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**INDEPENDENT REGULATORY REVIEW COMMISSION
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May 14, 2003

Brian V. Harpster, VMD, Chairman
State Board of Veterinary Medicine
2601 North 3rd Street
Harrisburg, PA 17105

Re: Regulation #16A-5714 (IRRC #2334)
State Board of Veterinary Medicine
Continuing Education Provider Approval

Dear Chairman Harpster:

Enclosed are the Commission's comments for consideration when you prepare the final version of this regulation. These comments are not a formal approval or disapproval of the regulation. However, they specify the regulatory review criteria that have not been met.

The Comments will be available on our website at www.irrc.state.pa.us. If you would like to discuss them, please contact my office at 783-5417.

Sincerely,

Robert E. Nyce
Executive Director
wbg
Enclosure

cc: Honorable Thomas P. Gannon, Majority Chairman, House Professional Licensure Committee
Honorable William W. Rieger, Democratic Chairman, House Professional Licensure Committee
Honorable Robert M. Tomlinson, Chairman, Senate Consumer Protection and Professional Licensure Committee
Honorable Lisa M. Boscola, Minority Chairman, Senate Consumer Protection and Professional Licensure Committee
Honorable Pedro A. Cortes, Secretary, Department of State

Comments of the Independent Regulatory Review Commission

on

State Board of Veterinary Medicine Regulation No. 16A-5714

Continuing Education Provider Approval

May 14, 2003

We submit for your consideration the following comments that include references to the criteria in the Regulatory Review Act (71 P.S. § 745.5b) which have not been met. The State Board of Veterinary Medicine (Board) must respond to these comments when it submits the final-form regulation. If the final-form regulation is not delivered within two years of the close of the public comment period, the regulation will be deemed withdrawn.

1. Sections 31.15 and 31.36. Continuing education - Consistency with statute.

Act 167 of 2002 increased the required continuing education clock hours for veterinarians from eight clock hours to 30 clock hours and establishes a 16-clock hour requirement for certified veterinary health technicians. The House Professional Licensure Committee recommends that the Board incorporate the statutory increase in required continuing education clock hours into this proposal. We agree.

2. Section 31.40. Continuing education provider approval - Consistency with statute.

Section 31.40 (a) refers to "certified animal health technicians." Act 167 of 2002 deleted the term "animal health technician" and redefined the category as "certified veterinary technician." The term should be updated to reflect current law. We recommend a similar revision of the heading "Animal Health Technicians and Noncertified Employees" as well.