



COMMONWEALTH OF PENNSYLVANIA
 DEPARTMENT OF STATE
 BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS

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June 30, 2000

Christopher L. Markham
 John E. Nanorta, Jr. Esq.
 Independent Regulatory Review Commission
 14th Floor, Harrisstown 2
 333 Market Street
 Harrisburg, PA 17120

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 INDEPENDENT REGULATORY
 REVIEW COMMISSION

Re: Proposed Regulation 16A-579 Biennial Fees for State Board of Veterinary Medicine

Dear Mr. Markham and Mr. Nanorta:

Thank you for giving me the opportunity to provide the Commission with the additional information you requested regarding the biennial fee regulation proposed by the State Board of Veterinary Medicine ("Board"). I have reviewed the biennial fee regulation proposed by the State Board of Nursing and have included similar information relevant to the Board below. In addition, I have received additional information from the Bureau of Enforcement and Investigation ("BEI") regarding the increased costs of law enforcement services provided to the Board.

As I explained to you in our telephone conversation on June 28, 2000, much of the increased costs experienced by the Board may be attributed to the increase in the number of complaints filed against licensed veterinarians, licensed veterinary technicians, and against unlicensed individuals holding themselves out as veterinary practitioners. In the past few years, the Board has seen an increase in both the number and complexity of the disciplinary matters coming before the Board. For example, the Board saw a 43% increase in the number of cases opened from 1998 to 1999. In calendar year 1998, 74 cases were opened; in 1999, 106 cases were opened. Each of the cases filed is investigated by the BEI and then sent to the prosecution division of the legal office for evaluation. Thus, as the number of complaints filed increases, the cost of law enforcement and the legal office increases.

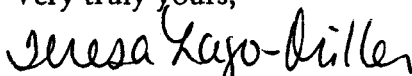
The following table shows the hours spent by BEI on matters for the Board for the past six years:

Fiscal Year	Number of Cases Opened	Hours
99/00	106	1,604.25
98/99	74	1,184.80
97/98	118	1,343.25
96/97	111	1,243.00
95/96	76	597.25
94/95	86	898.75

I have focused on the increased expenditures in the areas of law enforcement and the legal office because the increases in these areas have been dramatic. The following chart shows the categories of expenses tracked and presents a summary of expenditure charges for fiscal year 1997-98 and 1998-99:

<u>Cost Centers</u>	<u>FY 1997-98</u>	<u>Projected FY 1998-99</u>
BPOA Administration	3,943.69	5,491.14
Commissioner's Office	3,491.68	4,228.85
Law Enforcement	95,196.84	103,953.45
Board Member Expenses	8,699.13	8,700.72
Test Administration	.05	50.00
Hearing Expenses	3,732.73	1,757.64
Central Support Services	10,419.59	11,823.32
Board Administration	31,154.36	23,657.87
Prof. Health Monitoring	1,589.92	1,969.04
Public Information Office	72.71	1,443.26
Legis. & Regul. Analysis	1,843.78	4,228.29
Legal Office	60,986.55	Actual 90,561.21
Rolled Expenditures	(86.74)	656.58
Total Board Costs	221,044.29	261,139.28

I hope the above information has answered your questions. If you have additional concerns, please do not hesitate to contact me.

Very truly yours,

 Teresa Lazo-Miller, Esq.
 Counsel, State Board of Veterinary Medicine

Enclosure
 c: Robert Kline, Board Administrator