February 26, 2014

The Honorable Joe Pitts
420 Cannon House Office Building
United States House of Representatives
Washington, DC 20515

The Honorable Frank Pallone
237 Cannon House Office Building
United States House of Representatives
Washington, DC 20515

Dear Chairman Pitts and Ranking Member Pallone,

On behalf of the American Veterinary Medical Association’s more than 85,000 members, we would like to thank you for scheduling H.R. 1528, the Veterinary Medicine Mobility Act (VMMA) of 2013, for a markup by the Health Subcommittee. We urge the subcommittee to act swiftly and favorably report VMMA so that it may be considered by the full committee.

This legislation, which will amend the Controlled Substances Act (CSA) by allowing veterinarians to transport, administer and dispense controlled substances outside of their registered locations, is of the utmost importance to our members.

The practice of veterinary medicine is unique in that veterinarians treat multiple species of animals in a wide variety of settings. To adequately practice medicine, veterinarians are often required to provide mobile or ambulatory services in the field. This is particularly important in rural areas and for the care of large animals because it is often not feasible, practical or possible for owners to bring their livestock (i.e., cows, pigs, horses, sheep, and goats) to a brick-and-mortar clinic or hospital. Also, many companion animal veterinarians provide “house call” services for their patients or may operate mobile spay and neuter veterinary clinics. In addition, some veterinarians throughout the course of their daily duties may use controlled substances to remove or translocate dangerous wildlife (e.g. bears, cougars), rescue trapped wildlife (e.g. deer trapped in a fence), or conduct research and disease control efforts.

The Drug Enforcement Administration’s (DEA) interpretation of provisions within the CSA and resulting federal regulations make it illegal for veterinary registrants to transport controlled substances for use outside of their registered locations. The DEA has informed organized veterinary medical associations and individual veterinarians that transporting controlled substances is illegal per the CSA and thus the agency requires that a statutory change be made that will allow veterinarians to legally provide complete veterinary care in certain situations, such as the ones described above.
By passing the Veterinary Medicine Mobility Act, Congress will ensure that veterinarians are able to provide proper care for their animal patients. The ability to be mobile is imperative for veterinarians to meet the health and welfare needs of the animals that they treat as well as to safeguard public safety and the nation’s food supply.

Again, we thank the subcommittee for taking up this important piece of legislation that will address this crucial situation for veterinary practitioners across the country. If you have questions or if we can be of further assistance, please do not hesitate to contact Dr. Ashley Morgan (202-289-3210, amorgan@avma.org).

Best regards,

W. Ron DeHaven DVM, MBA
CEO and Executive Vice President