

Report of the

**Virginia Department of Agriculture and Consumer
Services**

To the

**Senate Committee on Agriculture, Conservation and
Natural Resources**

Concerning the

Virginia Humane Investigator Program

October 31, 2011



***VIRGINIA DEPARTMENT
OF AGRICULTURE AND
CONSUMER SERVICES***

Preface

At the conclusion of the 2011 Session of the General Assembly of Virginia the Chair of the Senate Committee on Agriculture, Conservation and Natural Resources requested the Virginia Department of Agriculture and Consumer Services (herein the Department) to perform an agency-level review of the humane investigator program as detailed in the Comprehensive Animal Care laws of the Commonwealth (Chapter 65 of Title 3.2 of the Code of Virginia). Specifically, the Department was asked to consider the following:

1. The role of humane investigators with respect to the State Veterinarian, animal control officers, and other parties with responsibility over the enforcement of the Commonwealth's animal cruelty laws;
2. The costs and benefits associated with a more robust humane investigator program; and
3. Recommendations that might lead to more effective and efficient enforcement and reporting on animal welfare.

The Department's Office of Animal Care and Health Policy within the Division of Animal and Food Industry Services under the direction of the State Veterinarian coordinated this review. The Department utilized a variety of methods and sources to conduct this review. In addition to material already available given the Department's association with the Comprehensive Animal Care laws, the following actions were taken specific to this review:

1. A public hearing;
2. A meeting with currently serving humane investigators, representatives of interested statewide stakeholder organizations, and the Department's Animal Control Officer Training Standards Working Group¹ in attendance; and
3. An informal telephonic survey² of circuit courts not currently appointing humane investigators.

¹ The Department's Animal Control Officer Training Standards Working Group was established in 2011 to review and make recommendations to the Department concerning the Virginia Basic Animal Control Officer Training Standards and animal control officer training generally. The twelve member working group consists of representatives of the Office of the Attorney General, Virginia Alliance for Animal Shelters, Virginia Animal Control Association, Virginia Association of Counties, Virginia Federation of the Humane Societies, and Virginia Municipal League; two representatives of the regional criminal justice training academies; two at-large animal control officer representatives; and two staff veterinarians in the Department's Office of Animal Care and Health Policy.

² The Clerks of Courts of circuit courts not currently appointing humane investigators were surveyed via telephone. To facilitate participation, responses were compiled without identifying the respondent. Sixty-seven survey results were obtained.

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Executive Summary

At the request of the Senate Committee on Agriculture, Conservation and Natural Resources the Virginia Department of Agriculture and Consumer Services conducted a review of the humane investigator program in the Commonwealth.

The Department was asked to review the role of humane investigators with respect to the State Veterinarian, animal control officers, and other parties with responsibility over the enforcement of the Commonwealth's animal cruelty laws:

- There are seven humane investigators currently active in Virginia who work cooperatively with the animal control agencies of the localities they serve.
- There are over 400 animal control officers employed by 132 animal control agencies in the Commonwealth.
- The State Veterinarian's involvement with humane investigators is limited to the approval of continuing training and the provision of regulatory and technical veterinary guidance upon request.

The Department was asked to consider the costs and benefits associated with a more robust humane investigator program. The following advantages to a more robust program were identified:

- Currently serving humane investigators provide a valuable service to their communities.
- Humane investigators can serve as a liaison between animal control agencies and humane societies and similar animal welfare organizations.
- Fiscal constraints faced by local governments make expansion of animal control agencies difficult and humane investigators may provide a low-cost alternative.

The following disadvantages to a more robust program were identified:

- Efficient and effective enforcement of the Commonwealth's Comprehensive Animal Care laws is best achieved when all enforcement agents are part of a unified command structure.
- A majority of circuit courts and key stakeholder organizations would prefer an alternative mechanism to expansion of the current humane investigator program to achieve more effective enforcement.
- Sufficient Animal Control Officer Basic Training capacity does not currently exist to provide the basic training that would be required for additional humane investigator appointments.

The Department was asked to provide recommendations that might lead to more effective and efficient enforcement and reporting of animal welfare provisions contained in the Code of Virginia. The Department recommends the following:

- In respect to the Comprehensive Animal Care laws of the Commonwealth, legislative priority should be given to mechanisms that enhance the position of animal control officers and the animal control agencies of local governments that employ them.
- Current humane investigator appointments should be maintained.
- Humane investigator appointments should not be expanded.
- Should it be the desire of the General Assembly, local governments may be given authority to appoint auxiliary animal control officers.

The Current Status of the Humane Investigator Program in Virginia

Background

The Comprehensive Animal Care laws of the Commonwealth contain both civil and criminal provisions relating to Virginia's animal populations, and establish a mechanism for their enforcement. Civil laws include provisions such as the licensure of dogs, control of rabies, and control of dangerous or vicious dogs. Criminal laws include crimes relating to animal neglect, cruelty, and fighting. Prior to 1998, two separate enforcement mechanisms for this body of law existed in the Commonwealth. Local governments employed one or more animal wardens to enforce the full range of civil and criminal provisions of the Comprehensive Animal Care laws (with the exception of certain limited provisions reserved for the State Veterinarian), and local ordinances pursuant to such. Enforcement responsibility for civil and criminal provisions relating to animal neglect and animal cruelty was shared by animal wardens and court-appointed humane investigators, who were generally affiliated with an animal humane society or organization.

This model of enforcement was not unique to Virginia. Most states had a similar structure in place. There were real and perceived drawbacks associated with this model of enforcement. Most notable among them was that not all circuit courts chose to appoint humane investigators, or had a suitable pool of candidates to draw from if an appointment was desired. Humane investigators could operate independently of animal wardens, and therefore the same alleged violations could be investigated by both entities with different conclusions reached. Humane investigators were also often alleged to be biased or to overstep their authority, regardless of whether such was in fact occurring, given their affiliation with humane societies and/or personal beliefs concerning animals.

Substantive changes to the roles of animal wardens and humane investigators were made by the 1998 General Assembly (Acts of Assembly, Volume II, Chapter 817, pages 1985-2003) in creating the position of animal control officer in lieu of animal warden and stripping humane investigators of certain authorities such as right of entry without warrant and issuance of summons. Further substantive changes were made by the 2003 General Assembly (Acts of Assembly, Volume II, Chapter 858, pages 1174-1176) in limiting the appointment of new humane investigators only to fill vacancies for appointments made prior to 2003 and under certain other conditions. Since 2003, legislation that would return the humane investigator program to a level similar to its status prior to 1998 has been considered by the General Assembly during several sessions but was not passed.

The Role of Humane Investigators in Respect to Animal Control Officers and the State Veterinarian

Section 3.2-6559 of the Code of Virginia details the authority currently vested to humane investigators, namely to investigate violations of laws and ordinances regarding care and treatment of animals and disposal of dead animals within their jurisdiction. The specific laws and ordinances regarding care and treatment are not elucidated, but historically humane investigators have focused their activities on alleged violations of Section 3.2-6503 concerning adequate care of companion animals, Section 3.2-6569 concerning the seizure of animals and predicates for such, and Section 3.2-6570 concerning animal cruelty. Basic and continuing training requirements for humane investigators mirror those for animal control officers.

Humane investigators are appointed by circuit courts, and only have authority in the localities over which the appointing court has jurisdiction. Currently, circuit courts can only make appointments for humane investigator positions that existed prior to July 1, 2003. This can be accomplished either by (1) reappointment of the incumbent or (2) if the incumbent is unable or unwilling to seek reappointment, appointment of an individual who has both secured a written recommendation from the entity that oversees animal control for the locality and has completed a basic animal control officer training course. The latter requirement, given the limited availability of and access to such courses, can make the appointment of a new individual difficult in practice. Beyond appointment and revocation of such with cause, circuit courts have no further statutory role in managing humane investigators or their activities.

Humane investigators are statutorily required to carry an identification card issued by the locality in which they serve and to provide a quarterly report summarizing their investigations to the administrative agency that oversees animal control for the locality. There are no further statutory provisions concerning collaboration with the locality's animal control or other law enforcement agencies. Humane investigators are in theory able to independently receive complaints of animal cruelty or neglect, investigate such, bring charges in front of a magistrate, and prosecute cases without the involvement or approval of the locality's animal control or other law enforcement officers and public prosecutors. In practice, those humane investigators that are still serving in Virginia work more closely with these entities.

In 2003, any authority that the State Veterinarian had over the appointment eligibility of humane investigators or the conduct of their duties was removed from the Code of Virginia. The only statutory authority that remains to the State Veterinarian concerning humane investigators is indirect, through approval of animal control officer basic and continuing training courses. The Department also interacts with humane investigators if

they request regulatory guidance or veterinary technical assistance in conjunction with a case in the same manner that the Department interacts with animal control officers.

Current Humane Investigator Appointments

In the course of this review the Department was able to identify seven humane investigators currently serving in Virginia. These appointments are:

- 2 humane investigators with joint jurisdiction in the City of Danville and Pittsylvania County;
- 1 humane investigator with jurisdiction in Fluvanna, Greene, Madison, and Orange Counties;
- 1 humane investigator with jurisdiction in Culpeper and Fauquier Counties;
- 1 humane investigator with jurisdiction in Fauquier and Rappahannock Counties;
- 1 humane investigator with jurisdiction in Bath County; and
- 1 humane investigator with jurisdiction in Fairfax County

The currently serving humane investigators all have strong working relationships with animal control and law enforcement agencies for the jurisdictions they serve. In at least two of the localities served humane investigators play a critical role in ensuring that complaints of animal neglect or cruelty are investigated. Humane investigators report that they coordinate their enforcement activities carefully with animal control and other law enforcement officers to ensure that they are not operating in conflict with other enforcement activities. All currently serving humane investigators are affiliated with at least one humane society or animal welfare organization. In some cases, these organizations subsidize their activities and in others the humane investigators personally fund their activities. All currently serving humane investigators have considerable length of tenure in the position.

Current Animal Control Officer Employment Status

Every county and city in the Commonwealth is obligated to employ an animal control officer to enforce the Comprehensive Animal Care laws, and may employ additional deputy animal control officers. Pursuant to Section 3.2-6555 of the Code of Virginia, each locality must submit to the State Veterinarian information concerning the employment status of their animal control officers. To facilitate this reporting, the Department annually surveys each locality. As of January 2011, 424 animal control officers were employed by 132 animal control agencies in Virginia. There are several agencies with dual jurisdiction, for example the County of James City provides animal control services to the City of Williamsburg. The average animal control force statewide is 3.2 officers per locality; with a range of 1 to 28 officers (Nineteen counties and 14 cities in the Commonwealth have only one animal control officer). Fifty-five percent of

animal control agencies in the Commonwealth are overseen by the law enforcement agency of their locality, the remaining 45% are overseen by the county administrator or city manager. The Comprehensive Animal Care laws explicitly state that all law enforcement officers of the Commonwealth also have full authority to enforce such within their jurisdictions. Enforcement of the Comprehensive Animal Care laws by law enforcement agencies in support of animal control officers occurs to varying degrees throughout the Commonwealth.

The Costs and Benefits Associated With a More Robust Humane Investigator Program

The Department works closely with local governments and their animal control and law enforcement agencies as they enforce the Comprehensive Animal Care laws throughout the Commonwealth. The Department also works with a variety of statewide organizations with an interest in this body of law. Through these relationships the Department is cognizant of many of the issues surrounding the humane investigator program. To corroborate this knowledge the Department held a meeting with stakeholder organizations and humane investigators, conducted a public hearing, and surveyed a sample of circuit courts in order to fully evaluate the advantages and disadvantages of an expanded humane investigator program.

Advantages

The Department has identified the following advantages of an expanded humane investigator program:

- 1. Currently serving humane investigators provide a valuable service to their communities.** The humane investigators currently appointed in Virginia have considerable breadth of experience, and have demonstrated success in enforcing provisions of the Comprehensive Animal Care laws pertaining to animal neglect and cruelty. They have fostered close working relationships with animal control and other law enforcement agencies within their jurisdictions, and demonstrate that volunteer enforcement agents can work cohesively with animal control officers when this relationship exists.
- 2. Humane investigators can serve as a liaison between animal control agencies and humane societies and similar animal welfare organizations.** The Department, through its regulatory relationships with animal control agencies, animal humane societies, and other animal welfare organizations, is aware that conflict can develop between animal control agencies and local

animal welfare organizations for a variety of reasons. Humane investigators, given their usual affiliation with an animal welfare organization, can serve as a liaison between these entities if they work in close collaboration with animal control.

- 3. Fiscal constraints faced by local governments make expansion of animal control agencies difficult and humane investigators may provide a low-cost alternative.** Though the Department is not privy to decisions concerning staffing levels for animal control agencies made by local governments, it is frequently reported to the Department by local governments and their animal control agencies that augmentation is desired but not fiscally possible. Though there are some costs associated with humane investigators borne by local governments (such as criminal background checks made prior to recommendation), these costs are negligible compared to the costs associated with hiring additional animal control officers. If humane investigators are able to work cooperatively with the animal control agency for the locality they serve, they can indeed assume some of the caseload before the animal control agency.

An additional proposed advantage to expansion of the humane investigator program voiced by members of the public during the course of this review was that humane investigators can supplant enforcement activities in localities where there is perceived ineffective or even negligent enforcement by animal control officers, or indeed investigate the actions of animal control officers themselves. The Department disputes that this would be a benefit of an expanded program. Such was never the intent of the humane investigator program and would be counterproductive to achieving more effective and efficient enforcement and therefore not in the best interest of the Commonwealth.

Disadvantages

The Department has identified the following disadvantages of an expanded humane investigator program:

- 1. Efficient and effective enforcement of the Commonwealth's Comprehensive Animal Care laws is best achieved when all enforcement agents are part of a unified command structure.** The scope of the Comprehensive Animal Care laws continues to increase, and penalties for violations of certain statutes therein have increased in recent years. Violations of the criminal and civil provisions of this body of law often occur simultaneously. Furthermore, violations of the Comprehensive Animal Care laws often occur in tandem with other criminal acts or civil violations detailed elsewhere in the Code of Virginia or established by

local ordinance. Animal control officers employed by local governments have the ability to enforce both criminal and civil violations of the Comprehensive Animal Care laws and any local ordinance adopted pursuant to such, and are either part of or work in cooperation with the local law enforcement agency that has authority to enforce wider civil and criminal codes. Humane investigators do not have this full authority, nor are they guaranteed the cooperation of animal control and other law enforcement officers within the jurisdictions they serve. The longevity of Virginia's currently serving humane investigators is due in part to the relationships they have fostered with animal control and law enforcement agencies serving their jurisdictions. This relationship cannot be guaranteed should additional humane investigators be appointed by circuit courts as there is no mechanism to ensure collaborative enforcement.

The investigation of potential violations pertaining to the commercial breeding of dogs (Section 3.2-6507.1 et seq. of the Code of Virginia) and animal fighting (Section 3.2-6571 of the Code of Virginia) offer cases in point. In regard to the commercial breeding of dogs, a humane investigator can only address failures to provide adequate care or animal cruelty; an animal control officer can also address the full spectrum of provisions specific to commercial breeding as well as relevant local ordinances. Therefore, independent investigations of commercial dog breeding facilities by animal control officers and humane investigators could have different outcomes, which would present challenges to all involved parties. In regard to animal fighting, the need for integrated and comprehensive enforcement is more acute. Animal fighting violations can carry a felony penalty and often occur in conjunction with other serious crimes such as drug trafficking, illegal firearm possession, racketeering, and illegal gambling. Investigations of these crimes can be complex, lengthy, costly, and involve multiple jurisdictions working in close cooperation. The independent investigation of allegations of animal neglect or cruelty by a humane investigator not aware of such other criminal investigation could be extremely damaging to the ongoing investigation and place the humane investigator at grave risk to their personal safety.

- 2. A majority of circuit courts and key stakeholder organizations would prefer an alternative mechanism to expansion of the current humane investigator program to achieve more effective enforcement.** In order to ascertain their support for expansion of the current humane investigator program, the Department conducted an informal telephonic survey of the Clerks of Court of circuit courts throughout the Commonwealth that do not currently appoint

humane investigators. Sixty-seven responses were gathered. Clerks were asked the following questions:

- **Has your court in the past appointed a humane investigator, and if so why was appointment ceased?** The majority (82%) of respondents indicated they had not had an appointment; 18% indicated that they had. Of those that previously had an appointment, the following reasons were given for not reappointing: two courts indicated no replacement could be found, two indicated it was unpopular with the public, one indicated no further need for the appointment, one indicated animal control provided sufficient enforcement, one indicated it was too dangerous, and five indicated no comment.
- **Would you like to appoint a humane investigator, but are prevented by the current statutory requirements?** The majority (84%) of respondents indicated that their court would not like to appoint a humane investigator; 13% indicated that their court had no opinion; and 3% indicated that their court would like to appoint a humane investigator.
- **Has your court been requested by members of the public or concerned organizations to appoint a humane investigator?** The majority (89.5%) of respondents indicated that their court had not been requested to appoint a humane investigator; 9% indicated that they had; and 1.5% had no comment.
- **Is your court the appropriate body to appoint humane investigators for your locality, or should this function be given to an appropriate body within the local administration?** The majority (75%) of respondents indicated that appointment authority should be given to the appropriate body within the local administration; 13% indicated that they were the appropriate appointing body; and 12% had no comment.

The Department also requested the positions of interested organizations with statewide membership on expansion of the humane investigator program. The **Virginia Voters for Animal Welfare** is in favor of expansion of the current humane investigator program. The **Virginia Alliance for Animal Shelters** has not yet taken a position on this issue. The following organizations prefer alternative mechanisms for volunteer enforcement agents and/or are opposed to expansion of the humane investigator program:

The **Virginia Agribusiness Council** is opposed to expansion of the humane investigator program and maintains that animal control officers are the most effective mechanism for consistent and unbiased enforcement of the Comprehensive Animal Care laws.

The **Virginia Alliance for Animal Agriculture** is opposed to expansion of the humane investigator program and maintains that animal control officers are the most effective mechanism for consistent and unbiased enforcement of the Comprehensive Animal Care laws.

The **Virginia Animal Control Association** is opposed to expansion of the current humane investigator program given the unique authority it grants civilian volunteers to enforce statutory law without accountability or supervision, and would prefer a mechanism that ensures full integration with animal control agencies.

The **Virginia Association of Counties (VACo)** has not adopted a formal position but is opposed to the expansion of a court-appointed humane investigator program. VACo maintains that any additional appointments of humane investigators should be at the discretion of and serve at the pleasure of local governing bodies.

The **Virginia Farm Bureau** is opposed to expansion of the humane investigator program and maintains that animal control officers are the most effective mechanism for consistent and unbiased enforcement of the Comprehensive Animal Care laws.

The **Virginia Federation of Humane Societies** supports expansion of the humane investigator program but maintains that such should be done only in communities that desire such and if integrated with local animal control agencies.

The **Virginia Foxhound Club** is opposed to expansion of the humane investigator program and maintains that animal control officers are the most effective mechanism for consistent and unbiased enforcement of the Comprehensive Animal Care laws.

The **Virginia Municipal League** has not yet adopted a formal position on this issue but is likely to oppose any legislation that would allow for additional court-appointed humane investigators without the approval of the local governing body.

- 3. Sufficient Animal Control Officer Basic Training capacity does not currently exist to provide the basic training that would be required for additional humane investigator appointments.** Currently, humane investigators are required to have completed a basic animal control officer training program before they are eligible for initial appointment by a circuit court. The Department feels that it is critical that this requirement be maintained for any mechanism that allows for the appointment of volunteer enforcement agents. Currently, there are two mechanisms by which basic animal control officer training is provided in Virginia. The first is through the system of regional criminal justice training academies. There are three academies that currently offer classes on an approximately annual basis for animal control officers employed by affiliated local governments. The second mechanism is internal training programs conducted by specific localities or consortiums of such strictly for their employees. The first mechanism does not currently have the capacity to train the influx of people seeking training that could be generated by an expansion of the humane investigator program; and furthermore must give priority to the training needs of affiliated local government animal control and/or law enforcement agencies. The second mechanism would not be open to court-appointed humane investigators.

Recommendations

The Department has carefully considered the current status of the humane investigator program in Virginia and the effect that expansion of the program would have on efficient and effective enforcement of the Commonwealth's Comprehensive Animal Care laws. The Department is aware of a genuine desire on the part of the concerned public to see strengthened, responsive enforcement of these laws and that volunteer enforcement agents are a possible mechanism to achieve this goal. The Department offers the following recommendations to the Senate Committee on Agriculture, Conservation and Natural Resources as they consider this issue:

- 1. In respect to the Comprehensive Animal Care laws of the Commonwealth, legislative priority should be given to mechanisms that enhance the position of animal control officers and the animal control agencies of local governments that employ them.** The cornerstone of efficient, effective, and responsive enforcement of Virginia's body of animal law is our animal control officer force. The over 400 animal control officers currently serving in Virginia play an important role not only in ensuring the welfare of animals within their jurisdictions, but also in ensuring public health and safety. As the Comprehensive Animal Care laws of the Commonwealth are expanded in both

scope and penalties for their violation strengthened, commensurate authority should be granted to animal control officers to ensure that they can efficiently, effectively, and safely conduct their duties.

2. **Current humane investigator appointments should be maintained.** The humane investigators currently serving in Virginia are dedicated assets to their communities. They collectively have considerable breadth of experience in justly applying the Comprehensive Animal Care laws to situations impacting the communities they serve. Incumbents of the remaining humane investigator appointments work collaboratively with animal control agencies in their jurisdictions; in some cases they are an integral part of such. Elimination of these appointments would have a tangible dampening effect on enforcement activities in the localities they serve. Alternative mechanisms for volunteer enforcement agents should protect these appointments, or ensure that the incumbents can segue seamlessly into any new program.
3. **Humane investigator appointments should not be expanded.** Effective enforcement of the Commonwealth's Comprehensive Animal Care laws requires careful coordination and collaboration. The current mechanism for humane investigator appointment by circuit courts, without concurrent oversight by or accountability to animal control and law enforcement agencies within their jurisdictions, cannot ensure that this collaboration occurs. Having two distinct and potentially conflicting mechanisms for enforcement of the Comprehensive Animal Care laws within one jurisdiction has significant drawbacks. Violations of the Comprehensive Animal Care laws, particularly those of a graver nature such as animal cruelty and animal fighting, often are associated with other significant criminal activities. Effective enforcement actions can require lengthy and careful investigation necessitating collaboration between multiple animal control and law enforcement agencies. Concurrent enforcement activities independently initiated by a humane investigator could jeopardize this. Lack of integration with animal control and/or law enforcement agencies could also place humane investigators in dangerous situations without sufficient resources, and ultimately could result in perceptions of bias on the part of humane investigators by the public and stakeholder organizations. Furthermore, a majority of the circuit courts surveyed by the Department recommend that such appointments be made and managed by local governments.
4. **Should it be the desire of the General Assembly, local governments may be given authority to appoint auxiliary animal control officers.** The increasingly complex scope of the Comprehensive Animal Care laws, and significant potential

for other crimes to occur in conjunction with violations of such, necessitates highly coordinated enforcement strategies. In order to ensure efficient and effective enforcement of the Comprehensive Animal Care laws, all agents charged with such duties should be appointed by, directed by, and answerable to the same agency. Should it be the desire of the General Assembly to allow for volunteer enforcement of the Comprehensive Animal Care laws, the Department suggests that a reasonable model to follow may be provided by Section 15.2-1731 et seq. of the Code of Virginia concerning auxiliary police officers. Allowing local governing bodies the authority to appoint non-compensated at-will auxiliary animal control officers under established parameters would achieve largely the same effect as the appointment of humane investigators by circuit courts, while at the same time ensuring efficient and collaborative, rather than potentially conflicting, enforcement activities.

Appendix

SENATE OF VIRGINIA

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February 24, 2011

Matthew J. Lohr
Commissioner, Virginia Department of Agriculture and Consumer Services
102 Governor Street
Richmond, Virginia 23219

Dear Commissioner Lohr,

As you may know, the Senate Committee on Agriculture, Conservation and Natural Resources has reviewed a large number of bills this session including SB 842, proposed by Senator J. Chapman Petersen. The legislation would have allowed the appointment of new humane investigators.

At the request of the patron, the Committee chose to postpone further consideration of this matter during the 2011 Session of the General Assembly to allow for an agency-level review of the legislation. Therefore, on behalf of Senator Petersen and the other members of the Committee, I request you to address the subject matter of this legislation during the 2011 interim. I envision that the review would include: (i) the role of humane investigators with respect to the State Veterinarian, animal control officers, and other parties with responsibility over the enforcement of the Commonwealth's animal cruelty laws; (ii) the costs and benefits associated with a more robust humane investigator program; and (iii) any recommendations that might lead to more effective and efficient enforcement and reporting on animal welfare. I hope that you could bring your findings together into a report made available to the Committee by November 1, 2011.

Although I will not be returning to the General Assembly this year, I certainly appreciate your consideration in this matter. Should you have any questions or concerns, please do not hesitate to contact me or our committee counsel, Ellen Porter.

Best Regards,

A handwritten signature in cursive script that reads "Patricia S. Ticer".

Senator Patricia S. Ticer
Senate Committee on Agriculture, Conservation and Natural Resources

cc: Members of the Senate Committee on Agriculture, Conservation and Natural Resources