



**Texas
Sunset
Advisory
Commission**

STAFF EVALUATION

*Office of the State Forester
Office of the State Entomologist
State Soil and Water Conservation Board
Texas Department on Aging
Texas Commission for the Deaf
Texas Advisory Board of Occupational Therapy*

**A Staff Report
to the
Sunset Advisory Commission**

1984

OFFICE OF THE STATE ENTOMOLOGIST

March 1984

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SUMMARY

The Office of the State Entomologist was established in 1899. The office was originally created to devise methods for destroying insects that were threatening agriculture in Texas. The state entomologist is currently responsible for operating the Honey Bee Disease Control Program, also known as the Texas Apiary Inspection Service.

The program was designed to protect the honey bee industry from infectious diseases and parasites affecting honey bees. If left uncontrolled, the spread of these diseases would result in economic losses for the honey bee industry in Texas. The agency controls the outbreak of disease through what is essentially a licensing operation involving permitting, certification, inspection, and enforcement activities.

The review indicated that there is a continuing need for the agency's function. A major characteristic of the honey bee industry is the movement of hives by beekeepers from one state to another. This movement allows beekeepers to take advantage of weather conditions and nectar-producing fields and crops found in other states. All states with a major honey bee industry carry out a licensing function designed to control diseases and parasites affecting honey bees. Interviews conducted with these states indicated that the various state disease control programs, as a whole, work together to control the spread of disease by preventing the interstate movement of diseased hives and equipment. Beekeepers are prohibited from moving or selling bees from one state to another without receiving from both states a permit certifying that the hives are disease free. The review indicated that without a Texas disease control program, beekeeping operations based in the state could be prohibited from moving or selling bees in other states, resulting in economic losses for the industry and Texas.

The results of the review indicated that, while the agency generally operates in an efficient and effective manner, there are changes which should be made in the event the legislature decides to continue the agency. An analysis of alternatives to the current operations of the agency indicated that one alternative does exist where potential benefits outweighed disadvantages. One issue was identified which offered both a change in state policy as well as major advantages and disadvantages.

I. MAINTAIN THE AGENCY WITH MODIFICATIONS

A. Overall Administration

- 1. The statute should be amended to require the agency to make a reasonable effort to increase fees to at least 50 percent of the agency's total budget.**

The agency currently charges fees that are projected to cover 14 percent of the agency's budget. As a general state policy, at least 50 to 75 percent of the costs associated with regulating a profession or business are paid for through fees charged to the regulated industry. The agency's current fee structure does not cover at least 50 percent of the agency's budget. A solution to this problem is to require, in statute, that the agency make a reasonable effort to increase fees to cover at least 50 percent of the agency's total budget.

- 2. The statute should be amended to require that agency fee funds, currently in a local account outside the state treasury, be brought into a special fund in the state treasury.**

The agency's statute currently allows fees collected by the agency to be deposited in a special account outside of the state treasury. This practice runs counter to general state policy requiring licensing agencies to deposit fees and other charges in a special account in the state treasury. To solve this problem, the agency's statute should be amended to require the agency to deposit its fees in a special account in the state treasury.

- 3. The statute should be amended to change the title of "State Entomologist" to "Chief Apiary Inspector" to more accurately reflect the current duties of the officer.**

The title "State Entomologist" is currently used to identify the officer that is responsible for operating the Honey Bee Disease Control Program. This title does not accurately reflect the duties of the office and can be confused with the activities of entomologists working in the Texas Department of Agriculture. To solve this problem, the title "State Entomologist" should be changed to "Chief Apiary Inspector" to more accurately reflect the correct duties of the office.

B. Evaluation of Programs

1. **The statute should be amended to require that specific information be supplied on bee hive locations to assist in enforcement efforts.**

Currently, the statute allows the state entomologist to require that bee keepers register the location of their hives by county so that the hives can be located for inspection purposes. This system of registration does not establish the location of hives to the point where they can easily be located by the state entomologist for inspection. This problem can be solved by amending the statute to allow the state entomologist to require bee keepers to register, by map, the exact location of their hives.

II. ALTERNATIVES

1. **The Department of Agriculture's statute should be amended to transfer the Apiary Equipment Brand Program from TDA to the Office of the State Entomologist.**

The Texas Department of Agriculture is responsible for administering and enforcing the Apiary Equipment Brand Program. However, TDA is not actively involved in inspecting hives and other apiary equipment with brands to ensure compliance with the law. The office of the State Entomologist does regularly inspect hives and could administer and enforce the program at no additional costs.

III. OTHER POLICY CONSIDERATIONS

1. **Should the Honey Bee Disease Control Program be transferred to The Department of Agriculture.**

The State Entomologist, located at Texas A&M University, currently operates the Honey Bee Disease Control Program. Most other states operate their program from the state department of agriculture. If the program were transferred to the TDA, the program might benefit from the field office structure available at that agency. However, it is unclear whether significant efficiencies could be gained through such a transfer, given current budget amounts.

AGENCY EVALUATION

The review of the current operations of an agency is based on several criteria contained in the Sunset Act. The analysis made under these criteria is intended to give answers to the following basic questions:

1. Does the policy-making structure of the agency fairly reflect the interests served by the agency?
 2. Does the agency operate efficiently?
 3. Has the agency been effective in meeting its statutory requirements?
 4. Do the agency's programs overlap or duplicate programs of other agencies to a degree that presents serious problems?
 5. Is the agency carrying out only those programs authorized by the legislature?
 6. If the agency is abolished, could the state reasonably expect federal intervention or a substantial loss of federal funds?
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BACKGROUND

Organization and Objectives

The Office of the State Entomologist was created in 1899 and is currently active. The state entomologist, who is also known as the Chief Inspector of the Texas Apiary Inspection Service, operates as a component of the Texas Agricultural Experiment Station at College Station. The state entomologist is appointed by the director of the Agricultural Experiment Station, with the approval of the Texas A&M University Board of Regents. Agency operations are conducted by a staff of three persons and funded in fiscal year 1984 in the amount of \$99,444 from general revenue and a budgeted \$17,000 from fees.

Originally, the Office of the State Entomologist was responsible for devising methods for destroying all insects that were a threat to agriculture in Texas. The state entomologist also served as professor of entomology at Texas A&M University. In 1903 the state entomologist's duties were expanded to include the operation of the Honey Bee Disease Control Program. Under this program, the state entomologist was given the responsibility for taking steps to prevent, control and eradicate diseases affecting honey bees. During this period it is estimated that approximately 65 percent of the hives in Texas were infested with and subsequently lost to foul brood, resulting in significant economic losses for the honey bee industry. In 1925, the legislature eliminated the state entomologist's responsibilities for destroying all insects harmful to Texas crops and for serving as professor of entomology at Texas A&M. The Honey Bee Disease Control Program, however, remained with the state entomologist.

The Office of the State Entomologist currently operates only the Honey Bee Disease Control Program, known also as the Texas Apiary Inspection Service. As mentioned earlier, the service was originally created to protect the honey bee industry from infectious diseases that caused economic hardships to the industry. In 1983, the agency's statute was updated, giving the state entomologist responsibility for controlling all infectious diseases and parasites affecting honey bees and consequently threatening the Texas honey bee industry. (The estimated value of the industry ranges between \$100 to \$200 million annually. This is based on the sale of honey, bee wax, pollen, bees and the pollination of various crops in the state.)

Diseases and parasites affecting honey bees are transmitted when diseased hives come in contact with healthy hives. In order to prevent and control the outbreak of disease, the inspection service conducts what amounts to a licensing function which includes permitting, certification, inspection, and enforcement operations. Permitting and certification are designed to prevent the interstate and the intrastate movement of diseased bees. Beekeepers entering or leaving the state with hives or moving bees within the state must obtain a permit from the state entomologist signifying that the hives are disease free. In addition, persons involved in the sale of queen and package bees to out of state and foreign buyers must have their operations certified as being disease free by the state entomologist. In fiscal year 1983, 484 permits and 32 certificates were issued.

The inspection activity is also an important part of the disease control program. Inspections are conducted by the state entomologist and his assistant to: 1) monitor the state for outbreaks of disease; 2) establish the disease status of hives for permitting and certification purposes and; 3) ensure that beekeepers are complying with the law. In fiscal year 1983, the agency inspected 163 apiaries and a total of 11,537 hives.

Finally, enforcement activities are conducted to ensure compliance with the law. The state entomologist has the authority to place bee yards containing diseased hives under quarantine. Under quarantine, the bee keeper is prohibited from moving bees in or out of the quarantined yards for 30 days. In fiscal year 1983, 15 yards were placed under formal quarantine by the state entomologist. The state entomologist can also initiate legal action when provisions of the law, such as failure to obtain a necessary permit, are violated. Formal complaints concerning violations are filed by the state entomologist with the district or county attorney in the county where the alleged violation occurred. Under the statute, a violation of the law is a class C misdemeanor which is punishable by a fine of up to \$200. In addition, the state entomologist can seek a court order to seize or prevent the sale of diseased bees or equipment. The state entomologist can also seek a court order to enter private or public premises on which bees, equipment, bee pollen or honey may be located to determine whether a violation of the law has occurred.

REVIEW OF OPERATIONS

This section covers the evaluation of current agency operations undertaken to identify any major changes which should be made to improve the efficiency and effectiveness of those operations; if the agency is to be continued. The evaluation is divided into three general areas dealing with: 1) a review and analysis of the policy-making body; and 2) a review and analysis of the overall administration of the agency; and 3) a review and analysis of the operation of specific agency programs.

Policy-Making Structure

The evaluation of the policy-making structure was designed to determine if the current statutory structure contains provisions that ensure adequate executive and legislative control over the organization of the body; competency of members to perform required duties; proper balance of interests within the composition; and effective means for selection and removal of members.

Because the Office of the State Entomologist is located within the Texas Agricultural Experiment Station, the review of the agency's policy-making structure was not based on the usual criteria. In this instance, the organizational structure and administrative controls governing the agency were reviewed to determine if sufficient accountability for agency activities was provided. The results of this aspect of the review indicates that the organizational structure and administrative controls were adequate.

Overall Administration

The evaluation of the overall agency administration was designed to determine whether the management policies and procedures, the monitoring of management practices and the reporting requirements of the agency were consistent with the general practices used for internal management of time, personnel, and funds.

Fees supporting the agency should be increased.

Historically, the program of the state entomologist has been supported from general revenue. The 68th Legislature, however, amended the agency's statute to provide for licensee fees to supplement general revenue. These fees went into

effect in September 1983. Fees are charged for permits, certification, and inspections, and are as follows:

Permits

Interstate Permit (Hives leaving Texas)	\$50 per shipment of bees
Intrastate Permits (Hives moved between Texas counties)	\$25 per year

Certification

Queen Breeder Certification	\$200 per location per year
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Inspections

Requested Inspection	\$50 per inspection
Reinspection	\$25 per inspection

For fiscal year 1984, approximately \$17,000 is projected to come from fees while \$99,444 will come from general revenue for a total appropriation of \$116,444.

As a general state policy the total costs associated with a licensing agency's regulation of a profession or business are paid through fees charged to the regulated industry. In those few instances where fees do not cover full costs, at least 50 to 75 percent of costs are covered. The review indicated that the fee structure of the state entomologist is budgeted to cover only 14 percent of total agency costs in fiscal 1984.

An analysis of the current fee structure was made to determine to what level the agency's fees would have to be increased in order to cover 50 percent of the agency's total budget for fiscal year 1984. Because the current fee system has only been in effect since September of 1983, little information exists on how much revenue will actually be generated under the current system. However, projections indicate that fees could generate between \$17,000 and \$22,000 in revenue. To meet half of the agency's total fiscal year 1984 budget of \$116,000, the fees would have to be increased to raise an additional \$36,000 to \$41,000. This increase in fees would be applied to approximately 400 commercial beekeepers and could increase fees by an average amount of \$50 to \$100 per beekeeper. This represents a sizeable increase over the current levels. It is unclear as to how such sizeable increases would affect the honey bee industry in Texas. Therefore, rather than

requiring the agency to immediately increase fees to cover at least 50 percent of the agency budget, it is recommended that the agency's statute be changed to require the agency to make reasonable efforts to increase fees to that level. The agency's statute should also be changed to remove the current ceiling on fees, thereby allowing fee increases to occur.

Fees collected by the agency should be deposited in a special fund in the treasury.

The agency's statute currently allows fees collected by the agency to be deposited in a special account outside the state treasury. The review indicated that there are two state policies governing how funds generated from fees and other charges should be handled. The first policy deals with colleges and universities. This policy allows institutions of higher learning to maintain certain kinds of fees and revenues in local accounts outside of the state treasury. This provides educational institutions flexibility in the administration of educationally related operations. The second policy concerns agencies of general government. This policy requires all state agencies, other than educational institutions, to deposit fees and other charges in the state treasury. This ensures legislative review of an agency's expenditures through the appropriations process.

The review indicated that, even though the agency is currently located in the Texas Agricultural Experiment Station which is part of the Texas A&M University System, it is in fact a licensing agency. Generally, other licensing agencies deposit their fees in the state treasury in accordance with the second policy. The review also indicated that the policy governing how educational institutions handle fees and charges was not intended to apply to licensing agencies. The agency's statute should be amended so that fees collected by the agency are placed in a special fund in the state treasury.

The title of "state entomologist" should be updated to reflect current duties.

The review indicated that the title of "state entomologist" was originally used to identify the office responsible for devising methods for controlling harmful insects. Over time, the duties of the state entomologist have changed to where the office is no longer responsible for such a large span of activity today, currently operating only the Honey Bee Disease Control Program. The broader statewide

entomology function which suggested the title of "state entomologist" have largely been moved to the Texas Department of Agriculture, which is responsible for the control and eradication of harmful insects.

In general, agency and position titles should accurately reflect actual duties and operations. The title "state entomologist" does not accurately reflect the agency's involvement in the Honey Bee Disease Control Program and also may be confused with the programs of the Texas Department of Agriculture. Therefore, in order to more accurately reflect the office's duties and to reduce any potential confusion, the title "state entomologist" should be changed to "chief apiary inspector."

Evaluation of Programs

As discussed in the background section, the agency attempts to control the outbreak of disease through what is essentially a licensing operation involving permitting, certification, inspection, and enforcement activities. Major areas of concern resulting from the evaluation of these functions are set out below.

Information should be required to help enforcement efforts.

The statute currently allows the state entomologist to require that all bee keepers, especially those moving bees, register the location of their hives by county. This practice theoretically establishes the general location of the hives and makes inspections easier to conduct. A review of the registration requirement was made to determine if registering hives by county did in fact make inspections easier.

The review showed that registering hives by county did not establish the location of the hives to the point where the entomologist and his assistant could easily locate them for inspections. Under the current system of registration, the entomologist establishes the exact location of hives by either going to the areas where beekeepers have located hives in the past or by contacting beekeepers to obtain the exact location of their hives. The review indicated that these methods did not adequately assist the state entomologist in conducting random inspections because the state entomologist does not have enough information to locate the hives easily. In addition, the review indicated that other state licensing agencies require that licensed businesses and individuals provide the exact location where

they conduct business so that they may easily be located for inspection to determine compliance with the applicable laws.

The review indicated that, until 1979, the state entomologist was authorized to require beekeepers to register the exact location of their hives by map. This method is currently used in the majority of states with honey bee disease control programs. The "exact location" provision was removed in response to a concern among beekeepers that the location of their hives would become public information. If such information were available publicly, commercial beekeepers fear that knowledge of the exact location of hives would lead to increased theft of bee hives or the honey from the hives. In addition, commercial beekeepers desire to keep hive locations secret for other reasons. Beekeepers spend time and effort scouting areas to determine the most productive locations for their hives. Once a good location is found, beekeepers wish to keep that knowledge secret to prevent other beekeepers from moving into the area, eventually causing over crowding and decreased honey production.

While the beekeepers' concern over the secrecy of hive locations is understandable, the review indicated that in 1980 the attorney general ruled in Opinion MW-248 that this information qualifies as a trade secret under the Open Records Act. According to the opinion, the exact location of bee hives is therefore not subject to public disclosure under the Open Records Act. However, the beekeepers' concern over the secrecy of hive locations can be further addressed by adding a provision in the agency's statute which would specifically exempt such information from public disclosure. To assist the entomologist in locating hives for inspection, it is therefore recommended that the agency's statute be amended to authorize the agency to obtain exact location of hives by map. Furthermore, this information should be specifically exempted from public disclosure in the agency's statute.

EVALUATION OF OTHER SUNSET CRITERIA

The review of the agency's efforts to comply with overall state policies concerning the manner in which the public is able to participate in the decisions of the agency and whether the agency is fair and impartial in dealing with its employees and the general public is based on criteria contained in the Sunset Act.

The analysis made under these criteria is intended to give answers to the following questions:

1. Does the agency have and use reasonable procedures to inform the public of its activities?
 2. Has the agency complied with applicable requirements of both state and federal law concerning equal employment and the rights and privacy of individuals?
 3. Has the agency and its officers complied with the regulations regarding conflict of interest?
 4. Has the agency complied with the provisions of the Open Meetings and Open Records Act?
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EVALUATION OF OTHER SUNSET CRITERIA

This section covers the evaluation of the agency's efforts in applying those general practices that have been developed to comply with the general state policies which ensure: 1) the awareness and understanding necessary to have effective participation by all persons affected by the activities of the agency; and 2) that agency personnel are fair and impartial in their dealings with persons affected by the agency and that the agency deals with its employees in a fair and impartial manner.

Open Meetings/Open Records

The review indicated that the agency was in compliance with the Open Meetings Act. Because the agency has no board or commission, there are no regular board meetings. However, the review indicated that when meetings are held to discuss changes to the agency's statute and rules, the agency does file timely notices of these meetings with the Secretary of State's Office. The agency is also in compliance with the Open Records Act. In general, the agency considers all of its records public information except for information concerning the exact location of a beekeepers hives. This information is considered confidential under Attorney General Opinion MW-248.

EEOC/Privacy

A review was conducted to determine the agency's compliance with applicable provision of state and federal statutes concerning equal employment opportunity and the rights and privacy of employees. The Office of the State Entomologist is subject to Texas Agricultural Experiment Station's Affirmative Action Plan, which is essentially a restatement of the Texas A&M University System plan. In addition, the agency is subject to the Texas Agricultural Experiment Station policy concerning the rights and privacy of employees. In both cases, the review indicated that the agency was in compliance with state and federal policies dealing with equal employment opportunity and the rights and privacy of employees.

Public Participation

The agency's operations were examined to determine if the general public and those affected by the agency have been informed of its activities. In addition, the

agency was reviewed to determine if the public was given an opportunity to participate in the agency's policy making process.

The review indicated that the agency provides adequate information about its activities to the general public and to those directly affected by the agency. In addition to his inspection duties, the state entomologist talks to beekeeper association groups and conducts seminars on issues relating to beekeeping and the activities of the agency. The general public is informed about the agency's activities through a brochure provided by the Texas Agricultural Experiment Station. In addition, copies of the agency's statute and regulations are made available to the public by the agency.

The review also indicated that the agency's activities and policies allowed for input into the policy-making process by the general public and those affected by the agency. The agency has adopted formal rules under the Administrative Procedures and Texas Register Act allowing for input by those outside of the agency into the policy-making process.

Conflict of Interest

The review focused on agency efforts to inform employees of responsibilities relating to conflict of interest statutes and compliance with the applicable statute. Information collected during the review indicated that the agency's employees, including the state entomologist, are provided copies of these statutes and requested to read them. The results of the review also indicated that the employees are in compliance with applicable laws.

ALTERNATIVES

The analysis of whether there are practical alternatives to either the functions or the organizational structure are based on criteria contained in the Sunset Act.

The analysis of alternatives is directed toward the answers to the following questions:

1. Are there other suitable ways to perform the functions which are less restrictive or which can deliver the same type of service?
 2. Are there other practical organizational approaches available through consolidation or reorganization?
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ALTERNATIVES

As part of the review of this agency, the functions performed by the agency were evaluated to determine if alternatives to current practices were available. State agencies with functions similar to those performed by this agency were reviewed to determine if they had developed alternative practices which offered substantial benefits and which could be implemented in a practical fashion. In addition, the practices of other states were reviewed in a like fashion and it was determined that their practices were similar to those of Texas. It was concluded that a practical alternative to the current structure does exist, and it is discussed below.

Transfer the Department of Agriculture Program relating to bees to the Texas Apiary Inspection Service.

Under the agency's statute, a person may not operate an apiary in the state unless the apiary equipment is either clearly marked with the name and address of the person operating the apiary or with a brand issued and registered to the person by the Texas Department of Agriculture. Brand registration allows hives and other apiary equipment to be easily identified in cases of theft. The review focused on the feasibility of transferring the apiary equipment registration program from TDA to the Office of the State Entomologist.

The review indicated that TDA handles the processing of brand applications in its office but does not inspect brands in the field to determine if the brands comply with the statute. However, in the course of his regular inspections, the state entomologist inspects brands to assist in determining ownership of the hives. The review indicated that the state entomologist could inspect brands and initiate action when violations of the brand law are discovered. The transfer of the apiary brand registration program from TDA to the state entomologist would consolidate the administering, monitoring and enforcement activity of the program into one agency with no additional costs.

OTHER POLICY CONSIDERATIONS

During the review of an agency under sunset, various issues were identified that involve significant changes in state policy relating to current methods of regulation or service delivery. Most of these issues have been the subject of continuing debate with no clear resolution on either side.

Arguments for and against these issues, as presented by various parties contacted during the review, are briefly summarized. For the purposes of the sunset report, these issues are identified so they can be addressed as a part of the sunset review if the Sunset Commission chooses to do so.

OTHER POLICY CONSIDERATIONS

This section covers that part of the evaluation which identifies major policy issues surrounding the agency under review. For the purpose of this report, major policy issues are given the working definition of being issues, the resolution of which, could involve substantial change in current state policy. Further, a major policy issue is one which has had strong arguments developed, both pro and con, concerning the proposed change. The material in this section structures the major question of state policy raised by the issue and identifies the major elements of the arguments for and against the proposal.

Should the Honey Bee Disease Control Program be transferred to the Texas Department of Agriculture.

The review indicated that the majority of states with honey bee disease control programs have them located in the state department of agriculture. These programs are usually not conducted in a university setting but are part of the general agency structure of state government. These findings suggest the possibility of transferring the functions of the Honey Bee Disease Control Program to the Texas Department of Agriculture.

In support of this idea, it could be argued that this transfer would bring the disease control program in line with how the majority of other states with honey bee disease programs operate. In so doing, the overall efficiency and effectiveness of the honey bee disease program could possibly be improved. TDA currently has inspectors operating out of 12 field offices located throughout the state. This structure could potentially be used to improve the enforcement and inspection activities of the program. In addition, transferring the program would place all functions relating to the regulation of honey bees into one agency. Thereby helping to coordinate this regulatory activity with that of the bee brand program currently located in the TDA.

In opposition, it could be argued that, while most other states operate this regulatory program from a department of agriculture, little additional benefit would be gained by consolidating this program with the operations of the Texas Department of Agriculture. Given current amounts of money budgeted to the program, it is unclear whether regulation through the TDA could be provided with

significant increases in efficiency or effectiveness. The program has operated acceptably at Texas A&M, and the program fits in well with the agricultural extension services provided by the university. Moving the program would also involve the expenditure of money to physically carry out the transfer.

ACROSS-THE-BOARD RECOMMENDATIONS

From its inception, the Sunset Commission identified common agency problems. These problems have been addressed through standard statutory provisions incorporated into the legislation developed for agencies undergoing sunset review. Since these provisions are routinely applied to all agencies under review, the specific language is not repeated throughout the reports. The application to particular agencies are denoted in abbreviated chart form.

OFFICE OF THE STATE ENTOMOLOGIST

Applied	Modified	Not Applied	Across-the-Board Recommendations
			A. GENERAL
X		X	1. Require public membership on boards and commissions.
		X	2. Require specific provisions relating to conflicts of interest.
		X	3. Provide that a person registered as a lobbyist under Article 6252-9c, V.A.C.S., may not act as general counsel to the board or serve as a member of the board.
		X	4. Require that appointment to the board shall be made without regard to race, creed, sex, religion, or national origin of the appointee.
X		X	5. Specify grounds for removal of a board member.
		X	6. Require the board to make annual written reports to the governor, the auditor and the legislature accounting for all receipts and disbursements made under its statute.
		X	7. Require the board to establish skill oriented career ladders.
X			8. Require a system of merit pay based on documented employee performance.
X			9. Provide that the state auditor shall audit the financial transactions of the board at least once during each biennium.
X			10. Provide for notification and information to the public concerning board activities.
X			11. Place agency funds in the Treasury to ensure legislative review of agency expenditures through the appropriation process.
X			12. Require files to be maintained on complaints.
X			13. Require that all parties to formal complaints be periodically informed in writing as to the status of the complaint.
	X	X	14. (a) Authorize agencies to set fees. (b) Authorize agencies to set fees up to a certain limit.
*			15. Require development of an E.E.O. plan.
X			16. Require the agency to provide information on standards of conduct to board members and employees.
X			17. Provide for public testimony at agency meetings.
		X	18. Require that the policy body of an agency develop and implement policies which clearly separates board and staff functions.

*Already in statute or required.
**Not approved for application.

Office of the State Entomologist
(Continued)

Applied	Modified	Not Applied	Across-the-Board Recommendations
			B. LICENSING
		X	1. Require standard time frames for licensees who are Xdelinquent in renewal of licenses.
		X	2. Provide for notice to a person taking an examination of the results of the exam within a reasonable time of the testing date.
		X	3. Provide an analysis, on request, to individuals failing the examination.
		X	4. Require licensing disqualifications to be: 1) easily determined, and 2) currently existing conditions.
		X	5. (a) Provide for licensing by endorsement rather than reciprocity.
		X	(b) Provide for licensing by reciprocity rather than endorsement.
		X	6. Authorize the staggered renewal of licenses.
*			7. Authorize agencies to use a full range of penalties.
		X	8. Specify board hearing requirements.
		X	9. Revise restrictive rules or statutes to allow advertising and competitive bidding practices which are not deceptive or misleading.
		X	10. Authorize the board to adopt a system of voluntary continuing education.

*Already in statute or required.

**Not approved for application.