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To: Mr. Jared B. Granier
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From: Farra Mughal
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Occupational Licensing Review Program

Date: July 6, 2026

Subject: Louisiana Board of Veterinary Medicine
Proposed Amendment to LAC 46:LXXXV.303(B)(7)-Examinations

I. SUMMARY

The Louisiana Board of Veterinary Medicine (the “**Board**”) proposes amending LAC 46:LXXXV.303(B)(7) (the “**Proposed Amendment**”), relative to the maximum number of attempts a licensure candidate may take the North American Veterinary Licensing Examination (“**NAVLE**”). The Proposed Amendment aligns with a policy change from the test vendor to not apply any attempts made prior to December 1, 2025 to the five-attempt maximum.

The Board published a Notice of Intent to promulgate the Proposed Amendment on April 20, 2026.¹ The Notice invited public comments and requests to conduct a public hearing on this Proposed Amendment on May 10, 2026, and received no written comments or requests for public hearing.²

Examination requirements may act as barriers to market competition and the Proposed Amendment to §303(B)(7) is therefore properly considered an occupational regulation with reasonably foreseeable anti-competitive effects.³

Pursuant to La. R.S. 49:260, the Board submitted the Proposed Amendment to the Louisiana Department of Justice’s Occupational Licensing Review Program (“**OLRP**”) on May 14, 2026. The OLRP invited public comments on the Proposed Amendment May 15, 2026 through May 28, 2026 and received no comments. As set forth below, the OLRP has determined the Board’s Proposed Amendment to LAC 46: LXXXV §303(B)(7) adheres to clearly articulated state policy and therefore approves this Amendment for adoption as drafted in accordance with the Louisiana Administrative Procedure Act (the “**APA**”).

¹ Louisiana Register, Vol. 52, No. 4, at pgs. 515-516

² Id. at 515

³ LSA- R.S. 49:260 (G)(4)

II. ANALYSIS

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.”⁴ The Board is statutorily authorized to examine and determine the qualifications and fitness of applicants for licensure in the state and to issue, renew, deny, suspend, or revoke licenses and temporary permits to practice veterinary medicine in the state.⁵

A. **Proposed LAC 46:LXXXV.303(B)(7)-Examinations**

The Board proposes amending §303(B)(7) to align with a recent policy change by the test vendor, International Council for Veterinary Assessment (“**ICVA**”), to not apply any examination attempts made prior to December 1, 2025 towards the five-attempt maximum.

The Board asserts the Proposed Amendment does not change the substantive application requirements for licensure or certification. Rather, the amendment would continue to limit applicants to a maximum of five attempts to pass the NAVLE while providing that examination attempts made before December 1, 2025, will not count toward that five-attempt limit. Additionally, the Board states that the proposed amendment would permit individuals who were previously ineligible for licensure because they had exhausted the maximum number of examination attempts to retake the NAVLE and, upon successfully passing the examination, become eligible to apply for licensure.

According to an article on the ICVA’s website, the policy change is based on a comprehensive review of candidate feedback and NAVLE data.⁶ Additionally, the ICVA is eliminating the waiver process to ensure a consistent and equitable policy for all candidates.⁷

The Board has been granted the statutory authority to adopt, amend, or repeal all rules necessary for its government.⁸ Additionally, the Board is statutorily authorized to examine and determine the qualifications and fitness of applicants for a license to practice veterinary medicine in the state.⁹ Accordingly, it is within the Board’s authority to amend its rules to align with the ICVA’s policy change.

While examination requirements may function as barriers to market entry by reducing the pool of eligible licensees, the Proposed Amendment relaxes an existing eligibility restriction by excluding examination attempts made before December 1, 2025, from the calculation of the five-attempt examination limit. As a result, applicants who previously exhausted, or partially exhausted, their allowable examination attempts may once again become eligible to take the NAVLE, thereby expanding the pool of potential licensees. By permitting additional qualified applicants to pursue

⁴ LSA-R.S. 37:1511

⁵ LSA-R.S. 37:1518 (A)(1)-(2)

⁶ [News and Updates | ICVA](#)

⁷ Id.

⁸ LSA-R.S. 37:1518(9)

⁹ LSA-R.S. 37:1518 (A)(1)

licensure, the amendment may increase the availability of licensed veterinarians in Louisiana, thereby promoting greater public access to competent and qualified veterinary care. As such, the Proposed Amendment is likely to have a pro-competitive impact.

Therefore, the 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 APA.

III. DETERMINATION

The Board is a state regulatory body created to safeguard the people of Louisiana against incompetent practitioners of veterinary medicine.¹⁰ The Board holds the statutory authority to examine and determine the qualifications and fitness of applicants for a license to practice veterinary medicine in this state and 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.¹¹ The Proposed Amendment is within the Board's statutory authority and adheres to clearly articulated state policy. As such, the Board may proceed with promulgation of the Proposed Amendment without further input from the OLRP and in accordance with the APA.

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OCCUPATIONAL LICENSING REVIEW PROGRAM



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¹⁰ LSA-R.S. 37:1511

¹¹ LSA-R.S. 37:1518 (A)(1) and (A)(9)