



TEMPORARY GUIDANCE FOR VETERINARIANS AND PRODUCERS: TELEMEDICINE AND THE VETERINARIAN-CLIENT-PATIENT RELATIONSHIP (VCPR)

The American Association of Bovine Practitioners (AABP), National Milk Producers Federation (NMPF) and National Cattlemen’s Beef Association (NCBA) recognize the essential role that veterinarians, dairy producers and beef producers play in ensuring a safe, wholesome and ample food supply during the COVID-19 pandemic. We also recognize that public health and safety is the number one priority during this crisis. This guidance serves to assist bovine veterinarians in providing essential services to clients utilizing telemedicine. Telemedicine does not replace the value and role of a face-to-face veterinarian-client-patient relationship.

The Food and Drug Administration (FDA) announced on March 24, 2020, that it intends to temporarily suspend enforcement of certain requirements in order to allow veterinarians to better utilize telemedicine to address animal health needs during the COVID-19 pandemic. The FDA [Guidance for Industry #269](#) states:

“FDA recognizes the vital role veterinarians play in protecting public health. FDA is aware that during the COVID-19 outbreak some States are modifying their requirements for veterinary telemedicine, including State requirements regarding the veterinarian-client-patient relationship (VCPR). Given that the Federal VCPR definition requires animal examination and/or medically appropriate and timely visits to the premises where the animal(s) are kept, the Federal VCPR definition cannot be met solely through telemedicine. To further facilitate veterinarians’ ability to utilize telemedicine to address animal health needs during the COVID-19 outbreak, FDA intends to temporarily suspend enforcement of a portion of the Federal VCPR requirements. Specifically, FDA generally intends not to enforce the animal examination and premises visit VCPR requirements relevant to FDA regulations governing Extralabel Drug Use in Animals (21 CFR part 530) and Veterinary Feed Directive Drugs (21 CFR 558.6). Given the temporary nature of this policy, we plan to reassess it periodically and provide revision or withdrawal of this guidance as necessary.”

IMPORTANT POINTS FOR VETERINARIANS AND PRODUCERS

- Telemedicine is a tool that can be utilized in certain circumstances to incorporate social/physical distancing into animal health management and oversight.
- The Veterinarian of Record (VoR) is the responsible party for determining if a specific situation can be managed or augmented through the use of telemedicine.
- In general, the VoR can consider utilizing telemedicine for:
 - Triage of individual animal cases, when a VCPR has not been previously established and a physical exam is not possible due to human health or safety concerns during this pandemic, to determine steps that can be taken until a physical exam can be completed by a veterinarian.



TEMPORARY GUIDANCE FOR VETERINARIANS AND PRODUCERS: TELEMEDICINE AND THE VETERINARIAN-CLIENT-PATIENT RELATIONSHIP (VCPR)

Continued from page 1

- Therapeutic recommendations of individual cases or herd-based management and treatment decisions to supplement an existing VCPR.
- Incorporation of treatment, prevention and control programs on a herd basis where a VCPR is currently established.
- Veterinarians must also consider their individual state and provincial regulations regarding the practice of veterinary medicine and the VCPR.
- The AABP guideline “[Establishing and Maintaining the Veterinarian-Client-Patient Relationship in Bovine Practice](#)” (revised March 2020) can assist veterinarians and producers in ensuring appropriate oversight of prevention, control and treatment protocols occurs. This includes maintaining medical records, ensuring appropriate training of on-farm personnel, review of disease prevention, control and treatment records and other available data, follow-up evaluations and establishing appropriate meat and milk withdrawal periods for all medications.
- At this time, telemedicine is not appropriate for the issuance of Certificates of Veterinary Inspection (CVIs) or other regulatory work that must be performed by a licensed accredited veterinarian.
- **NOTE: NATIONAL DAIRY FARM ANIMAL CARE PROGRAM** Telemedicine as outlined here and in accordance with the FDA Guidance for Industry #269 is compliant with the [National Dairy FARM Animal Care Program](#) requirements for a veterinarian-client-patient-relationship. Documentation via electronic signatures and scanned documents with signatures can be used to successfully demonstrate meeting the FARM standards requiring signatures.
- If an individual case cannot be managed with telemedicine and a veterinarian is not available to directly examine and/or treat the individual patient, the veterinarian is in the best position to make recommendations regarding the need for:
 - Shipment to a slaughter facility in cases where the veterinarian can determine the animal is fit for transport, is not displaying any signs of systemic illness that would preclude the animal from entering the food supply and is not currently treated with a medication that is within the specified withdrawal period.
 - Immediate humane euthanasia using an approved method specified by AABP ([Humane Euthanasia of Cattle Guidelines](#)) or the American Veterinary Medical Association.
- Telemedicine services provided by a veterinarian are professional services similar to other veterinary services and producers should expect to be charged a professional fee for telemedicine services.

MARCH 28, 2020