



Common Sense Initiative

Mike DeWine, Governor
Jon Husted, Lt. Governor

Sean McCullough, Director

MEMORANDUM

TO: Theresa Stir, Ohio Veterinary Medical Licensing Board

FROM: Ethan Wittkorn, Regulatory Policy Advocate

DATE: June 2, 2021

RE: CSI Review – Euthanasia Rule (OAC 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 April 20, 2021, and the public comment period was open through May 13, 2021. Unless otherwise noted below, this recommendation reflects the version of the proposed rule filed with the CSI Office on April 20, 2021.

The proposed rule covers drugs to be used for euthanasia, approved persons to conduct euthanasia, and curriculum for euthanasia certification courses. Amendments have been proposed to clarify that the rule applies to euthanasia technicians, to clarify who may perform euthanasia on an animal, and to make organizational updates.

During the period of early stakeholder outreach, the Board shared the proposed rule with the Ohio Board of Pharmacy and the Ohio Veterinary Medical Association (OVMA). Additionally, the Board posted notification of the proposed rule change to their website for public view. The OVMA submitted comments during this time that led the Board to further amend the rule. No comments were received during the CSI public comment period.

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Affected communities may include veterinarians, veterinary technicians, and euthanasia technicians, practicing in animal shelters. Adverse impacts may include potential costs associated with certification courses, certifications by the Ohio Board of Pharmacy, and the submission of course information to the Board. The rule, in tandem with regulations implemented by the Ohio Board of Pharmacy, serves to provide affected communities with a uniform standard for security and use of dangerous drugs used for euthanasia. In turn, these standards may help to provide better safety measures to protect providers and the public.

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.