



THE COLLEGE OF
VETERINARIANS
OF ONTARIO

REPORT ON CONSULTATION

Topic: Use of Compounded Drugs in Veterinary Practice

Consultation Period: March 27, 2018 – May 28, 2018

Submissions: 8 submissions

What is the Issue

Over the past three years, draft standards outlining the practice expectations of a veterinarian related to prescribing and dispensing drugs, inclusive of antimicrobials, have been debated and considered by a Prescribing and Dispensing Working Group. The establishment of this working group was directed by Council to make recommended practice expectations to the profession, informed by broad species sector input, on these important, high-risk activities, which include prescribing and dispensing compounded drugs. Throughout this process these drafts have been informed by new federal rules strengthening veterinary oversight of antimicrobial use, and multiple discussions with varied stakeholders on the realities of day-to-day veterinary practice. The standards have undergone a targeted stakeholder consultation as well as two public consultations over the past several years to ensure that they represent accurate, comprehensive, and reasonable practice expectations for veterinary obligations related to drugs across species.

Why is it Important

The aim of the series of standards related to veterinary pharmaceuticals is to demonstrate the importance of the role of the veterinarian in both the prescribing and the dispensing of drugs, by recognizing and mitigating the inherent risks posed by drugs to animal and public health.

Overview of the Proposal

For an overview of the proposed changes that the College consulted on, please visit:
<https://cvo.org/For-the-Public/Public-Consultations/Veterinary-Obligations-Related-to-Drugs.aspx>.

Consultation Process

At its March 2018 meeting, Council was pleased to approve a series of draft Professional Practice Standards, including a draft standard related to Use of Compounded Drugs in Veterinary Practice,

which set out current and proposed practice expectations for veterinarians across all species. The draft Professional Practice Standards were circulated for public consultation for a 60-day period during which members of the College and members of the public were asked to provide their feedback.

What we Heard and How We Responded

(a) Informed Client Consent

There were a number of questions related to the obtaining of informed client consent for compounded drugs. Some respondents asked whether informed consent must always be written and suggested that requiring consent in every instance would be overly onerous.

Informed client consent is the legal and ethical foundation on which professionals deliver services. The proposed standard aligns with the veterinary profession's responsibility to obtain this consent. Whether informed consent is written or verbal depends on a veterinarian's professional judgment and the risk involved in the circumstances.

For the above reasons, no changes were made with respect to the requirement to obtain informed client consent.

(b) Wording Regarding In-Office Use

There was a suggestion that the wording of practice expectation 7 be amended to: "Understands that he or she may issue a prescription for a quantity of a compounded formulation in the reasonable expectation of a formerly identified need in a patient or patient group for maintaining an inventory of the compounded formulation for in-office use that is reasonably expected to be used before the beyond use date."

This amendment was made to the standard to ensure that veterinarians only keep on hand enough compounded drugs to meet the anticipated need.

Sample Comments

The following quotes, summarized from comments received, reflect issues raised during the consultation:

- *Does informed consent imply a requirement for a signed document by the client before dispensing?*
- *It is recommended that the expectation (7) be amended as follows: Understands that he or she may issue a prescription for a quantity of a compounded formulation in the absence reasonable expectation of an a formerly identified need in a patient or patient group for maintaining an inventory of the compounded formulation for in-office use that is reasonably expected to be used before the beyond use date.*

Council June 2018 Decision

Council reviewed the consultation feedback and the draft *Professional Practice Standard: Use of Compounded Drugs in Veterinary Practice* at its June 2018 meeting and approved the draft Professional Practice Standard for adoption, to be accompanied with a guide.