



THE COLLEGE OF
VETERINARIANS
OF ONTARIO

PROFESSIONAL PRACTICE STANDARD

Prescribing Drugs

TBD

Introduction

Under the *Veterinarians Act* and Regulations, veterinarians licensed by the College of Veterinarians of Ontario are authorized to prescribe drugs. Prescribing drugs is an important component of the practice of most veterinarians and one that requires appropriate knowledge and skill, and the use of professional judgment. In most circumstances, prescribing is coupled with the act of dispensing; however, there are acceptable instances when prescribing is a procedure performed independently by a veterinarian. A veterinarian should acknowledge and manage the inherent conflict of interest in assuming the dual role of prescriber and dispenser.

The professional activity of prescribing is informed and regulated by a broad legislative framework: the *Controlled Drugs and Substances Act*, *Narcotic Control Regulations*, *Benzodiazepine and other Targeted Substances Regulations*, the *Drug and Pharmacies Regulation Act*, the *Drug Interchangeability and Dispensing Fee Act*, the *Food and Drugs Act and Regulations*, the *Feeds Act and Regulations* and the *Veterinarians Act* and the regulations thereunder. This legislation sets out the requirements for the prescribing, sale, and dispensing of drugs. The College *Professional Practice Standard: Management and Disposal of Controlled Drugs* and *Professional Practice Standard: Use of Compounded Products in Veterinary Practice* also describe specific expectations in the prescribing of controlled drugs and compounded products, respectively.

Definitions

Client

Client means, with respect to a veterinarian, the owner of an animal(s), group of animals, or herd(s) that the veterinarian is treating, an authorized representative of the owner, or an individual who the veterinarian reasonably determines is acting in the interest of the animal.

Drug

As per the *Drug and Pharmacies Regulation Act*, drug means any substance or preparation containing any substance (a) manufactured, sold or represented for use in (i) the diagnosis, treatment, mitigation

or prevention of a disease, disorder, abnormal physical or mental state or the symptoms thereof, in humans, animals or fowl, or (ii) restoring, correcting or modifying functions in humans, animals or fowl, (b) referred to in Schedule I, II, or III, (c) listed in a publication named by the regulations made under the *Drug and Pharmacies Regulation Act*, or (d) named in the regulations made under the *Drug and Pharmacies Regulation Act*.

Extra-Label Drug Use

Extra-label drug use (ELDU), often termed “off-label use”, refers to the actual or intended use of any drug, whether it is a prescription or an over-the-counter (OTC) drug, in an animal in a manner that is not in accordance with the label or the package insert of the drug approved by Health Canada. This includes the use of all drugs (including unapproved bulk pharmaceutical substances and compounded drugs) that do not have a Canadian approved label.¹

Prescribing

The act of prescribing is a direction from a veterinarian authorizing the dispensing of a drug or mixture of drugs to a client for a specified animal or group of animals.²

Prescription

A prescription is an evidence based or informed order by a veterinarian directing that a specific animal or group of animals, be administered a specified drug, via an appropriate route of administration, in a defined dosage for a specified time in order to treat or prevent an identified condition, disease, disorder or dysfunction.

Withholding Time

Withholding time means, in reference to a food producing animal that receives a drug or substance, the period of time for which the animals or the product of the animal should be withheld or withdrawn from sale for consumption.

Practice Expectations

A veterinarian meets the *Professional Practice Standard: Prescribing Drugs* when the veterinarian:

1. Respects the best interest(s) of the client and of the animal or group of animals in prescribing and/or dispensing a drug, acknowledging the overarching responsibilities of professionalism and balanced judgment.
2. Prescribes only those drugs that have been approved for sale by Health Canada. Applications for the prescription and use of unapproved drugs (Investigational New Drug, Emergency Drug Release, or Experimental Studies Certificate) can be made to Health Canada.
3. Prescribes drugs only from an accredited veterinary facility from which the veterinarian practices veterinary medicine.

¹ CVMA Guidelines for the legitimate use of Compounded Drugs in Veterinary Practice

² *Veterinarians Act*, R.R.O. 1990, Reg. 1093, s. 23 (1).

4. (a) Prescribes drugs within the context of a Veterinarian-Client-Patient-Relationship (VCPR)³ where the veterinarian:

- Has been retained by the owner of the animal(s), groups of companion animals, or herd(s), an authorized representative of the owner, or an individual who the veterinarian reasonably determines is acting in the interest of the animal;
- Has advised the client that the veterinarian will only provide services in accordance with the standards of practice of the profession;
- Has reached an agreement with the client as to the scope of the services to be provided by the veterinarian; and
- Has obtained the consent of the client for each service to be provided.

(b) Understands that additional requirements for prescribing drugs are that the veterinarian:

- has sufficient knowledge of the animal or group of animals by virtue of a history and inquiry and either physical examination of the animal or group of animals or medically appropriate and timely visits to the premises where the animal or group of animals is kept to reach at least a general or preliminary diagnosis;
- believes that the drug is prophylactically or therapeutically indicated for the animal or group of animals; and
- is readily available in case of adverse reactions to the drug or failure of the regimen of therapy.⁴

5. Prescribes controlled substances only when the animal is under his or her professional treatment and the controlled substance is required for a condition for which the animal is receiving treatment from the veterinarian.

6. Prescribes drugs for use in livestock in a manner consistent with the *Food and Drugs Act* and regulations, and the *Feeds Act* and regulations.

7. Provides a written prescription for a prescribed drug when requested by a client, unless the client requests that an oral prescription be provided.

8. Provides an oral prescription when requested by a client to an individual acceptable to the client, that is either a pharmacist, who is a member of the Ontario College of Pharmacists, or a veterinarian.⁵

9. Includes the following information on a written, signed prescription, or verbally, if an oral prescription is provided in keeping with section 8:

- Name, strength and quantity of the drug;
- Name and address of the veterinarian;
- Identity of the animal or group of animals for which the drug is prescribed;
- Name of the client;
- Prescribed directions for use (dose, route of administration, frequency, and duration);

³ Unless one of the exceptions to the requirement for a VCPR apply, inclusive of section 18(3) of Regulation 1093

⁴ In accordance with the College's policy on After Hours Care.

⁵ See section on "Dispensing Without an Existing Veterinarian-Client-Patient Relationship" in the Professional Practice Standard: Dispensing

- Date the prescription is issued, including the day, month and year;
- Withholding times, if the prescription is for a food-producing animal;
- Number of refills permitted, if any; and
- Veterinarian's licence number issued by the College.

10. For further clarity, the following information is also required for prescriptions regarding medically important antimicrobials⁶ which are to be administered via feed:

- Animal production type;
- Weight or age;
- Type of feed;
- Total amount of feed or feeding period;
- Amount of drug used per tonne;
- Manufacturing instructions;
- Cautions; and
- CgFARAD # if applicable.

11. Maintains appropriate security of prescription forms to mitigate against misuse or theft.

12. Does not sign a blank or incomplete prescription form.

13. Advises the client of appropriate withholding times when prescribing drugs for use in food-producing animals, which shall be at least as long as the withholding time recommended by the manufacturer of the drug or substance. Appropriate withholding time(s) must be included in the prescription. In instances where the withholding time is not known, makes every effort to establish an appropriate withholding time.

14. Abides by the *Decision Cascade* published by the Canadian Veterinary Medical Association when making prescribing decisions, and, when appropriate, the Health Canada *Categorization of Antimicrobial Drugs Based on their Importance in Human Medicine*.

15. Prescribes drugs in an extra-label manner that is consistent with Health Canada's *Policy on Extra-Label Drug Use in Food Producing Animals* and the Canadian Veterinary Medical Association's *Position Statement on Extra-Label Drug Use (ELDU)*.

16. Prescribes compounded drugs in a manner consistent with the College's *Professional Practice Standard: Use of Compounded Products in Veterinary Practice*. Only prescribes products compounded from an active pharmaceutical ingredient (API) if other options in the Canadian Veterinary Medical Association *Decision Cascade* are not available or appropriate.

17. Prescribes antimicrobials in a manner consistent with prudent use of antimicrobials that sustains the clinical efficacy of antimicrobials by optimizing drug use, choice, dosing, duration, and route of administration, while minimizing the emergence of resistance and other adverse effects.

⁶ Medically important antimicrobials are defined as those in categories I, II, and III with respect to the Health Canada categorization of medically important antimicrobials.

18. Informs a client of the common side effects and any serious risks associated with the administration of a prescribed drug used in either a label or extra-label manner. Informs the client of the proper storage, handling, and the means of administration of a prescribed drug. Records this information in the medical record.

19. Charges a reasonable fee, if any, for the provision of a written or oral prescription.

20. Maintains a record of the details of each prescription within the medical record, inclusive of recording a diagnosis or purpose for the use of any antimicrobials.

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Legislative Authority

Food and Drugs Act and Regulations (Federal)

Feeds Act and Regulations (Federal)

Controlled Drugs and Substances Act and Regulations (Federal)

Drug and Pharmacies Regulation Act and Regulations (Provincial)

Drug Interchangeability and Dispensing Fee Act (Provincial)

Veterinarians Act (Provincial)

Regulation 1093, s. 1, 18, 23(1), 26, 28(6), 31, 33(1), 33(2) (*Veterinarians Act*) (Provincial)

Guide to the Standard

A separate Guide to the Professional Practice Standard: Prescribing has been developed by the College. See the Resources tab on the College website at www.cvo.org.

Other References:

Policy on Extra-label Drug Use in Food Producing Animals, Health Canada, 2015. http://www.hc-sc.gc.ca/dhp-mps/vet/label-etiquet/pol_eldu-umdde-eng.php

Position Statement: Extra-label Drug Use (ELDU), Canadian Veterinary Medical Association, 2015. <http://www.canadianveterinarians.net/documents/extra-label-drug-use-eldu>

Guidelines for Legitimate Use of Compounded Drugs in Veterinary Practice, Canadian Veterinary Medical Association, 2006. <http://www.canadianveterinarians.net/documents/cvma-guidelines-for-legitimate-use-of-compounded-drugs-in-veterinary-practice-2006>

Pharmacy Compounding, CVMA Guidelines and Decision Cascade, 2015.

<http://www.canadianveterinarians.net/news-events/news/pharmacy-compounding-cvma-guidelines-decision-cascade>

Guidelines on the Prudent Use of Antimicrobial Drugs in Animals, Canadian Veterinary Medical Association, 1999. <http://www.canadianveterinarians.net/documents/cvma-general-guidelines-prudent-use-of-antimicrobial-drugs-in-animals-1999>

Position Statement: Antimicrobial Use in Animals, Canadian Veterinary Medical Association, 2014. <http://www.canadianveterinarians.net/documents/antimicrobial-use-in-animals>

Categorization of Antimicrobial Drugs Based on their importance in Human Medicine (Table 23). Veterinary Drugs Directorate's (VDD)

http://www.hc-sc.gc.ca/dhp-mps/vet/antimicrob/amr_ram_hum-med-rev-eng.php

Professional Practice Standard: Management and Disposal of Controlled Drugs

Guide to the Professional Practice Standard: Management and Disposal of Controlled Drugs

Professional Practice Standard: Use of Compounded Products in Veterinary Practice

Guide to the Professional Practice Standard: Use of Compounded Products in Veterinary Practice

Professional Practice Standard: Informed Client Consent

Guide to the Professional Practice Standard: Informed Client Consent

Professional Practice Standard: Medical Records

Guide to the Professional Practice Standard: Medical Records

Position Statement: Veterinarian Client Patient Relationship

Professional Practice Standard: Dispensing

Other References:

Canadian gFARAD Website:

<https://cqfarad.usask.ca/home.html>