

STATE BOARD OF GUIDE DOGS FOR THE BLIND

FINAL STATEMENT OF REASONS

Hearing Date: January 13, 2014

Subject Matter of Proposed Regulations: Standards of Conduct

Section Affected: 16 CCR 2285

Updated Information

The Initial Statement of Reasons is included in the file. It was revised prior to publishing the Notice; however an outdated version was inadvertently posted on the Board's website. The correct version was made available to the public and is now available on the Board's website. Furthermore, several non-substantive revisions were made to the regulation text after the close of the public comment period in order to improve grammar and clarity.

Local Mandate

A mandate is not imposed on local agencies or school districts

Small Business Impact

The Board has determined that the proposed regulations would not affect small businesses because the affected guide dog schools are non-profit organizations.

Consideration of Alternatives

No reasonable alternative which was considered or that has otherwise been identified and brought to the attention of the board/bureau/commission/program would be more effective in carrying out the purpose for which it was proposed or would be as effective and less burdensome to affected private persons than the adopted regulation or would be more cost effective to affected private persons and equally effective in implementing the statutory policy or other provision of law. The following alternative was considered and was rejected for the reasons set forth below:

- (1) Do not seek a regulatory change.

Reason for rejection: The Board's highest priority is the protection of the public while exercising its licensing, regulatory, and disciplinary functions. Without this regulatory change, the Board would be disregarding suggestions from the legislature during its last sunset review regarding a more clearly defined framework in which to practice guide

dog instruction in a more ethical, transparent way with the objective in protecting consumers.

Objections or Recommendations/Responses

The Board received no written or verbal comments regarding the proposed regulatory action.