



01/20/2023

Legislative Reference Library
645 State Office Building
100 Rev. Dr. Martin Luther King Jr. Blvd.
St. Paul, Minnesota 55155

**Re: In The Matter of the Proposed Rules of the Minnesota Racing Commission
Governing Horse Racing, Definitions, Stabling, Class C Licenses, TB/QH Races,
Harness Races, Horse Medication, Medical Testing, Breeders' Fund and Prohibited
Acts, Minnesota Rules, Chapters 7869, 7876, 7877, 7883, 7884, 7890, 7892, 7895 and
7897; Revisor's ID Number R-04762**

Dear Librarian:

The Minnesota Racing Commission intends to adopt rules governing Horse Racing, Definitions, Stabling, Class C Licenses, Thoroughbred and Quarter horse Races, Harness Races, Horse Medication, Medical Testing, Breeders' Fund and Prohibited acts. We plan to publish a Dual Notice in the January 23rd, 2023 State Register.

The Department has prepared a Statement of Need and Reasonableness. As required by Minnesota Statutes, sections 14.131 and 14.23, the Department is sending the Library an electronic copy of the Statement of Need and Reasonableness at the same time we are mailing our Notice of Intent to Adopt Rules.

If you have questions, please contact me at 651-925-3951.

Yours very truly,

Chad Peterson

Chad Peterson

Contract, Procurement and Rulemaking Assistant

Enclosure: Statement of Need and Reasonableness

R-04762

Minnesota Racing Commission

STATEMENT OF NEED AND REASONABLENESS

Proposed Amendments to Rules Governing Horse Racing, Definitions, Stabling, Class C Licenses, TB/QH Races, Harness Races, Horse Medication, Medical Testing, Breeders' Fund and Prohibited Acts; Chapters 7869, 7876, 7877, 7883, 7884, 7890, 7892, 7895 and 7897.

INTRODUCTION

The Minnesota Racing Commission (MRC) continuously strives to keep its rules current and relevant as the industry evolves. This rulemaking initiative will modify, clarify, and update various existing MRC rules pertaining to licensing, animal welfare, and the safety of all participants. There is an emphasis on horse health, veterinary practices, medications, and racing rules. Many of these changes are necessitated by new Federal legislation. Following is a summary of the changes.

7869.0100 Subp. 32b. Definitions.

This definition is being added to define "Horseracing Integrity and Safety Act" which created the Horse Racing and Safety Authority (HISA)

7869.0100, Subp. 32c. Definitions.

This definition is being added to define "HorseRacing Integrity and Safety Authority (HISA)" which is used elsewhere in the rules.

7869.0100, Subp. 32d. Definitions.

This definition is being added to define "HorseRacing Integrity and Safety Authority (HISA) Covered Horse" which is used elsewhere in the rules.

7869.0100, Subp. 32e. Definitions.

This definition is being added to define "HorseRacing Integrity and Safety Authority (HISA) Covered Horse Race" which is used elsewhere in the rules.

7869.0100, Subp. 32f. Definitions.

This definition is being added to define "HorseRacing Integrity and Welfare Unit (HIWU)" which is used elsewhere in the rules.

7869.0100, Subp. 51a. **Definitions.**

This definition is being updated to modify what constitutes the minimum and maximum number of races required for a racing day and provides language for cancellation due to several factors.

7869.0100, Subp. 56a. **Definitions.**

This definition is being added to define “Ship in” which is used elsewhere in the rules.

7876.0100, Subp. 10. **Original Certificate of Veterinary inspection.**

This proposed rule changes the length of time a certificate of veterinary inspection (CVI) is valid, adds a requirement for an influenza vaccination, updates the method of CVI submission to the Commission, and clarifies the duration of CVI’s for HISA and non-HISA covered horses for on-track stabling.

7876.0110, Subp. 4. **Original Certificate of Veterinary inspection.**

This proposed rule changes the length of time a certificate of veterinary inspection (CVI) is valid, adds a requirement for an influenza vaccination, updates the method of CVI submission to the Commission, and clarifies the duration of CVI’s for HISA and non-HISA covered horses for on-track stabling.

7876.0120, Subp. 1. **Certificate of Veterinary inspection.**

This proposed rule changes the length of time a certificate of veterinary inspection (CVI) is valid, adds a requirement for an influenza vaccination, updates the method of submission to the Commission, and clarifies the duration of the CVI for HISA and non-HISA covered horses for on-and off-track stabling.

7877.0170, Subp. 2. **P Trainers.**

This change updates the trainer’s responsibilities for providing a certificate of veterinary inspection and required vaccinations and provides the method of submission to the Commission.

7877.0170, Subp. 2. **X. Trainers.**

This rule is being added to clarify responsibilities for Standardbred trainers including horse custody, stabling and entering horses into races.

7877.0170, Subp. 9. **Veterinarians.**

This rule is changed to require the Commission to report rulings or violations against a veterinarian to the Minnesota Board of Veterinary Medicine.

7877.0170, Subp. 10. **Pony Riders.**

This change updates responsibilities for anyone bringing a pony horse onto the grounds. It updates the days the certificate of inspection (CVI) is valid, adds a requirement for influenza vaccination, and changes the method of CVI submission to the Commission.

7877.0175, Subp. 8b. **Veterinarian’s List.**

This change adds horses to the veterinarian's list that are barred from racing for the life of the horse or have been treated with shock wave therapy.

7877.0175, Subp. 8f. **Nerved horses.**

This rule change removes the list of nerved horses from use by the Commission.

7877.0175, Subp. 8g. **Pregnant mares and fillies.**

This change removes the term fillies, as its use is improper in this context.

7879.0200, Subp. 2. **Specific duties and responsibilities of stewards.**

This rule change extends the deadline for stewards to sign reports from 24 to 72 hours.

7883.0100, Subp. 2a. **Prohibited starters.**

This rule change prohibits horses that tested positive for a prohibited substance in a qualifying trial for racing in that future race and clarifies which horse will replace the prohibited horse in that future race.

7883.0100, Subp. 6. E. **Prohibited entries.**

This rule change prohibits the entry of a Thoroughbred or Quarter Horse 12 years of age or older in a race. This is a reduction from 14 years of age or older.

7883.0100, Subp. 6. K. **Prohibited entries.**

This rule is being added to prohibit the entry of racehorse that is six years old or older and has not started or won a race or that has not started a race in 3 or more years.

7883.0120, Subp. 1c. **Drawing horses into a race from also-eligible list.**

This rule is being removed.

7883.0140, Subp. 22A. **Claimed horse shall race at track claimed.**

This rule change updates the minimum number of days from 30 to 60 days before a claimed horse can race at a track other than the track where it was claimed. It also removes the requirement that a claimed horse make a subsequent start at the racetrack where it was claimed.

7884.0120, Subp. 13A. **Horses denied entry.**

This rule change is made to clarify that a horse listed on the veterinarian's list may enter a race but not participate in a race until the removal date listed on the veterinarian's list has passed.

7884.0120, Subp. 13B. **Horses denied entry.**

This section is being renumbered for clarity.

7884.0120, Subp. 13C. **Horses denied entry.**

This rule denies entry to races for any horse that is barred, suspended or ineligible for racing in other racing jurisdictions than Minnesota.

7884.0120, Subp. 18. **Declaring hobbles.**

This rule is added to give trainers the option of racing with or without hobbles in a Standardbred harness race regardless of qualification and addresses when this situation would be treated as an equipment change.

7884.0170, Subp. 1. **Stewards to approve scratches.**

This rule adds a requirement that horses on the grounds scratched for veterinary reasons be examined by a commission veterinarian and the stewards be notified prior to the scratch being made final.

7884.0170, Subp 4. **Scratched as unsound.**

This rule adds an official workout as an acceptable alternative to a horse requalifying if the horse had been scratched as unsound.

7884.0190, Subp. 2. C. **Horses required to compete in qualifying races for race meets longer than two weeks.**

This rule change clarifies that if a horse has not started for a period of 45 days, on the 45th day it becomes ineligible.

7884.0190, Subp. 2a. C. **Horses required to compete in qualifying races regardless of duration of meet.**

This rule is being reworded and shortened for clarity.

7884.0190, Subp. 8. **Medications.**

This change removes the requirement that a randomly selected horse participating in a qualifying race test negative prior to reentry. This applies only to horses not on the veterinarian's list.

7884.0190, Subp. 2. **Conduct after word "go" is given.**

This rule is being amended to shorten the length of the whip allowed and changes an allowed built-in snapper to a built-in popper as part of the total whip length.

7890.0100, Subp. 21 **Veterinarian's list.**

The rule is being updated by changing the referenced subpart from 7877.0175 Subp.8 to 7877.0175 Subp. 8b.

7890.0110, Subp. 5. **Discontinuance of treatments.**

This rule is being updated to strike language related to the use of corticosteroids as it has been changed elsewhere in the rules.

7890.0140, Subp. 1. **Examination of bleeders.**

This rule removes the reference to the bleeders list and also removes redundant language.

7890.0140, Subpart 2. **Confirmation of bleeder must be certified.**

This rule is being removed.

7890.0140, Subp. 3. **Bleeders imported from other jurisdictions.**

This rule is being renumbered from subpart “3” to “2” and removal of references to the time of transmission of the information is being removed from the rule.

7890.0140, Subp. 4. **Horses placed on bleeder list.**

This rule is being renumbered from subpart “4” to “3” and removes reference and instructions for horses placed on the bleeders list and adds references to the veterinarians list.

7890.0140, Subp. 5. **Restrictions on bleeders.**

This rule is being renumbered from subpart “5” to “4” and changes “confirmed bleeders” to “bleeders.”

7890.0140, Subp. 5. A. **Restrictions on bleeders.**

This amendment is removing the words “bleeders list” from the rule.

7892.0110, **OUT OF COMEPTITION TESTING**

This change moves rule 7892.0120 Subp. C in its entirety to 7892.0110 Subpart 2a. Taking of Samples

7892.0120, Subp. 1. B. **Horses tested.**

This rule part is being amended to change the rule reference from “7877.0175 Subpart 8” to “7877.0175 Subpart 8b.”

7892.0120, Subp. 1. C. **Horses tested.**

This rule section is being renumber to 7892.0110 Subpart 2a.

7892.0120, Subp. 1. D. **Horses tested.**

This rule section is being renumber subpart “D” to “C.”

7892.0120, Subp. 1. E. **Horses tested.**

This rule section is being renumber subpart “E” to “D.”

7892.0120, Subp. 1. F. **Horses tested.**

This rule section is being renumber subpart “F” to “E.”

7895.0100, Subp. 9. **Onsite Visit.**

This rule is being added so facility managers, breeders and owners know that commission employees visit and verify the presence broodmares and stallions each year at locations participating in the Breeders’ Fund program and requires their cooperation.

7895.0100, Subp. 10. **Identification of broodmare and stallion.**

This rule is being added to ensure the proper identification of broodmares and stallions.

7895.0125, Subp. 1. A. **Broodmare registration.**

This amendment adds the requirement that a broodmare's Jockey Club physical or digital certificate and registration application be submitted electronically to the Commission by March 15th of the current breeding year.

7895.0125, Subp. 2. A. **Stallion registration.**

This amendment adds the requirement for a stallion's Jockey Club physical or digital certificate and registration application be submitted electronically to the Commission by January 31 of the current breeding year.

7895.0350, Subp. 1. **Broodmare registration.**

This amendment adds the requirement that broodmare registration be submitted electronically to the Commission by March 15th of the current breeding year.

7895.0350, Subp. 2. **Stallion registration.**

This amendment adds the requirement that Stallion Registration be submitted electronically to the Commission.

7897.0100, Subp. 11. **Nerved horses.**

This rule change prevents a person from bringing a horse on the grounds that has been nerved.

7897.0100, Subp. 21. **Prohibited Acts.**

This definition is being amended to remove the word "filly."

ALTERNATIVE FORMAT

Upon request, this Statement of Need and Reasonableness can be made available in an alternative format, such as large print, Braille, or audio. To make a request, contact E. Joseph Newton at the Minnesota Racing Commission, 15201 Zurich Street, Suite 212, Columbus, MN 55025; phone 651-356-1200; fax 651-925-3954; or email joseph.newton@state.mn.us. TTY users may call the Racing Commission at 800-627-3529.

STATUTORY AUTHORITY

The Racing Commission's statutory authority to adopt the rules is set forth in Minnesota Statutes section 240.03, 240.23 and 240.24.

The Racing Commission's statutory authority to adopt the rules is set forth in Minnesota Statutes section 240.23, which provides as follows:

The Commission has the authority, in addition to all other rulemaking authority granted elsewhere in this chapter to promulgate rules governing: a) the conduct of horse races held at licensed racetracks in Minnesota, including but not limited to the rules of racing, standards of entry, operation of claiming races, filing and handling of objections, carrying of weights, and declaration of official results, b) wire and wireless communications between the premises of a licensed racetrack and any place outside the premises, c)

information on horse races which is sold on the premises of a licensed racetrack, d) liability insurance which it may require of all racetrack licensees, e) the auditing of the books and records of a licensee by an auditor employed or appointed by the Commission, f) emergency action plans maintained by licensed racetracks and their periodic review, g) safety, security, and sanitation of stabling facilities at licensed racetracks, h) entry fees and other funds received by a licensee in the course of conducting racing which the Commission determines must be placed in an escrow account, i) affirmative action in employment and contracting by licensed racetracks, and j) procedures for the sampling and testing of any horse that is eligible to race in Minnesota for substances or practices that are prohibited by law or rule; and (k) any other aspect of horse racing or pari-mutuel betting which in its opinion affects the integrity of racing or the public health, welfare, or safety.

Also, Minnesota Statutes section 240.24 authorizes the Racing Commission to “make and enforce rules governing medication and medical testing for horses running at licensed racetracks.” And Minnesota Statutes section 240.03 specifies Racing Commission powers and duties which include regulating horse racing in Minnesota to ensure that it is conducted in the public interest and to take all necessary steps to ensure the integrity of racing in Minnesota.

REGULATORY ANALYSIS

- (1) A description of the classes of persons who probably will be affected by the proposed rule, including classes that will bear the costs of the proposed rule and classes that will benefit from the proposed rule.**

The people affected by these proposed rule changes are racetrack owners, horse owners, horse trainers and other persons involved in horse racing. All stakeholders will benefit from the updating, simplification, and clarification of existing rules. The Racing Commission believes that there will be no increased cost to anyone.

- (2) The probable costs to the agency and to any other agency of the implementation and enforcement of the proposed rule and any anticipated effect on state revenues.**

There is no anticipated change in costs to the Racing Commission or to any other state or local agency due to these proposed amendments.

- (3) A determination of whether there are less costly methods or less intrusive methods for achieving the purpose of the proposed rule.**

The Racing Commission believes the proposed changes will not be intrusive, as they mainly seek to clarify and simplify existing rules or bring current rules into alignment with industry standards. The cost to implement them will be minimal. The Racing Commission has not identified any less costly or less intrusive methods for achieving the purposes of the proposed rules.

- (4) A description of any alternative methods for achieving the purpose of the proposed rule that were seriously considered by the agency and the reasons why they were rejected in favor of the proposed rule.**

There were no alternative methods available. A number of meetings were held with industry participants and stakeholders. Many of the proposed rules reflect changes in national racing standards and were presented by industry participants and stakeholders. Other rules changes are proposed to update, clarify or simplify existing rules.

- (5) The probable costs of complying with the proposed rule, including the portion of the total costs that will be borne by identifiable categories of affected parties, such as separate classes of governmental units, businesses, or individuals.**

There are no significant anticipated costs to governmental units, businesses or individuals. Most of these proposals seek to clarify or simplify existing rules, conform the rules to industry practices, or conform rules to national trade association rules to keep them up-to-date and consistent with requirements in other racing jurisdictions.

- (6) The probable costs or consequences of not adopting the proposed rule, including those costs or consequences borne by identifiable categories of affected parties, such as separate classes of government units, businesses, or individuals.**

The consequences of not adopting the proposed rules would be that some of Minnesota's medication and horse racing rules would be outdated and inconsistent with national standards and practices. This could lead to confusion in the Minnesota horse industry as horses move from state to state and less ability to detect prohibited drugs in racehorses. Without the proposed rule changes, detection and prevention of the administration of prohibited medications would be more difficult, leading to an unsafe racing environment.

- (7) An assessment of any differences between the proposed rule and existing federal regulations and a specific analysis of the need for and reasonableness of each difference.**

In January 2021 federal legislation was enacted creating the Horse Racing Safety and Integrity Authority. There are new federal regulations in place regarding Thoroughbred horse racing. There are no current differences between the federal regulations regarding these proposed rule changes. Non-Thoroughbred horse racing is regulated by the various individual state racing commissions. Several of the proposed rules are aimed at achieving uniformity across states, reciprocity with other jurisdictions, and adoption of industry model rules and safety initiatives and to stay abreast of current Federal regulation.

- (8) An assessment of the cumulative effect of the rule with other federal and state regulations related to the specific purpose of the rule.**

These rules are specific to horse racing but when required are consistent with state regulations for the Boards of Animal Health and Veterinary Medicine and USDA APHIS requirements. Many of these proposed rules are meant to align with the new federal HISA

program which went into effect on July 1, 2022. The cumulative effect is unknown as the program is new and evolving. The remainder of the rules are updates or minor changes to existing rules with no specific cumulative effects.

PERFORMANCE-BASED RULES

These rules are proposed to support the horse breeding industry consistent with the Racing Commission's mission. As required by Minnesota Statutes, section 14.002, they were developed with every effort to emphasize superior achievement in meeting the agency's regulatory objectives and maximum flexibility for the regulated parties and the agency in meeting those goals. We consulted with staff, commissioners, the Office of the Attorney General, interested industry members, and regulators from other states. We also reviewed model rules and rules in effect in other states.

ADDITIONAL NOTICE

The Racing Commission began work on these rule proposals in July of 2022 after receiving recommendations from racing stewards, racetracks, Racing Commission staff and industry members. Several stakeholder meetings were held to discuss the proposals. Meetings were held at various times with Class A and B license holders and industry stakeholder groups. Horse trainers, owners, racetrack representatives, racing officials, horsepersons groups, the Jockey's Guild, and Racing Commission staff were consulted. The public was encouraged to submit additional proposals.

The proposed rules were revised and then thoroughly discussed at a public meeting of the Racing Commission's Racing Committee, a panel comprised of three commissioners, on October 12th, 2022. Members of the public provided valuable input at this meeting. The Racing Committee unanimously voted to recommend the rules to the full Racing Commission with some minor modifications. After the initial 60-day comment period, on October 20, 2022, the full Minnesota Racing Commission met and accepted the Racing Committee's recommendation and voted to publish the Notice of Intent to Adopt Rules. The rules discussion was clearly included on all agendas duly prepared and mailed or e-mailed 7 days prior to these public meetings. Agendas were also posted on the Racing Commission's website. Minutes and recordings of the meetings are available on the Racing Commission's website at www.mn.gov/mrc/.

Our Notice Plan includes:

1. Publishing the Request for Comments in the August 1, 2022 edition of the State Register.
2. Posting the Request for Comments on the Commission's website at <https://mn.gov/mrc/> with a link to the Office of Administrative Hearings rulemaking e-comments website.
3. Posting the Request for Comments on the Office of Administrative Hearings rulemaking e-comments website with a link from commission's website.
4. Posting the Request for Comments on the Commission's Facebook page.

5. E-mailing the Request for Comments to everyone registered to be on any of the Commission's mailing lists, in addition to those persons on the rulemaking list required under Minnesota Statutes, section 14.14, subdivision 1a.
6. E-mailing the Request for Comments to each of the commission's contact persons with the Class A & B licensees.
7. E-mailing the Request for Comments to each person holding a Class C license from the Commission to work as a racing veterinarian in the past two years.
8. E-mailing the Request for Comments separately to each of our contacts at the six horsepersons' organizations that are affected by horse racing in Minnesota, along with a specific request that they post it on their website or otherwise communicate it to their members. These organizations include: the Minnesota Thoroughbred Association, the Minnesota Horsemen's Benevolent and Protective Association, Minnesota Harness Racing, Inc., the Minnesota Quarter Horse Racing Association, the Jockey's Guild, and the United States Trotting Association.
9. E-mailing the Request for Comments to organizations in Minnesota that we have identified as having an interest in animal health, including the Minnesota Board of Animal Health, the Minnesota Board of Veterinary Medicine, the Minnesota Humane Society, the Minnesota Veterinary Medical Association, and the University of Minnesota College of Veterinary Medicine. We will request that these organizations disseminate the Request for Comments to their members and constituents as they see fit.
10. The start of this rulemaking project was announced at the July 18, 2022, public meeting of the Minnesota Racing Commission.
11. Commission staff will hold a public stakeholder meeting within the 60-day comment period, to obtain input from interested persons. This meeting will be announced at Commission meetings, via our website, and via our mailing lists as described above.
12. Commission staff will update the Commission and the public on the progress of rule development at each regularly scheduled public meeting of the Minnesota Racing Commission.

CONSULT WITH MMB ON LOCAL GOVERNMENT IMPACT

As required by Minnesota Statutes, section 14.131, the Racing Commission will consult with Minnesota Management and Budget (MMB). We will do this by sending MMB copies of the documents that we send to the Governor's Office for review and approval. We will do this before the Racing Commission publishes the Notice of Intent to Adopt. The documents will include: the Governor's Office Proposed Rule and SONAR Form; the proposed rules; and the SONAR. The Racing Commission will submit a copy of the cover correspondence and any response received from Minnesota Management and Budget to OAH with the documents it submits for ALJ review.

DETERMINATION ABOUT RULES REQUIRING LOCAL IMPLEMENTATION

As required by Minnesota Statutes, section 14.128, subdivision 1, the agency has considered whether these proposed rules will require a local government to adopt or amend any ordinance or other regulation to comply with these rules. The Racing Commission has determined that they will not, because all activity that these amendments affect occurs on licensed racetrack grounds or private farms, not out in the local community. There are times where we may have to contact local law enforcement or county/city attorney offices, but that is in the normal course of fulfilling our duties and responsibilities when events warrant. It is not anticipated that these amendments will either increase or decrease those contacts.

COST OF COMPLYING FOR SMALL BUSINESS OR CITY

As required by Minnesota Statutes, section 14.127, the Racing Commission has considered whether the cost of complying with the proposed rules in the first year after the rules take effect will exceed \$25,000 for any small business or small city. The Racing Commission has determined that the cost of complying with the proposed rules will be negligible and could not exceed \$25,000 for a small business. The Racing Commission has determined that the cost of complying with the proposed rules in the first year after the rules take effect will not exceed \$25,000 for any small city.

LIST OF WITNESSES

If these rules go to a public hearing, the Racing Commission anticipates having the following principal witnesses testify in support of the need for and reasonableness of the rules:

1. Charlene Briner, Interim Executive Director, Minnesota Racing Commission.
2. Dr. Lynn Hovda, Chief Commission Veterinarian, Minnesota Racing Commission.
3. E. Joseph Newton, General Counsel, Minnesota Racing Commission.
4. Stephanie Jenson, Safety Coordinator, Minnesota Racing Commission.

Additional witnesses could be called as needed. The Racing Commission does anticipate calling non-agency witnesses.

RULE BY RULE ANALYSIS

7869.0100 Subp. 32a. Horseracing Integrity and Safety Act (HISA)

This definition is being added as the term is used elsewhere in the rules and should be properly defined. This definition comes from the Horseracing Integrity and Safety Act of 2020. (Exhibit 1)

7869.0100 Subp. 32b. **Horseracing Integrity and Safety Authority (HISA)**

This definition is being added as the term is used elsewhere in the rules and should be properly defined. The definition comes from the Horseracing Integrity and Safety Authority website. (Exhibit 2)

7869.0100 Subp. 32c. **Horseracing Integrity and Safety Authority (HISA) Covered Horse**

This definition is being added as the term is used elsewhere in the rules and should be properly defined. The definition comes from the HISA definition of “Covered Horse.” (Exhibit 3)

7869.0100 Subp. 32d. **HorseRacing Integrity and Safety Authority (HISA) Covered Horse Race**

This definition is being added as the term is used elsewhere in the rules and should be properly defined. The definition comes from the HISA definition of “Covered Horserace or Race.” (Exhibit 4)

7869.0100 Subp.32e. **HorseRacing Integrity and Welfare Unit (HIWU).**

This definition is being added as the term is used elsewhere in the rules and should be properly defined. (Exhibit 5)

7869.0100 Subp. 51a. **Racing Day.**

This definition modifies that found in Minnesota Statute 240.01, subd.17 to permit a racing day to have fewer than eight races should the races need to be cancelled for environmental concerns such as torrential rain or excessive heat, lack of power, failure of technology including problems with the tote board or photo finish, and a lack of horses to fill a field. This proposed rule change is needed so inclement weather and other conditions outside the control of the Class A licensee have less of an effect on the Licensee’s ability to fulfill their obligated number of race days for each race meeting.

7869.0100 Subp. 56a. **Ship In**

This definition is being added as the term is used elsewhere in the rules and should be properly defined.

7876.0100 Subp. 10. **Original certificate of veterinary inspection.**

There are four distinct parts to this proposed rule change:

Part I changes the date of inspection and issuance for equine certificates of inspection (health certificates) from ten days to five days. HISA regulations for Thoroughbreds require this, primarily for health reasons and to prevent the transport of infectious diseases by a sick horse. It is reasonable to expand this for all racing breeds based on health and welfare alone. In addition, Quarter Horses are often shipped on the same certificate of veterinary inspection or in the same trailer as Thoroughbreds making a single inspection and issuance date mandatory. (Exhibit 6).

Part II adds the date of an influenza vaccination to the certificate of veterinary inspection. Influenza is one of the two most common infectious respiratory diseases in horses and almost all horses entering the racetrack are vaccinated against it in combination with equine herpes virus, the other common infectious disease in horses. Influenza in particular is a highly contagious respiratory pathogen in young, commingled unvaccinated horses, and in unvaccinated horses can quickly spread throughout an entire barn. HISA requires that these vaccinations be administered every six months. Adding this information to the certificate of veterinary inspection helps prevent the spread of these two diseases in horses and provides the trainer with a known, valid date for planning boosters. (Exhibit 7)

Part III changes the requirements for how the certificate of veterinary inspection is transmitted to the Commission Veterinarian. This changes the rules from the use of paper forms to providing documents through a specific online portal. Electronic submission of both the certificate of veterinary inspection and the equine infectious anemia test results began during COVID to decrease the amount of paperwork handled and processed by individuals at the stable gate and to prevent those horses without the appropriate documents from being held at the stable gate for prolonged periods. It has been used successfully for three years and this change is proposed to align with current use.

Part IV makes an accommodation for HISA covered horses, where a new certificate of veterinary inspection is required every five days should a HISA covered horse leave the racetrack and return but does not change the 30-day requirement for breeds not affected by HISA requirements. This proposed change is necessary to conform with HISA but not adversely affect those non-HISA covered horses that ship in and out from farms and training centers.

7876.0110 Subp. 4. **Original certificate of veterinary inspection.**

There are four distinct parts to this proposed rule change:

Part I changes the date of inspection and issuance for equine certificates of inspection (health certificates) from ten days to five days. HISA regulations for Thoroughbreds require this, primarily for health reasons and to prevent the transport of infectious diseases by a sick horse. It is reasonable to expand this for all racing breeds based on health and welfare alone. In addition, Quarter Horses are sometimes shipped on the same certificate of veterinary inspection or in the same trailer as Thoroughbreds making a single inspection and issuance date mandatory. (Exhibit 6.)

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veterinary inspection helps prevent the spread of these two diseases in horses and provides the trainer with a known, valid date for planning boosters. (Exhibit 7)

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Part IV makes an accommodation for HISA covered horses, where a new certificate of veterinary inspection is required every five days should a HISA covered horse leave the racetrack and return but does not change the 30-day requirement for breeds not affected by HISA requirements. This proposed change is necessary to conform with HISA but not adversely affect those non-HISA covered horses that may need to ship in and out from veterinary clinics and other racetracks.

7876.0120 Subp. 1. **Certificate of veterinary inspection.**

There are four distinct parts to this proposed rule change:

Part I changes the date of inspection and issuance for equine certificates of inspection (health certificates) from ten days to five days. HISA regulations for Thoroughbreds require this, primarily for health reasons and to prevent the transport of infectious diseases by a sick horse. It is reasonable to expand this for all racing breeds based on health and welfare alone. In addition, Quarter Horses are sometimes shipped on the same certificate of veterinary inspection or in the same trailer as Thoroughbreds making a single inspection and issuance date mandatory. (Exhibit 6)

Part II adds the date of an influenza vaccination to the certificate of veterinary inspection. Influenza is one of the two most common infectious respiratory diseases in horses and almost all horses entering the racetrack are vaccinated against it in combination with equine herpes virus, the other common infectious disease in horses. Influenza in particular is a highly contagious respiratory pathogen in young, commingled unvaccinated horses, and in unvaccinated horses can quickly spread throughout an entire barn. HISA requires that these vaccinations be administered every six months. Adding this information to the certificate of veterinary inspection helps prevent the spread of these two diseases in horses and provides the trainer with a known, valid date for planning boosters. (Exhibit 7)

Part III changes the requirements for how the certificate of veterinary inspection is transmitted to the Commission Veterinarian. This changes the rules from the use of paper forms to providing documents through a specific online portal. Electronic submission of both the certificate of veterinary inspection and equine infectious anemia test results began during COVID to decrease the amount of paperwork handled and processed by individuals at the stable

gate and to prevent those horses without the appropriate documents from being held at the stable gate for prolonged periods. It has been used successfully for three years and this change is proposed to align with current use.

Part IV makes an accommodation for HISA horses, where a new certificate of veterinary inspection is required every five days should a HISA covered horse leave the racetrack and return but does not change the 30-day requirement for breeds not affected by HISA requirements. This proposed change is necessary to conform with HISA but not adversely affect those non-HISA covered horses that ship in and out from farms and training centers.

7877.0170 Subp. 2. **Trainers.**

There are three distinct parts to this proposed rule change:

Part I changes the date of inspection and issuance for equine certificates of inspection (health certificates) from ten days to five days. HISA regulations for Thoroughbreds require this, primarily for health reasons and to prevent the transport of infectious diseases by a sick horse. It is reasonable to expand this for all racing breeds based on health and welfare alone. In addition, Quarter Horses are sometimes shipped on the same certificate of veterinary inspection or in the same trailer as Thoroughbreds making a single inspection and issuance date mandatory. (Exhibit 6)

Part II adds the date of an influenza vaccination to the certificate of veterinary inspection. Influenza is one of the two most common infectious respiratory diseases in horses and almost all horses entering the racetrack are vaccinated against it in combination with equine herpes virus, the other common infectious disease in horses. Influenza in particular is a highly contagious respiratory pathogen in young, commingled unvaccinated horses, and in unvaccinated horses can quickly spread throughout an entire barn. HISA requires that these vaccinations be administered every six months. Adding this information to the certificate of veterinary inspection helps prevent the spread of these two diseases in horses and provides the trainer with a known, valid date for planning boosters. (Exhibit 7)

Part III changes the requirements for how the certificate of veterinary inspection is transmitted to the commission veterinarian. This changes the rules from the use of paper forms to providing documents through a specific online portal. Electronic submission of both the certificate of veterinary inspection and equine infectious anemia test results began during COVID to decrease the amount of paperwork handled and processed by individuals at the stable gate and to prevent those horses without the appropriate documents from being held at the stable gate for prolonged periods. It has been used successfully for three years and this change is proposed to align with current use.

7877.0170 Subp. 2. X **Trainers.**

This proposed rule change is needed to ensure that each horse stabled at the Standardbred racetrack has a specific identified trainer who is responsible for ensuring that the horse is adequately cared for on a daily basis and provides a contact person for the Stewards and

Commission Veterinarian should this not occur. It also ensures that only the trainer of that horse, who has knowledge about the horse's athletic potential and capability, enters that horse in a race. This proposed rule keeps someone else from entering a horse into a race that may be below or beyond the horse's physical ability. Doing so may result in injury to the horse or driver and be unfair to the betting public.

7877.0170 Subp. 2 Veterinarians.

The commission licenses veterinarians to practice veterinary medicine on the grounds of the racetrack. Each veterinarian must be licensed by the Minnesota Board of Veterinary Medicine (MBVM) prior to receiving a commission license. From time-to-time one of these veterinarians becomes involved in an activity detrimental to horse racing or horse health. These infractions or rule violations are dealt with by the Stewards, who subsequently issue a ruling, which may be of interest to the MBVM. MBVM rule 9100.0700 UNPROFESSIONAL CONDUCT provides grounds for disciplinary action by the Board. Included are failing to meet minimum standards of practice; engaging in conduct likely to deceive, defraud or harm the public; claiming to have performed or charging for an act or treatment that was not provided; and violating or failing to comply with a state or federal law or regulation relating to the storing, labeling, prescribing, or dispensing of controlled substances. Should a veterinarian practicing at a Minnesota racetrack be ruled on by the Stewards for these or other violations it is reasonable for this ruling or violation to be reported to the MBVM, which may result in a further investigation leading to additional penalties. (Exhibits 8 and 9)

7877.0175 Subp. 8b. Veterinarian's list.

The two additions to this list are already used daily by the Commission Veterinarians so this is primarily a housekeeping detail. They are specifically added to conform with HISA rules. It is rare that a horse is barred for life, the most common reason being a horse that has experienced exercise induced pulmonary hemorrhage (EIPH or "bled") four times in a calendar year. Other possibilities include persistent unsoundness despite repeated attempts to work off the Veterinarian's List, a horse consistently refusing to break out of the starting gate, or more likely, a horse being repetitively fractious injuring itself or horses around it. The addition of shock wave therapy is again a matter of updating the rule as current Minnesota Racing Commission rules (7890.0110, Subp. 3A) require the horse treated with shock wave therapy be placed on the Veterinarian's List for 30 days so this is just a matter of conforming to that rule. (Exhibit 10)

7877.0175 Subp. 8f. Nerved horses.

This proposed rule change strikes out posting horses registered as nerved. It is necessary based on a proposed change in 7897.0100 Prohibited Acts, Subp. 11 Nerved Horses.

7877.0175 Subp. 8g. Pregnant mares and fillies.

Technically, once a horse is determined to be pregnant or "in foal" it is no longer a filly, but a mare. This change is needed to update the current rule with correct terminology.

7879.0200 Subp. 2. **Specific duties and responsibilities of stewards.**

For the past three seasons, live racing has occurred three or four days a week, with at least one “dark” day each week when no racing or training occurs. Typically, on the “dark” day, the office is not attended by Stewards or only a single Steward is available. During other nonracing days, all three Stewards are not necessarily together in the office at the same time making it difficult, if not impossible, to comply with the current rule. Changing the rule from 24 hours to 72 hours is reasonable as it provides additional time for the report to be generated and signed by all three Stewards.

7883.0100 Subp. 2a. **Prohibited starters.**

A trial is a horse race used to determine the qualifiers for a final race, with the fastest times determining the finalist. This proposed rule change is primarily associated with Quarter Horse racing, where qualifying trials generally occur 14 days prior to the futurity or derby. All horses may be drug tested before the trials or the fastest horses in each heat tested after the qualifying trial. If a horse tests positive for any controlled or prohibited medication and is disqualified after the qualifying event, this proposed rule would allow the next fastest horse to enter the final event. For instance, if a trial allowed only ten horses in a future race and one horse tested positive, then the eleventh horse on the list of fastest horses would move up and be allowed to enter. It is reasonable to do this as it provides a full field of racing for the betting public and rewards the horse owners who have invested time and money into these events.

7883.0100 Subp. 6. **Prohibited entries.**

The racing ages of horses vary, but most Thoroughbred horses and Quarter Horses begin racing as two-year-olds and race until they are ten. Rarely, a few horses race past their tenth year. In 2022, no Thoroughbred horse or Quarter Horse raced past the age of 10, with only a few racing as 10-year-olds. Horses tend to become slower as they age making competition with younger horses more difficult. Despite some of the finest veterinary care, osteoarthritis, a disease affecting joints and bones, becomes more prevalent with each passing year resulting in a decrease in soundness and serviceable racing condition. When coupled with a strong welfare and public perception component related to racing older horses as well as the difficulty in placing them in retirement homes, it is reasonable to limit the racing age of horses to 2 to 11 years. (Exhibit 11, 12, 13, 14)

7883.0100 Subp. 6 **Prohibited entries.**

A maiden is best defined as a racehorse that has been entered and raced, but not yet won a race. Thoroughbred horses and Quarter Horses that are six years of age or older maidens have had four years to successfully win a race. If they have not won a race by this time, it is unlikely that they

will be able to safely race and win in the future. It is unfair to the betting public to allow this horse to enter and unfair to the horse to continually train and be entered into a race with little chance of winning.

Horses that are six years of age or older that have never raced, while technically maidens, are also not good candidates for a successful racing career. Building strong bone density necessary for racing begins when horses start training and racing at two years of age and continues as they move into their three-year-old year and peak racing conditions. Data has shown that older horses that began racing as two-year-olds have a decreased risk of career ending injury as opposed to those horses that did not begin training or racing as a two-year-old. In addition to the physical strain of putting a six-year-old or older racehorse into race training, the change in environment takes a mental toll on the horse. Some of these horses are brought directly from the field to the racetrack, which is a big change in terms of environment and human interaction and makes them a prime candidate for developing physical ailments including anorexia, weight loss, and gastrointestinal ulcers. All these conditions make it reasonable to prohibit entry for horses six years of age and older that have not raced or won a race. (Exhibit 12)

Horses that have not started in three or more years have a high potential for suffering a catastrophic injury. Typically, these horses have suffered a prior injury such as a suspensory branch or tendon failure that should have resulted in a career change or has required substantial time away from racing and training. Three years is conservatively more than enough time for rehabilitation and a return to training and racing. Past three years, the potential for reinjury in these horses is very high. Should this happen during training or a race, the health, and lives of riders as well as the horse are in jeopardy

7883.0120 Subp. 1c. Drawing horses into a race from also-eligible list

This rule is struck as it is not commonly used at most Quarter Horse racetracks and is not currently followed by the Board of Stewards.

7883.0140 Subp. 22. Claimed horse shall race at track claimed.

This proposed rule change is intended to put stricter parameters on horse movement after a horse is claimed at a race meeting. The current conditions allowing a claimed horse to quickly leave the state are detrimental to the Minnesota racing industry. To ensure full race fields and competitive racing, claimed horses need to stay in the state and fulfill racing obligations. In addition, this change brings the rule much closer to alignment with the standards set by the Association of Racing Commissioners International.

7884.0120 Subp. 13A. Horses denied entry.

Most horses with minor issues such as a foot abscess or illness are placed on the Veterinarian's List with a specified off date of ten days. During this time, the horse may be entered for a race that takes place after their ten days are completed. This is a reasonable action as it gives the

horse a full ten days to recover yet allows the horse to maintain a racing schedule and not miss an additional 5 to 7 days of racing.

Horses with more serious injuries are not given a specified off date as they often need much longer than ten days to recover. These horses may not enter until examined by the Commission Veterinarian or have performed a successful work out observed by the Commission Veterinarian and removed from the Veterinarian's List. (Exhibit 15)

7884.120 Subp. 13B. Horses denied entry.

Horses barred in other racing jurisdictions as well as those suspended by the Stewards or ineligible for any reason should not be allowed to enter a race in Minnesota. This rule is reasonable as it prevents horses that should not be racing at any sanctioned race meet from shipping into a Minnesota racetrack with the intent to enter and race.

7884.0120 Subp. 18. Declaring hobbles.

This proposed rule allows the trainer to choose whether the horse is racing with or without hobbles but requires a specific designation at the time of entry. Such designation provides total transparency to the betting public without the trainer being required to declare an equipment change. This rule is reasonable as it aligns with USTA 18.09 USE OF HOBBLER and prevents the trainer from making last minute equipment changes that may affect the outcome of the race without the betting public being made aware. (Exhibit 16)

7884.0170 Subp. 1 Stewards to approve scratches.

A horse that is scratched for a veterinary reason must have the specific problem (i.e., ill, lame, unsound) noted when placed on the Veterinarian's List. The only person who can put a horse on the Veterinarian's List is the Commission Veterinarian and to do that they must know the reason a request was made to scratch the horse. This is important not only for the race, but for the health of the horse and wellbeing of the entire backside. The horse may be lame or unsound, in which case the horse may need a satisfactory work and diagnostics. Alternatively, the horse may be ill, which will result in a minimum of ten days on the Veterinarian's List. In addition, depending on the illness other diagnostic testing such as intranasal swabs or blood work for infectious bacteria or viruses may be required. For instance, a horse with a highly contagious respiratory disease such as Strangles or neurological disease such as herpes virus myelitis would need to be moved to the isolation area and nasal swabs taken. These determinations can only be made after a physical examination of the horse.

7884.0170 Subp. 4. Scratched as unsound.

When a horse is put on the Veterinarian's List the trainers are notified as to the requirements for removal. Most horses with minor injuries just need to qualify, but on occasion a horse may have a physical problem that requires an official timed workout prior to removal from the list. Examples of this would be a horse that pulled up lame during a race or a horse with an injury that has taken longer than expected to heal. In these instances, the Commission Veterinarian needs to

be able to look more closely at the horse before, during and after the workout. This rule is reasonable as it allows most horses to simply qualify but provides the Commission Veterinarian with an opportunity to more thoroughly evaluate a horse prior to releasing it from the Veterinarian's List.

7884.0190 Subp. 2. Horses required to compete in qualifying races for race meets longer than two weeks.

The proposed rule change clarifies that if a horse has not started for a period of 45 days, ineligibility begins on day 45.

7884.0190 Subp. 2a. Horses required to compete in qualifying races regardless of duration of meet.

This proposed rule change modifies the current rule, so it is less confusing. A "break" is defined in 7869.0100 subp. 9. as the act of a harness horse altering either its pacing or trotting stride. Horses break for several reasons, including age and inexperience, poor training, poor driver handling, and unsoundness. Qualifying is needed to allow the Stewards and Commission Veterinarian another chance to evaluate the horse to determine whether it is adequately trained to continue racing, has an ongoing unsoundness issue, or if continued racing poses a safety issue for other horses in the field. Horses that continue to break generally do so for a reason and continued breaks are best resolved during training hours and not when patrons and fans are wagering on a horse.

7884.0190 Subp. 8. Medications.

Drug testing for qualifying races is not similar to post race testing where typically the first and second place horse have raced for purse money and are tested for prohibited and therapeutic medications. The goal of a qualifying race is to show that a horse is fit and ready to race. There is no competition for first place, and they are not racing for purse money. Most horses competing in a qualifying race are not randomly tested. Typically, one horse per qualifying race is tested. The time for test results to be returned may be 5 or more days, which effectively prevents tested horses from entering a race for at least a week or more after qualifying. It is more effective to allow them to race and penalize afterwards if necessary. A horse on the Veterinarian's List is there for a specific reason, most often lameness or unsoundness that left unchecked could have an adverse effect on the horse and driver. These horses need to qualify with no medications in their system so the Commission Veterinarian can accurately evaluate them for a safe return to racing. In this instance, where the possibility of masking a lameness or unsoundness with medications is high, test results need to be returned prior to allowing the horse to return to racing.

7884.0260 Subp. 2. Conduct after word "go" is given.

This proposed rule change specifically identifies the total length of the whip including the popper. It is necessary to standardize what constitutes an acceptable whip. (Exhibit 17)

7890.0100 Subp. 21. **Veterinarian's list.**

This correction is made to align with prior rule changes.

7890.0110 Subp. 5. **Discontinuance of treatments.**

The information of corticosteroids was amended in 2021 and is now found in rule 7890.0110, subpart 8a. This language is struck as it is no longer correct.

7890.0140 Subp.1-5 **BLEEDERS.**

The proposed changes to all five subparts of the rule coincide with the current practice of the Commission Veterinarians locally and nationally. In Minnesota, about 95% of Thoroughbreds and Quarter Horses over the age of 2 race on furosemide and 75% of Standardbreds. Due to the large numbers, a bleeder list is no longer kept. No certification specific to the horse being a “bleeder” is provided and nothing is stamped on or attached to the registration papers as almost all Thoroughbred horses have digital certificates and not paper certificates. Rather, horses that exhibit “bleeding” are placed on the Veterinarian’s List for the duration specified in Subp 4. above and trainers are notified in writing when this occurs.

7892.0110 Subpart 2a. **Taking of Samples.**

This a housekeeping move. This is not a new section but moved from 7892.0120 TAKING OF SAMPLES, Subp. C so all the rules related to out-of-competition testing are together in one part of the rules.

7892.0120 Subpart 1. B. **Horses tested.**

This correction is made to align with prior rule changes.

7892.0120 Subpart 1. C. **Horses tested.**

This a housekeeping move. This part of the rule was moved to 7892.0110 OUT-OF-COMPETITION TESTING, subp.2a so all the rules related to out-of-competition testing are together in one part of the rules.

7895.0100 Subp. 9. **Onsite Visit.**

Onsite farm visits to verify the presence of broodmares and stallions participating in the Breeders’ Fund program is not a new procedure. Rather, onsite visits have taken place for over 20 years. Full cooperation has not always occurred, so this proposed rule is needed and reasonable to specifically address the physical presence of broodmares and stallions in

Minnesota and encourage cooperation by owners, breeders, and facility managers. This rule is reasonable as it identifies an ongoing commission program.

7895.0100 Subp 10. Identification of broodmare and stallion.

Every attempt is made to identify each horse using the physical characteristics found on the foal registration papers (either physical or digital registrations) and by lip tattoo, freeze brand or microchip. Sometimes this is not possible, especially in a plain brown or black mare or stallion with a faded lip tattoo or freeze brand. In these horses the insertion of a microchip for identification is required. Since their advent in 2016, microchips have been inexpensive and readily available so this should not be a financial hardship for owners of the horse. Most younger Thoroughbreds and Standardbreds have a microchip and when they retire from racing and move into breeding identification by microchip will become easier. This is not true, however, for the older mares and stallions who left racing prior to 2016. Accurate identification is critical to determining whether the correct mare or stallion has been produced for examination, making this rule both needed and reasonable.

7895.0125 Subpart 1. Broodmare registration.

This proposed rule change is made to simplify the method by which registration applications are received by the commission. This rule is reasonable as it moves the commission into the digital world, streamlines the process, and removes the variabilities and time delays associated with mailing, faxing, or in person submission.

7895.0125 Subp. 2. Stallion registration.

This proposed rule change is made to simplify the method in which registration applications are received by the commission. This rule is reasonable as it moves the commission into the digital world, streamlines the process, and removes the variabilities and time delays associated with mailing, faxing, or in person submission.

7895.0350 Subpart 1. Broodmare registration.

This proposed rule change is made to simplify the method in which registration applications are received by the commission. This rule is reasonable as it moves the commission into the digital world, streamlines the process, and removes the variabilities and time delays associated with mailing, faxing, or in person submission.

7895.0350 Subp. 2 Stallion registration.

This proposed rule change is made to simplify the method in which registration applications are received by the commission. This rule is reasonable as it moves the commission into the digital world, streamlines the process, and removes the variabilities and time delays associated with mailing, faxing, or in person submission.

7897.0100 Subp. 11. Nerved horses.

Posterior digital neurectomies (surgically severing a nerve below the fetlock) are rarely performed anymore and then only as a salvage procedure for a horse with chronic, severe heel pain nonresponsive to current treatment modalities such as longer acting nonsteroidal anti-inflammatory drugs or a bisphosphonate such as Osphos or Tildren. “Nerved” horses have no sensation in the back 2/3 of their foot, which results in an increased risk of stumbling and tripping. This could result in a catastrophic injury to a horse or rider should this occur during training or racing, particularly if the horse was in the front of the group. The safety and welfare of the horse and rider make it reasonable to modify this rule. (Exhibit 18)

7897.0100 Subp. 21. Pregnant filly or mare.

This proposed rule change simply clarifies that once a filly is pregnant or in foal she is no longer a filly, but a mare. It is a technical change to ensure correct language.

EXHIBITS

Exhibit 1	Horseracing Integrity and Safety Act of 2020
Exhibit 2	Horseracing Integrity and Safety Authority (HISA) Establishment
Exhibit 3	HISA Definition of “Covered Horse”
Exhibit 4	HISA Definition of “Covered Horserace or Race”
Exhibit 5	Bloodhorse Article, HISA Finds Partner to Build Enforcement Agency (May 3, 2022)
Exhibit 6	HISA Rule 2143(1); Racehorse Monitoring, CVI
Exhibit 7	HISA Rule 2143(2,3); Racehorse Monitoring, Vaccination Verification
Exhibit 8	Proposed HISA Banned Substance List
Exhibit 9	Minnesota Board of Veterinary Medicine Rule 9100.0700; Unprofessional Conduct
Exhibit 10	HISA Rule 2241; Duration of Stay on the Veterinarians List
Exhibit 11	Gramm & Marksteiner; The Effect of Age on Thoroughbred Racing Performance, Journal of Equine Science Vol. 21, No. 4, pp. 73-78 (2010)
Exhibit 12	Paulick Report; Voss, Natalie; “Bramlage: Racing And Training 2-Year-Olds Reduces Their Risk of Injury – Here’s Why” (May 4, 2020)
Exhibit 13	Colonial Downs 2022 Entry Restrictions
Exhibit 14	Age of Starters at Canterbury Park 2022 Race Meet
Exhibit 15	Minnesota Veterinarians List Notice
Exhibit 16	USTA Rule 18.09, Use of Hobbles
Exhibit 17	Photo of Old and New Harness Whips
Exhibit 18	Photos of Medications

CONCLUSION

Based on the foregoing, the proposed rules are both reasonable and necessary to protect the integrity of racing in Minnesota.

12/21/2022

DATE: December 21, 2022
This document available for
public review on this date.

DocuSigned by:
Charlene Briner
CA27A5F0C424447...

Charlene Briner
Interim Executive Director
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