPC § 4853). The VMB oversees approximately 36,000 licensees, including 4,000 registered premises.

Premises Registration. The VMB is responsible for licensing and inspecting veterinary premises where animal health care tasks are performed. Current law requires that any owner, operator, officer, director, shareholder, general partner or agent for service of process be clearly identified on a premises application, and requires any changes in these positions to be reported to the VMB within 30 days. The VMB has enforcement authority, including the ability to deny, suspend, or revoke a premises registration based on a premises registration holder’s criminal and disciplinary history.

Under current regulations, veterinary premises must meet stringent requirements to ensure animal patient safety. In recognition that veterinary care services are

evolving to meet the need of communities, and that some veterinary care services may be performed safely outside of a traditional veterinary premises hospital, the VMB recently adopted regulations to establish separately regulatory requirements for vaccination clinics, mobile veterinary premises, and small animal premises.

The minimum standards for a veterinary premises include administrative requirements such as signage, kenneling standards for animals that remain in care for more than 24 hours, phone access, facility hours of operations, among others. Premises must have capacity for radiological services, pathology and diagnostic services at the site, through another premises or outside service. Premises must abide by drug storage, sanitary standards, sterilized equipment standards, veterinary reference materials, among others.

Current regulations delineate additional standards that are required when providing *aseptic surgical services*, which include: 1) limits on storage to surgical supplies only, 2) prohibition on open shelving, 3) have a means for viewing diagnostic images, 4) specifications for surgical equipment, 5) sterile equipment standards, 6) appropriate attire of staff, and 7) compliance with specified building standards, which require a separate surgical room for aseptic procedures that require aseptic preparation.

Minimal regulations for mobile veterinary premises include requirements to provide disclosure notices about the hours of operation, phone number for access to after-hour emergency services, and a number for follow up questions. Mobile clinics must also meet specified requirements for standard veterinary premises and have a separate and distinct room where aseptic surgical services are provided. Aseptic surgical procedures refer to those practices used to maintain a sterile environment during surgery to prevent contamination and infection.

Spay and Neuter and High-Quality, High-Volume Spay and Neuter. There is no mandate in California which requires a dog or cat owner to spay or neuter their pet. Some local jurisdictions may require it, and animal shelters are required to provide spay and neuter services prior to adopting out an animal. Generally, the practice of spay and neuter (the common terms) is referred to as the surgical sterilization of an animal. "Spaying" is the typical procedure for a female animal and "neuter" is the typical procedure for a male animal. Both procedures aim to ensure that the animals will not reproduce, mainly to control the pet overpopulation. Animal welfare advocates note that spay and neuter services are vital to address the pet animal overpopulation and accessible and affordable pet care.

HQHVSN services relate to the specialized surgical techniques and operational practices which are designed to perform many spay and neuter surgeries more swiftly, while maintaining the high standards of patient care. Because this type of spay and neuter is a special technique that allows for a more rapid surgical procedure, these services are often performed at HQHVSN clinics, where a high-volume of animals can be spayed and neutered during the clinic hours. This specialized service is valuable for shelters and rescue organizations that contract with local government for animal care services as a way to provide these necessary surgeries to many animals who need it, and also for those consumers who have

difficulties accessing traditional veterinary care services, as they can attend one of these clinics which are typically offered at a low or no cost.

This bill creates a definition of HGHVSN as “the aseptic surgical sterilization by a veterinarian, including the supervision by the veterinarian of presurgical preparation and recovery of the animals, of 20 or more dogs, cats, or rabbits, or any combination thereof, within 12 consecutive hours.” This definition provides clarification to the number of animals treated in these events rather than specifics on the actual surgical skills required or utilized to perform these surgeries.

To help ensure that veterinarians are trained in the technique of HGHVSN, the Legislature passed SB 1233 (Wilk, Chapter 613, Stats. Of 2024), which authorizes veterinary schools in California to develop and offer a high-quality, high-volume spay and neuter certification program as elective coursework to enrolled students. Among other requirements, the program would need to make low- or no-cost sterilization services available to the public, with priority access based on “socioeconomic status”, while ensuring the training and care provided by the program is consistent with generally accepted standards in the profession.

The author and sponsor note that the requirement for separate surgical rooms for any veterinary surgery is problematic to meet specifically for HGHVSN events. They note, HGHVSN is most effective when it can be done in community centers and large rooms, allowing for a more efficient flow of animals and exponential increase in the number of animals that can be safely and quickly sterilized. To address this challenge for HGHVSN pop-up event providers, this bill would exempt HGHVSN from the requirement to comply with certain veterinary premises regulations, including the requirement for a separate room that is reserved for aseptic surgical procedures, the requirement to maintain equipment for viewing radiographs, and the prohibition on open shelving in the area in which the aseptic surgical sterilization procedure is performed.

- 3. Arguments in Support.** A broad coalition writes in support and notes, “California’s animal shelters and communities are facing growing pressure from a worsening access to-care crisis. A severe veterinary workforce shortage and limited access to affordable veterinary services have made it increasingly difficult for families to obtain basic care such as spay and neuter. At the same time, shelters and rescue organizations are required to sterilize animals before adoption, placing additional strain on already limited surgical capacity. In many rural and underserved communities, spay and neuter services may be hours away or financially out of reach, while urban communities often face long waitlists and limited appointment availability. Existing regulations require veterinary premises performing sterilization surgeries to maintain a separately dedicated surgical suite. This requirement does not reflect the modern operational design many veterinarians trained in high-quality, high-volume spay and neuter (HGHVSN) techniques used in other parts of the country. This means that, under current law, veterinarians are limited in the number of California animals that can receive timely sterilization services. AB 2010 removes this specific barrier while preserving all existing health and safety standards under the Veterinary Medicine Practice Act. By allowing clinics to utilize space more efficiently while continuing to follow strict surgical protocols, the bill enables

veterinary teams to safely increase the number of animals that can be sterilized in a given clinic setting.”

City of Sacramento writes in support and notes, “Every spay or neuter surgery performed today prevents future births and helps break the cycle of shelter overcrowding. By expanding access to affordable sterilization services, AB 2010 will reduce pressure on shelters, support families seeking responsible pet care, and improve animal welfare outcomes statewide. By allowing the City’s Front Street Animal Shelter to hold MASH-style clinics or local community centers or other venues that can handle the high volume of animals and staff, AB 2010 will help the City address our overcrowded animal shelter and reduce the number of unwanted animals.”

The California Veterinary Medical Association writes in support and notes, “HQHVSN has been performed for decades, nationwide, on hundreds of thousands of animals, and has proven itself to be the best current approach to combatting pet overpopulation. There are no reports of significant post-operative infections from HQHVSN, despite it being performed in an environment that deviates from California’s sterile surgery room model. Unfortunately, California’s current veterinary surgery room minimum standards prevent HQHVSN from being performed in the way it has been designed. AB 2010 will solve this problem by making a narrow exemption from those standards for specific HQHVSN events, recognizing that such standards are impossible (or highly infeasible) to comply with in the non-traditional settings in which HQHVSN events typically occur. By recognizing the unique nature of those events, AB 2010 will clear the way for HQHVSN providers to combat our pet overpopulation crisis.”

4. **Arguments in Opposition.** Fix our Shelters writes in opposition and notes, “We are writing to express our opposition to AB 2010 by Assembly Member Soria. This bill is a proposal to create broad exemptions for high-volume spay/neuter services and temporary or MASH-style clinic models through legislation rather than through the Veterinary Medical Board’s established regulatory process.

“Fix Our Shelters and our coalition of rescues and animal advocates strongly support expanding access to high-volume, high-quality spay and neuter services. Increasing sterilization capacity is essentially to reducing euthanasia, preventing suffering, and addressing California’s ongoing animal overpopulation crisis. We must use every available means to increase spay/neuter resources.

“At its core, this proposal raises a fundamental issue: whether California is willing to lower established veterinary medical standards in ways that create foreseeable and preventable harm to animal patients.

“Spay and neuter surgery, while routine, is still invasive abdominal surgery requiring strict adherence to aseptic technique, anesthesia monitoring, temperature control, and postoperative care protocols.

- Increased risk of surgical site infections
- Anesthetic complications, including hypoxia and death
- Hemorrhage and internal injury

- Post-operative pain, delayed recovery, and preventable suffering
- Lack of continuity of care when compliance arise

“AB 2010 proposes to relax the very framework designed to Milgate these risks.”

5. Policy Issues for Consideration.

Should the VMB be tasked with determining premises standards for HVHQSN? The VMB is tasked with the regulation and oversight of veterinary premises. The VMB has already promulgated regulations which establish standards for all veterinary premises, small animal fixed veterinary premises, mobile veterinary premises, and animal vaccination veterinary premises. This bill creates an exemption from certain premises requirements when HVHQSN services are provided. However, it may be appropriate for the VMB to determine premises standards for HVHQSN service events. This would be consistent with the other premises regulations established by the VMB. The regulatory process provides an opportunity for stakeholder feedback and public comment, along with review by the Office of Administrative Law. Although this bill aims to limit the provision of these services to temporary settings, it could inadvertently create authorization for a new business model, while limiting the VMB’s oversight. *The author should continue to work with stakeholders including the VMB to ensure the most appropriate means to determine the animal patient safety standards for HVHQSN.*

Should the exemptions from regulatory requirements be limited to HVHQSN services when they are performed for no cost or low cost? As currently drafted, this bill would allow HVHQSN services to be exempt from certain premises requirements established by the VMB. Although the intent of the bill appears to reflect limited instances where HVHQSN services may be provided, as currently drafted the applicability is broad. *The Author should continue to work with stakeholders to potentially limit any exemption from VMB regulations to only those premises where the HVHQSN services are provided at low-cost or no cost, or hosted through public animal control agency or shelter, society for the prevention of cruelty to animals shelter, humane society shelter, or rescue group, or non-profit entities.*

SUPPORT AND OPPOSITION:

Support:

Animal Balance (co-sponsor)
 ASPCA (co-sponsor)
 San Francisco SPCA (co-sponsor)
 San Diego Humane Society (co-sponsor))
 Ace of Hearts Dog Rescue
 Animal Shelter Assistance Program
 Animalsave
 Arc Inland Empire
 Bay Area CATS
 Berkeley-east Bay Humane Society
 Best Friends Animal Society

Better World Rescue
Calanimals
City of Huron
City of Rancho Cordova
City of Sacramento
County of Riverside
Eastwood Ranch Foundation
Forgotten Felines of Sonoma County
Friends of Colusa County Animal Shelter
Frosted Faces Foundation
Humane Society of Imperial County
Humane Veterinary Medical Association
Humane World for Animals
Inland Valley Humane Society & SPCA
Island Cat Resources and Adoption
Joybound People & Pets
Madera County Animal Services
Norcal German Shorthaired Pointer Rescue, INC
Oakland Animal Services
Orange County Animal Allies
Peninsula Humane Society & SPCA
Pets in Need
Rancho Coastal Humane Society
Ridgecrest Animal Shelter
Sacramento SPCA
Santa Barbara Humane
Santa Cruz County Animal Shelter
Santa Cruz County Animal Shelter Foundation
Sequoia Humane Society
The Dancing Cat
The Paw Mission
Town of Apple Valley Animal Services
Valley Humane Society

Opposition:

Fix our Shelters

-- END --