

(1) In order for a **VFD** to be lawful, the veterinarian issuing the VFD must:

- (i) Be licensed to practice veterinary medicine; and
- (ii) Be operating in the course of the veterinarian's professional practice and in compliance with all applicable veterinary licensing and practice requirements, including issuing the VFD in the context of a veterinarian-client patient relationship (VCPR) as defined by the State. **If applicable VCPR requirements as defined by such State do not include the key elements of a valid VCPR as defined in § 530.3(i) of this chapter, the veterinarian must issue the VFD in the context of a valid VCPR as defined in § 530.3(i) of this chapter.** a veterinarian must meet the following requirements

Establishing a VCPR. Determine if the state or Federal definition applies.

<http://www.fda.gov/AnimalVeterinary/DevelopmentApprovalProcess/ucm460406.htm>

For example Michigan follows the federal law:

(i) *A valid veterinarian-client-patient relationship* is one in which:

(1) A veterinarian has assumed the responsibility for making medical judgments regarding the health of (an) animal(s) and the need for medical treatment, and the client (the owner of the animal or animals or other caretaker) has agreed to follow the instructions of the veterinarian;

(2) There is sufficient knowledge of the animal(s) by the veterinarian to initiate at least a general or preliminary diagnosis of the medical condition of the animal(s); and

(3) The practicing veterinarian is readily available for followup in case of adverse reactions or failure of the regimen of therapy. Such a relationship can exist only when the veterinarian has recently seen and is personally acquainted with the keeping and care of the animal(s) by virtue of examination of the animal(s), and/or by medically appropriate and timely visits to the premises where the animal(s) are kept.

The Federal definition is as follows:

The veterinarian has assumed responsibility for making medical judgements regarding health of animal(s) and need for medical treatment.

Whereas Iowa follows the state definition.