BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY • GAVIN NEWSOM, GOVERNOR
DEPARTMENT OF CONSUMER AFFAIRS • VETERINARY MEDICAL BOARD
1747 North Market Blvd., Suite 230, Sacramento, CA 95834-2978
P (916) 515-5220 | Toll-Free (866) 229-0170 | www.vmb.ca.gov

MEMORANDUM

DATE	January 2, 2025
TO	Veterinary Medical Board (Board)
FROM	Justin Sotelo, Policy Specialist
SUBJECT	**Agenda Item 24.D. Outreach**

Inspector Recruitment

On October 10, 2024, the Board informed its email subscribers that it was recruiting California licensed veterinarians and registered veterinary technicians (RVTs) to serve as inspectors for the Board's Enforcement Program. Subscribers were notified that there was specifically a need for inspectors in the Bay Area. As part of the recruitment, licensees are informed that inspectors perform routine, complaint, and probation related inspections of veterinary premises and assist practitioners in maintaining minimum standards and avoiding enforcement actions and that inspections consist of making unannounced visits to veterinary premises and evaluating different aspects of the practice. Additionally, licensees are informed that inspections are required as part of a complaint investigation, which may include working with an investigator from the Department of Consumer Affairs, Division of Investigation, or other law enforcement agency. Inspector applicants must have at least five (5) years of clinical practice experience within the six (6) years immediately preceding application.

California Department of Food and Agriculture (CDFA) Releases 2023 Feed Directive Summary Report

On October 21, 2024, the Board informed its email subscribers that the CDFA's Antimicrobial Use and Stewardship (AUS) Program announced its release of the 2023 Veterinary Feed Directive Summary Report.

This report presents an up-to-date illustration of Veterinary Feed Directive (VFD) feed manufacturing and distribution in California. The annual VFD Summary Report has been developed to provide a transparent and thorough explanation of the AUS program's involvement to ensure feed manufacturer / distributor compliance with state and federal VFD order mandates.

2023 Report highlights include:

- Background, including general information, scope of reporting and processes for protecting confidential information.

- Data tables reporting VFD information by species, drug, indication type and amounts sold, as well as aggregated, informative visuals.
- Animal Health and Food Safety Services and Inspection Services Divisions' collective, collaborative outreach and education efforts aimed at the public, distributors and veterinarians.
- Plans for the AUS program and future VFD collection and compliance.

In conjunction with CDFA's Commercial Feed Regulatory Program under Food and Agricultural Code (FAC) Section 14092.5, AUS collects VFD information on a quarterly basis from both manufacturers and distributors listed on the U.S. Food and Drug Administration's (FDA) VFD Distributor Notification list. The information collected is held confidential in accordance with FAC Section 14407.

Inspection Webinar

On November 1, 2024, the Board informed its email subscribers about the free 2-hour Inspection Webinar it was hosting that took place virtually on November 14, 2024. The Inspection Webinar was a collaboration between the U.S. Drug Enforcement Administration (DEA) and the Board. During the webinar, DEA and Board inspectors walked through their respective inspection processes. As a result of webinar, the Board issued 314 continuing education (CE) certificates to eligible attendees. On December 19, 2024, a link to the webinar video was published on the Board's website.

Unlicensed Practice Stakeholder Meeting

On November 4, 2024, the Board informed its email subscribers about the November 18, 2024 Unlicensed Practice Stakeholder Meeting. The one-hour virtual stakeholder meeting was hosted by the Unlicensed Practice Subcommittee of the Board's Multidisciplinary Advisory Committee (MDC) and focused on the topic of unlicensed veterinary practice related to small animals. The purpose of the meeting was to seek ways to clarify the veterinary medicine licensure exemptions under Business and Professions Code (BPC) section 4827 and enhance unlicensed practice penalties under BPC sections 4875.2 and 148, and California Code of Regulations, title 16, section 2043, to decrease unlicensed practice and prevent unintended consequences. Additional stakeholder meetings will be held to obtain additional input from the veterinary community. Future announcements will be made once meeting dates have been determined.

RVT Applicant Education Requirements Stakeholder Meeting

On November 15, 2024, the Board informed its email subscribers about the December 6, 2024 RVT Applicant Education Requirements Stakeholder Meeting. The 2-hour virtual stakeholder meeting was hosted by the RVT Subcommittee of the Board's MDC. The purpose of the meeting was to evaluate the education requirements for individuals applying for Board registration as a veterinary technician (RVT applicants). The Subcommittee received input from interested stakeholders, including the public, RVTs, veterinarians, veterinary assistants, education program administrators, and professional associations regarding whether RVT applicants should be required to complete

education or whether RVT applicants would be safe to practice in California after completing clinical practice without education.

FDA Letter to Veterinarians

On December 4, 2024, the Board informed its email subscribers and social media followers that the FDA issued a letter to veterinarians regarding the use of aspirin products in lactating dairy cattle.

The letter read:

Dear Veterinarian:

The U.S. Food and Drug Administration understands that veterinarians and dairy farmers may be treating lactating dairy cattle for pyrexia and pain with aspirin and wants to clarify that there are no FDA-approved aspirin products for use in cattle. The extralabel use of unapproved drugs in food-producing species is prohibited.

There are FDA-approved products for controlling pyrexia and pain in lactating dairy cattle that are safe, effective, and have established milk and meat withdrawal periods. All FDA-approved animal products are required to carry one of the following statements on the label:

> "Approved by FDA under NADA # XXX-XXX" (for brand name animal drugs), or
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> "Approved by FDA under ANADA # XXX-XXX" (for generic animal drugs).

Under the Animal Medicinal Drug Use Clarification Act (also known as AMDUCA), veterinarians may use an FDA-approved human or animal drug in food-producing species under specific conditions. There is one FDA-approved human aspirin product (Vazalore) that is currently marketed. Although other human aspirin products are marketed under an over-the-counter monograph, that monograph is not an approval and, therefore, these products cannot be used in an extralabel manner. Given the impracticality of dosing cattle with a sufficient amount of the approved human product, the FDA understands that veterinarians and dairy farmers may instead be using unapproved aspirin products that are not legally marketed. The extralabel use of unapproved drug products in food-producing species is prohibited.

Veterinarians and dairy farmers should stop use of unapproved aspirin in lactating dairy cattle and use FDA-approved products to control pyrexia and pain. In the event that animals have already been treated with aspirin, veterinarians should use their scientific expertise and available resources to set protective and extended milk and meat withdrawal periods for treated animals.

Misbranded Drugs Webinar

On December 11, 2024, the Board informed its email subscriber about the free 2-hour Misbranded Drugs Webinar it will be hosting virtually on January 28, 2025. During the webinar, Board inspectors will be joined by representatives from the Board of Pharmacy

and the FDA to discuss misbranded drugs in veterinary medicine. CE credit will be provided to those who attend.

Senate Bill 669 and Assembly Bill 1399 Frequently Asked Questions (FAQs) Flyers (Strategic Plan Objective 5.2)

Senate Bill (SB) 669 (Cortese, Chapter 882, Statutes of 2023) went into effect on January 1, 2024, and authorizes a veterinarian to allow an RVT to act as an agent of the veterinarian for the purpose of establishing the veterinarian-client-patient relationship (VCPR) to administer preventive or prophylactic vaccines or medications for the control or eradication of apparent or anticipated internal or external parasites, as specified.

Assembly Bill (AB) 1399 (Friedman, Chapter 475, Statutes of 2023) went into effect on January 1, 2024, and places in statute the requirements for a VCPR for a veterinarian to prescribe, dispense, or administer a drug, medicine, application, or treatment of whatever nature for the prevention, cure, or relief of a wound, fracture, bodily injury, or disease of animals, as specified.

SB 669 and AB 1399 FAQs were approved by the Board on April 17, 2024. FAQ flyers were created by the DCA Office of Public Affairs s are intended to provide guidance to veterinary professionals. The flyers will be published on the Board's Forms and Publications web page.