

**Michigan Office of Administrative Hearings and Rules**

**Administrative Rules Division (ARD)**

611 W. Ottawa Street

Lansing, MI 48909

Phone: 517-335-8658 Fax: 517-335-9512

**REGULATORY IMPACT STATEMENT  
and COST-BENEFIT ANALYSIS (RIS)**

**Agency Information:**

**Department name:**

Licensing and Regulatory Affairs

**Bureau name:**

Bureau of Professional Licensing

**Name of person filling out RIS:**

Dena Marks

**Phone number of person filling out RIS:**

517-335-3679

**E-mail of person filling out RIS:**

MarksD1@michigan.gov

**Rule Set Information:**

**ARD assigned rule set number:**

2021-57 LR

**Title of proposed rule set:**

Veterinary Medicine – General Rules

**Comparison of Rule(s) to Federal/State/Association Standard**

**1. Compare the proposed rules to parallel federal rules or standards set by a state or national licensing agency or accreditation association, if any exist.**

Each state establishes its own requirements with respect to the licensure of veterinarians, so there are no federal rules or standards set by a national or state agency that the proposed rules can be compared to.

**A. Are these rules required by state law or federal mandate?**

MCL 333.16145 requires that only a board or task force may promulgate rules to specify requirements for licenses, registrations, renewals, examinations, and required passing scores.

MCL 333.16287 requires the department, in consultation with the board, to promulgate rules to implement telehealth services.

The rules are not required by federal mandate.

**B. If these rules exceed a federal standard, please identify the federal standard or citation, describe why it is necessary that the proposed rules exceed the federal standard or law, and specify the costs and benefits arising out of the deviation.**

The proposed rules do not exceed a federal standard.

**2. Compare the proposed rules to standards in similarly situated states, based on geographic location, topography, natural resources, commonalities, or economic similarities.**

The proposed rules are consistent with the standards required in the Public Health Code and the rules are largely consistent with the requirements of other states in the Great Lakes Region. Every state in the Great Lakes region provides for the licensure of veterinarians.

**A. If the rules exceed standards in those states, please explain why and specify the costs and benefits arising out of the deviation.**

The standards pertaining to the licensure of veterinarians and continuing education requirements for renewal differ from state to state. Overall, the standards in the proposed veterinary medicine rules do not exceed those of the other states in the Great Lakes region.

**3. Identify any laws, rules, and other legal requirements that may duplicate, overlap, or conflict with the proposed rules.**

There are no other laws, rules, or other legal requirements that may duplicate, overlap, or conflict with these proposed rules.

**A. Explain how the rules have been coordinated, to the extent practicable, with other federal, state, and local laws applicable to the same activity or subject matter. This section should include a discussion of the efforts undertaken by the agency to avoid or minimize duplication.**

No coordination is needed because there are no other applicable laws that regulate the areas addressed in the proposed rules.

**4. If MCL 24.232(8) applies and the proposed rules are more stringent than the applicable federally mandated standard, provide a statement of specific facts that establish the clear and convincing need to adopt the more stringent rules.**

MCL 24.232(8) does not apply.

**5. If MCL 24.232(9) applies and the proposed rules are more stringent than the applicable federal standard, provide either the Michigan statute that specifically authorizes the more stringent rules OR a statement of the specific facts that establish the clear and convincing need to adopt the more stringent rules.**

MCL 24.232(9) does not apply.

**Purpose and Objectives of the Rule(s)**

**6. Identify the behavior and frequency of behavior that the proposed rules are designed to alter.**

Part 1 General Provisions: The amended rule in this part pertains to telehealth services. The proposed rules will clarify the requirements for providing a telehealth service to ensure that veterinarian standards of care are met. This rule is required by MCL 333.16287.

Part 2 Education and Examination: The current rules pertaining to examination and approval of accreditation standards are out of date. The proposed rules will provide up-to-date information concerning the approved examination and accreditation standards.

Part 3 Licensure: The rules in this part pertain to licensure by examination, licensure by endorsement, limited licensure, and relicensure. The proposed rules clarify the requirements for licensure, licensure by endorsement, and relicensure. The proposed rules also amend the licensure by endorsement rule to add the requirements for a Canadian-licensed applicant to assist the applicant in becoming licensed. The proposed rules also amend the licensure by endorsement and relicensure rules to require an applicant to disclose each license, registration, or certification in a health profession or specialty issued by any other jurisdiction or entity and require the applicant to demonstrate that no disciplinary proceedings are currently pending and that any prior sanction has been satisfied before being licensed by endorsement or relicensed. These proposed changes are intended to ensure public safety and will assist applicants in determining if they satisfy the requirements for licensure by endorsement or relicensure.

Part 4 Supervision and Delegation: The rules in this part pertain to supervision and delegation. The proposed rules provide the standards for supervision of a veterinary technician and limited licensee. They also establish the requirements for delegating a duty to and providing supervision of a veterinary student and veterinary assistant. Clarifying the delegation and supervision requirements is intended to provide better care to animal patients and better protection of public health, safety, and welfare.

Part 5 Medical Records: The rules in this part pertain to the licensee's duty to keep medical records. The rule has been revised to ensure that all relevant information is retained and to advise the licensee of the client's rights related to an animal patient's medical records. The revisions will ensure that the medical records of an animal patient are available to the client, the department, and public health officials, as needed.

**A. Estimate the change in the frequency of the targeted behavior expected from the proposed rules.**

The frequency of use is not expected to change.

**B. Describe the difference between current behavior/practice and desired behavior/practice.**

Part 1 General Provisions: The amended rule in this part pertains to telehealth services. Currently, the standards do not ensure that a licensee has sufficient knowledge of the animal patient to render telehealth services. The proposed rules will clarify the requirements for providing a telehealth service to ensure that current standards of care are met. This rule is required by MCL 333.16287.

Part 2 Education and Examination: The current rule pertaining to accreditation standards is out of date. The proposed rule will provide up-to-date information concerning accreditation standards to assist applicants to become licensed.

Part 3 Licensure: The rules in this part pertain to licensure by examination, licensure by endorsement, limited licensure, and relicensure. The current rules do not provide the requirements for a Canadian-licensed applicant to become licensed by endorsement. The proposed rules will add those requirements to assist the applicant in becoming licensed. The proposed rules also amend the licensure by endorsement and relicensure rules to require an applicant to disclose each license, registration, or certification in a health profession or specialty issued by any other jurisdiction or entity and require the applicant to demonstrate that no disciplinary proceedings are currently pending and that any prior sanction has been satisfied before being licensed by endorsement or relicensed. The proposed changes are intended to ensure public safety and will assist applicants in determining if they satisfy the requirements for licensure by endorsement or relicensure.

Part 4 Supervision and Delegation: The rules in this part pertain to the supervision of a veterinary student or limited licensee and the delegation of a duty by a licensee. The proposed rules will clarify the level of supervision required by the supervising veterinarian to ensure public safety.

Part 5 Medical Records: The rules in this part pertain to the licensee's duty to keep medical records. The proposed rule will ensure that all relevant information is retained and advise the licensee of the client's rights related to an animal patient's medical records. The revisions will ensure that the medical records of an animal patient are available to the client, the department, and public health officials, as needed.

**C. What is the desired outcome?**

R 338.4901a: This rule pertains to telehealth services. The proposed rule is intended to meet the statutory requirements of MCL 333.16287 and provide licensees with sufficient direction on how and when rendering telehealth services may be rendered.

R. 338.4904: This rule pertains to the approval and adoption of the standards for accreditation by the American Veterinary Medical Association. The accreditation standards have been revised, and the proposed rules will update the accreditation information approved and adopted in this rule.

R 338.4905: This rule pertains to licensure by examination. The proposed rules add a reference to the applicant's duty to comply with all applicable administrative rules. The rule is intended to assist an applicant in becoming licensed. The proposed rule is intended to reorganize all licensure rules into Part 3 of the rules and to clarify the requirements for licensure by examination.

R 338.4906: This rule pertains to licensure by endorsement. The proposed rules add the requirements for a Canadian-licensed applicant to assist the applicant in becoming licensed. The proposed rules also amend the rule to require an applicant to disclose each license, registration, or certification in a health profession or specialty issued by any other jurisdiction or entity and require the applicant to demonstrate that no disciplinary proceedings are currently pending and that any prior sanction has been satisfied before being licensed by endorsement or relicensed. These proposed changes are intended to ensure public safety and will assist an applicant in determining if he or she satisfies the requirements for licensure by endorsement.

R 338.4907: This rule pertains to educational limited licensure. The proposed rules add a reference to the applicant's duty to comply with all applicable administrative rules. The rule is intended to assist an applicant in becoming licensed. The proposed rule is intended to reorganize all licensure rules into Part 3 of the rules and to clarify the requirements for licensure by examination.

R 338.4907a: This rule pertains to clinical academic limited licensure. The proposed rules add a reference to the applicant's duty to comply with all applicable administrative rules. The rule is intended to assist an applicant in becoming licensed.

R 338.4907b: This rule pertains to senior student limited licensure. The proposed rules add a reference to the applicant's duty to comply with all applicable administrative rules. The rule is intended to assist an applicant in becoming licensed.

R 338.4907c: This rule pertains to graduates of nonapproved veterinary education programs limited licensure. The proposed rules add a reference to the applicant's duty to comply with all applicable administrative rules. The rule is intended to assist an applicant in becoming licensed.

R 338.4909: This rule pertains to relicensure. The proposed rules add a reference to the applicant's duty to comply with all applicable administrative rules. The rule is intended to assist an applicant in becoming relicensed. The proposed rules also clarify the requirements for relicensure and amend the rule to require an applicant to disclose each license, registration, or certification in a health profession or specialty issued by any other jurisdiction or entity and require the applicant to demonstrate that no disciplinary proceedings are currently pending and that any prior sanction has been satisfied before being relicensed. These proposed changes are intended to ensure public safety and will assist applicants in determining if they satisfy the requirements for relicensure.

R 338.4910: This rule pertains to the supervision of a veterinary student or limited licensee. The proposed rule is intended to clarify a licensee's duties when supervising a veterinary student, limited licensee, veterinary technician, or a veterinary assistant.

R 338.4921: This rule pertains to medical records. The proposed rule is intended to clarify a licensee's duties pertaining to documenting, providing, and disclosing medical records.

**7. Identify the harm resulting from the behavior that the proposed rules are designed to alter and the likelihood that the harm will occur in the absence of the rule.**

Part 1 General Provisions: The amended rule in this part pertains to telehealth services. The proposed rules will clarify the requirements for providing a telehealth service to ensure that standards of care are met. This rule is required by MCL 333.16287.

Part 2 Education and Examination: The current rule pertaining to accreditation standards is out-of-date. The proposed rule will provide up-to-date information concerning accreditation standards.

Part 3 Licensure: The rules in this part pertain to licensure by examination, licensure by endorsement, limited licensure, and relicensure. The proposed rules clarify the requirements for licensure, licensure by endorsement, and relicensure. The proposed rules also amend the licensure by endorsement rule to add the requirements for a Canadian-licensed applicant to assist the applicant in becoming licensed. The proposed rules also amend the licensure by endorsement and relicensure rules to require an applicant to disclose each license, registration, or certification in a health profession or specialty issued by any other jurisdiction or entity and require the applicant to demonstrate that no disciplinary proceedings are currently pending and that any prior sanction has been satisfied before being licensed by endorsement or relicensed. These proposed changes are intended to ensure public safety and will assist applicants in determining if they satisfy the requirements for licensure by endorsement or relicensed.

Part 4 Supervision and Delegation: The rules in this part pertain to the supervision of a veterinary student, limited licensee, veterinary technician, or veterinary assistant and the delegation of a duty by a licensee. The level of supervision required and a licensee's duties when there has been a delegation are clarified to ensure public safety.

Part 5 Medical Records: The rule in this part pertains to the licensee's duty to keep medical records. The rule has been revised to ensure that all relevant information is retained. The revisions will ensure that the medical records of an animal patient are available to the client, the department, and public health officials, as needed.

**A. What is the rationale for changing the rules instead of leaving them as currently written?**

Part 1 is being changed to clarify how and when rendering telehealth services is appropriate.

Part 2 is being changed to update information pertaining to the board-approved educational programs.

Part 3 is being changed to clarify the requirements for licensure, licensure by endorsement, limited licensure, and relicensure. Additionally, the proposed rules require an applicant for licensure by endorsement or relicensure to disclose each license, registration, or certification in a health profession or specialty issued by any other jurisdiction or entity and require the applicant to demonstrate that no disciplinary proceedings are currently pending and that any prior sanction has been satisfied before being relicensed. These proposed changes are intended to ensure public safety and will assist applicants in determining if they satisfy the requirements for licensure by endorsement or relicensure.

Part 4 is being changed to clarify the requirements for supervision of a veterinary student, limited licensee, veterinary technician, or veterinary assistant and the licensee's duties when there is a delegation.

Part 5 is being changed to clarify a licensee's duties pertaining to documenting, providing, and disclosing medical records.

**8. Describe how the proposed rules protect the health, safety, and welfare of Michigan citizens while promoting a regulatory environment in Michigan that is the least burdensome alternative for those required to comply.**

Part 1 General Rules: The telehealth rule will protect the health, safety, and welfare of Michigan citizens by ensuring that a licensee knows and satisfies his or her duties when rendering a telehealth service to the animal patient.

Part 2 Examination and Education: The rules in this part protect the health, safety, and welfare of Michigan citizens by requiring that an applicant has attended an accredited school. There is no less burdensome way to ensure that a licensee possesses the minimum level of competence to practice veterinary medicine.

Part 3 Licensure: In the proposed rules, changes will be made for clarity and amendments will be made to the requirements for licensure, licensure by endorsement, limited licensure, and relicensure. Additionally, the proposed rules require an applicant for licensure by endorsement or relicensure to disclose each license, registration, or certification in a health profession or specialty issued by any other jurisdiction or entity and require the applicant to demonstrate that no disciplinary proceedings are currently pending and that any prior sanction has been satisfied before being licensed by endorsement or relicensed. These proposed changes are intended to ensure public safety by determining if the applicant is safe to practice.

Part 4 Supervision and Delegation: The rules in this part protect the health, safety, and welfare of Michigan citizens by ensuring that a delegatee has sufficient supervision by a licensed veterinarian. The health, safety, and welfare of Michigan citizens is also protected by requiring a veterinarian who delegates a duty to supervise the delegatee to ensure that the delegated duty is performed in a manner that provides the standard of care that the licensee expected.

Part 5 Medical Records: The rules in this part protect the health, safety, and welfare of Michigan citizens by requiring a licensee to collect and retain records that may assist in the care of the animal patient and to ensure that records pertaining to public health issues are complete and readily available if needed.

**9. Describe any rules in the affected rule set that are obsolete or unnecessary and can be rescinded.**

No rules can be rescinded.

**Fiscal Impact on the Agency**

Fiscal impact is an increase or decrease in expenditures from the current level of expenditures, i.e. hiring additional staff, higher contract costs, programming costs, changes in reimbursements rates, etc. over and above what is currently expended for that function. It does not include more intangible costs for benefits, such as opportunity costs, the value of time saved or lost, etc., unless those issues result in a measurable impact on expenditures.

**10. Please provide the fiscal impact on the agency (an estimate of the cost of rule imposition or potential savings for the agency promulgating the rule).**

The proposed rules are not expected to have a fiscal impact on the agency.

**11. Describe whether or not an agency appropriation has been made or a funding source provided for any expenditures associated with the proposed rules.**

No agency appropriation has been made or a funding source provided because there are no expenditures associated with the proposed rules.

**12. Describe how the proposed rules are necessary and suitable to accomplish their purpose, in relationship to the burden(s) the rules place on individuals. Burdens may include fiscal or administrative burdens, or duplicative acts.**

Part 1 General Provisions: The proposed rules clarify the requirements for rendering telehealth services. Ensuring the health, safety, and welfare of the client and his or her animal patient outweighs any burden that may be placed on the individual as a result of this rule. No burdens on individuals have been identified.

Part 2 Education and Examination: The proposed rules in this part identify approved educational programs. There is no new burden being placed on an individual as a result of these rules.

Part 3 Licensure: The rules in this part pertain to licensure by examination, licensure by endorsement, limited licensure, and relicensure. The proposed rules require an applicant for licensure by endorsement or relicensure to disclose each license, registration, or certification in a health profession or specialty issued by any other jurisdiction or entity and require the applicant to demonstrate that no disciplinary proceedings are currently pending and that any prior sanction has been satisfied before being licensed by endorsement or relicensed. Any burden placed on an individual as a result of these proposed rules is outweighed by the need to ensure that the applicant is safe to practice ensuring the health, safety, and welfare of Michigan citizens. No burdens on individuals have been identified.

Part 4 Supervision and Delegation: The rules in this part pertain to the supervision of a veterinary student, limited licensee, veterinary technician, or veterinary assistant and the delegation of a duty by a licensee. The level of supervision required and a licensee's duties in a delegation are both clarified to ensure public safety. Any additional burden placed on an individual would be outweighed by the need to ensure the health, safety, and welfare of Michigan citizens when a delegatee is performing a duty within the scope of the practice of veterinary medicine. No burdens on individuals have been identified.

Part 5 Medical Records: The rules in this part pertain to the duty to keep medical records. The rule has been revised to ensure that all relevant information is retained and to advise of the client's rights related to an animal patient's medical records. The revisions will ensure that the records of an animal patient are available to the client, the department, and public health officials, as needed. No new burden is placed on an individual as a result of this rule.

**A. Despite the identified burden(s), identify how the requirements in the rules are still needed and reasonable compared to the burdens.**

There is no identified burden imposed by the proposed rules.

## **Impact on Other State or Local Governmental Units**

**13. Estimate any increase or decrease in revenues to other state or local governmental units (i.e. cities, counties, school districts) as a result of the rule. Estimate the cost increases or reductions for other state or local governmental units (i.e. cities, counties, school districts) as a result of the rule. Include the cost of equipment, supplies, labor, and increased administrative costs in both the initial imposition of the rule and any ongoing monitoring.**

There are no anticipated increases or reductions for other state or local governmental units as result of the proposed rules.

**14. Discuss any program, service, duty, or responsibility imposed upon any city, county, town, village, or school district by the rules.**

There are no anticipated or intended programs, services, duties, or responsibilities imposed on any city, town, village, or school district as a result of these proposed rules.

**A. Describe any actions that governmental units must take to be in compliance with the rules. This section should include items such as record keeping and reporting requirements or changing operational practices.**

There are no anticipated actions that a governmental unit must take to comply with the proposed rules.

**15. Describe whether or not an appropriation to state or local governmental units has been made or a funding source provided for any additional expenditures associated with the proposed rules.**

No appropriations have been made to any governmental units as result of the proposed rules. No additional expenditures are anticipated or intended with the proposed rules.

## **Rural Impact**

**16. In general, what impact will the rules have on rural areas?**

The proposed rules impose requirements on individual licensees regardless of whether they live or practice in a rural area. Even if a licensee lives or works in a rural area, the department could not exempt the licensee from the rules because it would create a disparity in the regulation of the profession.

**A. Describe the types of public or private interests in rural areas that will be affected by the rules.**

The proposed rules will not impact public or private interests in rural areas.

**Environmental Impact**

**17. Do the proposed rules have any impact on the environment? If yes, please explain.**

The proposed rules will not have any impact on the environment.

**Small Business Impact Statement**

**18. Describe whether and how the agency considered exempting small businesses from the proposed rules.**

The department did not consider exempting small business because they are not impacted by the proposed rules.

**19. If small businesses are not exempt, describe (a) the manner in which the agency reduced the economic impact of the proposed rules on small businesses, including a detailed recitation of the efforts of the agency to comply with the mandate to reduce the disproportionate impact of the rules upon small businesses as described below (in accordance with MCL 24.240(1)(a-d)), or (b) the reasons such a reduction was not lawful or feasible.**

The rules cannot exempt small businesses because the rules do not directly regulate small businesses. The rules regulate individual licensees. Further, the Michigan Public Health Code requires veterinarians to be licensed.

**A. Identify and estimate the number of small businesses affected by the proposed rules and the probable effect on small businesses.**

There are approximately 4,402 licensed veterinarians in Michigan.

A licensee may work in a small business. However, no matter what type of business environment the licensee works in, he or she will have to comply with the proposed rules. The rules do not impact small businesses differently because the impact is to the individual licensee only.

**B. Describe how the agency established differing compliance or reporting requirements or timetables for small businesses under the rules after projecting the required reporting, record-keeping, and other administrative costs.**

The agency did not establish separate compliance or reporting requirements for small businesses. The proposed rules will apply to all licensees. The rules were drafted to be the least burdensome on all affected licensees.

**C. Describe how the agency consolidated or simplified the compliance and reporting requirements for small businesses and identify the skills necessary to comply with the reporting requirements.**

The agency did not consolidate or simplify compliance and reporting requirements for small businesses with the proposed rules because the proposed rules do not impact small businesses.

**D. Describe how the agency established performance standards to replace design or operation standards required by the proposed rules.**

The agency did not establish performance standards to replace design or operation standards required by these rules.

**20. Identify any disproportionate impact the proposed rules may have on small businesses because of their size or geographic location.**

The proposed rules do not impact small business. They impact an individual registrant or licensee. Therefore, there is no disproportionate impact on a small business because of its size or geographic location.

**21. Identify the nature of any report and the estimated cost of its preparation by small businesses required to comply with the proposed rules.**

The proposed rules affect individuals applying for licensure and renewal, regardless if they practice in a small business. There is no separate cost to a small business.

**22. Analyze the costs of compliance for all small businesses affected by the proposed rules, including costs of equipment, supplies, labor, and increased administrative costs.**

There are no expected costs for equipment, supplies, labor, or administrative costs that a small business would incur in complying with the proposed rules.

The rules impact licensees and not small businesses.

**23. Identify the nature and estimated cost of any legal, consulting, or accounting services that small businesses would incur in complying with the proposed rules.**

There are no expected costs for legal, consulting, or accounting services that a small business would incur in complying with the proposed rules.

**24. Estimate the ability of small businesses to absorb the costs without suffering economic harm and without adversely affecting competition in the marketplace.**

There are no expected costs to a small business that will cause economic harm to a small business or the marketplace as a result of the proposed rules.

**25. Estimate the cost, if any, to the agency of administering or enforcing a rule that exempts or sets lesser standards for compliance by small businesses.**

The proposed rules impose requirements on individual licensees rather than a small business. Even if a licensee's practice qualifies as a small business, the department could not exempt his or her business because it would create disparity in the regulation of the profession.

Therefore, there is no cost to the agency for administering or enforcing the rules because exempting or setting lesser standards of compliance for a small business is not in the best interest of the public.

**26. Identify the impact on the public interest of exempting or setting lesser standards of compliance for small businesses.**

The proposed rules impose requirements on individual licensees rather than a small business. Even if a licensee's work qualifies as a small business, the department could not exempt his or her business because it would create a disparity in the regulation of the profession. Therefore, exempting or setting lesser standards of compliance for a small business is not in the best interest of the public.

**27. Describe whether and how the agency has involved small businesses in the development of the proposed rules.**

The department worked with the Michigan Board of Veterinary Medicine in the development of the proposed rules. The Board is composed of members of the profession and public members. No small businesses were involved in the development of the rules.

**A. If small businesses were involved in the development of the rules, please identify the business(es).**

No small businesses were involved in the development of the rules.

**Cost-Benefit Analysis of Rules (independent of statutory impact)**

**28. Estimate the actual statewide compliance costs of the rule amendments on businesses or groups.**

There are no estimated compliance costs with these rule amendments on businesses or groups.

**A. Identify the businesses or groups who will be directly affected by, bear the cost of, or directly benefit from the proposed rules.**

No businesses or groups will be directly affected or benefitted by the proposed rules. No additional costs will be imposed on any businesses or groups.

**B. What additional costs will be imposed on businesses and other groups as a result of these proposed rules (i.e. new equipment, supplies, labor, accounting, or recordkeeping)? Please identify the types and number of businesses and groups. Be sure to quantify how each entity will be affected.**

No additional costs will be imposed on any businesses or groups.

**29. Estimate the actual statewide compliance costs of the proposed rules on individuals (regulated individuals or the public). Include the costs of education, training, application fees, examination fees, license fees, new equipment, supplies, labor, accounting, or recordkeeping.**

It is estimated that there will be no new compliance costs imposed on individuals as a result of the proposed rules.

**A. How many and what category of individuals will be affected by the rules?**

All licensees and applicants are affected by the proposed rules.

**B. What qualitative and quantitative impact do the proposed changes in rules have on these individuals?**

There is no qualitative or quantitative impact on individuals as a result of the proposed rules.

**30. Quantify any cost reductions to businesses, individuals, groups of individuals, or governmental units as a result of the proposed rules.**

There are no cost reductions to businesses, individuals, groups of individuals, or governmental units as a result of the proposed rules.

**31. Estimate the primary and direct benefits and any secondary or indirect benefits of the proposed rules. Please provide both quantitative and qualitative information, as well as your assumptions.**

The proposed rules use clear, concise language, and implement the statutory requirements for licensing. The clear, concise language allows the public and licensees to better understand the requirements for licensure.

**32. Explain how the proposed rules will impact business growth and job creation (or elimination) in Michigan.**

The rules are not expected to have an impact on business growth, job creation, or job elimination in Michigan.

**33. Identify any individuals or businesses who will be disproportionately affected by the rules as a result of their industrial sector, segment of the public, business size, or geographic location.**

The department does not expect any individuals or businesses to be disproportionately impacted by the rules as a result of their industrial sector, segment of the public, business size, or geographic location.

**34. Identify the sources the agency relied upon in compiling the regulatory impact statement, including the methodology utilized in determining the existence and extent of the impact of the proposed rules and a cost-benefit analysis of the proposed rules.**

American Veterinary Medical Association: <https://www.avma.org/>

Illinois: <https://ilga.gov/legislation/ilcs/ilcs3.asp?ActID=1326&ChapAct=225%26nbsp%3BILCS%26nbsp%3B115%2F&ChapterID=24&ChapterName=PROFESSIONS+AND+OCCUPATIONS&ActName=Veterinary+Medicine+and+Surgery+Practice+Act+of+2004%2E>;  
<https://www.ilga.gov/commission/jcar/admincode/068/06801500sections.html>

Indiana: <https://secure.in.gov/pla/2651.htm>

Kentucky: <https://www.kybve.com/practice-act.html>

Minnesota: <https://mn.gov/boards/veterinary-medicine/board/resources/statutes-rules.jsp>

New York: <http://www.op.nysed.gov/prof/vetmed/vetlaw.htm>

Ohio: <http://codes.ohio.gov/orc/4741>; <http://codes.ohio.gov/oac/4741>

Pennsylvania: <http://www.pacodeandbulletin.gov/Display/pacode?file=/secure/pacode/data/049/chapter31/chap31toc.html&d=reduce>;  
<https://www.dos.pa.gov/ProfessionalLicensing/BoardsCommissions/VeterinaryMedicine/Documents/Board%20Documents/Vet%20-%20Practice%20Act.pdf>

Wisconsin: [https://datcp.wi.gov/Pages/About\\_Us/VEBStatutesRulesGuidance.aspx](https://datcp.wi.gov/Pages/About_Us/VEBStatutesRulesGuidance.aspx)

**A. How were estimates made, and what were your assumptions? Include internal and external sources, published reports, information provided by associations or organizations, etc., that demonstrate a need for the proposed rules.**

Since the rules are required by statute, no estimates were made.

## **Alternative to Regulation**

**35. Identify any reasonable alternatives to the proposed rules that would achieve the same or similar goals.**

Since the rules are required by statute, there are no reasonable alternatives to the proposed rules.

**A. Please include any statutory amendments that may be necessary to achieve such alternatives.**

Since the rules are required by statute, a statutory change would be needed to provide an alternative.

**36. Discuss the feasibility of establishing a regulatory program similar to that proposed in the rules that would operate through private market-based mechanisms. Please include a discussion of private market-based systems utilized by other states.**

Since the rules are required by statute, private market-based systems cannot serve as an alternative. The licensing of veterinarians is a state function, and states regulate veterinarians by statute, regulation, or both. Private market-based systems are not used for licensing and regulation.

There are professional organizations that establish criteria for membership, but these organizations would provide the public with significantly less protection because membership in many of these organizations is voluntary. This means an individual who meets the membership requirements but does not join one of the professional organizations would be able to practice, and there would be no way to ensure their competency or hold them accountable.

**37. Discuss all significant alternatives the agency considered during rule development and why they were not incorporated into the rules. This section should include ideas considered both during internal discussions and discussions with stakeholders, affected parties, or advisory groups.**

Since the rules are specifically required by statute, there are no alternatives to the proposed rules that the agency could consider. They are necessary for the administration and enforcement of the licensing process.

**Additional Information**

**38. As required by MCL 24.245b(1)(c), please describe any instructions regarding the method of complying with the rules, if applicable.**

The instructions for compliance are included in the rules.