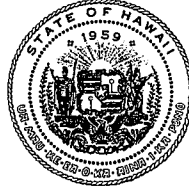


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BOARD OF VETERINARY EXAMINERS

STATE OF HAWAII PROFESSIONAL AND VOCATIONAL LICENSING DIVISION DEPARTMENT OF COMMERCE AND CONSUMER AFFAIRS

P.O. Box 3469
HONOLULU, HAWAII 96801
www.cca.hawaii.gov/pvl

August 28, 2015

Bernadette M. Dunham, D.V.M., Ph.D.
Director, Center for Veterinary Medicine
Food and Drug Administration
7519 Standish Place, HFV-12
Rockville, MD 20855

Dear Dr. Dunham:

RE: FDS Veterinary Feed Directive

The Board of Veterinary Examiners ("Board") reviewed your letter dated June 11, 2015, at its July 15, 2015 meeting. Thank you for your patience in awaiting the Board's response and for your understanding that this meeting was the Board's first meeting subsequent to the receipt of your letter.

You asked the Board to verify "whether the statutes, rules, or regulations governing the practice of veterinary medicine in your jurisdiction (1) require a veterinary-client patient relationship (VCPR) for a veterinarian to write a lawful veterinary feed directive (VFD), and if so (2) whether the State defined VCPR contains the key elements" stated in the letter. The Board informally opined that Hawaii Revised Statutes (HRS) Chapter 471 and Hawaii Administrative Rules (HAR) Chapter 101 do not specifically address and define VCPR.

In accordance with Hawaii Administrative Rules section 16-201-90, the above interpretation is for informational and explanatory purposes only. It is not an official opinion or decision, and thus, is not to be viewed as binding on the Board.

For Hawaii laws and rules related to veterinarians, please logon to:
http://cca.hawaii.gov/pvl/boards/veterinary/statute_rules/

Should you have any questions, please contact me at the above address or at (808) 586-2697, between the hours of 7:45 a.m. – 4:30 p.m., Hawaiian Standard Time.

Sincerely,

Lynn Bhanot
Executive Officer

LB:ln