

**MEMORANDUM**

**TO:** Theresa Stir, Ohio Veterinary Medical Licensing Board

**FROM:** Jacob Ritzenthaler, Regulatory Policy Advocate

**DATE:** February 1, 2018

**RE:** **CSI Review – E-Licensing (OAC 4741-1-02, 4741-1-03, 4741-1-08, 4741-1-11, 4741-1-13, and 4741-1-20)**

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On behalf of Lt. Governor Mary Taylor, and pursuant to the authority granted to the Common Sense Initiative (CSI) Office under Ohio Revised Code (ORC) section 107.54, the CSI Office has reviewed the abovementioned administrative rule package and associated Business Impact Analysis (BIA). This memo represents the CSI Office's comments to the Agency as provided for in ORC 107.54.

**Analysis**

This rule package contains six amended rules proposed by the Ohio Veterinary Medical Licensing Board (Board). The rule package was submitted to the CSI Office on October 16, 2017 and the public comment period was held open through November 6, 2017.

The rules in Ohio Administrative Code (OAC) Chapter 4741-1 set forth general regulations for veterinary facilities in the state. The rules in this package are being amended to implement changes that adhere to the e-licensing system. These changes include allowing renewal applications to be submitted electronically and the elimination of requirements involving the display of renewal certificates. OAC 4741-1-13 is being amended to implement changes made to OAC 901:12-6-02, which prohibits the tail docking of dairy cows by unlicensed individuals.

During early stakeholder outreach, the Board sent the proposed rules to veterinary medical associations and relevant industry stakeholders for feedback. The Board received feedback from the Ohio Veterinary Medical Association and industry stakeholders regarding the transition to the

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new e-licensing system and changes to the livestock management rule. The Board accepted these suggestions and made amendments to the rule to reflect the necessary changes. No comments were received during the CSI public comment period.

The business communities impacted by these rules include all veterinarians and veterinary technicians in the state. The adverse impacts created by these rules include fees for license application and renewal, as well as time spent pursuing continuing education requirements. License renewal fees, which must be paid every two years, cost \$155 for veterinarians and \$35 for veterinary technicians. A veterinary specialist must pay a one-time license application fee of \$50. Additionally, the amendments to the rules include new fees for processing renewal applications through the e-licensing system, which cost \$3.50 per application and go towards maintaining the system. The Board acknowledges in the BIA that the cost of acquiring continuing education hours can vary greatly but gives examples which range from free online courses to conferences that can cost \$270. In the BIA, the Board states that the rules provide businesses with guidelines for practicing safely, and that the amendments allow for quicker and easier license renewal. After reviewing the proposed rules and the BIA, the CSI Office has determined that the rules satisfactorily meet the standards espoused by the CSI Office, and the purpose of the rule package is justified.

### **Recommendations**

For the reasons described above, the CSI Office has no recommendations on this rule package.

### **Conclusion**

Based on its review of the proposed rule package, the CSI Office recommends the Ohio Veterinary Medical Licensing Board should proceed in filing the proposed rules with the Joint Committee on Agency Rule Review.