



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 2, 2013

Summary of the Proposed Amendments to Regulation

The Board of Veterinary Medicine (Board) proposes to: 1) allow international conferences of veterinary medicine to be used for continuing education 2) change the required time frame for licensure reinstatement from 30 days after expiration to one year; and 3) revise the requirement for delegation of animal massage.

Result of Analysis

The benefits likely exceed the costs for all proposed changes.

Estimated Economic Impact

International conferences for continuing education

The current regulations specify that “National or regional conferences of veterinary medicine” are acceptable sponsors for continuing education courses or programs. The Board proposes to add international conferences of veterinary medicine to the list of accepted sponsors. As the Department of Health Professions points out, there are several high quality international conferences that the Board believes should be accepted. For those veterinarians with interest in international conferences, this proposed additional option for continuing education credit will be beneficial. Since there appears to be no cost or reduction in assurance of licensed veterinarians’ skills associated with the proposed amendment, it should create a net benefit.

Time frame for reinstatement

Currently, a license may be renewed up to 30 days after expiration by payment of a late fee and the renewal fee. After 30 days, the licensee must reinstate with payment of the

reinstatement and renewal fees. For veterinarians, the reinstatement fee is \$175. For veterinary technicians, the reinstatement fee is \$50.

The Board proposes to allow late renewal up to one year after expiration; the late fee is \$45 for veterinarians and \$15 for veterinary technicians. Licensees who renew an expired license between 31 days and one year after the expiration date will therefore realize a saving of \$130 for veterinarians and \$35 for veterinarian technicians.

Reinstatement also requires submission of all documentation showing completion of continuing education. A late renewal only requires that the licensee attest to have completed the continuing education hours. Thus the proposal to allow late renewal up to one year after expiration will also save time in the assembling and transmitting of documents for licensees who renew an expired license between 31 days and one year after the expiration date.

Delegation of animal massage

Under the current regulations “Animal massage or physical therapy may be delegated by a veterinarian to persons qualified by training and experience by an order from the veterinarian.” The Board does not believe simple animal massage needs to be delegated by an order. Similar to human massage, it may be done in a spa-like facility. However, massage therapy is typically used to treat a medical condition and the Board believes it should continue to be delegated by an order. Therefore, the Board proposes to change the term “animal massage” to “massage therapy” in the quoted sentence above. In practice, this change just results in no longer needing a delegation order for simple massage. This will result in a small time savings for veterinary practices.

Businesses and Entities Affected

The proposed amendments affect the 272 restricted veterinary facilities and 736 full-service veterinary facilities in the Commonwealth;¹ all or most of which qualify as small businesses. The proposed amendments also directly affect the 3771 licensed veterinarians, 1613 licensed veterinary technicians and 22 registered equine dental technicians in Virginia.

Localities Particularly Affected

The proposed amendments do not disproportionately affect particular localities.

Projected Impact on Employment

The proposed amendments are unlikely to significantly affect employment.

Effects on the Use and Value of Private Property

The proposal to add international conferences of veterinary medicine to the list of accepted sponsors for continuing education courses and programs will increase the likelihood that veterinarians attend international conferences. The proposal to change the required time frame for reinstatement from 30 days after expiration to one year will decrease costs for veterinarians and veterinarian technicians who renew an expired license between 31 days and one year after the expiration date. The proposal to revise the requirement for delegation of animal massage will save a small amount of time for veterinary practices.

Small Businesses: Costs and Other Effects

The proposed amendments will not increase costs for small businesses. The proposal to change the required time frame for reinstatement from 30 days after expiration to one year will decrease costs for small veterinary practices where veterinarians or veterinarian technicians renew an expired license between 31 days and one year after the expiration date. The proposal to revise the requirement for delegation of animal massage will save a small amount of time for small veterinary practices.

Small Businesses: Alternative Method that Minimizes Adverse Impact

The proposed amendments do not adversely affect small businesses.

Real Estate Development Costs

The proposed amendments will not affect real estate development costs.

Legal Mandate

The Department of Planning and Budget (DPB) has analyzed the economic impact of this proposed regulation in accordance with Section 2.2-4007.04 of the Administrative Process Act and Executive Order Number 14 (10). Section 2.2-4007.04 requires that such economic impact analyses include, but need not be limited to, a determination of the public benefit, the projected number of businesses or other entities to whom the regulation would apply, the identity of any

¹ Data source: Department of Health Professions

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. Further, if the proposed regulation has an adverse effect on small businesses, Section 2.2-4007.04 requires that such economic impact analyses include (i) an identification and estimate of the number of small businesses subject to the regulation; (ii) the projected reporting, recordkeeping, and other administrative costs required for small businesses to comply with the regulation, including the type of professional skills necessary for preparing required reports and other documents; (iii) a statement of the probable effect of the regulation on affected small businesses; and (iv) a description of any less intrusive or less costly alternative methods of achieving the purpose of the regulation. The analysis presented above represents DPB's best estimate of these economic impacts.