



CHICAGO VETERINARY MEDICAL ASSOCIATION

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September 14, 2012

Federal Trade Commission – Office of the Secretary
600 Pennsylvania Ave, NW, Room H-113 (Annex X)
Washington, DC 20580

RE: Pet Medications Workshop, Project No. P12-1201

Dear Sir/Madam,

The Chicago Veterinary Medical Association is one of the largest regional veterinary medical associations in the nation with over **1000** veterinarians who assist more than one million Chicago area pets and their families. Since 1896, the membership of the Chicago VMA has been dedicated to advancing the health and well-being of animals. Our commitment is also to provide exemplary public awareness. Providing pet medications is an integral part of the practice of veterinary medicine, and as such requires the expertise and judgment of veterinary professionals. It is with this premise that we provide the following comments regarding this issue.

Regarding HR 1406, the Fairness to Pet Owners Act of 2011, which would federally mandate that veterinarians provide prescriptions to clients regardless of whether or not they request a medication prescription, the Chicago Veterinary Medical Association stands in strong opposition to the mandatory prescription clause as proposed.

The Chicago VMA's position is similar to the American Veterinary Medical Association's:

- The AVMA believes HR 1406 is redundant and will cause undue regulatory and administrative burdens on veterinary practices. It is burdensome and unnecessary to require a written prescription as well as a written notification that the prescription may be filled elsewhere, regardless of whether the client is having the prescription filled by the veterinarian;
- The provision requiring verification of prescriptions, regardless of whether the pharmacy is accredited or licensed, places the veterinarian in both a legal and ethical dilemma. At the same time, it puts consumers at risk;
- HR 1406 encroaches on state jurisdiction; state pharmacy and veterinary practice laws already govern compliance by veterinarians;
- Clients already have the flexibility to fill a prescription at their veterinary clinic or at a pharmacy of their choice. The AVMA is supportive of a client's right to choose where to have a prescription filled; and
- The AVMA believes that veterinarians are uniquely educated to provide the best professional guidance and education to pet owners when dispensing prescription products.

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The Chicago VMA acknowledges that veterinarians are uniquely trained in veterinary medical pharmacology, thus the veterinary-client-patient relationship provides the best model for optimal animal care. While the Chicago VMA is supportive of the pet owner's right to choose where to have a prescription filled, per the Principles of Veterinary Medical Ethics, we oppose HR 1406 and federally mandated veterinary prescription writing.

Respectfully submitted,

Alexis Newman DVM
Executive Board President – 2012
Chicago Veterinary Medical Association