Compliance Corner

Agencies That Supervise the Veterinary Profession

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early all businesses in California with employees are regulated by agencies like the Employee Development Department, the Department of Industrial Relations, the Department of Fair Employment and Housing, and the Board of Equalization. But veterinary practices in the state are more specifically overseen by a range of state and federal agencies that enforce laws distinct to the veterinary profession. Here is a brief summary of those agencies and what they do.

State Agencies

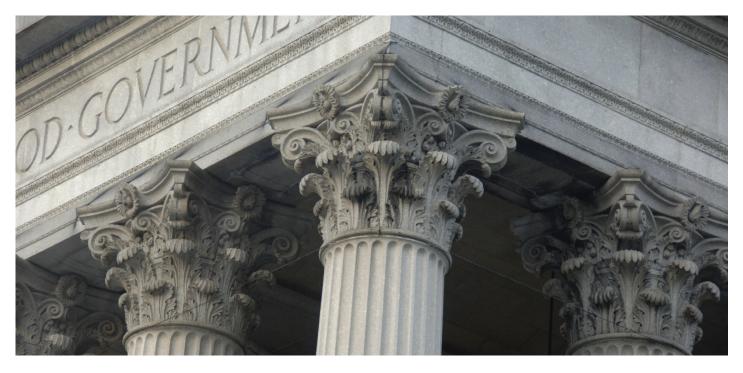
The California Veterinary Medical Board (VMB) safeguards consumers and the well-being of animals by regulating veterinary medicine throughout the state. Part of its mission includes developing, maintaining, and enforcing professional standards, licensing veterinary professionals and their premises, and upholding the California Veterinary Medicine Practice Act. The VMB also administers examinations for licensing, writes regulations for veterinary practices, and investigates complaints from consumers, sometimes resulting in fines or, in the most egregious cases, license suspension or revocation.

The VMB issues several licenses and permits that must be applied for prior to practicing. They include veterinarian and

registered veterinary technician licenses, premises permits for veterinary businesses, and veterinary assistant controlled substance permits for veterinary assistants who access and administer controlled substances as part of their work duties. Licenses and permits range in cost and must be renewed annually or biennially, depending on the regulations for each type. For more information, visit vmb.ca.gov.

The California State Board of Pharmacy (BOP) regulates California pharmacies and licenses pharmacists. With respect to veterinary professionals, the BOP writes regulations for prescribers, including prescription rules, regulations regarding compounded medication, and required consumer disclosures (such as drug label requirements), among other offerings. The BOP also oversees Veterinary Food Animal Drug Retailers, who dispense veterinary drugs for food-producing animals. While the BOP's authority does impact the profession as described above, veterinarians and veterinary practices are not required to register with the BOP.

The California Department of Justice (DOJ) requires all practitioners with DEA numbers to register with the Controlled Drug Utilization and Review Evaluation System (CURES) database, send in weekly reports



when controlled substances are dispensed, and utilize a DOJ-approved prescription pad when dispensing controlled substances. All veterinarians (prescribers) are required to register with CURES, regardless of whether they dispense controlled substances to clients. No registration fee is required. Separately, the Attorney General's office, a distinct arm of the DOJ, will support the VMB during administrative hearings if a practitioner has been formally charged with violating the California Veterinary Medicine Practice Act.

The California Department of Public Health (CDPH) has three branches that commonly impact veterinary practices:

- The Rabies Branch oversees rabies control efforts, vaccination mandate laws, and reporting/surveillance data.
- The Medical Waste Management Program, which regulates the generation, handling, storage, treatment, and disposal of medical waste (including biohazardous, pharmaceutical, pathology, trace chemotherapeutic, and sharps waste), requires veterinary practices to register as Small Quantity Generators and pay a nominal annual registration fee.
- The Radiologic Health Branch maintains regulations regarding radiation safety, registers radiationproducing machines, and inspects premises.
 Veterinarians must register each radiation-producing machine in their practice with the Radiologic Health Branch and pay significant biennial registration fees.

The California Environmental Protection Agency (EPA) Department of Toxic Substances Control (DTSC) ensures that hazardous waste is properly managed by generators through registration (required for most veterinary practices), inspections, investigations, and disposal via registered hazardous waste haulers. A nominal annual registration fee is required.

The California Horse Racing Board (CHRB) works to ensure the integrity, viability, and safety of the horse-racing industry. The CHRB requires veterinarians who work on horse racing tracks to keep record of medications administered, lameness, and more. Some of these rules are created by the Medication and Track Safety Committee. Veterinarians may not work on the track without a separate license issued by the CHRB. A licensing fee is required.

The California Department of Fish and Wildlife (CDFW) maintains several branches, only two of which are directly involved in veterinary practice:

- The Wildlife Branch is concerned with wildlife injuries and mortality events, disease surveillance, and wildlife health population monitoring.
- The Law Enforcement (Wildlife Protection) Division enforces laws to protect wildlife, including employing game wardens who administer permits for owning prohibited species. Veterinarians in possession of or treating prohibited species must report to the Wildlife Branch within 48 hours. The CDFW will help to make case management decisions, coordinate care, and potentially transfer injured wildlife to one of its designated wildlife care facilities. As with the BOP, the CDFW maintains no veterinary registration requirements.

Federal Agencies

The United States Drug Enforcement Administration (DEA) creates and enforces laws regarding controlled substances, including proper usage, storage, and recordkeeping. The DEA requires practitioners to register in order to handle, order, or prescribe controlled substances. All veterinarians in California who offer services to the public must have their own DEA registration number. The DEA registration fee is considerable and must be paid every three years.

The United States Department of Agriculture's (USDA) two branches that most commonly affect veterinary practices are the Animal Plant Health Inspection Service (APHIS) and National Veterinary Accreditation Program (NVAP). Both of these divisions supervise imports and exports of animals and grant accreditation to practitioners who issue health certificates for domestic and international animal movement. The USDA also investigates drug residue violations in animal agriculture operations. NVAP accreditation is free, but veterinarians must take mandatory continuing education courses every three years.

The United States Food and Drug Administration (FDA) manages new drugs and medical equipment, animal drug compounding, pet foods, extra-label drug use, and more. There are no FDA registration requirements for veterinarians.

More information on these agencies and their intersections with veterinary practices can be found at cvma-inline.net under Regulatory Compliance > State and Federal Agencies.

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