Client Drug Consultation Requirement for Veterinarians Begins January 2019

The Governor signed SB 1480 in 2018, which includes a new requirement for veterinarians to provide drug consultation to clients. Effective January 1, 2019, each time a veterinarian initially prescribes, dispenses, or furnishes (gives a client) a prescription medication in an outpatient setting, he or she must offer to provide consultation to the client or the client’s agent for each medication provided or prescribed.

The conditions of SB 1480 are as follows:

- The veterinarian is required to offer consultation the first time he or she prescribes or dispenses medication to a client or client’s agent in an outpatient setting.
- It only applies to written prescriptions or to prescription drugs dispensed from practice stock for clients to take home. Medication refills or drugs being dispensed on a repeat basis do not require subsequent consultations.
- The consultation does not apply to drugs administered to animal patients.
- Non-prescription products do not require consultation.
- The consultation may be conducted either in person or through electronic means.

The consultation must include at a minimum the following information:

1. **The name and description of the prescription (also referred to as “dangerous”) drug.** The description would include what type of drug it is and what it is used to treat. For instance, carprofen is a non-steroidal anti-inflammatory drug that is being used to treat musculoskeletal inflammation.

2. **Route of administration, dosage form, dosage, duration of drug therapy, the duration of the effects of the drug, and the common severe adverse effects associated with the use of a short-acting or long-acting drug.** Continuing with the carprofen example, the medication consists of a 75 mg tablet that is given orally twice daily for 10 days. The drug has about a 12-hour duration of effect when treating musculoskeletal inflammation. Only common, severe, adverse effects need to be mentioned.

3. **Any special directions for proper use and storage.** Examples include if the drug requires reconstitution prior to use or if it should be stored in darkness or in a refrigerator.

4. **Actions to be taken in the event of a missed dose.** Because no information on this topic exists on product labels or in literature, it is up to each veterinarian
providing the consultation to determine how he or she would like to advise a client on what to do if an animal patient misses a dose.

5. **If available, precautions and relevant warnings provided by the drug’s manufacturer, including common severe adverse effects of the drug.** If the drug manufacturer provides information about common severe adverse side effects of the drug, that information should be provided to the client.

If the client requests written documentation about the drug, the veterinarian must provide it, if available. Sources could include drug information provided by the manufacturer; information found in a veterinary drug compendium; or information compiled by the veterinarian. If written information is unavailable, then a veterinarian is not required to provide written documentation.

A veterinarian may delegate to a registered veterinary technician or veterinary assistant the task of providing the required consultation and if applicable, drug documentation.

The new law also requires that it be noted in the patient medical record whether the consultation is provided or declined by the client or client agent. As a safeguard, it is recommended that the name of the client or client’s agent is included in the record as part of the entry which documents the drug consultation offer. The name or initials of the person responsible for documenting the consultation in the record should be included in the entry.

To read the Veterinary Medical Board statement on client drug consultation, visit https://www.vmb.ca.gov/laws_regs/drug_consultation.pdf

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California Business and Professions Code Section 4829.5

(a) Each time a veterinarian initially prescribes, dispenses, or furnishes a dangerous drug, as defined in Section 4022, to an animal patient in an outpatient setting, the veterinarian shall offer to provide, in person or through electronic means, to the client responsible for the animal, or his or her agent, a consultation that includes the following information:

(1) The name and description of the dangerous drug.

(2) Route of administration, dosage form, dosage, duration of drug therapy, the duration of the effects of the drug, and the common severe adverse effects associated with the use of a short-acting or long-acting drug.

(3) Any special directions for proper use and storage.

(4) Actions to be taken in the event of a missed dose.

(5) If available, precautions and relevant warnings provided by the drug’s manufacturer, including common severe adverse effects of the drug.

(b) If requested, a veterinarian shall provide drug documentation, if available.

(c) A veterinarian may delegate to a registered veterinary technician or veterinary assistant the task of providing the consultation and drug documentation required by this section.

(d) It shall be noted in the medical record of the animal patient if the consultation described in this section is provided or declined by the client or his or her agent.