



Economic Impact Analysis Virginia Department of Planning and Budget

18 VAC 150-20 – Regulations Governing the Practice of Veterinary Medicine Department of Health Professions April 18, 2005

The Department of Planning and Budget (DPB) has analyzed the economic impact of this proposed regulation in accordance with Section 2.2-4007.G of the Administrative Process Act and Executive Order Number 21 (02). Section 2.2-4007.G requires that such economic impact analyses include, but need not be limited to, the projected number of businesses or other entities to whom the regulation would apply, the identity of any localities and types of businesses or other entities particularly affected, the projected number of persons and employment positions to be affected, the projected costs to affected businesses or entities to implement or comply with the regulation, and the impact on the use and value of private property. The analysis presented below represents DPB's best estimate of these economic impacts.

Summary of the Proposed Regulation

The Board of Veterinary Medicine (board) proposes to require that for all initial rabies inoculations, the rabies certificate shall contain the following language: "An animal is not considered immunized for at least 28 days after the initial or primary vaccination is administered."

Estimated Economic Impact

At its February 3, 2005 meeting, the board discussed a concern raised by the owner of a kitten that had been vaccinated for rabies six days prior to being bitten by an unidentified animal. The owner had not been made aware that it would require 28 days before her kitten's inoculation would be considered by health officials to be effective. She was informed that her kitten would either need to be quarantined for six months or euthanized.

In consideration of the seriousness of rabies and the fact that the public is most likely unaware of having to wait 28 days before a rabies vaccination is effective, the board voted

unanimously to amend its regulations to ensure that licensees acted on the need to inform clients of the waiting period. It determined that for all initial rabies inoculations, the rabies certificate should contain the following language: “An animal is not considered immunized for at least 28 days after the initial or primary vaccination is administered.” According to the Department of Health Professions, the additional disclosure may be handwritten, typed, or stamped on the certificate. Thus, the cost of compliance for veterinarians and their staff is small. As demonstrated by the case that was brought to the board’s attention, the knowledge that animals are not considered immunized for at least 28 days after the initial or primary vaccination is administered can be quite valuable for animal owners. Many such owners would likely take some additional effort to keep their animals from exposure to wild animals during those 28 days if informed of the delay in effectiveness of the inoculation,¹ as well as the consequences of quarantine or euthanasia. It is not known how often veterinarians or their staff verbally communicate to the animal owner about the 28 day delay in effectiveness of the inoculation; but even for those that do, having the information visually presented will increase the probability that owners will absorb or pay attention to this information. The benefit of the potential for reduced exposure to rabid animals due to the likely increase in comprehension of the risks by animal owners, likely exceeds the small compliance costs for veterinarians and their staff. Thus, the proposed amendment to the regulations will likely produce a net benefit.

Businesses and Entities Affected

The proposed requirement potentially affects the 3,094 licensed veterinarians and 936 licensed veterinary technicians² in the Commonwealth, as well as their patients and their patients’ owners.

Localities Particularly Affected

The proposed regulations affect all Virginia localities.

Projected Impact on Employment

The proposed amendment will not significantly affect employment levels.

¹ Source for this data: the Department of Health Professions cites the U.S. Centers for Disease Control’s latest recommendation and report relating to rabies in their *Compendium of Animal Rabies Prevention and Control, 2004* under “Control Methods in Domestic and Confined Animals, Pre-exposure Vaccination and Management.”

² Source: Department of Health Professions.

Effects on the Use and Value of Private Property

Veterinarians or their staff will write, type or stamp “An animal is not considered immunized for at least 28 days after the initial or primary vaccination is administered” on rabies certificates. The cost of doing so is quite small and will not have a large impact on the value of the business.