

**From:** [Sunset Advisory Commission](#)  
**To:** [Trisha Linebarger](#)  
**Subject:** FW: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Thursday, November 10, 2016 7:48:53 AM

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-----Original Message-----

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Wednesday, November 09, 2016 6:32 PM  
To: Sunset Advisory Commission  
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: STATE BOARD VETERINARY MEDICAL EXAMINERS

First Name: James

Last Name: Wright

Title: Veterinarian

Organization you are affiliated with: Retired

Email:

City: Tyler

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed:

Thank you for the opportunity to comment on the Sunset Review of the Texas Board of Veterinary Medical Examiners (TBVME). To put my comments in perspective, I will tell you that I am a retired veterinarian; however, except for a short time in private practice, most of my career was in veterinary public health. During my public health career, especially the last 19 years, which were with the Texas Department of State Health Services, I worked very closely with many veterinary practitioners and many animal shelters. I still proudly have an active Texas license.

Let me reiterate the comments of the Texas Veterinary Medical Association (TVMA) about the contributions of veterinarians, both public health and private practitioners, to the health of our nation. About 60% of the infectious diseases that cause disease in humans are zoonotic; in other words, they can be transmitted between animals and humans. By diagnosing and treating these diseases in animals, and by educating the animals' owners about the diseases, veterinarians protect the health of the animals and their owners. Indeed, veterinarians also help protect our food supply and our agricultural economy by helping to detect, treat, and prevent, diseases that could seriously impact our livestock or our trade with other countries.

Issue 1 – I certainly concur that veterinarians should have a regulating body to assure that they meet accepted standards of practice. It is very important for the members of this regulatory body to realize and recognize that these standards of care may vary in different types of practices and settings, for example: small animal vs large animal vs specialty practice vs shelter medicine. Therefore, it is important that there be a strong presence of veterinarians in the regulatory body. (Note: TVMA gave a good discussion of the “standards of care” issue in its comments on Item 5 of the report.)

Issue 2 – Though the recommendation to have a schedule of sanctions and disciplinary actions sounds good, I

would hope that the agency schedule would not be so prescriptive that it would not allow an inspector to educate a veterinarian and allow “on the spot correction” of a minor deviation from the standard.

Issue 3 – Though I do not personally prescribe, dispense, or handle controlled substances, I have enough experience in dealing with my practitioner colleagues that I can confidently assure you they recognize and appreciate the fact that drug abuse is common, and it is a drain on our community and our society. Practitioners do not want to contribute in any way to this problem. Quite honestly, they also have a financial incentive to closely track their drug inventories, because any theft or diversion of their controlled drug inventory is a financial loss to them.

Unfortunately, some tiny percent of practitioners may be careless with their drug inventory or may actually sell controlled drugs for their use by abusers. Rest assured that their practitioner colleagues do not respect them, nor do they condone their actions. They would be happy to see these renegades apprehended and disciplined.

In spite of the above facts, I do not believe that requiring veterinary practitioners to use the Texas Prescription Monitoring Program (PMP) would be a good idea. First, the practitioners do not use or prescribe many of the controlled substances that are most commonly abused. Second, they are already required to maintain an up-to-date log of their controlled substance inventories and uses. That log and their inventories are subject to inspection at any time. Third, since the PMP is not designed to be used with animals, it is fraught with difficulties: determining an animal’s age, an owned animal may be brought to the clinic by various members of the animal’s family, or even friends.

In summary, I would hate to see practitioners be required to use the PMP.

Issue 4 – Requiring fingerprinting and background checks for license applicants and for renewals seems a little excessive, and a big inconvenience for the veterinarians. Also, I am not sure of the benefit it would provide to the citizens of the state. Therefore, I do not favor this requirement.

Issue 5 -- I definitely believe that all people practicing veterinary medicine in our state should be licensed by the TBVME. There might be a place for a few very specific exceptions; however, anyone doing routine practice, whether in a small animal practice, in a shelter, or on a farm or ranch, should be licensed.

I do believe it is a good idea to establish a rule defining “designated caretaker” so that that term cannot be used to shield a veterinarian from the requirement to be licensed, or to practice to the recognized standard of care.

Please forgive the length of these comments. This profession is dear to me, so I wanted to share my thoughts with you.

Thank you.....James Wright, DVM, MPVM

Any Alternative or New Recommendations on This Agency: None

My Comment Will Be Made Public: I agree