

September 19, 2011

Susan Geranen, Executive Officer
Veterinary Medical Board
2005 Evergreen Street, Suite 2250
Sacramento, CA 95815

Dear Ms. Geranen:

The California Veterinary Medical Association commends the Veterinary Medical Board (VMB) and the Veterinary Medicine Multidisciplinary Advisory Committee (MDC) on the proposed regulatory changes to the minimum standards of practice that were recently approved by the VMB and are now open to a formal public hearing.

This process was long overdue as the practice of veterinary medicine has undergone many changes since the last review of the minimum standards over twenty years ago. Throughout this process, the MDC carefully and thoughtfully evaluated current sections of the California Veterinary Medicine Practice Act for relevance to consumer protection and a changing profession. Discussion was both logical and realistic as each section was analyzed and discussed.

As a member of the public, the CVMA closely monitored and participated in the MDC meetings that addressed and revised the minimum standards of practice and we approve of these much needed proposed revisions.

The CVMA presented a draft of the proposed minimum standards at a meeting of our Board of Governors and House of Delegates to review the proposed changes and comment to the MDC before the final revisions were made. This provided input from a mix of veterinarians from a variety of practice types and geographic locations. The MDC took the suggestions of these licensed professionals under consideration prior to their final proposal.

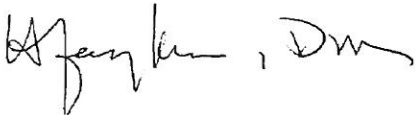
A regulatory change of great importance in the proposal is the clarification of existing law of the use of a dental scaler and the list of items allowed under law in Section 2037, Dental Operation, Defined. While the CVMA believes that current law clearly outlaws the use of a scaler, unlicensed teeth cleaners who are not under the supervision of a veterinarian have for many years continued to illegally use this device and cause harm to animals. This regulatory change will end the debate once and for all on the definition

of a "dental operation" and allow for increased consumer protection and prosecution of unlicensed activity.

The CVMA would like to ask for clarification of Section 3032.25, Written Prescriptions in Absence of Originally Prescribing Veterinarian, in the proposed regulations - specifically, subsection (b)(2). We believe the intent of the language is to allow a veterinarian to fill a prescription written by another veterinarian on an emergency basis for a client who is traveling and cannot return to their regular veterinarian for the refill. If this is the intent of this language, we request that the VMB review and clarify the text to clearly state the intent.

Thank you for the opportunity to comment on the proposed regulations.

Sincerely,

A handwritten signature in black ink, appearing to read "H. Jay Kerr, DVM". The signature is written in a cursive style with a large initial "H" and a distinct "DVM" at the end.

H. Jay Kerr, DVM
President