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MEMORANDUM

DATE	November 16, 2026
TO	Physician Assistant Board (Board)
FROM	Jasmine Dhillon, Legislative and Regulatory Specialist Kristy Schieldge, Regulations Counsel, Attorney IV
SUBJECT	**Agenda Item 15. Update on Pending Regulatory Packages**

1. 16 CCR 1399.514, 1399.615 – SB 697: License Renewal and Continuing Medical Education Required

Proposed Language for Board discussion	Board Approved Language to Notice	PAB Staff work with DCA Legal & Budgets on Pre-review of Documents	Submitted to DCA for Initial Phase Review	DCA Submits to Agency for Initial Review	PAB files Notice with OAL	45-Day Comment Period Ended
05/18/2026	05/18/2026					
Board Reviews Comments from 45-day Comment Period	**Public Hearing Held (optional)**	**PAB Staff work with DCA Legal on Final Rulemaking Package**	**Submitted to DCA for Review**	**Submitted to Agency for Review**	**Submitted to OAL for Review**	**Effective Date**

This regulatory proposal will clarify, interpret, and make specific all requirements for license renewal or restoration of a license to active status. It consolidates all the renewal and restoration requirements in one location and clarifies that the license status for those who do not renew by their expiration date is "unlicensed." This proposal also incorporates the new continuing medical education (CME) requirements for showing proof of a one-time approved controlled substance education course imposed by SB 697. At the May 28, 2020 Board meeting, the Board voted to rescind the Board's prior proposed text, and approved changes to the language of 16 CCR section 1399.514. At the November 6, 2023 meeting, the Board voted to adopt the revised regulatory language. This package was placed on hold pending legislation in 2025, as the Board sought amendments to Business and Professions Code (BPC) section 3523 to address apparent authority issues with providing their renewal application

online through BreEZe. The Legislature has included amendments to BPC section 3523 in AB 1501, and the bill has been chaptered, with an effective date of January 1, 2026. At its May 18, 2026 Board meeting, the Board considered and approved proposed revised regulatory language to reauthorize initiation of the rulemaking process. The regulatory documents necessary to support the proposal are being prepared by staff for submission to the DCA Budget Office and Legal Affairs Division. Per Departmental policy this review is required prior to review by the Acting Director of the Department of Consumer Affairs as required by Business and Professions Code (BPC) section 313.1.

2. 16 CCR 1399.506, 1399.507, 1399.511, 1399.530, 1399.535, 1399.536, 1399.538, 1399.539, 1399.546 and 1399.556 – SB 697: Application, Exam Scores, Addresses, and Records

Proposed Language for Board discussion	Board Approved Language to Notice	PAB Staff work with DCA Legal and Budgets on Pre-review of Documents	Submitted to DCA for Initial Phase Review	DCA Submits to Agency for Initial Review	PAB files Notice with OAL	45-Day Comment Period Ended
11/06/2023	08/15/2025 (contingent on enactment of AB 1501)	11/03/2025	12/18/2025	12/29/2025	02/05/2026	04/10/2026
Board Reviews Comments from 45-day Comment Period	**Public Hearing Held (optional)**	**PAB Staff work with DCA Legal on Final Rulemaking Package**	**Submitted to DCA for Review**	**Submitted to Agency for Review**	**Submitted to OAL for Review**	**Effective Date**
N/A	N/A	04/23/2026	09/30/2026	Not required	10/22/2026	

This regulatory proposal will update existing regulations and bring them in line with changes made to the Physician Assistant Practice Act by SB 697 (Caballero, Chapter 707, Statutes of 2019), and the requirements imposed by AB 2113 (Low, Chapter 186, Statutes of 2020). These amendments specify the requirements for applications of licensure and remove the regulatory requirement that the Board establish a passing score for the licensure examination. These amendments clarify in regulation the AB 2113-mandated expedited application review for active-duty members and spouses of active-duty members of the Armed Forces of the United States, as well as refugees, asylees, and special immigrant visa holders.

After numerous changes over the years, the Board reviewed and adopted final proposed revised regulatory language to continue the rulemaking process at the August 15, 2025 Board meeting. Staff finalized the initial rulemaking documents with Regulations Counsel and filed the Notice with the Office of Administrative Law (OAL) on February 5, 2026. While notice of this rulemaking was filed with the OAL and published in the California Regulatory Notice Register on February 20, 2026, the Notice of Proposed Regulatory Action, Proposed Regulatory Language and Initial Statement of Reasons were inadvertently not posted to the Board's

website and the Notice of Proposed Regulatory Action was not sent by mail or electronic communication to persons required to receive notice on February 20, 2026. Rather, these actions were taken on February 23, 2026. Therefore, the Executive Officer, on behalf of the Board, extended the end date of the public comment period to April 10, 2026 after confirming with OAL that this proposed extension would address the error. No comments were received during the public comment period, and the final rulemaking file was sent to the Acting Director for review on April 28, 2026. Once approved, the final documents were submitted to OAL for final review on May 21, 2026. Staff met with the assigned OAL reviewing attorney and discussed changes to the text. At its August 14, 2026 meeting, the Board reviewed and approved the proposed modified text so staff can initiate a 15-day public comment period. The 15-day public comment period ended on September 8, 2026, and no comments were received. The final documents were submitted to OAL for final review on October 22, 2026. A final decision from OAL is expected on or before December 7, 2026.

3. 16 CCR 1399.515 – AB 2461: Retired Status Updates and Returned Fingerprint Requirement

Proposed Language for Board discussion	Board Approved Language to Notice	PAB Staff work with DCA Legal & Budgets on Pre-review of Documents	Submitted to DCA for Initial Phase Review	DCA Submits to Agency for Initial Review	PAB files Notice with OAL	45-Day Comment Period Ended
04/21/2025	04/21/2025, revised 11/17/2025	04/02/2026	05/18/2026	09/02/2026	09/23/2026	
Board Reviews Comments from 45-day Comment Period	Public Hearing Held (optional)	PAB Staff work with DCA Legal on Final Rulemaking Package	Submitted to DCA for Review	Submitted to Agency for Review	Submitted to OAL for Review	Effective Date

This regulatory proposal would require retired status licensees who seek to re-activate their license to provide fingerprints to the Department of Justice so that the Board may conduct criminal history background checks. This would eliminate the risk of the Board reactivating a license of a retired PA who got a state or federal arrest or disposition since retiring their license. The Board voted to adopt the proposed regulatory language to initiate the rulemaking process at the April 21, 2025 Board meeting. The Board reviewed and adopted proposed revised regulatory language to continue the rulemaking process at the November 17, 2025 meeting. Staff finalized the initial documents and submitted initial documents for Budget and Legal review on April 2, 2026. The package was sent to the Acting Director for review on May 18, 2026, and was approved on August 30, 2026. It was sent to Agency for review on September 1, 2026. Agency approved the package on September 22, 2026, and the Notice was filed with the Office of Administrative

Law (OAL) on September 23, 2026 to initiate the 45-day public comment period beginning on October 9, 2026. The public comment period for this regulatory proposal ends on November 23, 2026.

4. 16 CCR 1399.523 – SB 1441: Implement Uniform Standards Related to Substance Abusing Licensees and Update of Disciplinary Guidelines

Proposed Language for Board discussion	Board Approved Language to Notice	PAB Staff work with DCA Legal & Budgets on Pre-review of Documents	Submitted to DCA for Initial Phase Review	DCA Submits to Agency for Initial Review	PAB files Notice with OAL	45-Day Comment Period Ended
Board Reviews Comments from 45-day Comment Period	**Public Hearing Held (optional)**	**PAB Staff work with DCA Legal on Final Rulemaking Package**	**Submitted to DCA for Review**	**Submitted to Agency for Review**	**Submitted to OAL for Review**	**Effective Date**

This package reflects updates to the Board's Disciplinary Guidelines and includes incorporating relevant updates to the portions of the Uniform Standards Regarding Substance-Abusing Healing Arts licensees (Uniform Standards) required by Business and Professions Code section 315. It brings Board regulations in line with updates made by the Substance Abuse Coordination Committee (SACC) in 2019. The SACC was established by SB 1441 (Ridley-Thomas, Chapter 548, Statutes of 2008), and develops department-wide Uniform Standards required by law to be "used" by healing arts boards in this Department. Staff is working on the proposed language for Board consideration at a future board meeting next calendar year.