



Office of Small Business and Entrepreneurship  
One North Capitol Avenue, Suite 600  
Indianapolis, IN 46204

Toll free: 888-472-3244  
Phone: 317-234-2082  
Fax: 317-232-8872

[www.osbe.in.gov](http://www.osbe.in.gov)

July 30, 2015

Sarah Simpson, JD  
Director of Legal Affairs, Licensing and Enforcement  
Indiana Board of Animal Health  
Discovery Hall, Suite 100  
1202 East 38<sup>th</sup> St.  
Indianapolis, IN 46205

Dear Ms. Simpson,

Pursuant to IC 4-22, 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 15-161 proposed by the Indiana Board of Animal Health ("BOAH"). The proposed rule amends 345 IAC 1-3 and other provisions of 345 IAC governing the movement of poultry and other birds into the state and within the state. It amends 345 IAC 1-3 to require a seller or owner and buyer or recipient of poultry within Indiana to maintain a record of the transaction. It amends 345 IAC 4-4 to update the incorporation by reference of the National Poultry Improvement Plan (NPIP). It amends 345 IAC 7-3.5 to required licensed livestock dealers and market facilities to maintain certain records related to purchase and sales of poultry. It amends 345 IAC 7-4.5 to require a person holding an exhibition of poultry to register the event with the board and maintain certain records.

The economic impact statement prepared by the BOAH states this proposed rule does not increase compliance costs for regulated entities. BOAH does not assess a fee to register a poultry exhibition. All other requirements in the rule pertain to recordkeeping for private treaty sales and entities such as licensed markets and exhibitions. Although the BOAH can provide the number of licensed markets and estimate the number of exhibitions, based on available data it is not possible to estimate the number of private treaty sales of poultry that occur within the state on an annual basis. However, the proposed rule merely requires these individuals to maintain a minimal amount of information regarding the transaction, so the rule does not impose significant compliance costs on these individuals. 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,

A handwritten signature in black ink that reads "Erik Scheub".

Erik Scheub