



**INDIANA OFFICE OF SMALL BUSINESS AND ENTREPRENEURSHIP**

*Jacob Schpok, Executive Director*

June 30, 2014

Sarah Simpson, JD  
Director of Legal Affairs, Licensing and Enforcement  
Indiana Board of Animal Health  
Discovery Hall, Suite 100  
1202 East 38th Street  
Indianapolis, IN 46205

Dear Ms. Sykes,

Pursuant to IC 4-22-2-28, the Indiana Office of Small Business and Entrepreneurship (“OSBE”) has reviewed the economic impact analysis for small business associated with rule changes contained in LSA Document #14-57 proposed by Indiana State Board of Animal Health (“BOAH”). The proposed rule amends 345 IAC 1 to conform to the new United States Department of Agriculture - Animal and Plant Health Inspection Service (USDA-APHIS) livestock traceability requirements at 9 CFR Part 86. Makes numerous changes in 345 IAC 1 to align BOAH rules with the federal identification and documentation requirements for livestock moving interstate and to clarify identification and documentation requirements for animal moving intrastate. Makes numerous changes in 345 IAC 2 to conform definitions to the federal traceability rule and to relocate disease-specific import requirements currently located in Article 1. Amends 345 IAC 2.5-2-3 to clarify when an animal tested for tuberculosis must be identified. Amends 345 IAC 2.5-3-2 to relocate general interstate identification and documentation requirements for cattle to 345 IAC 1-3. Amends 345 IAC 2.5-5-3 to relocate general intrastate identification and documentation requirements for cervids to 345 IAC 1-3. Makes numerous changes to 345 IAC 3 to relocate disease-specific interstate movement requirements currently located in Article 1. Adds 345 IAC 4-4-5 and 345 IAC 4-4-6 to relocate disease-specific requirements for poultry entering Indiana and moving to exhibition that are currently located in Article 1 and Article 7. Makes numerous changes in 345 IAC 5 to align definitions with the federal traceability rule and to relocate and amend official identification requirements for sheep and goats. Adds 345 IAC 6-1.1-4.6 to relocate Equine Infectious Anemia (EIA) testing requirements for horses entering Indiana that are currently in Article 1. Amends 345 IAC 7-3.5-9 to require market facilities to submit periodic reports for certain animals received from out of state. Amends 345 IAC 7-3.5-9.5 to align the recordkeeping requirements for livestock market facilities with 9 CFR 71. Amends 345 IAC 7-5-9 to align identification requirements for livestock exhibitions with changes to acceptable forms of official identification for purposes of intrastate and interstate movement.

The economic impact statement prepared by the BOAH estimates the cost of having a veterinarian prepares a certificate of veterinary inspection (CVI) to be in the range of \$50 - \$75. Therefore, this change presents a cost savings to cattle owners of up to \$49.78 because they can apply the least expensive ear tag and maintain the necessary records instead of having to pay for the preparation of a CVI. OSBE does not object to the economic impact to small business associated with the proposed rule. If you have any questions about the comments contained herein please contact me at 232.5679 or [ombudsman@osbe.in.gov](mailto:ombudsman@osbe.in.gov).

Regards,

Erik Scheub