



Common Sense Initiative

Mike DeWine, Governor
Jon Husted, Lt. Governor

Carrie Kuruc, Director

MEMORANDUM

TO: Theresa Stir, Ohio Veterinary Medical Licensing Board

FROM: Ethan Wittkorn, Regulatory Policy Advocate

DATE: February 14, 2020

RE: CSI Review – Approval of Euthanasia Agent & Technician Certification Course (4741-1-23)

On behalf of Lt. Governor Jon Husted, 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 Board as provided for in ORC 107.54.

Analysis

This Ohio Veterinary Medical Licensing Board (Board) rule package consists of one amended rule. It was submitted to the CSI Office on December 13, 2019, and the public comment period was open through January 14, 2019. Unless otherwise noted below, this recommendation reflects the version of the proposed rules filed with the CSI office on December 13, 2019.

The proposed rule serves to approve the course curriculum for euthanasia agent certifications and euthanasia technician certifications. Proposed amendments to the rule include the addition of tiletamine, zolazepam, ketamine hydrochloride, and xylazine to the approved list of drugs for the purposes of sedating or anesthetizing an animal for euthanasia in an animal shelter. Additional amendments include reference and organizational updates and the removal of requirements that veterinarians and veterinarian technicians overseeing laboratory courses be licensed in Ohio. The Board also added curriculum requirements for storage of anesthetizing and sedative agents.

During the period of early stakeholder outreach, the Board sought comments on the proposed rules by posting them to the Board website. Additionally, the Board shared the proposed rules directly

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with the Ohio Board of Pharmacy and the Ohio Veterinary Medical Association (OVMA). The OVMA worked with the board to make changes to the rules, which are reflected in the version filed with CSI. Additionally, the Pharmacy Board and the Veterinary Medical Board both approved the suggested edits to the proposed rules. No comments were submitted during the CSI public comment period.

Impacted communities include veterinarians, registered veterinarian technicians, current and prospective euthanasia agents, and animal shelters. Impacts include the completion of the proposed curriculum to engage in work as a euthanasia technician and any costs associated with the completion of the course. The Board states that the intent of the proposed rules is to establish uniform regulations for the security, storage, and usage of dangerous drugs. Additionally, ORC 4729.532 requires the board to approve drugs to be utilized by animal shelters for euthanasia, and the applicable curriculum.

Recommendations

Based on the information above, the CSI Office has no recommendations on this rule package.

Conclusion

The CSI Office concludes that the Board should proceed in filing the proposed rules with the Joint Committee on Agency Rule Review.