



MEMORANDUM

DATE	July 16, 2019
TO	Multidisciplinary Advisory Committee
FROM	Jeff Pollard, DVM, MDC Chair
SUBJECT	Agenda Item 6. Discussion and Potential Recommendation on Defining Conditions That Must be Met for Board Approval of Providing Statutory Authority for a Veterinarian to Give Clients Cannabis Treatment Recommendations

During the April 2019 meeting, the Board opposed SB [627](#) (Galgiani, 2019). SB 627 would, among other things, authorize veterinarians to recommend medicinal cannabis or medicinal cannabis products for use on animal patients. It would also require the Board to issue guidelines on the appropriate administration and use of medicinal cannabis on an animal patient. The Board would be required to report to the Legislature on January 1, 2021, and every six months thereafter, on the status and progress of developing the guidelines.

The Board acknowledged that cannabis and cannabis products may have potential health benefits to animals. However, there is still a significant need for funding for cannabis research so that veterinarians and the public are informed on the possible efficacious use of cannabis to treat animals and ensure the full protection of consumers and their animals. While other medications and dangerous drugs have been provided to animal patients without significant research, those were not previously identified as Schedule I Controlled Substances, as is cannabis.

Although the Board opposed the bill, it directed the MDC to define specific conditions that must be met for Board approval of providing statutory authority for a veterinarian to give clients cannabis treatment recommendations.

In the [Assembly Business and Professions Committee analysis of SB 627](#), multiple policy issues and recommended amendments were identified, many mirroring the Board’s concerns, including the lack of research and necessary funding for the research. In addition, one of the amendments removed the Board’s reporting requirement to the Legislation and replaced it with a 2022 deadline for adopting recommendation guidelines.

During the July 9, 2019 Committee hearing, the author’s office accepted all amendments in the Committee analysis, the Chair provided a “Do Pass” recommendation, and the bill passed out of Committee to the Assembly Appropriations Committee.

According to Assembly Business and Professions Committee staff, the author’s office will address the Committee’s concern regarding the lack of research and the necessary funding.

Board staff and legal counsel are working with the Committee to propose language addressing this concern for the author's consideration.

Until SB 627 passes and research is conducted, it may be too early to discuss specific conditions that must be met in order to approve veterinarians recommending medicinal cannabis for animal use. However, once adequate research is conducted, the MDC may want to consider the following topics when developing the guidelines:

- Indications for use
- Effective doses – dosing is ideally based on an animal patient's own endocannabinoid system (ECS), disease process, and other factors.
- Species differences (e.g., larger concentrations of CB1 receptors in the brainstem of dogs which causes them to be more susceptible to THC toxicity).
- Proper dosing intervals.
- Therapeutic blood concentrations.
- Half-life in dogs and cats.
- Physiologic effects (intended) (e.g., induction of enzymes).
- Adverse side effects – real and potential.
- Interaction with other medications (e.g., pain meds, anticonvulsants, psychotropics).
- Effects of long-term use.
- Use in patients with co-morbidities (e.g., liver disease).
- Product: percentage of CBD vs. THC, Terpenes.
- Delivery: oil, treat, topical, other.
- Certificate of Analysis.
- Toxicity - how much/what concentration is safe? Effective?
- What if the patient is pregnant?
- Monitoring.
- Liability to licensee – civil and administrative with regard to the Board (e.g., trail of plant, harvest, processing, formulation of product, sale, recommendation/prescription, storage, improper access/use (e.g., children)).