

CHAPTER REVIEW AND SUMMARY

Bureau Name	Iowa Board of Veterinary Medicine	Total Rule Count	5
Staff Member		Number of Pages	2
Chapter or Rule	811 IAC chapter 9	Code Section Authorizing Rule	sections 169.5(7)(j) and 169.11

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

This chapter outlines the process and requirement to obtain temporary veterinary permits. The chapter defines the different types of temporary permits and what is required to obtain one. One of the temporary permits is the temporary education permit. The benefit of this permit is that it allows Iowa State University to permit interns and residents to practice under the scope of their program at Iowa State University College of Veterinary Medicine. The chapter also defines the grounds for discipline and disciplinary procedures.

Are the intended public benefits being achieved?

Yes. The temporary permits provide an alternative licensing option to veterinarians that do not wish to obtain a full license, while still ensuring licensing of competent veterinarians.

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:

There are no fees directly associated with this chapter. Fees for temporary permits are contained in chapter 6.

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

There are no costs incurred by the public. The only costs imposed are on the persons wanting to become temporary licensed veterinarians in Iowa.

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.

Yes. The temporary permit is statutorily authorized and allows for the licensing of veterinarians who are in intern or residency programs at ISU or do not seek a full license.

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.

These are specifically defined temporary permit types.

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):

None.

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 9.1, 9.2, 9.3, 9.4, and 9.5

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

None.

METRICS

Total number of rules repealed	0
Proposed word count reduction after repeal and/or re-promulgation	855-822=33

REGULATORY ANALYSIS

1. Persons affected by the proposed rule

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

Persons seeking temporary licensure to practice veterinary medicine in Iowa.

Classes of persons that will benefit from the proposed rule:

The general public will benefit from this rule, as well as Iowa State University College of Veterinary Medicine. Veterinarians employed by temporary licensure at Iowa State University may have specialized training and education allowing them to offer specialized coursework not currently available. Pet and livestock owners are also specific persons that will benefit.

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:

There are no direct costs to the public imposed by this rule.

Qualitative description of impact:

The only qualitative impact of the rule would be the underlying substantive requirements applicants for temporary licensure must meet in order to obtain licensure. Those impacts include certain educational or experiential minimums.

3. Costs to the state

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

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

Anticipated effect on state revenues:

See prior answer.

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

Inaction would far exceed the costs associated with this rule. Iowa State College of Veterinary Medicine would be greatly limited in its ability to operate with enough veterinary staff. Practices that rely on qualified veterinarians that wish to only practice for a limited time, would also be at a disadvantage without this rule.

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

There are no alternatives to address this specific temporary permit.

6. Alternative methods considered by the agency

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

N/A. See prior answer.

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 obtain temporary permits to practice veterinary medicine in Iowa. The rule may actually benefit small businesses by providing for the ability to temporarily hire or retain experts in certain fields of veterinary medicine that would otherwise prove cost prohibitive if required to be hired/retained full-time.