



1400 River Park Drive, Suite 100
Sacramento, CA 95815-4505
916-649-0599
fax 916-646-9156
staff@cvma.net
www.cvma.net

April 22, 2021

The Honorable Evan Low, Chair
Assembly Business and Professions Committee
Co-Chair, Joint Legislative Sunset Review Committee
State Capitol, Room 4126
Sacramento, CA. 98514

RE: AB 1533: 2021 SUNSET REVIEW: BOARD OF PHARMACY

Dear Chairman Low,

The California Veterinary Medical Association (CVMA), representing over 7,800 veterinarians, registered veterinary technicians, and students, appreciates the opportunity to comment on the latest amendments to Assembly Bill 1533 as part of the Joint Legislative Sunset Review of the California Board of Pharmacy (BOP). We thank the Committee and its consultants for their thorough review of the issues pertaining to veterinary medicine and the BOP. Those issues are discussed below.

Requiring a Compounding Pharmacist on the BOP – Support

The CVMA supports the continued existence of the BOP but feels strongly that the BOP would benefit from the presence of a compounding pharmacist. In that regard, several critical veterinary medications do not exist in FDA-approved form and thus may only be obtained through compounders. Notwithstanding that fundamental limitation, the CVMA is encountering significant—and increasingly frequent—issues with BOP enforcement of what it perceives to be existing compounding restrictions, as well as proposed new regulations relating to compounded medications for animals and veterinary practice. The CVMA is concerned that the BOP's activity is jeopardizing the availability of compounded medications that relieve animal suffering and save animal lives. Thus, the CVMA supports the addition of language into the California Pharmacy Act which mandates that one seat on the BOP be a compounding pharmacist. A compounding pharmacist will bring much needed expertise in this field to the BOP, thereby improving communication, understanding, and rule-making relating to animal drug compounding and veterinary use of compounded drugs.

**Allowing Pharmacists to Initiate, Adjust, or Discontinue Drug Therapy – SEEK AMENDMENT
for Veterinary Prescriptions and Animal Patients**

The CVMA requests an amendment to proposed California Business and Professions Code Section 4052(a)(13) to clarify that pharmacists may initiate, adjust, or discontinue drug therapy only in collaborative practice agreements with human health care providers. We believe that the legislative intent behind this amendment was to address the human health care realm; however, as written, it would apply in the context of veterinary medicine, as well. Regardless of circumstance, the CVMA believes it would be imprudent to extend this authority to pharmacists who are filling prescriptions for animal patients. We are unaware of instances in which veterinary practices have collaborative practice agreements with pharmacies, but even if such agreements exist pharmacists are typically trained and familiar with human medicine and medications to a far greater extent than animal medications. Vast anatomic and physiologic differences exist between animal species, resulting in drugs behaving differently between them. For this and other reasons, we are uncomfortable with pharmacists having authority and autonomy to initiate, adjust or discontinue drug therapy in animal patients. For purposes of consumer and animal protection, these decisions should be left to trained veterinarians in the context of a valid Veterinarian-Client-Patient Relationship.

Thank you for your consideration of the CVMA's comments and concerns. Please contact me if you would like to discuss these topics further.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan Baxter". The signature is fluid and cursive, with a long horizontal stroke at the end.

Dan Baxter, Executive Director
California Veterinary Medical Association

cc: Co-Chairman Senator Richard Roth
Members of the Joint Legislative Sunset Review Committee
Robby Sumner, Chief Consultant, Assembly Business and Professions Committee
Patrick Le, Consultant, Assembly Business and Professions Committee
Sarah Mason, Chief Consultant, Senate Business, Professions, and Economic
Development Committee
Elissa Silva, Consultant, Senate Business, Professions, and Economic Development
Committee
Anne Sodergren, Executive Officer, Board of Pharmacy
Mike Dillon and Christina DiCaro, CVMA Lobbyists