

# Prescribing a Drug

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## Introduction

Under the *Veterinarians Act* and regulations, a veterinarian licensed by the College of Veterinarians of Ontario is authorized to prescribe and dispense a drug. More specifically, prescribing a drug 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 may be performed independently by a veterinarian. A veterinarian should acknowledge and manage the potential conflict of interest in assuming the dual role of prescriber and dispenser.

The professional activity of veterinary prescribing is informed and regulated by a broad legislative framework provincially and federally. This legislation sets out the requirements for the prescribing, sale, and dispensing of a drug. The *College Professional Practice Standard: Extra-Label Drug Use*, *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 a drug in an extra-label manner, a controlled drug, and a compounded product, respectively.



## Definitions

**Client:** Client means, with respect to a veterinarian, the owner of an animal(s) or group of animals 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(s) or group of animals.

**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), also referred to as "off-label use", refers to the use or intended use of a drug approved by Health Canada in an animal(s) or group of animals in a manner not in accordance with the label or package insert, with respect to species, indication, dose, duration, and route of administration. It also includes the use of all unapproved drugs, including unapproved bulk active pharmaceutical ingredients (APIs) and compounded drugs.<sup>1</sup>

**Prescription/prescribing:** A direction from a veterinarian authorizing the dispensing of a drug or mixture of drugs to a client for an animal(s) or group of animals.

**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 animal or the product(s) of the animal should be withheld or withdrawn from sale for consumption.

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<sup>1</sup> Extra-Label Drug Use (ELDU) in Animals, Health Canada



## Practice Expectations

A veterinarian meets the Professional Practice Standard: Prescribing a Drug when the veterinarian:

1. Respects the best interest(s) of the animal(s) or group of animals and of the client in prescribing and/or dispensing a drug, acknowledging the overarching responsibilities of professionalism and balanced judgment, including the protection of public health.
2. Prescribes a drug only when working from an accredited veterinary facility in Ontario.
3. Understands that the act of prescribing a drug may not be delegated.
4. A) Prescribes a drug within the context of a veterinarian-client-patient-relationship (VCPR)<sup>2</sup> where the veterinarian:
  - (i) Has been retained by the owner of the animal(s) or group of animals an authorized representative of the owner, or an individual who the veterinarian reasonably determines is acting in the interest of the animal(s) or group of animals;
  - (ii) Has advised the client that the veterinarian will only provide services in accordance with the standards of practice of the profession;
  - (iii) Has reached an agreement with the client as to the scope of the services to be provided by the veterinarian; and
  - (iv) Has obtained the consent of the client for each service to be provided.
- B) Understands that additional requirements for prescribing a drug are that the veterinarian:
  - (i) has recent and sufficient knowledge of the animal(s) or group of animals by virtue of a history and inquiry and either in-person physical examination of the animal(s) or group of animals or medically appropriate and timely in-person visits to the premises where the animal(s) or group of animals is kept to reach at least a general or preliminary diagnosis;

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<sup>2</sup> Unless one of the exceptions to the requirement for a VCPR apply, inclusive of section 18(3) of Regulation 1093.



- (ii) believes that the drug is prophylactically or therapeutically indicated for the animal(s) or group of animals; and
- (iii) is readily available in-person in case of adverse reactions to the drug or failure of the regimen of therapy.<sup>3</sup>

C) Further understands that they may obtain recent and sufficient knowledge through a virtual physical examination or virtual premise visit to prescribe a non-controlled drug to an animal(s) or group of animals when the following conditions are met:

- (i) They conduct a virtual physical examination or virtual premise visit of an animal(s) or group of animals' circumstances and condition to obtain sufficient information regarding its status and condition to indicate an immediate need for drug therapy;
- (ii) The quantity of the drug prescribed is limited to an immediate, short-term need or is the minimum amount necessary to allow the client a reasonable opportunity to obtain in-person veterinary services for the animal(s) or group of animals; and
- (iii) They are readily available in-person to manage adverse reactions to the drug or failure of the regimen of therapy.

- 5. Understands that an exception to the requirement that a VCPR must be established before a veterinarian can provide veterinary services (inclusive of prescribing a drug) includes where a veterinarian determines that there is an emergency situation and that an animal(s) or group of animals require(s) immediate veterinary services.
- 6. Prescribes a drug approved for veterinary use as the first drug treatment option where available. Alternatively, prescribes a drug approved for human use. When no approved drug exists and where a therapeutic need has been established, prescribes that a drug be

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<sup>3</sup> In accordance with the College's *Policy Statement: After-Hours Care Services*



compounded from a drug approved for veterinary use, a drug approved for human use, or (if neither is possible) from an active pharmaceutical ingredient.

7. Prescribes a drug in a manner consistent with the *Food and Drugs Act* and regulations, and, for medicated feed for livestock, in a manner consistent with the *Feeds Act* and regulations.
8. Prescribes a controlled substance only within a VCPR and where the controlled substance is required for a condition for which an individual animal is receiving treatment from the veterinarian.
9. Prescribes a controlled drug in a manner consistent with the College's *Professional Practice Standard: Management and Disposal of Controlled Drugs*.
10. Prescribes a compounded drug in a manner consistent with the College's *Professional Practice Standard: Use of Compounded Products in Veterinary Practice*.
11. Prescribes a drug in an extra-label manner that is consistent with the College's *Professional Practice Standard: Extra-Label Drug Use*.
12. Prescribes an antimicrobial drug in a manner consistent with responsible use of antimicrobial drugs that sustains the clinical efficacy of the drug by optimizing drug use, choice, dosing, duration, and route of administration, while minimizing the emergence of resistance and other adverse effects.
13. Maintains a medical record that contains sufficient information to support the prescription and use of an antimicrobial drug in accordance with the *Professional Practice Standard: Medical Records*.
14. Provides a client with information regarding 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.
15. Provides a written prescription for a prescribed drug when requested by a client, unless the client requests that an oral prescription be provided.



16. Provides an oral prescription when requested by a client, to an individual acceptable to the client, who is either a veterinarian licensed by the College of Veterinarians of Ontario, a member of the Ontario College of Pharmacists or a veterinarian practising outside of Ontario.<sup>4</sup>
17. (a) Includes the following information on a written, signed prescription, or verbally, if an oral prescription is provided in keeping with sections 15 and 16:
- 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, including the approximate number of animals in the case of groups;
  - Name and address of the client;
  - Prescribed directions for use (dose, route of administration, frequency, and duration);
  - Date the prescription is issued, including the day, month and year;
  - Withholding times, if the prescription is for a food-producing animal;
  - The weight of the animal if the dispensing veterinarian is not the same as the prescribing veterinarian;
  - Number of refills permitted, if any, or expiry date, or total amount of drug prescribed; and
  - Veterinarian's licence number issued by the College.
- (b) A prescription for a drug to be administered via feed must be consistent with federal legislation and must contain, in addition to the information in section 17.(a), the following:
- 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.
18. Advises the client of appropriate withholding times when prescribing a drug for use in food-producing animals, which shall be at least as long as the withholding time recommended by the

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<sup>4</sup> See section on "Dispensing Without an Existing Veterinarian-Client-Patient Relationship" in the *Professional Practice Standard: Dispensing*.



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. The Canadian Global Food Animal Residue Avoidance Database ([www.cgfarad.usask.ca](http://www.cgfarad.usask.ca)) should be consulted for its recommended residue avoidance information when a drug is used in an extra-label manner.

19. Issues a prescription for administration via feed in accordance with the Compendium of Medicating Ingredient Brochures (CMIB) and/or drug label where available.
20. Does not sign a blank or incomplete prescription form.
21. Maintains appropriate security of prescription forms to mitigate against misuse or theft.

## Guide to the Standard

A separate *Guide to the Professional Practice Standard: Prescribing a Drug* has been developed by the College and can be found on the Colleges' website [www.cvo.org](http://www.cvo.org).

## 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, 23-33 (*Veterinarians Act*) (Provincial)

## Resources

The following can be found at the College's website at [cvo.org](http://cvo.org):

1. *Professional Practice Standard: Dispensing a Drug*
2. *Guide to the Professional Practice Standard: Dispensing a Drug*
3. *Professional Practice Standard: Extra-Label Drug Use*
4. *Guide to the Professional Practice Standard: Extra-Label Drug Use*



5. *Professional Practice Standard: Management and Disposal of Controlled Drugs*
6. *Guide to the Professional Practice Standard: Management and Disposal of Controlled Drugs*
7. *Professional Practice Standard: Use of Compounded Drugs in Veterinary Practice*
8. *Guide to the Professional Practice Standard: Use of Compounded Drugs in Veterinary Practice*
9. *Professional Practice Standard: Informed Client Consent*
10. *Guide to the Professional Practice Standard: Informed Client Consent*
11. *Professional Practice Standard: Medical Records*
12. *Guide to the Professional Practice Standard: Medical Records*
13. *Professional Practice Standard: Establishing, Maintaining, and Discontinuing a Veterinarian-Client-Patient Relationship (VCPR)*
14. *Guide to the Professional Practice Standard: Establishing, Maintaining, and Discontinuing a Veterinarian-Client-Patient Relationship (VCPR)*
15. *Professional Practice Standard: Telemedicine*
16. *Guide to the Professional Practice Standard: Telemedicine*
17. *Information Sheet - Apiculture & Bee Medicine*

The following additional resources are also applicable:

1. [Policy on Extra-Label Drug Use in Food Producing Animals](#), Health Canada, 2015.
2. [Position Statement: Extra-label Drug Use \(ELDU\)](#), Canadian Veterinary Medical Association, 2021.
3. [Canadian gFARAD Website](#)
4. [Veterinary Oversight of Antimicrobial Use – A Pan-Canadian Framework of Professional Standards for Veterinarians](#), Canadian Veterinary Medical Association

College publications contain practice parameters and standards which should be considered by all Ontario veterinarians in the care of their patients and in the practice of the profession. College publications are developed in consultation with the profession and describe current professional expectations. It is important to note that these College publications may be used by the College or other bodies in determining whether appropriate standards of practice and professional responsibilities have been maintained. The College encourages you to refer to the website ([www.cvo.org](http://www.cvo.org)) to ensure you are referring to the most recent version of any document.