

## CHAPTER REVIEW AND SUMMARY

<b>Bureau Name</b>	Iowa Board of Veterinary Medicine	<b>Total Rule Count</b>	9
<b>Staff Member</b>		<b>Number of Pages</b>	5
<b>Chapter or Rule</b>	811 IAC chapter 6	<b>Code Section Authorizing Rule</b>	section 169.5(7)(j)

**Provide a summary of what public benefits the Chapter/Rule seeks to accomplish:**

This chapter provides for the process and requirements to obtain a license to practice veterinary medicine in Iowa. The chapter includes but not limited to, the application procedure, the requirements for license, the fees, and defines specific license types. The benefit to the public is a standardized process to ensure that the Iowa Board of Veterinary Medicine is granting a license to qualified veterinarians. The benefit to veterinarians is a clear understanding of the process to become a licensed veterinarian in Iowa.

**Are the intended public benefits being achieved?**

Yes. Veterinarians understand what the requirements are to become licensed, and the public is protected by a process that licenses veterinarians with standards that are applied equally.

**Provide a breakdown of the fees included in the Chapter as well as revenue generated over the previous 5 fiscal years; Include where the funds are deposited:**

See table below.

Validation Code	Bureau	Description	Authorization	Frequency	Amount Charged	Where is the fee amount listed? C=Code; R=Rule; N=neither	SFY23	SFY22	SFY21	SFY20	Number of Payers SFY20	SFY19	Number of Payers SFY19	SFY18	Where Deposited?
002	Animal Industry	Verification of Vet License	Statute-Chapter 169.5	Upon Request	\$15.00	R	3,580	2,950	2,825	3,525	235	3,989	265	3,165	IDALS
026	Animal Industry	State Vet License/Vet Tech Registration Renewal	Statute-Chapter 169.5 & 169.20	Three year	State Vet Licence - \$60	R	153,935	14,910	32,765	156,800	2,612	12,335	216	30,475	IDALS
027	Animal Industry	Vet Tech Exam	Statute-Chapter 169.20	Quarterly	\$45.00	R	2,600	3,025	2,310	990	22	3,060	68	3,650	State
053	Animal Industry	National Vet Examination	Statute Chapter 169.9	Twice/yr	reimbursement of actual cost	N	-	425	2,050	1,875	75	2,275	91	225	IDALS
074	Animal Industry	Vet Tech Registration/Other Fees			Vet Tech Renewal - \$15		30	210	8,095						State
	<b>Animal Industry Total</b>						<b>160,145</b>	<b>21,520</b>	<b>48,045</b>	<b>229,710</b>		<b>21,659</b>		<b>37,515</b>	

**What costs are incurred by the public to comply with the Chapter or Rule?**

There are no direct costs to the public regarding licensing veterinarians. The only costs imposed are on the applicants for licensure.

**What costs are incurred by the bureau or other agencies to implement/enforce the Chapter or Rule?**

Costs incurred to execute and enforce Chapter 811 are borne by the Iowa Department of Agriculture and Land Stewardship and the Iowa Board of Veterinary Medicine. The major cost is staff time. Staff and estimated percentage of time allocated is as follows; Executive Secretary of the Iowa Board of Veterinary Medicine (State Veterinarian) 15% FTE, Program Planner 2 60% FTE, and two Compliance Investigators 40% each (one Compliance Investigator 80% FTE). Other costs associated would include, but are not limited to, hiring expert witnesses, costs associated with hearings, legal staff, and office supplies.

**Do the costs justify the benefits achieved? Explain.**

The costs justify the process to ensure that licenses are issued to qualified and competent veterinarians.

**Are there alternatives that should be considered to achieve the benefit?**  YES  NO

**If YES, please list alternative(s) and provide analysis of less restrictive alternatives from other states, if applicable. If NO, please explain.**

There does not appear to be an alternative because the license requirements for veterinarians is specified in chapter 169.

**Does this Chapter or Rule contain language that is obsolete, outdated, inconsistent, redundant, or unnecessary language, including instances where rule language is duplicative of statutory language? [list chapter/rule number(s) that fall under any of the above categories]**

Yes. The Board reviewed this chapter and identified several words that were unnecessary or redundant of statute.

**RULES PROPOSED FOR REPEAL – List rule number(s):**

811 Iowa Admin. Code 6.5(1)(a)-(e), 6.6(1)(a)-(b), 6.6(2)(d)(1)-(7), 6.6(4)-(5)

**RULES PROPOSED FOR RE-PROMULGATION – List rule number(s) and please email an attachment with suggested changes (specific changes can be worked out later):**

811 Iowa Admin. Code 6.1, 6.2, 6.3 6.4, 6.5, 6.6, 6.7, 6.8 and 6.9

**Are there any rules that you would recommend be codified in statute?**

811 Iowa Admin. Code 6.1(2)(f) and 6.4(3)-(4) (PAVE)

**METRICS**

<b>Total number of rules repealed</b>	16 subrules
<b>Proposed word count reduction after repeal and/or re-promulgation</b>	2934-2395=539

## REGULATORY ANALYSIS

### 1. Persons affected by the proposed rule

Classes of persons that will bear the costs of the proposed rule:

Veterinarians seeking licensure in Iowa.

Classes of persons that will benefit from the proposed rule:

Citizens of Iowa that need to seek the services of veterinarians. Because Veterinarians are an integral part of food safety, the public can be assured that livestock are raised, treated and harvested in a humane way. Veterinarians would also benefit from this proposed rule.

### 2. Impact of the proposed rule, economic or otherwise, including the nature and amount of all the different kinds of costs that would be incurred

Quantitative description of impact:

Costs associated with this rule are the licensing fees and associated costs to obtain a veterinary license in Iowa. These costs are borne by the veterinarians seeking an Iowa license.

Qualitative description of impact:

The rule requires certain education, examination, and/or certification requirements be met before obtaining a license to practice veterinary medicine.

### 3. Costs to the state

Implementation and enforcement costs borne by the agency or any other agency:

Costs incurred to execute and enforce Chapter 811 are borne by the Iowa Department of Agriculture and Land Stewardship and the Iowa Board of Veterinary Medicine. The major cost is staff time. Staff and estimated percentage of time allocated is as follows; Executive Secretary of the Iowa Board of Veterinary Medicine (State Veterinarian) 15% FTE, Program Planner 2 60% FTE, and two Compliance Investigators 40% each (one Compliance Investigator 80% FTE). Other costs associated would include, but are not limited to, hiring expert witnesses, costs associated with hearings, legal staff, and office supplies.

Anticipated effect on state revenues:

Minimal. The license application process requires applicants to pay a fee to mitigate some of the costs to the State to review and approve license applications.

### 4. Comparison of the costs and benefits of the proposed rule to the costs and benefits of inaction

Inaction or not licensing veterinarians would have a huge negative impact in Iowa on the quality of veterinarians practicing and the effects it would have on pets and livestock.

**5. Determination if less costly methods or less intrusive methods exist for achieving the purpose of the proposed rule**

There is not an alternative because the license requirements for veterinarians is specified in chapter 169.

**6. Alternative methods considered by the agency**

Description of any alternative methods that were seriously considered by the agency:

Currently none have been considered.

Reasons why they were rejected in favor of the proposed rule:

N/A. See prior answer.

**Small Business Impact**

If the rule will have a substantial impact on small business, include a discussion of whether it would be feasible and practicable to do any of the following to reduce the impact of the rule on small business:

- Establish less stringent compliance or reporting requirements in the rule for small business.
- Establish less stringent schedules or deadlines in the rule for compliance or reporting requirements for small business.
- Consolidate or simplify the rule's compliance or reporting requirements for small business.
- Establish performance standards to replace design or operational standards in the rule for small business.
- Exempt small business from any or all requirements of the rule.

If legal and feasible, how does the rule use a method discussed above to reduce the substantial impact on small business?

This rule does not impose requirements on any businesses—just licensure requirements on persons wishing to practice veterinary medicine in Iowa. Accordingly, there does not appear to be any impacts on small businesses.