



Support S. 950, the Veterinary Medicine Mobility Act, to Allow Veterinarians to Transport Controlled Substances for Treatment of Animals!

AVMA seeks modification to the Controlled Substances Act and Drug Enforcement Administration policy that currently prohibits veterinarians from transporting controlled substances to administer and treat patients outside of the registered location.

Background

The Drug Enforcement Administration's (DEA) interpretation of provisions within the Controlled Substances Act (CSA) and resulting federal regulations make it illegal for registrants to transport controlled substances for use outside of a registered location.¹

The practice of veterinary medicine is unique in that veterinarians treat multiple species of animals in different practice settings. Veterinarians' ability to practice medicine often requires that they be able to provide mobile or ambulatory services. This is particularly important in rural areas and for the care of large animals because it is often not feasible, practical or possible for owners to bring livestock (i.e., cows, pigs, horses, sheep, and goats) to a bricks-and-mortar clinic or hospital. Many companion animal veterinarians provide "house call" services for their patients or operate mobile clinics that offer a variety of veterinary services for communities. Controlled substances are also used by veterinarians in research and disease control activities that may be conducted away from the veterinarian's principal place of business. And, in the discharge of their daily duties, veterinarians may use controlled substances to remove or translocate dangerous wildlife (e.g. bears, cougars) or rescue trapped wildlife (e.g. deer trapped in a fence).

The DEA has informed organized veterinary medicine that transporting controlled substances is illegal per the CSA and thus would require a statutory change to allow veterinarians to legally provide complete veterinary care. It is imperative veterinarians be able to legally transport controlled substances to the location of the animal patient, not only for animal health and welfare, but for public safety.

¹ CFR 1301.12, "A separate registration is required for each principal place of business or professional practice at one general physical location where controlled substances are manufactured, distributed, imported, exported or dispensed by a person."

Key Points:

- Veterinarians must be permitted to transport controlled substances outside a registered location (i.e. clinic, hospital, office, or clinician's home) to provide comprehensive veterinary care and to protect animal health and welfare.
- While recognizing there are certain instances when an animal cannot be brought to the veterinarian's registered location or when a veterinarian must transport controlled substances, the DEA maintains that a statutory change is required to address the regulation preventing veterinarians from legally transporting controlled substances in these situations.
- Recommendations by the DEA on how to treat animals while adhering to the law and regulations create serious concerns about the potential for drug diversion and for negative consequences to animal health, animal welfare, and public safety.

Supporting This Will:

- Require the DEA to promulgate regulations allowing veterinarians to transport controlled substances.
- Facilitate quality patient care by permitting veterinarians to transport needed medications to veterinary patients.
- Prevent legal action against veterinarians who are appropriately handling controlled substances in the course of providing complete veterinary care.
- Help assure the integrity of the drug dispensing and administration process by authorizing veterinarians to maintain control of these critical medications.

To co-sponsor the legislation, please contact Mr. Brandon Harder (brandon_harder@moran.senate.gov; 228-6968) in Sen. Jerry Moran's (KS) office. For additional information, please contact Dr. Ashley Morgan at 202-289-3210 or amorgan@avma.org.