



STATEMENT OF CONSIDERATION

Relating to 201 KAR 016:590

BOARDS AND COMMISSIONS

Kentucky Board of Veterinary Examiners

(Not Amended After Comments)

I. The public hearing on 201 KAR 016:590, scheduled for November 22, 2024, at 1:00 p.m. at the offices of the Kentucky Board of Veterinary Examiners (KBVE) was canceled; however, written comments were received during the public comment period, which closed November 30, 2024.

II. The following people submitted written comments:

<u>Name and Title</u>	<u>Agency/Organization/Entity/Other</u>
Angalyn Theno, DVM	Bluegrass Animal Care Center – Radcliff
Michael Williams, DVM	Bluegrass Animal Care Center – Brandenburg

III. The following people from the promulgating administrative body responded to the written comments:

<u>Name and Title</u>
John C. Park, DVM, KBVE Chair
Michelle M. Shane, KBVE Executive Director

IV. Summary of Comments and Responses

(1) Subject Matter: CE hours requirements - Number hours required in-person/live online vs. number hours pre-recorded/online

(a) Comment: Dr. Theno and Dr. Williams – Due to rural location of practice, it would be better to require only 10/30 hours of in-person/live online rather than 15/30 hours for DVMS, and only 1-2/6 hours of in-person/live online rather than 3/6 for LVTs.

(b) Response: The current regulation allows all CE hours for veterinarians and licensed veterinary technicians (LVTs) to be earned online. KBVE proposed the changes to CE hours in 201 KAR 16:590 because the Board determined there was value to in-person continuing education that was lost in the online format. After multiple discussions, including with the Kentucky Veterinary Medical Association (KVMA), KBVE determined that rural practices could be accommodated by allowing that the CE hours required as in-person to be earned online if the format was live format. This concession allows rural practices to still earn all the CE online, but requires a live, interactive component to ensure license holders are engaged and involved in the learning. As a result of this comment, no changes are proposed to this administrative regulation.

(2) Subject Matter: Definitions for “pharmacy” and “antimicrobials”

(a) Comment: Dr. Theno and Dr. Williams – Ask for clarification on the difference between “pharmacy” and “antimicrobials”, or if antimicrobials are included under pharmacy.

(b) Response: The proposed regulation change requires that 2/30 CE hours for veterinarians and 1/6 CE hours for LVTs shall be in one or more of the following topical areas: 1. Pharmacy or controlled substances, 2. Antimicrobials, or 3. State or federal laws and regulations related to the practice of veterinary medicine (or, for LVTs, also the practice of veterinary technology). There is no need to distinguish between “pharmacy” and “antimicrobials” because they are not separate requirements. However, it should be noted that in general “pharmacy” is generally defined as “the science or practice of the preparation and dispensing of medicinal drugs”. Further, the notation specifically about antimicrobials is related to the federal mandate from the Food and Drug Administration (FDA) Guidance for Industry (GFI) # 263: Recommendations for Sponsors of Medically Important Antimicrobial Drugs Approved for Use in Animals to Voluntarily Bring Under Veterinary Oversight All Products That Continue to be Available Over-the-Counter. As a result of this comment, no changes are proposed to this administrative regulation.

Summary of Statement of Consideration and  
Action Taken by Promulgating Administrative Body

The public hearing on this administrative regulation was canceled; however, one written comment was received. The Kentucky Board of Veterinary Examiners responded to the comment as noted above and will not be amending the administrative regulation.