



Virginia Department of Planning and Budget **Economic Impact Analysis**

18 VAC 150-20 Regulations Governing the Practice of Veterinary Medicine
Department of Health Professions
Town Hall Action/Stage: 5870 / 9470
January 7, 2022

The Department of Planning and Budget (DPB) has analyzed the economic impact of this proposed regulation in accordance with § 2.2-4007.04 of the Code of Virginia (Code) and Executive Order 14 (as amended, July 16, 2018). The analysis presented below represents DPB's best estimate of these economic impacts.¹

Summary of the Proposed Amendments to Regulation

In response to a petition for rulemaking from the Executive Director of the American Association of Veterinary State Boards, the Board of Veterinary Medicine (Board) proposes to accept PAVE certification as satisfying the educational requirements necessary for licensure as a veterinary technician. PAVE is the Program for the Assessment of Veterinary Education Equivalence for veterinary technicians by the American Association of Veterinary State Boards.

Background

The Department of Health Professions (DHP) states that the purpose of this regulatory action is to provide a pathway to licensure for persons educated in veterinary technology outside the U.S. or Canada, without requiring the additional costs and time associated with completion of a degree from an accredited program in the U.S. or Canada. PAVE assesses the education equivalence of international veterinary technician/nurse graduates through course review and

¹ Code § 2.2-4007.04 requires that such economic impact analyses determine the public benefits and costs of the proposed amendments. Further the analysis should include but not be limited to: (1) the projected number of businesses or other entities to whom the proposed regulatory action would apply, (2) the identity of any localities and types of businesses or other entities particularly affected, (3) the projected number of persons and employment positions to be affected, (4) the projected costs to affected businesses or entities to implement or comply with the regulation, and (5) the impact on the use and value of private property.

substantiation of English proficiency. PAVE has been operational for veterinarians for about 20 years.² It is now in the process of beginning to assess programs for veterinary technicians.

Estimated Benefits and Costs

The current regulation requires that applicants for licensure by examination as a veterinary technician have received a degree in veterinary technology or veterinary nursing from a college or school accredited by the American Veterinary Medical Association or the Canadian Veterinary Medical Association. The proposal is to also accept a PAVE certificate, which is available to a veterinary technician/nurse whose degree was conferred outside of the United States and Canada by a recognized post-secondary, professional school of veterinary technology/nursing or equivalent program.³

According to DHP, PAVE certification for veterinary technicians is not yet operational, but certain components of the PAVE certification process are anticipated. PAVE has set the application fee at \$300, and candidates for a certificate must take either the TOEFL⁴ iBT test (fee: \$235) or IELTS⁵ test (fee: \$250) to demonstrate English proficiency. For certification, PAVE may require that some candidates take one to three additional credit hours to supplement their foreign degree to achieve equivalency with the American and Canadian veterinary technology (or nursing) educational training.⁶ These courses could be completed at a local community college or through distance learning, and would cost \$100 to \$200 (in-state) per credit hour. That would be a cost ranging from \$100 to \$600 in course fees. All told the cost in fees would likely be less than \$1,200. There would also be the time costs associated with preparing for and taking the English proficiency test, and if necessary acquiring the one to three credit hours.⁷

These costs are considerably lower than acquiring a degree in veterinary technology or veterinary nursing from a college or school accredited by the American Veterinary Medical Association or the Canadian Veterinary Medical Association. According to DHP, the fees for

² See <https://aavsb.org/news/article/105>

³ See <https://aavsb.org/Download?url=s/hwa8pf812j0n5kv/PAVE%20for%20Veterinary%20Technician%20Standards%20and%20Policies.pdf>

⁴ TOEFL stands for Test of English as a Foreign Language.

⁵ IELTS stands for International English Language Testing System.

⁶ Source: DHP

⁷ All data provided by DHP.

obtaining an associate's degree in veterinary technology are between \$13,000 and \$15,000. It would also likely take approximately two years.⁸ Thus, the proposal clearly benefits persons who wish to become licensed as a veterinary technician in Virginia, but were educated in veterinary technology or nursing in a country outside the U. S. and Canada.

Businesses and Other Entities Affected

The proposal particularly affects persons who wish to become licensed as a veterinary technician in the Commonwealth, but were educated in veterinary technology or nursing in a country outside the U. S. and Canada. Indirectly, the proposal also potentially affects the 1,192 registered veterinary establishments⁹ in Virginia that may wish to hire such technicians.

The Code of Virginia requires DPB to assess whether an adverse impact may result from the proposed regulation.¹⁰ An adverse impact is indicated if there is any increase in net cost or reduction in net revenue for any entity, even if the benefits exceed the costs for all entities combined. No adverse impact is indicated for this proposal.

Small Businesses¹¹ Affected:¹²

The proposal does not appear to adversely affect small businesses.

⁸ Source: <https://www.collegerank.net/what-is-an-associates-degree/>

⁹ Data source: <https://www.dhp.virginia.gov/about/stats/2021Q4/04CurrentLicenseCountQ4FY2021.pdf>

¹⁰ Pursuant to Code § 2.2-4007.04(D): In the event this economic impact analysis reveals that the proposed regulation would have an adverse economic impact on businesses or would impose a significant adverse economic impact on a locality, business, or entity particularly affected, the Department of Planning and Budget shall advise the Joint Commission on Administrative Rules, the House Committee on Appropriations, and the Senate Committee on Finance. Statute does not define "adverse impact," state whether only Virginia entities should be considered, nor indicate whether an adverse impact results from regulatory requirements mandated by legislation.

¹¹ Pursuant to § 2.2-4007.04 of the Code of Virginia, small business is defined as "a business entity, including its affiliates, that (i) is independently owned and operated and (ii) employs fewer than 500 full-time employees or has gross annual sales of less than \$6 million."

¹² If the proposed regulatory action may have an adverse effect on small businesses, Code § 2.2-4007.04 requires that such economic impact analyses include: (1) an identification and estimate of the number of small businesses subject to the proposed regulation, (2) the projected reporting, recordkeeping, and other administrative costs required for small businesses to comply with the proposed regulation, including the type of professional skills necessary for preparing required reports and other documents, (3) a statement of the probable effect of the proposed regulation on affected small businesses, and (4) a description of any less intrusive or less costly alternative methods of achieving the purpose of the proposed regulation. Additionally, pursuant to Code § 2.2-4007.1, if there is a finding that a proposed regulation may have an adverse impact on small business, the Joint Commission on Administrative Rules shall be notified.

Localities¹³ Affected¹⁴

The proposal does not disproportionately affect particular localities or substantively affect costs for local governments.

Projected Impact on Employment

The proposal would make it easier for individuals educated as veterinary technicians or nurses outside of the U.S. or Canada to become employed as veterinary technicians in Virginia, but would not likely substantively affect total employment.

Effects on the Use and Value of Private Property

The proposal may make it modestly easier for veterinary establishments to find qualified veterinary technicians to hire, which may in turn modestly reduce their costs and commensurately increase their value. The proposal does not affect real estate development costs.

¹³ “Locality” can refer to either local governments or the locations in the Commonwealth where the activities relevant to the regulatory change are most likely to occur.

¹⁴ § 2.2-4007.04 defines “particularly affected” as bearing disproportionate material impact.