

To: Attorney General Liz Murrill

Attn: Department of Justice, Occupational Licensing Review Program

From: Jared B. Granier, MBA

Executive Director, Louisiana Board of Veterinary Medicine

Date: April 9, 2026

Subject: Amendments to Reporting Requirements for Zoo Personnel

The Louisiana Board of Veterinary Medicine has proposed amendments to LAC 46:LXXXV. Sections 1303 and 1305 of Chapters 13 in accordance with the Administrative Procedure Act, R.S. 49:950 et seq.

To facilitate the Department of Justice's review of the proposed rule, Louisiana Board of Veterinary Medicine provides answers to the following questions.

1. Describe any relevant factual background to the occupational regulation and the purpose of the occupational regulation? *[Explain]*

The present rules have no defined reporting requirements on the capture protocols and drug storage, use and inventory by veterinarians at zoo facilities as well as those laypersons who are required to complete chemical capture training.

These proposed amendments will require the escape and capture protocols, the drug storage and use protocols, and the drug inventory protocols to be submitted to the Board every five years for review. Additionally, all laypersons must complete the chemical capture training course every three years and submit proof of completion to the Board for review.

2. Is the occupational regulation within the scope of the occupational licensing board's general authority to regulate in a given occupation or industry? If so, identify the law that provides the authority for the rule and describe how the occupational regulation is within the scope. *[Explain]*

This Notice of Intent is within the Louisiana Board ("Board") of Veterinary Medicine's statutory authority in accordance with La R.S. 37:1518(A)(9) and La R.S. 37:1526.

3. Check all of the following that apply as reasons the occupational regulation is subject to review:

- Creates a barrier to market competition
- Fixes prices, limits price competition, or results in high prices for a product or service provided by or to a license holder.
- Reduces competition or excludes present or potential competitors from the occupation regulated by the board
- Limits output or supply in this state of any good or service provided by the members of the regulated occupation.
- Reduces the number of providers that can serve a particular set of customers
- Other activity (please describe) – *[Explain]*

It is the Board's determination that this proposed regulatory action does not have any reasonably foreseeable anti-competitive effects that would limit entrance into or the continued practice of veterinary medicine. Nevertheless, the Board is requesting OLRP review to ensure

transparency in its rulemaking efforts in accordance with the Louisiana Administrative Procedures Act.

4. Identify the clearly articulated state policy (e.g., health, safety, welfare, or consumer protection) in state statute, or any supporting evidence of the harm the action/proposed action is intended to protect against? [Explain]

There are no substantive changes to the current requirements for veterinarians and laypersons at zoo facilities. Rather, this proposed rule amendment more clearly defines how and when the licensed veterinarians and laypersons performing chemical capture must report these qualifications and required protocols to the Board.

5. Do any less restrictive alternatives to the occupational regulation exist for addressing the same harm? If so, include a comparison of the occupational regulation to the alternatives and a justification for not pursuing a less restrictive alternative. If no less restrictive alternatives exist, explain why. [Explain]

No. The proposed rule amendments are clarifying reporting requirements for licensed veterinarians and laypersons performing chemical capture.

6. Describe the process that the occupational licensing board followed in developing the proposed rule, including any public hearings held, studies conducted, and data collected or analyzed. [Explain]

- [12-05-25] Board discussed and voted on amendments to sections 1303 & 1305, requiring the escape and capture protocols, the drug storage and use protocols, and the drug inventory protocols to be submitted to the Board every five years for review. Additionally, all laypersons must complete the chemical capture training course every three years and submit proof of completion to the Board for review. [View Meeting Minutes from 12-05-25]
- [01-12-26] Notice of Intent and Fiscal & Economic Impact Statements submitted to Legislative Fiscal Office for review.
- [03-03-26] Legislative Fiscal Office approved Fiscal & Economic Impact Statements.
- [03-03-26] First Report submitted to Senate and House Legislative Oversight Committees on Agriculture, Forestry, Aquaculture, and Rural Development.
- [03-03-26] Notice of Intent submitted to the Governor's Office for review.
- [03-03-26] Notice of Intent submitted for publication in 2026 Louisiana Register, Volume 52, March edition.
- [03-20-26] Notice of Intent published in 2026 Louisiana Register, Volume 52, March edition. [View Notice of Intent]
- [03-21-26] Submission of written comments related to this rule proposal will be accepted only from March 21, 2026 to April 9, 2026.
- [04-09-26] Deadline for submission of written comments to Board. See instructions for submitting comments in Notice of Intent.
- [04-13-26] Notice of Intent submitted to Department of Justice's Occupational Licensing Review Program (OLRP) for review.

This rulemaking process can be found at www.lsbvm.org/rulemaking-projects.

7. Does the occupational regulation relate to a matter on which there is pending litigation or a final court order? [Explain]

No.

8. Please identify the board members voting in favor of this rule, and state whether the member is an active market participant. *[Explain]*

Drs. Christine McHughes Barr, Jesse Brandon, Christopher Morris, Larry Findley, Sr., and Trisha Marullo all voted in favor of this rule change, and all are currently practicing veterinarians and active market participants in the state of Louisiana.

9. Is there anything else that the occupational licensing board would like the Department to know about the proposed rule? *[Explain]*

No.