

Adverse impact notification sent to Joint Commission on Administrative Rules, House Committee on Appropriations, and Senate Committee on Finance (COV § 2.2-4007.04.C): Yes Not Needed

If/when this economic impact analysis (EIA) is published in the *Virginia Register of Regulations*, notification will be sent to each member of the General Assembly (COV § 2.2-4007.04.B).



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: 4193/7286
September 17, 2015

Summary of the Proposed Amendments to Regulation

As a result of a petition for rulemaking from a veterinary technician, the Board of Veterinary Medicine (Board) proposes to increase the number of continuing education hours that veterinary technicians must complete annually.

Result of Analysis

There is insufficient information to ascertain if benefits will outweigh costs for this regulatory action.

Estimated Economic Impact

Current regulation requires veterinary technicians to complete six hours of continuing education per year. Pursuant to a petition for rulemaking from a veterinary technician, the Board now proposes to increase the continuing education hours required of veterinary technicians to eight per year. Board staff reports that this action is being taken as a response to the petition for rulemaking and not because of any concerns raised by complaints about the general competency of veterinary technicians in the state. Board staff further reports that the Board believes that “additional hours can be obtained at no cost by taking advantage of on-line hours, those offered by vendors, specialty practices or local veterinary associations”. To the extent that additional hours of continuing education may increase the competency of veterinary technicians, veterinary

patients and their owners may benefit from this change. Any benefit that may accrue must be weighed against costs that veterinary technicians will likely incur.

If additional hours of training can be completed at no costs as the Board believes, veterinary technicians will only incur costs for their time spent in training, possible travel costs if training cannot be completed online and possible loss of salary for those two additional hours if paid time off to complete training is not part of their compensation package. If free training options are not readily available, convenient or varied enough, veterinary technicians may also incur class or seminar fees for the additional hours of training the Board is proposing.

Businesses and Entities Affected

Board staff reports there are currently 1,925 veterinary technicians licensed in the Commonwealth; all of these individuals, as well as any individuals who become licensed veterinary technicians in the future, will be affected by this proposed regulatory change.

Localities Particularly Affected

No locality in the Commonwealth will be particularly affected by this regulatory change.

Projected Impact on Employment

This proposed change is unlikely to impact employment in the Commonwealth.

Effects on the Use and Value of Private Property

This proposed change will likely have no impact on the use or value of private property.

Real Estate Development Costs

This proposed change will likely not affect real estate development costs.

Small Businesses:

Definition

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.”

Costs and Other Effects

Small business veterinarians may incur costs only if they pay for their veterinary technicians’ continuing education training.

Alternative Method that Minimizes Adverse Impact

Small business veterinarians who pay for their veterinary technicians' annual training would benefit if additional training were only required if it were necessary to insure competency by addressing identified deficiencies.

Adverse Impacts:

Businesses:

Veterinarians may incur costs only if they pay for their veterinary technicians' continuing education training.

Localities:

This proposed change is unlikely to adversely impact localities.

Other Entities:

This proposed change may adversely impact veterinary technicians who will likely incur costs for completing additional continuing education hours even if training options that do not include fees are available.

Legal Mandates

General: The Department of Planning and Budget 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 Number 17 (2014). Code § 2.2-4007.04 requires that such economic impact analyses determine the public benefits and costs of the proposed amendments. Further the report 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.

Adverse impacts: Pursuant to Code § 2.2-4007.04(C): 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 within the 45-day period.

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.

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