

and regulations are different, all stipulate that wildlife is essentially property of the state and prohibits private possession. In other words, “everyone” owns the wildlife, but no one owns it “individually”.

This basic premise, known as the state ownership doctrine, traces its early roots back several thousand years through the history of government control over the taking of wildlife from Greek and Roman law through the civil law of the European continent and the common law of England. From these early times, the ownership of wildlife was generally considered to be vested with the “state”, then generally meaning royalty and nobility. But with the American Revolution, the American colonists, rebelling against class privilege, transformed the concept of wildlife ownership by a sovereign king to ownership by the sovereign people.

This “public trust doctrine” has been affirmed through the US judicial system, beginning with several landmark decisions of the Supreme Court. In *Martin v. Waddell* (1842), Chief Justice Taney found that the rights to the navigable waters, submerged lands, fish and wildlife could not be conveyed as alienable rights because such rights were a public trust. While initially only applied to the original 13 states, in *Pollard’s Lease v. Hagan* (1845), the court applied the ruling to all newly admitted states. This was later reaffirmed in *Geer v. Connecticut* (1896), where the court concluded that the states had the right “to control and regulate the common property in game,” which right was to be exercised “as a trust for the benefit of the people.” The court further asserted that the states, as sovereigns and as representatives of their citizens, “owned” the wildlife within their borders.

Many of these early court decisions form the basis of contemporary state statutes, with such mandates exercised through the state wildlife agencies across the country. So a valid permit is required in order for a wildlife rehabilitator to possess any wild animal, even if just temporarily for purposes of care and recuperation.

A STUDY OF THE STATE REGULATIONS GOVERNING WILDLIFE REHABILITATION DURING 1999

Allan M. Casey, III and Shirley J. Casey

WildAgain Wildlife Rehabilitation, Inc.
29319 Northstar Lane
Evergreen, Colorado 80439

INTRODUCTION

All permitted wildlife rehabilitators must abide by a set of regulations or guidelines promulgated by their state wildlife agency. These state regulations establish the authority for a wildlife rehabilitator to temporarily possess live, native wildlife for the purpose of rehabilitation with the goal of release back into the wild. The regulations also provide requirements and restrictions that guide the rehabilitators activities to varying degrees.

This article presents the findings of a study of all 50 states in the US, conducted in 1999, to examine the nature and extent of state regulation that governs wildlife rehabilitation. The study is both a current look at the regulations and an update of a similar study conducted five years earlier. Changes and trends that have occurred during that time are identified.

STATE OWNERSHIP DOCTRINE

The primary reason that a wildlife rehabilitation permit, license or certificate is required is that there are very few circumstances where a private individual can legally possess live wildlife native to the state of residence. Though each state’s wildlife laws

SURVEY METHODOLOGY

A one page letter was sent to each of the 50 state wildlife agencies requesting information. The letter explained the nature of the study and asked for the information listed below.

Regulatory information – The letter requested a copy of the current state regulations governing wildlife rehabilitation, from all applicable agencies within a state, including Wildlife; Health; and Agriculture. It also requested copies of internal administrative policies or procedures that affected wildlife rehabilitation if not already included in the regulatory language. Lastly, copies of any state statutes that affected wildlife rehabilitation were requested.

Administrative information – This included copies of materials sent to new applicants or current permit holders, such as an application form, annual report form, caging guidelines, rabies vector species (RVS) protocols, and any educational or informational materials.

The first request for information was sent out in February, 1999 to each state agency. A second request letter was sent in April, 1999 using the state permit officer contact list as contained in the 1999 National Wildlife Rehabilitators Association (NWRRA) membership directory. A third request was mailed in June 1999. Approximately two-thirds of the states responded during this series of letters.

The remaining state agencies were contacted by phone during September through December 1999. Selected rehabilitators in those states were also contacted in order to obtain information. As many as six phone calls were required for some states in order to obtain the desired information. The final few states were contacted once again in January 2000. Information was received from all 50 states by the end of January 2000.

No effort was made to collect possible changes or updates that may have occurred during the one year period over which data was collected. Data was used as received and when received. Any

changes to regulations since the time of data collection are not reflected in this analysis. In some cases, a state agency was sometimes contacted after receipt of information for additional information or to ask questions or get clarification.

AREAS OF STUDY

From the data collected, the subject areas of analysis included the following topics.

Type of permit issued and general conditions (duration, renewals).

Required technical qualifications of applicants (experience, testing, continuing education).

Application form to be used by the applicant (format and content).

Caging requirements (suggested standards, approvals).

Facility and records inspections requirements (facilities and records, notice requirements).

Recordkeeping requirements (format, content, filing requirements).

Annual report requirements (content, submission requirements, due dates).

Incoming animal requirements (exam by veterinarian, notification requirements).

Release requirements (maximum holding time, location, non-releaseables).

Species restricted/prohibited for rehabilitation (Threatened/Endangered, zoonotic diseases).

TYPES OF PERMITS AND GENERAL CONDITIONS

All 50 states have regulations that prohibit the private possession of native wildlife (Table 1). However, only 45 states sanction and allow for issuance of a permit, license or other permission for the temporary possession of wildlife for purposes of rehabilitation leading to release back to the wild. Forty of the states issue a permit that is specific to wildlife rehabilitation. The five states (AK, AR, ND, SD, WV) that do not have state regulations for wildlife rehabilitation and do not issue state permits for such activity, do allow rehabilitation to be conducted under author-

Five other states (CT, MS, NE, NJ, OH) issue a permit that is governed by departmental guidelines, and not by formally adopted regulations.

Figure 1 shows the types of permits issued by each state during 1994 and 1999 for wildlife rehabilitation activities. Table 1 shows some of the other requirements and conditions for permit issuance. Over the five year period there was an increase in the number of states now requiring a minimum age for the applicant, and the number of states now charging a fee. There was also a growing acceptance in the regulations allowing for the use of volunteers. Sixteen states now embrace the use of volunteers in the rehabilitation activity.

Other new items in the regulations or expansion of existing permit conditions include the stipulation that the state is not responsible for any costs or liabilities; prohibition of wildlife rehabilitation if the activity conflicts with any local laws or ordinances; prohibition of charging for rehabilitation services (although most allow donations to be accepted); issuance of the permit based on need as determined by the agency; stipulation that the permit does not authorize the practice of veterinary medicine; the requirement to display or carry the permit at all times; and assumption by the wildlife agency in two states of full control of a rehabilitator's operation in times of natural disasters.

QUALIFICATIONS OF THE APPLICANT

In general, it appears that the minimum requirements to obtain a wildlife rehabilitation permit have increased over the five year period (Table 2). While about the same number of states still require a general level of "knowledge and proficiency", the number of states that now specify a minimum number of years of experience has increased almost four fold. An apprenticeship period is now required in about twice as many states as was required previously. Fifteen states now require passage of a written test, and usually with a passing score of at least 80 percent. Timing and requirements for re-testing varies. References are still generally required, and usually at least one must be from a licensed

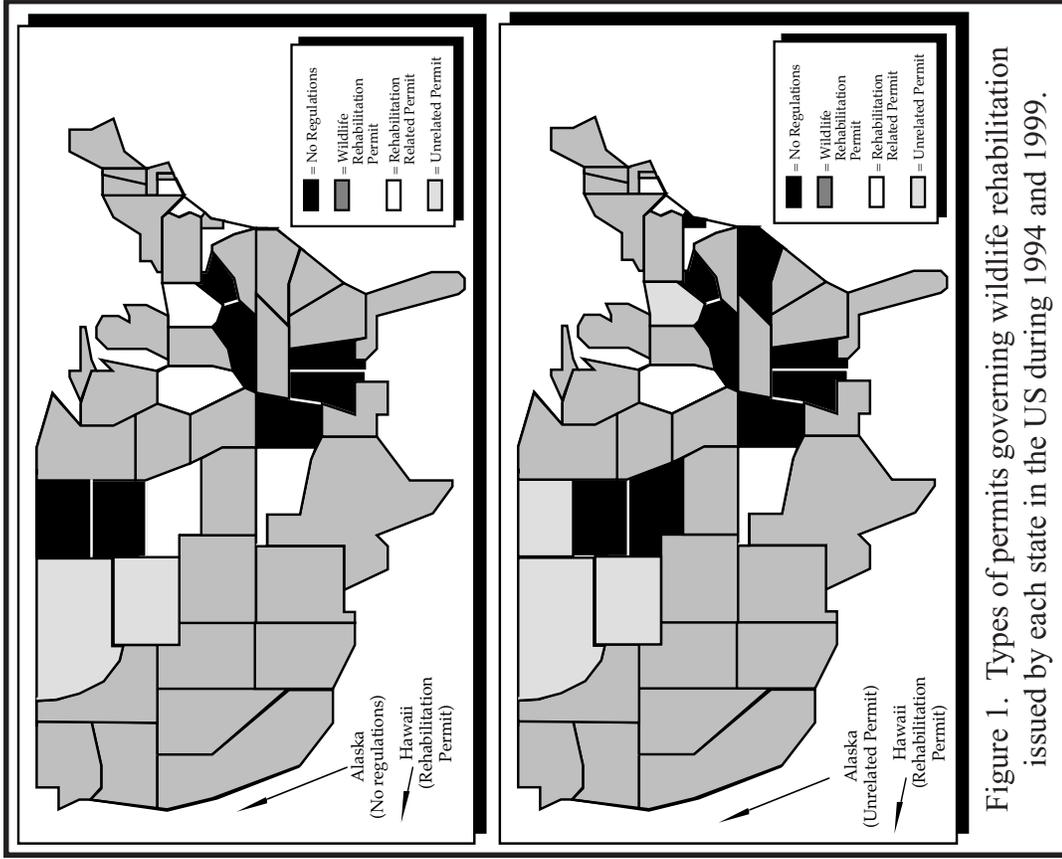


Figure 1. Types of permits governing wildlife rehabilitation issued by each state in the US during 1994 and 1999.

ity of a US Fish and Wildlife Service (USFWS) permit.

Six states (IL, KY, MD, MT, OK, WY) issue permits for rehabilitation under "related" regulations. These permits operate under various regulations governing activities including scientific collecting, pet and propagation, wildlife cooperator, wild bird certificate, non-commercial breeders license, and education or possession.

veterinarian who agrees to assist the applicant with medical services. Some states require other references, including from permitted rehabilitators and general character references.

Although not an initial requirement to obtain a permit, the requirements for continuing education are increasing. Twelve states now require some form of continuing education. The amount and timing of the continuing education requirement varies from 1 to 3 years. Submission of proof of attendance at continuing education sessions is usually required as part of the annual report sent to the wildlife agency.

APPLICATION FORM

Not much change was noted in the application forms provided to the applicants by the states. Most changes were only minor and asked for an additional item or two. Some additional states now also provide a specific application form.

Most application forms are provided by the states, and usually ask for training and experience; species desired to be rehabilitated; a description of and location of the caging and enclosures to be used; and references. Other items requested include a list of all volunteers or assistants; a copy of the Federal permit, if applicable; and the name and address of the assisting veterinarian.

FACILITY INSPECTIONS

Forty three of 50 states require an inspection of an applicant's facility and caging to obtain a permit (Table 3). The facility inspection is usually conducted by the local state wildlife agency officer. A few states also indicate that the USFWS, and the state Department of Health or Agriculture, also have the right to inspect. The actual time to conduct the inspection is not specified in the regulations of 19 states, but 29 states do specify a time ranging from "at any reasonable time or hour" or normal business hours, to "immediate". Six states specify that these inspections can be unannounced.

CAGING AND ENCLOSURES

Regulatory requirements for caging seem to be increasing, with a 25 percent increase in the number of states now having at least general requirements for caging, while an almost 50 percent increase was seen in the number of states requiring very specific sizes or materials (Table 4). In most all cases, the state wildlife agency approves the caging as either meeting or not meeting the state requirements.

A three-fold increase was seen in the number of states requiring or recommending the suggested standards and guidelines contained in the "Minimum Standards for Wildlife Rehabilitation" document published jointly by NW/RA and the International Wildlife Rehabilitation Council (IWRC). Some states refer to it in the regulation, while other states distribute the document to applicants.

Fourteen states require that the applicant have enclosures suitable for all ages of the species to be rehabilitated. Another trend observed over the five year period was a doubling of the states that require separation of caging from domestics and / or no public contact or display of wildlife undergoing rehabilitation.

RECORDKEEPING AND ANNUAL REPORT

Over thirty states require that the general records maintained by the permit holder be open for inspection by the agency, generally during normal working or business hours (Table 5). Only 15 states specify a format to be used for general recordkeeping. An even smaller number of states require that the records be "current or up-to-date".

Thirty two states have a specific form or format to be followed for the annual report. The most frequently required items of information on the annual report are the date admitted and the date of final disposition, details on the final disposition, the source and cause of admission, and usually the requirement to list each animal individually. The due date for the annual report falls around the end of January for about half of the states. Some states adhere to a December 31 date. Only a few states require monthly or semi-annual reports.

RELEASE OF WILDLIFE

While most states have fairly specific rules regarding the release of rehabilitated wildlife, there has been relatively little change in those requirements between 1994 and 1999 (Table 6). Most states require that the animal be released in areas as designated by the agency. A few more states are now requiring the release to either be within the vicinity of initial capture or within 5 to 10 miles of the capture point. Presumably this is driven by concerns of inadvertently spreading disease to otherwise healthy wildlife populations.

Eighteen states do not specify a maximum time to hold the animal prior to release. Another 13 states indicate animals should be released “as soon as possible”. A few more states now specify a certain number of days that should not be exceeded. However, even in those instances, the applicant can request an extension from the agency. These specific maximum holding times range from 30 to 365 days (Table 6).

There has been almost no change regarding non-releaseable wild animals. Almost half of the 50 states still permit certain wild animals to be kept for educational purposes, transferred to zoos, or used for scientific or captive breeding purposes. Six states still allow for the beneficial use of non-releaseable wildlife for fostering of young and species imprinting.

RESTRICTED AND PROHIBITED SPECIES

Probably the aspect of the regulations seeing the greatest degree of change in the five year period deals with restrictions or prohibitions placed on certain wildlife species (Table 7). Generally speaking, a restriction means the species can be rehabilitated, but only under certain conditions or with special authorizations. A prohibition means the species cannot be rehabilitated under any circumstances.

Almost half of the states now have some restrictions on species that are listed as a state sensitive species or species of concern, or are listed on the USFWS threatened or endangered (T&E) species list. States with a category of apprentice or sub-

permittee usually prohibit that category from rehabilitating T&E species.

Most restrictions and prohibitions are targeted to rabies vector species (RVS) due to concerns of exposure of rabies to humans, and the spread of rabies to healthy wildlife populations due to improper release. While most states now allow for some RVS rehabilitation, some states also require special training, use of the pre-exposure rabies vaccine for humans, and strict protocols and reporting. Increases in restrictions over the past 5 years were noted mostly with skunk (primarily *Mephitis mephitis*), raccoon (*Procyon lotor*) and fox (primarily *Vulpes vulpes* and *Urocyon cinereoargenteus*), with some additional increases seen in coyote (*Canis latrans*) and woodchuck (*Marmota monax*) (Table 7). These same species saw the largest increase in outright RVS prohibitions during the five year period.

The other category of restrictions involves game animals, primarily white-tailed deer (*Odocoileus virginianus*), black bear (*Ursus americanus*), moose (*Alces alces*) and elk (*Cervus elaphus*). These restrictions seem to stem from concerns over disease and the fact that these species are primary revenue producing species for many agencies.

Since this aspect of the state rehabilitation regulations has such a large impact, the progression of instituting these requirements is shown chronologically in Figures 2 to 4. The Figures show the status of the restrictions and prohibitions that existed in 1994 (Figure 2), the changes during the past 5 years (Figure 3), and lastly, the current state of restrictions and prohibitions that exist in 1999 (Figure 4).

MAGNITUDE OF CHANGES

Table 8 recaps the degree of change in state regulation of wildlife rehabilitation seen during the five year period from 1994 to 1999. Two-thirds of the states incorporated some change in their regulations (or guidelines), which ranged from a total rewrite or totally new rules to only minor changes. In Table 8, “Moderate” change would include making a few substantive changes such as

instituting a test, adding a new category or class of permit, or adding new restrictions on species. “Minor” change refers to such things as changing the due date of the annual report or requiring additional information to be reported. One-third of the states did not institute a change in their wildlife rehabilitation regulations.

Table 9 shows a summary cross-reference for the degree of change seen versus the types of changes made during the five year period. The cross-reference shows what appear to be “must have” items when regulations are instituted for the first time or undergo a complete rewrite and revision.

CONCLUSION AND OBSERVATIONS

While this study revealed no unexpected surprises in the types of changes being considered and instituted by the states for wildlife rehabilitation, it did serve to confirm some of the major trends emerging from discussions between the authors and both state wildlife agency personnel and wildlife rehabilitators from 1994 through 1999.

Since only one-third of the states experienced moderate to significant change in a five year period, the notion that the regulatory process moves slowly was confirmed. Discussions with some of the permit officers during the study suggested that since most wildlife agencies are facing significant budget pressure, even less time and attention would be devoted to reviewing or changing wildlife rehabilitation regulations in the future. The exception would be a response to emergency situations such as sudden disease outbreaks.

A joint stakeholder process involving both agency personnel as well as wildlife rehabilitators was used in some of the states where the regulations were totally rewritten or changed. The new regulations in these instances tended to be tougher, more complete and very specific to the wildlife rehabilitation activity. While on the surface this would seem to be a desirable trend, it has often resulted in a much more complex set of rules and regulations, involving testing, multiple categories of permits and continuing education. Some of the state agency personnel charged with

administering these new programs seemed increasingly concerned with the newly expanded administrative burden, especially in light of budget and staffing pressures.

Many of these new systems of regulations incorporate more stringent requirements. This should ultimately result in better qualified wildlife rehabilitators actually receiving permits, better caging and captive care, and better controls over inadvertent zoonotic or wildlife disease transmission. At the same time, it does create new barriers of entry for certain applicants. It also generally requires more recordkeeping and reporting, and as shown earlier, more restrictions and prohibitions on certain wildlife species.

Despite the relatively slow rate at which the regulatory process moves, it is in fact moving and evolving. The new regulations seem to demonstrate a more thorough understanding of the wildlife rehabilitation activity and more completeness in the regulations. This maturing process seems to be accompanied by the notion that wildlife rehabilitation is here to stay. With these more complex regulatory systems come more requirements, restrictions and oversight.

HOW TO GET MORE DETAILED INFORMATION

The authors have compiled a 70+ page report detailing almost every aspect of the regulations for each state. It is organized along the various aspects of the regulations as discussed in this article. For a copy, please contact the authors at their mailing address or by email at <wildagn@aol.com>.

LITERATURE CITED

- Breen, J. 1994. Encyclopedia of Reptiles and Amphibians. T.F.H. Publications, Inc. Ltd., The British Crown Colony of Hong Kong.
- Buck, S. 1996. Understanding Environmental Administration and Law. Island Press, Washington, DC.
- Casey, A. and S. Casey. 1994. Survey of state regulations governing wildlife rehabilitation. Journal of Wildlife Rehabilitation, Winter: 6-10.
- Casey, A. and S. Casey. 1995. State regulations governing wildlife rehabilitation; A summary of best practices. Journal of Wildlife Rehabilitation, Spring: 3-11.
- Casey, A. and S. Casey. 1996. Wildlife rehabilitators and a state wildlife agency: strengthening a relationship. Journal of Wildlife Rehabilitation, Winter: 6-12.
- Casey, A. and S. Casey. 1996. Wildlife rehabilitation: expanding the wildlife management framework. Journal of Wildlife Rehabilitation, Spring: 3-7.
- Chapman, J. and G. Feldhamer. 1992 (fifth printing). Wild Mammals of North America. The Johns Hopkins University Press, Baltimore, MD.
- Grosse, J. 1997. The Protection and Management of Our Natural Resources, Wildlife and Habitat (Second edition). Oceana Publications, Inc., Dobbs Ferry, NY.
- Musgrave, R. and M. Stein. 1993. State Wildlife Laws Handbook. Government Institutes, Inc., Rockville, MD.
- Robbins, C., B. Bruun and H. Zim. 1966. A Guide to Field Identification - Birds of North America. Golden Press, New York, NY.

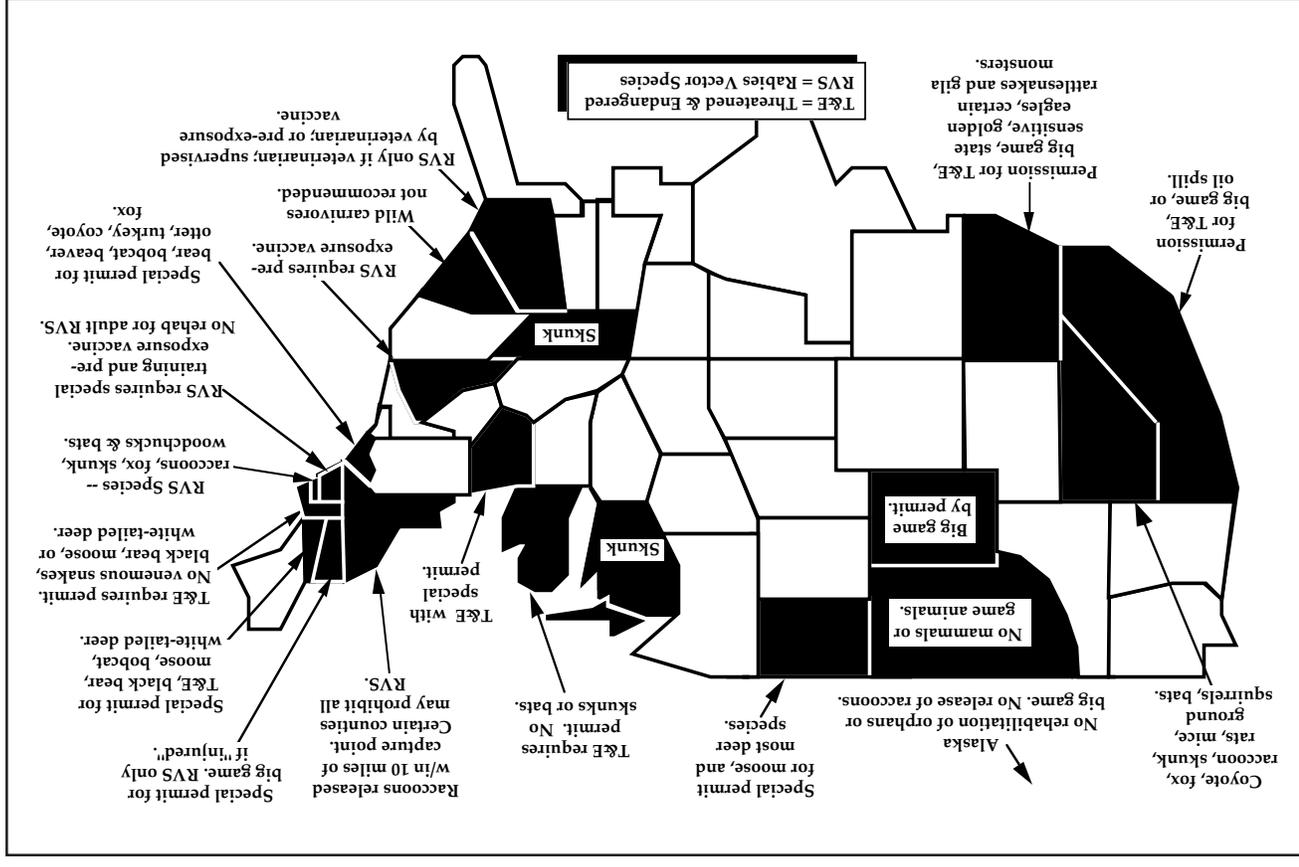


Figure 2. Species specific prohibitions and restrictions affecting wildlife rehabilitation during 1994.

Table 1. Types of wildlife rehabilitation permits issued by the US states.

General permit conditions	1994	1999
Number of states that have regulations that usually prohibit private possession of wildlife	50	50
Temporary possession allowed for rehabilitation	42	45
Temporary possession allowed for rescuers	0	3
Level, class or categories of permit		
1 class only	29	31
2 classes (for a sub or apprentice)	9	6
3 classes	4	5
4 or more classes	0	3
The permit is specific to wildlife rehabilitation	38	40
The regulations are specific to wildlife rehabilitation	31	33
Duration of permit		
1 year	27	27
> 1 year	14	14
Requirements to renew		
Submit annual report	30	34
Submit renewal application	9	13
Minimum age required for permit		
18 years of age	6	13
< 18	2	2
Permit fee charged (or can be assessed)	5	9

Table 2. Qualification requirements to obtain a state wildlife rehabilitation permit.

Personal Qualifications	1994	1999
Experience		
Demonstrate knowledge and proficiency	18	22
Specifies minimum years of experience	3	11
Apprenticeship		
6 months or less	3	3
12 months or longer	5	9
Test is required (generally > 80% score)	10	15
References		
From DVMs or DVMs who will assist	23	29
Other rehabilitators	8	12
General character reference	10	11
Continuing education		
Each year	3	4
Every 2 years	1	1
Every 3 years	1	3
Required, but not specific	2	3

Note on reading the tables -

Tables 1 - 7 reflect the number of states that have wildlife rehabilitation regulations for the aspect or attribute of the regulation indicated. For example, in Table 2 above, for experience requirements, there were 18 states whose regulations in 1994 required the applicant to demonstrate a general level of 'knowledge and proficiency in order to meet minimum qualifications for permit issuance. Likewise, in 1999, there were 22 states with such a requirement, 5 more states than five years earlier.

Table 3. Inspection requirements associated with state wildlife rehabilitation permits.

	1994	1999
Required for initial permit approval	36	43
Inspection conducted by:		
State wildlife agency	37	44
US Fish and Wildlife Service	2	3
Department of Health or Agriculture	1	1
Time to conduct inspection		
"At any reasonable time or hour"	15	19
Normal business hours	4	4
Immediate	5	6
No time specified	16	19
Unannounced	6	6

Table 4. Caging and enclosure requirements for state wildlife rehabilitation permits.

	1994	1999
Regulatory requirements are:		
General in nature	28	35
Specific as to sizes or materials	9	13
Require/recommend NWRA/IWRC guidelines	3	10
Require caging for all ages	12	14
Require separation of caging from domestics and/or no public contact or display	10	21
Agency approves all caging	36	40

Table 5. Recordkeeping requirements associated with state wildlife rehabilitation permits.

	1994	1999
General and Annual report.	13	15
Number of states that specify report format	13	15
Requirement to keep records current		
"Current or up-to-date"	9	11
"Daily or within 24 hours"	4	5
Records available for inspection		
Yes (time not specified)	11	14
"Reasonable times"	10	12
"Working hours"	4	4
Annual report format specified by the state	27	32
Partial list of required annual report contents		
List each animal individually	36	41
Date admitted	24	32
Date of disposition	26	32
Details on final disposition	34	40
Source and / or cause for admit	14	19
Due date for annual report submission		
Monthly or semiannually	2	2
December 31	6	9
January 10	1	1
January 15	4	5
January 20	1	1
January 30	3	1
January 31	14	18
February 1	2	3

Table 6. State regulations governing release of rehabilitated wildlife.

General permit requirements	1994	1999
Location of release		
As designated by agency	20	20
In vicinity of capture	7	12
5 to 10 miles from capture point	2	3
Maximum time to hold the animal		
None specified	17	18
"...release as soon as possible..."	10	13
No longer than:		
30 days	1	1
60 days	3	2
90 days	2	5
120 days	1	1
180 days	3	4
365 days	1	1
Permission needed to transfer non-releaseable wildlife for purposes of:		
Educational use		24
Scientific / breeding programs	23*	14
Placement in zoos		11
Use in the rehabilitation process	6	6

(* Breakdown of 1994 non-releaseable purposes unavailable.)

Table 7. Wildlife species restricted and prohibited by state wildlife rehabilitation regulations.

Type of restriction	1994	1999	1994	1999
	Restricted		Prohibited	
Threatened & Endangered species				
Must have approval	5	7		Generally
Notification within:				prohibited by
24 hours	6	7		apprentice class
48 hours	2	3		or sub-permittee
72 hours	1	2		
Rabies Vector Species (RVS)				
Skunk (<i>Mephitis mephitis</i>)	6	9	4	7
Raccoon (<i>Procyon lotor</i>)	5	10	3	6
Fox (<i>Vulpes vulpes</i> and <i>Urocyon cinereoargenteus</i>)	6	8	2	5
Bobcat (<i>Felis rufus</i>)	5	5		2
Bats	3	5	1	3
Coyote (<i>Canis latrans</i>)	1	4	1	3
Woodchuck (<i>Marmota monax</i>)	1	3	1	1
Adult RVS			1	2
Opossum (<i>Didelphis virginiana</i>)		1		
Hognosed skunk (<i>Conepatus mesoleucus</i>)		1		
Spotted skunk (<i>Spilogale putorius</i> and <i>S. gracilis</i>)		1		
State sensitive species				
Golden eagle (<i>Aquila chrysaetos</i>)	1	1		
State sensitive list	1	1		
Certain rattlesnakes	1	1		
Gila monster (<i>Heloderma suspectum</i>)	1	1		

Table 7. Wildlife species restricted and prohibited by state wildlife rehabilitation regulations. (continued)

Type of restriction	1994	1999	1994	1999
	Restricted	Prohibited	Restricted	Prohibited
Game animals				
White-tail deer (<i>Odocoileus virginianus</i>)	5	13	1	2
Black bear (<i>Ursus americanus</i>)	5	6	1	2
Moose (<i>Alces alces</i>)	4	4	1	1
Elk (<i>Cervus elphus</i>)	1	2		
Caribou (<i>Rangifer tarandus</i>)	1	1		
Antelope (<i>Antilocapra americana</i>)	1	1		
Bighorn sheep (<i>Ovis canadensis</i>)	1	1		
Mtn. lion (<i>Felis concolor</i>)	1	1		
Mtn. goat (<i>Oreamnos americanus</i>)	1	1		
Big game	2	2	1	1
Any game animal			1	1
Other concerns				
All mammals			1	3
Marine mammals				1
Orphans			1	1
Oil spill	1	1		
Nutria (<i>Myocastor coypus</i>)				1
Mink (<i>Mustela vison</i>)				1
Muskrat (<i>Ordatra zibethicus</i>)				1
Otter (<i>Lutra canadensis</i>)	1	1		1
Beaver (<i>Castor canadensis</i>)	1	1		1
Turkey (<i>Meleagris gallopavo</i>)	1	1	1	2
Mute swan (<i>Cygnus olor</i>)		1		
Venomous snakes			1	1
Herptiles (environmental impact)		1		

Table 8. Degree of change in state regulations governing wildlife rehabilitation from 1994 through 1999.

	No. of states	Percent
States adopting new or totally revamped regulations.	5	10
States instituting moderate changes in the regulations.	10	20
States instituting minor changes in the regulations.	14	28
States instituting new "guidelines" (but still do not have formal regulations).	4	8
Sub-total	33	66
States not instituting any changes in the regulations.	17	34
Total	50	100

Table 9. Trends in types of changes seen in state wildlife rehabilitation regulations from 1994 through 1999.

	Total # of states	New or total revamp	Moderate change	Minor change	New "guidelines"	No change
Number of states that have had changes or modifications.	50	5	10	14	4	17

Types of changes:

Restricted / prohib. species	19	5	9	4	1	
Expanded recordkeeping	17	4	8	1	4	
Tougher qualifications	17	5	6	2	4	
Expanded caging reqmnts.	15	5	4	3	3	
Specific release reqmnts.	14	5	6		3	
Minor admin. changes	14		4	9	1	
Use of volunteers OK	7	3	2		2	
Multiple permit levels	6	3	2	1		
Minimum age reqmnt. (18)	6	2	3		1	
Test required (> 80%)	5	2	3			
Renewal letter required	5	2	1	1	1	
Non-releaseables OK	5	1	2		2	
Continuing educ. required	4	3	1			