Department of Consumer Affairs
Veterinary Medical Board

Multidisciplinary Advisory Committee Meeting

Department of Consumer Affairs
1747 N. Market Blvd.
1st Floor Hearing Room
Sacramento, California

Tuesday, July 16, 2019
10:00 a.m.

Committee Members

Jeff Pollard, DVM, Chair
Kristi Pawlowski, RVT, Vice-Chair
Stuart Eckmann, Public Member
Kevin Lazarcheff, DVM
Leah Shufelt, RVT
Richard Sullivan, DVM
Meg Warner, DVM
Jennifer Loredo, RVT, Board Liaison
Cheryl Waterhouse, DVM, Board Liaison

Executive Officer

Jessica Sieferman

1747 North Market Blvd., Ste 230 • Sacramento, CA 95834 • www.vmb.ca.gov
916-515-5220 • 916-928-6849 (Fax)

BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY • GAVIN NEWSOM, GOVERNOR
DEPARTMENT OF CONSUMER AFFAIRS • VETERINARY MEDICAL BOARD
1747 North Market Blvd., Suite 230, Sacramento, CA 95834-2987
P (916) 515-5220 | Toll-Free (866) 229-0170 | www.vmb.ca.gov

AMENDED MEETING NOTICE and AGENDA
MULTIDISCIPLINARY ADVISORY COMMITTEE

Committee Members
Jeff Pollard, DVM, Chair
Kristi Pawlowski, RVT, Vice-Chair
Stuart Eckmann
Kevin Lazarcheff, DVM
Jennifer Loredo, RVT
Leah Shufelt, RVT
Richard Sullivan, DVM
Cheryl Waterhouse, DVM
Margaret Warner, DVM

July 16, 2019

Department of Consumer Affairs
1747 N. Market Blvd.
1st Floor Hearing Room
Sacramento, California 95834

Action may be taken on any item listed on the agenda.

10:00 a.m., Tuesday, July 16, 2019

1. Call to Order/ Roll Call/ Establishment of a Quorum
2. Committee Chair's Remarks, Committee Member Comments, and Introductions
3. Public Comment on Items Not on the Agenda
   Note: The Committee may not discuss or take action on any matter raised during this public comment section, except to decide whether to place the matter on the agenda of a future meeting. (Government Code Sections 11125 and 11125.7(a).)
4. Review and Approval of April 16, 2019 Committee Meeting Minutes
5. Discussion, Development, and Potential Recommendation on Guidelines for Veterinarian Discussion with Veterinary Clients of Cannabis Treatment on Animal Patients
6. Discussion and Potential Recommendation on Defining Conditions That Must be Met for Board Approval of Providing Statutory Authority for a Veterinarian to Give Clients Cannabis Treatment Recommendations
7. Discussion on Duplicative, Overlapping, or Outdated Regulations
8. Update from the Complaint Process Audit Subcommittee
9. Future Agenda Items, Committee Priorities, and Meeting Dates
10. Adjournment

This agenda can be found on the Veterinary Medical Board website at **www.vmb.ca.gov**. Action may be taken on any item on the agenda. The time and order of agenda items are subject to change at the discretion of the Committee Chair and may be taken out of order. In accordance with the Bagley-Keene Open Meeting Act, all meetings of the Committee are open to the public.

This meeting will be webcast, provided there are no unforeseen technical difficulties or limitations. To view the webcast, please visit **thedcapage.wordpress.com/webcasts/.** The meeting will not be cancelled if webcast is not available. If you wish to participate or to have a guaranteed opportunity to observe and participate, please plan to attend at a physical location. Meeting adjournment may not be webcast if it is the only item that occurs after a closed session.

Government Code section 11125.7 provides the opportunity for the public to address each agenda item during discussion or consideration by the Committee prior to the Committee taking any action on said item. Members of the public will be provided appropriate opportunities to comment on any issue before the Committee, but the Committee Chair may, at his or her discretion, apportion available time among those who wish to speak. Individuals may appear before the Committee to discuss items not on the agenda; however, the Committee can neither discuss nor take official action on these items at the time of the same meeting (Government Code sections 11125, 11125.7(a)).

The meeting locations are accessible to the physically disabled. A person who needs disability-related accommodations or modifications to participate in the meeting may make a request by contacting the Committee at (916) 515-5220, email: vmb@dca.ca.gov, or sending a written request to the Veterinary Medical Board, 1747 N. Market St., Suite 230, Sacramento, CA 95834. Providing your request at least five (5) business days prior to the meeting will help ensure availability of the requested accommodations. TDD Line: (916) 326-2297.

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MEETING MINUTES
MULTIDISCIPLINARY ADVISORY COMMITTEE

Mission Inn Hotel
3649 Mission Inn Avenue
Riverside, California 92501

10:00 a.m. Tuesday, April 16, 2019

1. Call to Order/Roll Call/Establishment of a Quorum

Multidisciplinary Advisory Committee (MDC) Chair, Dr. Jeff Pollard, called the meeting to order at 10:00 a.m. Veterinary Medical Board (Board) Executive Officer, Ms. Jessica Sieferman, called roll; nine members of the MDC were present, and a quorum was established.

2. Committee Chair's Remarks, Committee Member Comments, and Introductions

Dr. Pollard announced that it would be Dr. Allan Drusys' last meeting on the MDC, as he is terming out, and thanked him for the last six years of service on the MDC.

Members Present
Jeff Pollard, Doctor of Veterinary Medicine (DVM), Chair
Kristi Pawlowski, RVT, Vice-Chair
Allan C. Drusys, DVM
Stuart Eckmann, Public Member
Kevin Lazarcheff, DVM
Jennifer Loredo, RVT, Board Liaison
Leah Shufelt, RVT
Margaret Warner, DVM
Cheryl Waterhouse, DVM, Board Liaison

Staff Present
Jessica Sieferman, Executive Officer
Robert Stephanopoulos, Enforcement Manager
Moneel Singh, Administrative Program Manager
Amanda Drummond, Administrative Program Analyst
Tara Welch, Legal Counsel

Guests Present
Kathy Bowler, Board
Tonya Buenrostro, County of Riverside
Katherine Buff, RVT, County of Riverside
Mark Cushing, Animal Policy Group
Rich Edling, Boehringer Ingelheim Animal Health (BIAH)

Nancy Ehrlich, CaRVTA
Stacey Evans, Stacey Evans Consulting, LLC
Valerie Fenstermaker, California Veterinary Medical Association (CVMA)
Charis Fifield, VETCBD
Cindy Gonzalez, County of Riverside
Sharon Gonzales, County of Riverside
Paul Hansbury, Lovingly and Legally Grown
Bonnie Lutz, Esq.
Max Mikalonis, K Street Consulting
Grant Miller, DVM, CVMA
Elaine Myers, CaRVTA
Jaymie Noland, DVM, Board
Mark Nunez, DVM, Board
John Pascoe, DVM, University of California, Davis (UC Davis)
Ken Pawlowski, DVM, CVMA
Emma Perez-Singh, County of Riverside
Jaymie Peyton, DVM, UC Davis
Travis Scott, County of Riverside
Tim Shu, DVM, VETCBD
Richard Sullivan, DVM
Todd Tamms, DVM, VCA Chief Medical Officer
Susan Tibbon, Lovingly and Legally Grown
David Urrutia, County of Riverside

3. Public Comments on Items Not on the Agenda

There were no comments from the public, outside agencies, or associations.

4. Review and Approval of January 22, 2019 Committee Meeting Minutes

The MDC made minor changes to the January 22, 2019 meeting minutes.

- Dr. Allan Drusys moved and Dr. Kevin Lazarcheff seconded the motion to approve the minutes as amended. The motion carried 9-0.

5. Discussion on Legislative and Regulatory Proposals Regarding the Corporate Practice of Veterinary Medicine; Potential Recommendation to Full Board

The subcommittee consisting of Ms. Kristi Pawlowski and Mr. Stuart Eckmann provided an update to the MDC regarding the topic of corporate practice in veterinary medicine. A survey was submitted to licensees asking them to provide information about their practices. In a little over a week, the Board received approximately 500 responses. Ms. Sieferman clarified that the intent of the survey was to identify if there is a need to investigate corporate practice further and

determine if this was an issue in veterinary medicine, rather than to provide a statistical analysis of the results. The survey results indicated that this is an issue in veterinary medicine and one that warranted further investigation.

Public comments were received indicating that this was a complex issue and that the survey is not something that should be used to draw conclusions as the survey was not statistically sound. The MDC also discussed legislation regarding corporate practice of veterinary medicine in other states. Given the short time the survey was open, the MDC determined to leave the survey open and to reach out again to licensees to encourage additional responses. Additionally, the MDC subcommittee will continue researching this issue to determine what steps are necessary.

6. Discussion and Development of Guidelines for Discussion of Cannabis with Veterinary Clients; Potential Recommendation to Full Board

Dr. Margaret Warner provided an update from the subcommittee for cannabis guidelines and reported that definitions have been added to the guidelines to include hemp products following the passing of the Farm Bill. Additionally, comments received at the January meeting have been included in the guidelines to address continuing education and specifics on what the Board can provide. Public comment noted that the guidelines focus heavily on the dangers of cannabis products, but not the benefits. The MDC commented that the benefits of cannabis in animals is still new and developing, and it is not something that can be included in the guidelines, as it is up to the veterinarian discussing cannabis to take continuing education courses to learn the benefits. Additionally, it was commented that by indicating the benefits of cannabis in the guidelines, it can be interpreted as recommending cannabis, which currently is not authorized. Members of the public and the MDC made recommendations for amendments to the guidelines, and the MDC agreed they would bring this issue back to the July meeting for further deliberation. The modifications include:

- Modifying the first bullet point of the guidelines (page 2) to "The variability of quality, safety, testing, and sources of cannabis products."
- Modifying the final bullet point (page 3) to "The importance of periodic re-evaluation of the patient."

7. Update from the Complaint Process Audit Subcommittee

Dr. Pollard provided a brief update on the complaint process audit subcommittee. The subcommittee would continue to collaborate with Board staff regarding expert witness training, with focus on consistency, feedback, and re-training of expert witnesses.

8. Future Agenda Items and 2019 Meeting Dates

A. Multidisciplinary Advisory Committee Assignment Priorities

- Update from the Complaint Process Audit Subcommittee
- Update from the Cannabis Guidelines Discussion Subcommittee
- Update from the Corporate Practice Subcommittee
- Discussion of Managing Licensees and Premises Registration

B. 2019 Meeting Dates

- July 16, 2019 – Bay Area, Foothill College
- October 8, 2019 – Sacramento, DCA

9. Adjournment

The MDC adjourned at 2:25 p.m.

Veterinary Medical Board's

Guidelines for the Discussion of Cannabis Use for Veterinary Patients

Effective January 1, 2020

PREAMBLE

Pursuant to Business and Professions Code (BPC) section 4884, subdivision (b), a California licensed veterinarian will not be disciplined by the Veterinary Medical Board (VMB) solely for discussing the use of cannabis on an animal for medicinal purposes. As required by statute, the Board has developed these guidelines for discussion of the use of cannabis in veterinary patients with clients. (BPC, § 4884, subd. (c).)

BACKGROUND

On September 27, 2018, California Governor Edmund G. Brown, Jr. signed into law AB 2215 (Kalra, Chapter 819, Statutes of 2018). AB 2215 became effective January 1, 2019. This bill amends section 4883 of, and adds section 4884 to, the Business and Professions Code, relating to veterinarians.

The bill prohibits the VMB from disciplining, or denying, revoking, or suspending the license of, a licensed veterinarian solely for discussing the use of cannabis on an animal for medicinal purposes, absent negligence or incompetence.

The bill prohibits the veterinarian from dispensing or administering cannabis or cannabis products, or accepting, soliciting, or offering any form of remuneration from or to a cannabis licensee (aka, Medicinal and Adult-Use Cannabis Regulation and Safety Act [MAUCRSA] licensee) if the veterinarian or his or her immediate family have a financial interest with the cannabis licensee. Under both the federal Controlled Substances Act (CSA) (21 USCA § 801 et seq.) and the California Uniform Controlled Substances Act (CUCSA) (Cal. Health & Saf. Code, § 11000 et seq.), cannabis is listed as a Schedule I drug, characterized as having a high potential for abuse, have no currently accepted medical use in treatment in the United States, and lack accepted safety for use under medical supervision. A veterinarian is prohibited from prescribing a Schedule I drug.

GUIDELINES

The VMB has adopted the following guidelines for the discussion with veterinary clients of cannabis use on animal patients for medical purposes.

Veterinarian-Client-Patient Relationship: The veterinarian-client-patient relationship (VCPR) is fundamental to the provision of acceptable veterinary medical care. The veterinarian should document that an appropriate VCPR is established prior to discussions of cannabis with the animal owner client. (See California Code of Regulations (CCR), title 16, section 2032.1, Veterinarian-Client-Patient Relationship.)

Patient Evaluation and Record Keeping: A documented physical examination and collection of relevant clinical history is required. This history should include both subjective and objective data and must be obtained prior to discussion of cannabis for a medical purpose. Medical records must meet the accepted minimum requirements for record keeping as defined by the Veterinary Medicine Practice Act. (See CCR, tit. 16, § 2032.3, Record Keeping; Records; Contents; Transfer.)

Documentation of discussions should include the indication and safety of the use of cannabis. The discussions should be evaluated in accordance with accepted standards of practice as they evolve over time. This documentation may include advice about potential risks of the medical use of cannabis, including, but not limited to, the following:

- The variability of quality, source, safety, and testing of cannabis products (pesticide contamination, potentially harmful co-ingredients, e.g., xylitol, chocolate, butter).
- No federal or state agency oversees standardization of animal cannabis product concentrations.
- Research to-date is lacking conclusions regarding dose, toxicity, and efficacy.
- The side effects and signs of overdose or toxicity (e.g., ataxia, depression, vomiting, urinary incontinence, bradycardia, hyperthermia, tremors, anorexia, adipsia, hypothermia, seizure, stupor, tachycardia, weakness).
- Safeguarding of cannabis products from other pets and human exposures.
- Use in service animals that may place human handler safety in jeopardy.
- Possible interactions with other treatments and prescribed medications.
- Reminder to the client that cannabis is not being recommended or prescribed by the veterinarian.
- The importance of periodic re-evaluation of the patient in accordance with good veterinary practice.

Veterinarian's Conflicts of Interest: The amendments to BPC section 4883 and the addition of BPC section 4884 are very clear in that there will be no financial relationships with any cannabis licensees, no advertising of cannabis products, no stocking, dispensing, or administration of cannabis products. A veterinarian cannot prescribe or recommend the use of cannabis, only enter into discussions with the veterinary client concerning appropriate medical use within the confines of a VCPR. A veterinarian cannot have a professional office located at a dispensary or cultivation center. A veterinarian cannot be a director, officer, member, principal, employee, or a retailer of cannabis products. A cannabis dispensary may not employ a veterinarian to discuss cannabis with clients. (See BPC, §§ 4883, subds. (p), (q), (r), and 4884.)

Industrial Hemp: Under federal and state law (21 USCA § 802(16) and Cal. Health & Saf. Code, § 11018.5), industrial hemp is not a controlled substance regulated under the Uniform Controlled Substance Acts and is not regulated under the Medicinal and Adult-Use Cannabis Regulation and Safety Act (MAUCRSA) (BPC, § 26000 et seq.). Rather, industrial hemp is regulated by the federal Department of Agriculture and the California Department of Food and Agriculture (7 USCA § 1639o; Cal. Food & Agr. Code, § 81000). Thus, if a veterinarian prescribes, dispenses, furnishes, or recommends the use of industrial hemp on an animal patient, the veterinarian would not be subject to the statutory provisions regarding cannabis but would be subject to the provisions of the Veterinary Medicine Practice Act applicable to diagnosing, prescribing, or administering a drug, medicine, appliance, application, or treatment of whatever nature for the prevention, cure, or relief of a wound, fracture, bodily injury, or disease of animals (Bus. & Prof. Code, § 4826, subds. (b), (c)).

Definitions, Abbreviations, Acronyms

California Uniform Controlled Substances Act (CUCSA) – regulates the manufacture, importation, possession, use, and distribution of certain substances (Cal. Health & Saf. Code, § 11000 et seq.).

Cannabis – Cannabis means all parts of the plant Cannabis sativa L., whether growing or not; the seeds thereof; the resin extracted from any part of the plant; and every compound, manufacture, salt, derivative, mixture, or preparation of the plant, its seeds or resin. It does not include either of the following:
(a) Industrial hemp, as defined in Section 11018.5.
(b) The weight of any other ingredient combined with cannabis to prepare topical or oral administrations, food, drink, or other product.
(Cal Health & Saf. Code, § 11018.)

CBD – abbreviation for Cannabidiol, which is one out of 60 naturally occurring compounds present in cannabis. It is the second most prevalent cannabinoid in both hemp and marijuana and is non-psychoactive. CBD oil is mostly extracted from hemp and not marijuana. When extracted from hemp, this type of extract has less than 0.03% of THC.

CSA – The federal Controlled Substances Act (21 USCA § 801 et seq.).

Dronabinol, Marinol, Nabilone – synthetic cannabinoids.

Epidiolex – CBD product approved in June 2018 by the U.S. Food and Drug Administration (FDA) for controlling seizures in people with difficult-to-treat childhood-onset epilepsy.

Industrial Hemp – (a) Industrial hemp means a crop that is limited to types of the plant Cannabis sativa L. having no more than three-tenths of 1 percent tetrahydrocannabinol (THC) contained in the dried flowering tops, whether growing or not; the seeds of the plant; the resin extracted from any part of the plant; and every compound, manufacture, salt, derivative, mixture, or preparation of the plant, its seeds or resin produced therefrom.
(b) Industrial hemp shall not be subject to the provisions of this division or of Division 10 (commencing with Section 26000) of the Business and Professions Code, but instead shall be regulated by the Department of Food and Agriculture in accordance with the provisions of Division 24 (commencing with Section 81000) of the Food and Agriculture Code, inclusive. (Cal Health & Saf. Code, § 11018.5.)

Marijuana – (A) Subject to subparagraph (B), the term “marijuana” means all parts of the plant Cannabis sativa L., whether growing or not; the seeds thereof; the resin extracted from any part of such plant; and every compound, manufacture, salt, derivative, mixture, or preparation of such plant, its seeds or resin.
(B) The term “marihuana” does not include-

(i) hemp, as defined in section 297A of the Agricultural Marketing Act of 1946 [7 USCS § 1639o]; or
(ii) the mature stalks of such plant, fiber produced from such stalks, oil or cake made from the seeds of such plant, any other compound, manufacture, salt, derivative, mixture, or preparation of such mature stalks (except the resin extracted therefrom), fiber, oil, or cake, or the sterilized seed of such plant which is incapable of germination. [21 USCS § 802]

Medicinal and Adult-Use Cannabis Regulation and Safety Act (MAUCRSA) – establishes a comprehensive system to control and regulate the cultivation, distribution, transport, storage, manufacturing, processing, and sale of both of the following:

(1) Medicinal cannabis and medicinal cannabis products for patients with valid physician's recommendations.
(2) Adult-use cannabis and adult-use cannabis products for adults 21 years of age and over.

MAUCRSA also defines the power and duties of the state agencies responsible for controlling and regulating the commercial medicinal and adult-use cannabis industry (BPC §, 26000 et seq.).

Oils – Cannabis oil, whether CBD, THC, or both, is extracted from the flowers, leaves, and stalk mainly using different solvents. Hemp oil is made only from pressed seeds.

Terpenes – aromatic metabolites found in the oils of all plants (i.e., flavor or fragrance). Terpenes work together to modulate cannabinoids resulting in the so-called "entourage effect." Terpenes have their own medical effects, for example, interacting with neurotransmitters.

THC – delta-9 tetrahydrocannabinol, the primary psychoactive ingredient in marijuana, is one of at least 113 cannabinoids identified in cannabis.

Veterinarian-Client-Patient Relationship (VCPR) – a fundamental provision to acceptable veterinary medical care. A veterinarian-client-patient relationship shall be established by the following:

(1) The client has authorized the veterinarian to assume responsibility for making medical judgments regarding the health of the animal, including the need for medical treatment,
(2) The veterinarian has sufficient knowledge of the animal(s) to initiate at least a general or preliminary diagnosis of the medical condition of the animal(s). This means that the veterinarian is personally acquainted with the care of the animal(s) by virtue of an examination of the animal or by medically appropriate and timely visits to the premises where the animals are kept, and
3) The veterinarian has assumed responsibility for making medical judgments regarding the health of the animal and has communicated with the client a course of treatment appropriate to the circumstance. (CCR § 2032.1.)

Scientific Data and Information about Products Containing Cannabis or Cannabis-Derived Compounds; Public Hearing

MAY 31, 2019

https://www.fda.gov/news-events/fda-meetings-conferences-and-workshops/scientific-data-and-information-about-products-containing-cannabis-or-cannabis-derived-compounds

Date: May 31, 2019

Time: 08:00 AM EDT – 06:00 PM EDT

Location: White Oak Campus: The Great Room

10903 New Hampshire Ave

Bldg 31 Conference Center, The Great Room (Rm 1503)

Silver Spring, MD 20993

United States

Organized By: Food and Drug Administration

Background

The Food and Drug Administration held a public hearing to obtain scientific data and information about the safety, manufacturing, product quality, marketing, labeling, and sale of products containing cannabis or cannabis-derived compounds. See the *Federal Register* notice for more information.

Opening Remarks

Dr. Sharpless' opening remarks are now available.

https://www.fda.gov/news-events/speeches-fda-officials/remarks-dr-sharpless-fda-public-hearing-scientific-data-and-information-about-products-containing

The hearing transcript and slides will be posted online within 30 days.

Webcast Recording:

A webcast recording is available in four distinct segments. Each segment is in order based on the agenda.

- Opening until morning break
- After morning break until lunch
- After lunch until afternoon break
- After afternoon break until closing

Submitting Comments:

FDA established a docket for public comment on this hearing.The docket number is FDA-2019-N-1482. On June 20, 2019, the comment period was extended and the docket will now close on July 16, 2019. See the *Federal Register* announcement for more information. Submit either electronic or written comments on this public hearing by July 16, 2019. Please note that late, untimely filed comments will not be considered. Electronic comments must be submitted on or before July 16, 2019.The Regulations.gov electronic filing system will accept comments until 11:59 p.m. Eastern Time at the end of July 16, 2019. Comments received by mail/ hand delivery/ courier (for written/ paper submissions) will be considered timely if they are postmarked or the delivery service acceptance receipt is on or before that date. Submit written comments to the Division of Dockets Management (HFA-305), Food and Drug Administration, 5630 Fishers Lane, Rm. 1061, Rockville, MD 20852.

The Food and Drug Administration's Scientific Data and Information about Products Containing Cannabis or Cannabis-Derived Compounds Part 15 Public Hearing May 31, 2019 7:00 AM – 6:00 PM

https://www.fda.gov/media/126123/download

The Food and Drug Administration's Scientific Data and Information about Products Containing Cannabis or Cannabis-Derived Compounds Part 15 Public Hearing May 31, 2019 7:00 AM – 6:00 PM

https://www.fda.gov/media/126625/download

The Food and Drug Administration's Scientific Data and Information about Products Containing Cannabis or Cannabis-Derived Compounds Part 15 Public Hearing May 31, 2019 7:00 AM – 6:00 PM

https://www.fda.gov/media/126784/download

Excerpts from: Remarks by Dr. Sharpless at the FDA Public Hearing

MAY 31, 2019

Norman E. "Ned" Sharpless, MD
Acting Commissioner of Food and Drugs - Food and Drug Administration
https://www.fda.gov/news-events/speeches-fda-officials/remarks-dr-sharpless-fda-public-hearing-scientific-data-and-information-about-products-containing

We have over 500 people registered to attend in person, over 800 people registered to join us remotely, and over 100 speakers on today's agenda presenting on this topic.

Cannabis contains more than 80 biologically active chemical compounds, including the best known compounds, delta-9-tetrahydrocannabinol (THC) and cannabidiol (CBD).

If one of these compounds, or the plant itself, is added to a food or cosmetic, marketed as a drug, or otherwise added to an FDA-regulated product in interstate commerce, then it falls within FDA's jurisdiction.

At the same time, some relevant laws have changed. First, some states have changed their laws to allow for "medical" use of marijuana or CBD, and others have begun allowing for recreational marijuana use, or decriminalized recreational marijuana possession.

Second, certain federal laws have changed as well. Parts of the Cannabis sativa plant have been controlled under the Federal Controlled Substances Act, or CSA, since 1970 under the drug class "Marihuana." Last year, the federal scheduling of cannabis changed. The Agriculture Improvement Act of 2018, or the Farm Bill, removed hemp – meaning cannabis or derivatives of cannabis with a very low THC content (below 0.3% by dry weight) – from the CSA's definition of marijuana. As a result, while marijuana remains a Schedule I drug, hemp is no longer a controlled substance under Federal law.

The 2018 Farm Bill explicitly preserved FDA's authority to regulate products containing cannabis or cannabis-derived compounds. In doing so, Congress recognized FDA's important public health role with respect to all the products it regulates – including when those products are or contain cannabis ingredients.

If a product is being marketed as a drug – meaning, for example, that it's intended to have a therapeutic effect such as treating a disease or affecting the body's structure or function – then it's regulated as a drug, and it generally cannot be sold without FDA approval.

Food, including dietary supplements, is regulated differently, but with the same overarching goal of protecting consumers.

For example, while we don't generally require foods to be approved by FDA, we do require that a new food additive be approved as safe by FDA before being put in the food supply, unless the substance is generally recognized as safe, or GRAS.

This requirement applies to cannabis-derived ingredients, just as it does to any other substance. Americans deserve to know that substances being added to their foods are safe, regardless of the source.

Some compounds found in cannabis – specifically, CBD and THC – have been studied and even approved as drugs. It's important to note that the Federal Food, Drug & Cosmetic Act prohibits adding drugs to human or animal food in interstate commerce.

That includes both substances that have been approved as drugs, as well as compounds for which substantial clinical investigations have been instituted. Similarly, the law excludes these products from the statutory definition of a dietary supplement.

Based on the information available to FDA, we have concluded that these provisions apply to CBD and THC. And while there is an exception when the substance was marketed as a food or dietary supplement before it was studied as a drug, we have concluded that that is not the case for CBD or THC. What that means is that, under current law, CBD and THC cannot lawfully be added to a food or marketed as a dietary supplement.

Given the new interest in marketing cannabis products across the range of areas FDA regulates, we will need to carefully evaluate how all these pieces fit together in terms of how consumers might access cannabis products.

Nowhere is this truer than with CBD. While we have seen an explosion of interest in products containing CBD, there is still much that we don't know.

Prior to the 2018 Farm Bill, population-based research mostly included cannabis-focused observations in aggregate, rather than specific to CBD.

When hemp was removed as a controlled substance, this lack of research, and therefore evidence, to support CBD's broader use in FDA-regulated products, including in foods and dietary supplements, has resulted in unique complexities for its regulation, including many unanswered questions related to its safety.

Our biggest concern is the marketing of products that put the health and safety of consumers at risk, such as those claiming to prevent, diagnose, mitigate, treat, or cure serious diseases, such as cancer, in the absence of requisite approvals.

Veterinary Medical Board

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MEMORANDUM

DATE	July 16, 2019
TO	Multidisciplinary Advisory Committee
FROM	Jeff Pollard, DVM, MDC Chair
SUBJECT	**Agenda Item 6. Discussion and Potential Recommendation on Defining Conditions That Must be Met for Board Approval of Providing Statutory Authority for a Veterinarian to Give Clients Cannabis Treatment Recommendations**

During the April 2019 meeting, the Board opposed SB 627 (Galgiani, 2019). SB 627 would, among other things, authorize veterinarians to recommend medicinal cannabis or medicinal cannabis products for use on animal patients. It would also require the Board to issue guidelines on the appropriate administration and use of medicinal cannabis on an animal patient. The Board would be required to report to the Legislature on January 1, 2021, and every six months thereafter, on the status and progress of developing the guidelines.

The Board acknowledged that cannabis and cannabis products may have potential health benefits to animals. However, there is still a significant need for funding for cannabis research so that veterinarians and the public are informed on the possible efficacious use of cannabis to treat animals and ensure the full protection of consumers and their animals. While other medications and dangerous drugs have been provided to animal patients without significant research, those were not previously identified as Schedule I Controlled Substances, as is cannabis.

Although the Board opposed the bill, it directed the MDC to define specific conditions that must be met for Board approval of providing statutory authority for a veterinarian to give clients cannabis treatment recommendations.

In the Assembly Business and Professions Committee analysis of SB 627, multiple policy issues and recommended amendments were identified, many mirroring the Board's concerns, including the lack of research and necessary funding for the research. In addition, one of the amendments removed the Board's reporting requirement to the Legislation and replaced it with a 2022 deadline for adopting recommendation guidelines.

During the July 9, 2019 Committee hearing, the author's office accepted all amendments in the Committee analysis, the Chair provided a "Do Pass" recommendation, and the bill passed out of Committee to the Assembly Appropriations Committee.

According to Assembly Business and Professions Committee staff, the author's office will address the Committee's concern regarding the lack of research and the necessary funding.

Board staff and legal counsel are working with the Committee to propose language addressing this concern for the author's consideration.

Until SB 627 passes and research is conducted, it may be too early to discuss specific conditions that must be met in order to approve veterinarians recommending medicinal cannabis for animal use. However, once adequate research is conducted, the MDC may want to consider the following topics when developing the guidelines:

- Indications for use
- Effective doses – dosing is ideally based on an animal patient's own endocannabinoid system (ECS), disease process, and other factors.
- Species differences (e.g., larger concentrations of CB1 receptors in the brainstem of dogs which causes them to be more susceptible to THC toxicity).
- Proper dosing intervals.
- Therapeutic blood concentrations.
- Half-life in dogs and cats.
- Physiologic effects (intended) (e.g., induction of enzymes).
- Adverse side effects – real and potential.
- Interaction with other medications (e.g., pain meds, anticonvulsants, psychotropics).
- Effects of long-term use.
- Use in patients with co-morbidities (e.g., liver disease).
- Product: percentage of CBD vs. THC, Terpenes.
- Delivery: oil, treat, topical, other.
- Certificate of Analysis.
- Toxicity - how much/what concentration is safe? Effective?
- What if the patient is pregnant?
- Monitoring.
- Liability to licensee – civil and administrative with regard to the Board (e.g., trail of plant, harvest, processing, formulation of product, sale, recommendation/prescription, storage, improper access/use (e.g., children).

Veterinary Medical Board

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1747 North Market Blvd., Suite 230, Sacramento, CA 95834-2978
P (916) 515-5220 | Toll-Free (866) 229-0170 | www.vmb.ca.gov

MEMORANDUM

DATE	July 16, 2019
TO	Multidisciplinary Advisory Committee
FROM	Jessica Sieferman, Executive Officer
SUBJECT	**Agenda Item 7. Discussion on Duplicative, Overlapping, or Outdated Regulations**

AB 312 (Cooley, 2019), which was held under submission in the Assembly Appropriations Committee and failed to pass out of the Assembly this session, would have required each state agency to, on or before January 1, 2022, review its regulations, identify any regulations that are duplicative, overlapping, inconsistent, or out of date, revise those identified regulations, as provided, and report its findings and actions taken to the Legislature and Governor, as specified. Although AB 312 will not move forward this legislative session, it may move forward next year.

During the April Board meeting, the Board opposed AB 312 due to the sheer cost and additional burden it would have placed on the Board. However, the Board tasked the MDC with reviewing existing regulations and making recommendations to update/revise the Board's regulations, if necessary. Based on Dr. Richard Sullivan's extensive experience with the researching/writing regulations, he has graciously agreed to head this project.

To assist this endeavor, Board staff created the attached spreadsheet of regulations. It includes hyperlinks directly to the regulations, applicable statutes, most recent amendment dates (if any), most recent operative date, and initial operative dates. As demonstrated, there are some regulations that have not been reviewed or revised for multiple decades and should be looked at to see if they are still applicable and/or if they should be updated.

This will help identify if/what regulations are duplicative of statutes (and thereby unnecessary). In addition, Board staff is working on identifying any regulations that are currently causing concern, confusion, or other issues for licensees, the public, or Board staff.

Attachment:

1. Veterinary Medical Board's Regulations Spreadsheet

CCR Section Number	Referenced Statute	Regulation Name	Most Recent Amendment Date	Number of Amendments	Most Recent Operative Date	Initial Operative Date
Article 1. General Provisions						
§ 2000	BPC § 4800	Location of Offices	1/31/2011	5	3/2/2011	12/5/1946
§ 2002	BPC § 4800	Definitions	7/10/2014	3	10/1/2014	12/5/1946
§ 2003	BPC § 107	Delegation of Certain Functions	2/1/1977	1	30th day thereafter	12/5/1946
§ 2004	BPC § 4852*	Filing of Addresses	10/12/1983	2	30th day thereafter	12/5/1946
§ 2005	BPC § 4846*	Posting of Notice of Revocation or Suspension	2/17/1977	1	30th day thereafter	10/21/1953
§ 2006	BPC § 4875*	Disciplinary Guidelines	6/6/2013	2	10/1/2013	4/18/1997
§ 2007	BPC § 144*	Response to Board Inquiry		0	4/1/2012	4/15/2011
Article 2. Examination and Licensing						
§ 2009	BPC § 4839	Registered Veterinary Technicians	7/10/2014	2	10/1/2014	2/17/1977
§ 2010	BPC § 4848*	Application	7/10/2014	7	10/1/2014	12/5/1946
§ 2010.05	BPC § 144*	Fingerprint and Disclosure Requirements for Renewal of License		0	4/1/2012	4/15/2011
§ 2010.1	BPC § 4846.1*	Eligibility Evaluation - National Veterinarian Examination	7/10/2014	3	10/1/2014	7/18/2000
§ 2010.2	BPC § 4846.1*	Eligibility Evaluation - National Veterinary Technician Examination		0	10/1/2014	7/10/2014
§ 2010.5	BPC § 4905*	Receipt of Fees		0	30th day thereafter	2/17/1977
§ 2011	BPC § 158	Refund of Fees	7/18/2000	1	7/18/2000	2/17/1977
§ 2011.5	BPC § 4905	Waiver or Refund of License Fees	12/23/1994	2	1/1/1995	8/11/1965
§ 2014	BPC § 4848	Veterinary Licensing Examination	7/10/2014	5	10/1/2014	12/5/1946
§ 2014.1	BPC § 4841.1	Veterinary Technician Registration Examination		0	10/1/2014	10/1/2014
§ 2015	BPC § 4848*	Examinations Credit	7/10/2014	10	10/1/2014	12/5/1946
§ 2015.1	BPC § 4848*	Substantially Similar Examinations; Conditional Credit	7/10/2014	5	10/1/2014	3/29/1999
§ 2015.2	BPC § 4848	Veterinary Law Examination	1/31/2011	1	3/2/2011	3/29/1999
§ 2015.5	BPC § 4846	Abandonment of Application	2/17/1977	2	30th day thereafter	11/19/1954
§ 2016	BPC § 4848	Temporary Licensee; Application for a Regular Renewable License		0	6/9/2000	6/9/2000
§ 2020	BPC § 4849	Examination Appeal	1/31/2011	3	3/2/2011	12/7/1979
Article 2.5. Temporary Licenses						
§ 2021	BPC § 4848.3	Temporary License-Definitions	6/12/2009	2	7/12/2009	3/29/1999
§ 2021.1	BPC § 4848.3	Temporary Licenses; Notification of Supervisor	8/2/1999	1	8/2/1999	3/29/1999
§ 2021.3	BPC § 4848	California Curriculum - Content		0	6/9/2000	6/9/2000
§ 2021.4	BPC § 4848	Criteria for Provider Approval		0	6/9/2000	6/9/2000
§ 2021.5	BPC § 4848	Approved Curriculum		0	6/9/2000	6/9/2000
§ 2021.6	BPC § 4848	Approved Providers		0	6/9/2000	6/9/2000
§ 2021.7	BPC § 4848	Instructors		0	6/9/2000	6/9/2000
§ 2021.8	BPC § 4848	Denial, Withdrawal and Appeal of Approval		0	6/9/2000	6/9/2000
§ 2021.8a	Prior referenced statute repealed (Recommend BPC § 4848 for regulation clean up)	Processing Times for Provider and Course Request Applications		0	6/9/2000	6/9/2000
§ 2021.9	BPC § 4848.3*	Requirements for Supervisors	8/2/1999	1	8/2/1999	3/29/1999
§ 2021.10	BPC § 4848	Notification of Change of Supervisor		0	3/29/1999	3/29/1999
Article 3. Veterinary Colleges						
§ 2022	BPC § 4846	Recognized Veterinary Colleges	7/18/2000	5	7/18/2000	12/5/1946
§ 2023	BPC § 4848	Eligibility for Examinations	1/31/2011	1	3/2/2011	3/29/1999
§ 2024	BPC § 4848*	Education Requirement for Eligibility for Licensure	1/31/2011	7	3/2/2011	5/21/1976
§ 2025	BPC § 4846.1*	Gradates of Unrecognized Colleges - ECFVG or Pave Certificate	4/9/2002	4	5/9/2002	5/21/1976
§ 2027	BPC § 4846.2	Graduates and Students of Veterinary Colleges - Job Tasks	10/3/1984	3	30th day thereafter	6/17/1977

Article 4. Practice						
§ 2030	BPC § 4854*	Minimum Standards - Fixed Veterinary Premises	9/27/2013	6	1/1/2014	6/29/1979
§ 2030.05	BPC § 4853*	Minimum Standards - Licensee Manager		0	1/1/2014	1/1/2014
§ 2030.1	BPC § 4854*	Minimum Standards - Small Animal Fixed Premises	9/27/2013	1	1/1/2014	5/25/2000
§ 2030.2	BPC § 4854*	Small Animal Mobile Clinic	9/27/2013	2	1/1/2014	5/25/2000
§ 2030.3	BPC § 4854*	Small Animal Vaccination Clinic		0	1/1/2014	1/1/2014
§ 2032	BPC § 4883	Minimum Standards of Practice		0	6/24/2000	7/16/1980
§ 2032.05	BPC § 4883	Humane Treatment		0	1/1/2014	1/1/2014
§ 2032.1	BPC § 4883	Veterinarian-Client-Patient Relationship	9/27/2013	1	1/1/2014	6/24/2000
§ 2032.15	BPC § 4883	Veterinarian-Client-Patient Relationship in Absence of Client Communication		0	1/1/2014	1/1/2014
§ 2032.2	BPC § 4883	Written Prescriptions	9/27/2013	1	1/1/2014	6/24/2000
§ 2032.25	BPC § 4883	Written Prescriptions in Absence of Originally Prescribing Veterinarian		0	1/1/2014	1/1/2014
§ 2032.3	BPC § 4855*	Record Keeping; Records; Contents; Transfer	9/27/2013	1	1/1/2014	6/24/2000
§ 2032.35	BPC § 4855*	Altering Medical Records		0	1/1/2014	1/1/2014
§ 2032.4	BPC § 4883	Anesthesia	9/27/2013	2	1/1/2014	6/24/2000
§ 2032.5	BPC § 4854*	Emergency Hospitals		0	6/24/2000	6/24/2000
§ 2034	BPC § 4836*	Animal Health Care Tasks Definitions	8/1/2016	4	8/1/2016	7/16/1980
§ 2035	BPC § 4840*	Duties of Supervising Veterinarian	8/1/2016	2	8/1/2016	10/18/1979
§ 2036	BPC § 4836*	Animal Health Care Tasks for R.V.T.	8/3/2007	5	9/2/2007	7/16/1980
§ 2036.5	BPC § 4836*	Animal Hospital Health Care Tasks for Permit Holders and Veterinary Assistants	8/1/2016	4	8/1/2016	7/16/1980
§ 2037	BPC § 4826	Dental Operation, Defined	9/27/2013	1	1/1/2014	5/2/1990
§ 2038	BPC § 4826*	Musculoskeletal Manipulation		0	6/5/1998	6/5/1998
§ 2039	BPC § 4827	Sodium Pentobarbital/Euthanasia Training		0	10/30/1998	10/30/1998
§ 2039.5	Penal Code § 597.1	Animal Control Officer and Human Officer Training		0	12/20/2017	12/20/2017
Article 5. Criteria for Rehabilitation						
§ 2040	BPC § 488*	Substantial Relationship Criteria	2/17/1977	1	30th day thereafter	7/10/1975
§ 2041	BPC § 482*	Criteria for Rehabilitation	10/12/1983	2	30th day thereafter	7/10/1975
Article 5.5. Citations						
§ 2043	BPC § 4875.4*	Civil Penalties for Citation	8/23/2016	2	10/1/2016	1/1/1989
Article 6. Registered Veterinary Technicians						
§ 2060	BPC § 4846	Registered Veterinary Technicians		0	3/17/1977	3/17/1977
§ 2064	BPC § 4843*	Approval of Schools Accredited by the American Veterinary Medical Association		0	1/1/2015	1/1/2015
§ 2065	BPC § 4843*	Minimum Requirements for Approved Schools or Degree Programs	9/2/2014	5	1/1/2015	10/1/1976
§ 2065.5	BPC § 4843*	School or Degree Program Approval	9/2/2014	2	1/1/2015	3/15/1979
§ 2065.6	BPC § 4843*	School and Degree Program Approval Process	9/2/2014	1	1/1/2015	2/18/1999
§ 2065.7	BPC § 4843*	Inspections	9/2/2014	2	1/1/2015	2/18/1999
§ 2065.8	BPC § 4843*	Probation	9/2/2014	2	1/1/2015	2/18/1999
§ 2065.8.1	BPC § 4843*	Withdrawal of Approval	9/2/2014	1	1/1/2015	8/19/2004
§ 2065.8.2	BPC § 4843*	Procedures for Probation or Withdrawal of Approval	9/2/2014	1	1/1/2015	8/19/2004
§ 2065.8.3	BPC § 4843*	Director Notification	9/2/2014	1	1/1/2015	8/19/2004
§ 2065.9	BPC § 4843*	Reporting	9/2/2014	1	1/1/2015	2/18/1999
§ 2066	BPC § 4841.5*	Out of State Schools		0	1/1/52015	1/1/2015
§ 2066.1	BPC § 4841.5*	Unapproved In-State Schools		0	1/1/2015	1/1/2015
§ 2068.5	BPC § 4841.5	Practical Experience and Education As Equivalent Curriculum	6/12/2009	4	7/12/2009	4/1/1989
§ 2068.6	BPC § 4841.5*	Out of State Registration As Equivalent	7/10/2014	2	10/1/2014	4/1/1989
§ 2068.7	BPC § 4841.5	Limited Term RVT Examination Eligibility Window		0	2/3/2009 (Inoperative on 1/1/2010)	2/3/2009
§ 2069	BPC § 4840.5	Emergency Animal Care	3/15/1984	2	30th day thereafter	10/4/1975

Article 7. Fees						
§ 2070	BPC § 4905	Registration and Renewal Fees for Veterinarians	10/16/2018	19	12/5/2018	6/20/1977
§ 2071	BPC § 4842.5	Application, Registration and Renewal Fees for Registered Veterinary Technicians	10/16/2018	8	12/5/2018	3/17/1977
§ 2071.1	BPC § 4836.2*	Application, Permit, and Renewal Fees for Veterinary Assistant Controlled Substance Permits		0	8/1/2016	8/1/2016
Article 8. Alcohol and Drug Abuse Diversion Program for Veterinarians and Registered Veterinary Technicians						
§ 2075	BPC § 4808	Definitions		0	3/28/1984	3/28/1984
§ 2076	BPC § 4866	Criteria for Admission		0	12/5/1946	12/5/1946
§ 2077	BPC § 4866	Procedure for Review of Applicants		0	12/5/1946	12/5/1946
§ 2078	BPC § 4866	Administrative Physicians		0	11/24/1985	10/24/1985
§ 2079	BPC § 4866*	Causes for Denial of Admission		0	12/5/1946	12/5/1946
§ 2080	BPC § 4866*	Causes for Termination from the Program		0	12/5/1946	12/5/1946
§ 2081	BPC § 4866*	Notification of Termination		0	11/24/1985	11/24/1985
§ 2082	BPC § 4871	Confidentiality of Records		0	12/5/1946	12/5/1946
Article 9. Continuing Education: Veterinarian						
§ 2085	BPC § 4846.5	Definitions: Continuing Education	4/14/2011	1	5/14/2011	2/4/2002
§ 2085.1	BPC § 4846.5*	License Renewal Requirements	4/15/2011	1	4/1/2012	2/4/2002
§ 2085.2	BPC § 4846.5	Continuing Education Waivers	7/27/2005	1	8/26/2005	2/4/2002
§ 2085.3	BPC § 4846.5	Continuing Education Credit		0	2/4/2002	2/4/2002
§ 2085.4	BPC § 4846.5	Retroactive Approval of Course Providers		0	2/11/2002	2/11/2002
§ 2085.5	BPC § 4846.5	Approved Providers		0	2/4/2002	2/4/2002
§ 2085.6	BPC § 4846.5	Courses Relevant to Veterinary Medicine		0	2/4/2002	2/4/2002
§ 2085.7	BPC § 4846.5	Course Instructor Qualifications		0	2/4/2002	2/4/2002
§ 2085.8	BPC § 4846.5	Records and Course Completion		0	2/4/2002	2/4/2002
§ 2085.9	BPC § 4846.5	Licensee and Provider Course Records		0	2/4/2002	2/4/2002
§ 2085.10	BPC § 4846.5	Statutorily Recognized Providers		0	2/4/2002	2/4/2002
§ 2085.11	BPC § 4846.5	Board Recognized National Continuing Education Approval Body		0	2/4/2002	2/4/2002
§ 2085.12	BPC § 4846.5	Providers Application to Approval Entity; Processing Times		0	2/4/2002	2/4/2002
§ 2085.13	BPC § 4846.5	Withdrawal of Approval		0	2/4/2002	2/4/2002
Article 10. Continuing Education: Veterinary Technician						
§ 2086	BPC § 4838	Definitions: Continuing Education		0	5/14/2011	5/14/2011
§ 2086.1	BPC § 4838	Approved Providers and Compliance		0	5/14/2011	5/14/2011
§ 2086.2	BPC § 4838	Registration Renewal Requirements		0	5/14/2011	5/14/2011
§ 2086.3	BPC § 4838	Continuing Education Waivers		0	5/14/2011	5/14/2011
§ 2086.4	BPC § 4838	Continuing Education Credit		0	5/14/2011	5/14/2011
§ 2086.5	BPC § 4838	Courses Relevant to Veterinary Medicine and/or Veterinary Technology		0	5/14/2011	5/14/2011
§ 2086.6	BPC § 4838	Course Instructor Qualifications		0	5/14/2011	5/14/2011
§ 2086.7	BPC § 4846.5	Records of Course Completion		0	5/14/2011	5/14/2011
§ 2086.8	BPC § 4838	Licensee and Provider Course Records		0	5/14/2011	5/14/2011
§ 2086.9	BPC § 4838	Withdrawal of Approval		0	5/14/2011	5/14/2011
§ 2087	BPC § 4836.2*	Application		0	8/1/2016	8/1/2016
§ 2087.1	BPC § 4836.1	Notification of Licensee Manager		0	8/1/2016	8/1/2016
§ 2087.2	BPC § 4836.1	Change of Licensee Manager		0	8/1/2016	8/1/2016
§ 2087.3	BPC § 680*	Display of Veterinary Assistant Controlled Substances Permit (VACSP)		0	8/1/2016	8/1/2016

Key:
Yellow indicates that that Board has approved a regulatory change, but it has not yet been approved by OAL
Red indicates that Board staff has encountered problems with this regulation
Asterisks (*) indicate that additional statutory references may be made, but that the most relevant one is listed for clarity purposes.

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MEMORANDUM

DATE	July 16, 2019
TO	MDC Members
FROM	Jessica Sieferman, Executive Officer
SUBJECT	**Agenda Item 9. Future Agenda Items, Committee Priorities, and Meeting Dates**

- **Future Items/Priorities for October 8, 2019 (Sacramento):**
  - Cannabis Guidelines (Potentially)
  - Corporate Practice of Veterinary Medicine
  - Regulation Review

- **Proposed 2020 Schedule:**
  - January 28, 2020
  - April 21, 2020
  - July 21, 2020
  - October 20, 2020