



MEMORANDUM

DATE	July 7, 2022
TO	Veterinary Medical Board (Board)
FROM	Richard Sullivan, DVM, Chair Multidisciplinary Advisory Committee (MDC)
SUBJECT	Agenda Item 5.C. Recommendation to Revise Veterinarian-Client-Patient-Relationship Frequently Asked Questions

Background

During the July 2021 meeting (as discussed in more detail [here](#)), the Board approved [Veterinarian-Client-Patient-Relationship \(VCPR\) Frequently Asked Questions](#) (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 FAQs would be a “living document” where additions/revisions would be added as more questions are received.

Since then, the Board has received many questions regarding the VCPR and vaccinations. As such, the MDC was tasked with updating the FAQs to address these questions.

Proposed Updates to FAQs

During the April 19, 2022 meeting, the MDC approved a motion to recommend the Board approve the following additional question and answer regarding vaccinations and update the document on its website:

6. Is a VCPR required to administer vaccinations?

General Vaccination Practice

Generally, a vaccination is a treatment administered for the prevention of disease in an animal and requires a VCPR. (CCR, tit. 16, § 2032.1, subs. (a).)

However, there are statutory and regulatory exemptions from this general requirement, as follows.

Animal with Unknown Owner

If the animal patient is a wild animal or the owner is unknown, a vaccination can be administered without first establishing a VCPR. (CCR, tit. 16, § 2032.1, subs. (a).)

Shelter Setting

As of January 1, 2022, shelter staff can administer preventative or prophylactic nonprescription vaccinations to animals deposited with or impounded by a shelter without a veterinarian first establishing a VCPR. (BPC,^[1] § 4827, subd. (a)(5)(A).) To do so, shelter staff must follow written California-licensed veterinarian protocols and receive proper training, as specified, in the administration of the nonprescription preventative or prophylactic vaccinations. (*Id.*)

Small Animal Vaccination Clinic

A veterinarian onsite at a small animal vaccination clinic and veterinary staff supervised by the veterinarian can administer vaccinations without first establishing a VCPR. (CCR, tit. 16, § 2030.3.) However, administration of a vaccination that is a dangerous drug (defined under BPC, § 4022) requires a VCPR to be established prior to administering that vaccination. (CCR, tit. 16, § 2030.3, subs. (I).)

Action Requested

If the Board agrees with the MDC recommendation to add the vaccination question and answer described above to the Board's VCPR FAQs, please entertain a motion to revise the VCPR FAQs to include the vaccination Question No. 6 and answer and post the revised VCPR FAQs on the Board's website.

¹ "BPC" refers to the Business and Professions Code.