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INDEPENDENT REGULATORY
REVIEW COMMISSION

March 6, 2007

Ms. Mary Bender, Director
Bureau of Dog Law Enforcement
The Department of Agriculture
2301 North Cameron Street, Room 102
Harrisburg, PA 17110-9408

Re: Dog Law Enforcement Proposed Regulation #2 - 152 (#2559)
Pennsylvania Department of Agriculture

Dear Ms Bender:

I am writing on the behalf the Vet Tech Institute (VTI) in Pittsburgh, PA and as a member of the Pennsylvania Society for Biomedical Research (PSBR) in order to comment on the proposed regulations promulgated from the Pennsylvania Dog Law and published in *The Pennsylvania Bulletin* on December 16, 2006. I will first say that we have reviewed, and are in agreement with the PSBR's written comments regarding the proposed regulations. We applaud your efforts; in that, we believe that the intent of these regulations is to improve the quality of care for dogs housed in commercial kennel operations across the state. However, we also believe the regulations are not intended for dogs already housed in veterinary facilities. We would like to add our comments as to how these regulations would detrimentally affect our school, the future veterinary technicians we produce, and the animals we rehabilitate.

The Vet Tech Institute is a technical school focused only on training veterinary technicians. VTI (formerly Median School) has been training Veterinary paraprofessionals for over 25 years. We are currently producing quality graduates to try to fill the void of licensed veterinary technicians in Pennsylvania and meet the growing demand for veterinary technicians across the country. Our graduates have the ability to improve the lives and care for thousands of animals in Pennsylvania and around the world. VTI is currently regulated by the USDA under the Animal Welfare Act (AWA) as a "research and teaching facility," even though no research of any kind goes on within our walls. Because we use animals in teaching, we still must maintain and follow all USDA regulations, including the maintenance of an IACUC committee. We typically strive to go above and beyond the AWA by following the *Guide for the Care and Use of Laboratory Animals* whenever possible. We also employ a full-time veterinarian, a part-time

veterinarian, and nine licensed veterinary technicians. All animal care is supervised by our technicians and veterinarians on a daily basis. Our animals typically come from donated sources. The animals we bring in are unwanted, and are typically undernourished and many have a variety of parasites, minor infections, and minor behavioral problems. After a thorough physical exam by our veterinarian, we accept animals that we are able to reasonably rehabilitate through proper nutrition, medical care, parasite control, and socialization. Animals in our program only undergo procedures that would normally be performed at any veterinarians' office on any typical pet. We spay or neuter all animals going through our program and adopt out nearly 100% of the animals we admit.

Our school has remodeled our leased space in accordance with the USDA requirements and recommendation as detailed in the *Guide for Care and Use of Laboratory Animals* two times in the last five years in order to expand and enhance our training and kennel facilities at the approximate cost of approximately \$ 430,000. However, many of the newly proposed kennel guidelines would forfeit the service we are providing to our students and animals by rendering our current facilities "out of code". Trying to meet many of these regulations, as written, is simply impossible or would be so costly that it would endanger the very existence of our current program.

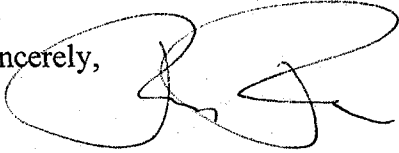
Some of the proposed regulations that we have issue with are as follows:

- Doubling the current USDA required space for dogs. In our current facility, we simply would not have the space to accommodate the number of dogs we require to provide quality instruction to our students and comfort for our animals.
- We do our best to admit dogs of relatively good health, but it is not possible to admit animals that are disease free. We currently admit dogs with a variety of parasites and treat them accordingly. Should we turn away or euthanize dogs because they have fleas or roundworms?
- Along this same line, throughout the proposed regulations, terminology referring to cleaning is used incorrectly. We are in agreement with PSBR's comments regarding sanitation and sterilization. We do our best to control disease with thorough cleaning, however, in a group of animals; complete sanitation and especially sterilization are rarely possible.
- We use stainless steel cages and runs to house our dogs. The proposed regulation regarding no mixture of urine, feces or other fluids between cages would be impossible to achieve using this traditional and widely accepted type of housing.
- We follow minimal five day quarantine as suggested by the USDA. Quarantine times beyond that may be employed by our veterinarian, if she/he deems necessary. A fourteen day quarantine is often not necessary, and may delay socialization of the animal.

- Further prescriptive language regarding drainage, ventilation, and lighting will add additional hardship for our school to exactly meet the proposed regulations. Again the cost of additional remodeling would be exuberant, if even possible, in the building of our current location.

In conclusion, please allow Vet Tech Institute to continue to educate veterinary technician students while rescuing and adopting out many unwanted dogs every year, and consider all veterinary teaching facilities registered with and inspected by the USDA under the AWA to be exempt from Pennsylvania Dog Law Regulations.

Sincerely,



Dr. Tracy Farone, DVM
Medical Director of VTI in Pittsburgh

Cc: Arthur Coccodrilli, Chairman
Independent regulatory review Commission
333 Market St., 14th Floor
Harrisburg, PA 17101