December 4, 2020

Dear Sunset Commission Members,

I am Ami Gordon, the founder of PAWedu. PAWedu is a program I have started in an effort to help promote effective animal care and prevent animal neglect and cruelty. We had the honor of being the first online responsible pet owner course approved by the Texas Department of Licensing and Regulation (TDLR). It is not surprising therefore that I strongly disagree with and oppose the Sunset Staff recommendation to eliminate TDLR's Online Responsible Pet Owner Program (ORPOP).

ORPOP provides judges with a vital tool in helping to prevent animal abuse and neglect as well as crimes against people. Under the statute establishing ORPOP, judges are given the discretion to require a person convicted of animal neglect or abuse to take a class on proper and effective animal care. This is particularly important since numerous studies show that people who abuse and/or neglect animals often move on to more savage forms of abuse and/or crimes against people.[1] Educating people on the proper care of an animal therefore can help prevent people from committing more serious crimes in the future.

In addition, many municipalities and rural areas simply do not have the ability to create or offer these courses. The online nature of PAWedu allows abusers to receive information on the proper care of animals in areas where such programs do not exist locally. As a result, the benefits of animal care education can be realized literally all across Texas. The statewide nature of our reach makes the state the most logical oversight body.

Moreover, these courses are required to accurately educate those taking the course on state and federal laws dealing with animal care, neglect and abuse. For example, the PAWedu course covers state laws on animal cruelty, including the difference between farm and non-farm animals, as well as the federal Preventing Animal Cruelty and Torture Act. It is therefore in the state's interest to ensure that these courses accurately reflect existing laws. This is particularly important given the intersection of these courses with the state's criminal justice system.

Furthermore, TDLR itself does not see this program as needing improvement or needing elimination. TDLR made no reference at all to this program in it's Sunset Self-Evaluation Report when listing ways its operating statutes could be improved.

Additionally, TDLR finalized ORPOP rules in March 2018. We received our license in February 2020. Two months later COVID-19 shut down the entire US economy including almost all courts handling animal cruelty. In June 2020 Sunset staff issued their staff report that recommended eliminating ORPOP. Making such a recommendation when licenses are less than a year old without taking into account the effects of a worldwide pandemic seems a somewhat rushed approach and recommendation.

Lastly, in the bill that established ORPOP (HB 162, 85th Regular Session, 2017) TDLR was given authority to set the fees for ORPOP to cover the program's costs. ORPOP therefore does not cost the agency any money — general revenue or otherwise.

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[1] https://www.animaltherapy.net/animal-abuse-human-violence/bibliography-the-link/

Eliminating this program is quite simply misguided. I urge you to not include the elimination of ORPOP in the TDLR sunset bill.

Thank you for your service to the people of Texas.

Sincerely,

Ami Gordon, Esq.
Founder, PAWedu