

## Memorandum

**To:** Senate Government Operations Committee  
**From:** Ken Schatz, DCF Commissioner *KAS*  
Sean Brown, Deputy Commissioner ESD  
**Date:** April 17, 2017  
**Subject:** H.219: VSNIP

We appreciate the opportunity to share our perspective about the current Vermont Spay and Neuter Incentive Program (VSNIP) and the proposed change to H.219.

The current statute requires that “[t]he agency *shall* implement the program through an agreement with a qualified organization consistent with the applicable administrative rules.” 20 V.S.A. § 3815(a). H.219 proposes to change the language to “[t]he agency *may* implement the program through an agreement with a qualified organization consistent with the applicable administrative rules. This shift from “shall” to “may” would allow DCF to either establish an outside agreement with a qualified organization or operate the program in house. DCF believes the language in H.219 represents good government in terms of providing the same flexibility to administer the VSNIP program inhouse or through a contract as we currently have with many of our other programs. DCF does support the original language from H.219.

During testimony last week, DCF was asked if we would consider supporting modified language limiting DCF’s ability to administer VSNIP inhouse to only when a qualified organization cannot be found to administer the program. DCF believes this modified language is unduly restrictive, takes away our discretion in making decisions about the most appropriate management of the program, and would require significant work to justify moving the program inhouse. Consequently, this language would impose an increased administrative burden, therefore we do not support it.

If H.219 is not supported by the Senate Government Operations Committee as passed by the House, DCF supports leaving the current statutory language in place requiring the program be administered by a qualified organization. If at some point in the future DCF believes the program should be administered inhouse or is unable to find a qualified organization to administer the program, we will come back to the General Assembly with a proposal to make changes to the VSNIP statute.

