



# MEMORANDUM

<b>DATE</b>	January 11, 2023
<b>TO</b>	Multidisciplinary Advisory Committee (MDC)
<b>FROM</b>	Richard Sullivan, DVM, Vice Chair
<b>SUBJECT</b>	<b>Agenda Item 8. Discussion and Potential Recommendation to Add to the Board’s Veterinarian-Client-Patient Relationship (VCPR) Frequently Asked Questions (FAQs)</b>

During the July 2021 meeting (as discussed in more detail [here](#)), the Board approved the Frequently Asked Questions Regarding Veterinarian-Client-Patient-Relationship (VCPR FAQs) to address the increased questions Board staff was receiving from the profession and consumers after April 1, 2021, when the VCPR regulatory amendments (California Code of Regulations (CCR), tit. 16, §§ 2032.15, 2032.25) became effective. During that discussion, it was noted that the VCPR FAQs would be a “living document” where additions/revisions would be added as more questions are received.

During the July 2022 meeting, the Board approved an update to the VCPR FAQs to address questions regarding the VCPR and vaccinations. The current VCPR FAQs are posted on the Board’s website [here](#).

Since then, the Board has received additional questions regarding refilling prescriptions at alternate locations. As such, Board staff requests the MDC, and subsequently the Board, consider updating the VCPR FAQs to add the following:

Question 7:

A corporation owns two veterinary premises and stores all electronic medical records on one shared electronic system. Doctor A establishes a VCPR with a client at Premises A and prescribes medication for the animal patient. A month later, the client goes to Premises B to refill the prescription from Doctor A. Can Doctor B refill the prescription without performing an examination, since Doctor B has access to the animal patient’s electronic medical records?

Answer:

Each veterinary premises must be registered separately with the Board. Although electronic medical record systems may be beneficial for a veterinarian at one veterinary premises to access animal patient medical records created at another veterinary premises, the VCPR follows the veterinarian, not the medical records.

In the absence of Doctor A, there are two exemptions from the VCPR requirement for Doctor B to prescribe, administer, or dispense medication: (1) on an emergency basis to maintain the health of the patient until the client and patient could return to Doctor A; or (2) Doctor B works at the same veterinary premises as Doctor A, and, among other things, in Doctor B's professional judgment, failure to refill the prescription might interrupt the animal patient's ongoing care and might have an adverse effect on the animal patient's well-being. (See CCR, tit. 16, § [2032.25](#), subs. (b)(2) for full list of requirements.)

In the above scenario, if neither exemption applies to the situation, Doctor B cannot refill the prescription without establishing a VCPR.

**Action Requested**

Review and discuss the proposed question and answer above. If approved, please entertain a motion to recommend to the Board the addition of new Question 7 to the Frequently Asked Questions Regarding the Veterinarian-Client-Patient Relationship (VCPR).