



THE COLLEGE OF  
VETERINARIANS  
OF ONTARIO

## **REPORT ON CONSULTATION**

<b>Topic:</b>	Prescribing a Drug
<b>Consultation Period:</b>	March 27, 2018 – May 28, 2018
<b>Submissions:</b>	22 submissions

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### **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. 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 Prescribing a Drug, 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) Whether On-Label Drugs Should Always be Prescribed Over Extra-Label Drugs

There was significant confusion over which drug a veterinarian should prescribe over another. Although an on-label drug approved for veterinary use would ideally be prescribed, where available, a drug approved for human use is a reasonable alternative if considered efficacious in the circumstances. The decision of which drug to prescribe is a matter of professional judgment based on sound clinical reasoning.

### (b) Medical Record-Keeping Requirements

A number of comments suggested that the medical records requirements are overly onerous. Many of the requirements are current and long-standing within existing College regulations and cannot be amended at this time.

Where possible, the accompanying guide to the standard suggests methods for making record-keeping less time-intensive and more efficient, while aligning with the practice expectations in the standard.

## Sample Comments

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

- *Under Practice Expectations #1: Should not the veterinarian be acting in the best interest of the animal first and foremost, assuming that by doing so also acts in the best interest of the client? There are many times that client wishes are not in the best interest of the animal (e.g. over prescribing antibiotics, demanding medication before workups, etc). At the very least, I suggest putting the animal first in this sentence, followed by reference to client. #2. Does this preclude veterinarians in industry or lab animal vets from prescribing drugs, as they are not necessarily working in an accredited veterinary facility. This would deny these animals medications. Is not a valid P-C-V relationship, method of documentation, knowledge, CVO licence, etc. enough? I am sure this is not the intention here, but perhaps wording could be added to clarify? #6. What about the economic benefit of the client? There are times a client requests the human alternative because it is cheaper. Will this be permissible? Or is the veterinarian obligated to prescribe the drug approved for veterinary use despite the client's wishes?*
- *2. "When no approved drug exists and where a therapeutic need has been established, prescribes that a drug be compounded from a drug approved for veterinary use, a drug approved for human use, or (if neither is possible) from an active pharmaceutical ingredient. " -Are we expected to prescribe a drug that we don't think is the best choice, even if it is a choice simply because it is approved for veterinary use?*
- *The decision tree cascade should be a guideline not a professional practice standard for companion animal medicine. The problems regarding food safety (drug withdrawal time) and antimicrobial resistance are not the same in companion animal medicine. The risk when using a non veterinary approved drug on an individual in companion animal*

- medicine is much lower than food animal medicine.*
- *Number 14 is excessively time consuming and not necessary. Recording that side effects and proper handling/storage were told to the client is not necessary and should not have to be recorded in the medical record.*
  - *The weight of the patient should also be included for small animals (non food animals) on the prescription to help ensure the dosage is correct.*

### **Council June 2018 Decision**

Council reviewed the consultation feedback and the draft *Professional Practice Standard: Prescribing a Drug* at its June 2018 meeting and approved the draft Professional Practice Standard for adoption, to be accompanied by a guide.