

CHAPTER REVIEW AND SUMMARY

Bureau Name	Iowa Board of Veterinary Medicine	Total Rule Count	3
Staff Member		Number of Pages	2
Chapter or Rule	811 IAC chapter 11	Code Section Authorizing Rule	section 169.5(7)(j)

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

This rule establishes minimum continuing education requirements for Veterinarians within the state of Iowa. The public benefits by having Veterinarians in the state being continually educated and updated on the most current Veterinary medical standards. This will ensure greater quality of life for companion animals and healthy, safe, secure and humane treatment of livestock that will be harvested and enter the human food supply. Continuing education for veterinarians on matters related to diversion of controlled substances is vital to addressing impaired practitioners.

Are the intended public benefits being achieved?

Yes. Veterinarians within the state are regularly being educated and updated on the most current medical procedures.
The food supply produced within the state is very safe and wholesome.
In addition, through education, plans have been put in place in the event of a foreign animal disease outbreak or a possible terrorist attack on our food supply.
Veterinarians are continuously learning about additional resources and efforts to recognize, address and limit the diversion of controlled substances and protect the public from impaired practitioners.

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 associated with Chapter 11

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

There are no costs incurred by the public to comply with Chapter 11. The costs incurred by licensed veterinarians can vary depending upon the type and duration of the continuing education program, but licensees retain the ability to select the courses they take among a diverse array of courses with varying levels of cost.

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 public deserves to have fully licensed Veterinarians who regularly update their education to ensure that all animals receive adequate care and veterinarians are aware of significant issues, including diversion of controlled substances, affecting their profession. In addition, there is a moral and ethical responsibility to maintain a wholesome and safe food supply.

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.

Continuing education is vitally important to ensuring licensed veterinarians in Iowa are continually updated and educated on new issues and methods to safely and competently practice veterinary medicine. Iowa's requirements are in line with most other states.

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 outdated.

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 11.1, 11.2 and 11.3

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	740-726=14

REGULATORY ANALYSIS

1. Persons affected by the proposed rule

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

The Veterinarians seeking their license will bear the cost of seeking out continuing education opportunities.

Classes of persons that will benefit from the proposed rule:

All pet owners and producers of livestock within the state. 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.

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 costs incurred by the public to comply with Chapter 11. The costs incurred by licensed veterinarians can vary depending upon the type and duration of the continuing education program, but licensees retain the ability to select the courses they take among a diverse array of courses with varying levels of cost.

Qualitative description of impact:

The qualitative impacts of the rule would likely be limited to the time required (60 hours over a three-year period) to attend and participate in the continuing education courses and preparing/submitting continuing education approvals to the Board.

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. Continuing education is reported to the Board as part of the license renewal process, and the application process requires applicants to pay a fee to mitigate some of the costs to the State to review and approve license applications and continuing education.

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

Removing this rule would potentially have a negative effect on the health and wellbeing of both companion animals and livestock within the state.

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

Continuing education is vitally important to ensuring licensed veterinarians in Iowa are continually updated and educated on new issues and methods to safely and competently practice veterinary medicine. Iowa's requirements are in line with most other states.

6. Alternative methods considered by the agency

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

Iowa reviewed continuing education requirements in other surrounding states, and Iowa is in line with most other states.

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

N/A. See prior answers.

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 continuing education requirements on persons wishing to renew their license to practice veterinary medicine in Iowa. Accordingly, there does not appear to be any impacts on small businesses.