



# *Impact of FDA Veterinary Feed Directive Policies on Practicing Veterinarians: Results of a Qualitative Survey*

Center for Public and Corporate Veterinary Medicine



*Challenges to Changing Antibiotic Use in Food Animal Production*  
Washington, D.C., Sept. 7, 2018



# *Purpose*



To survey food animal veterinarians about their experience with, including any barriers to, complying with the FDA's VFD Final Rule considering the pharmaceutical industry's compliance with GFI #213.

To use qualitative data in the development of a quantitative survey questionnaire

# Methods

- **Participant Eligibility**
  - Veterinarians in full-time practice (min 40 hours per week) who spend > 50% of their time working with the major food producing species (cattle, swine, poultry) in PA, MD, VA, NC, and SC
- **Recruitment**
  - List of private practices (primarily cattle)
  - Swine and Poultry Industry contacts
  - Veterinary Association list serves
- **Phone Interviews**
  - 15-30 minutes
  - Recorded and transcribed
  - Comments tagged based on common identified themes (Applied Thematic Analysis)
  - Data collated (in progress)

# Methods

## ■ Open-ended Questions

**Question 1:** From your perspective, what is the purpose of the FDA's Veterinary Feed Directive Final Rule and Guidance for Industry #213?

**Question 2:** What, if any, are the major barriers that you have encountered in issuing VFDs?

**Question 3:** In what ways, if any, have you changed the way you practice medicine in order to adhere to the VFD?

**Question 4:** How has the VFD Final Rule and implementation of GFI #213 impacted your practice as a veterinarian in other ways not already discussed? We are interested in hearing about positive, negative and neutral impacts.

**Question 5:** Have you found any resources particularly useful as you have learned to navigate VFD's?

**Question 6:** Are there any resources that would have been more helpful to have?

**Question 7:** How have FDA's VFD Final Rule and implementation of GFI #213 impacted your clients?

## *Results (to date)*

- Participants
  - Species represented:
    - Poultry - 6
    - Cattle - 6
    - Swine - 3
  - States represented
    - PA - 4
    - MD - 2
    - VA - 4
    - NC - 5
    - SC - 0
  - Average hours of work per week = 50 hours (range 40 to 60)
  - Average years in practice = 15 years (range 2 to 42)

# Results (to date)

## Five Major Themes Identified

FDA-Veterinarian Relationship	Resources	Impact on Business	Practice of Medicine	Client Relationships
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# Results (to date)

- Five Major Themes Identified with Additional Sub-themes

FDA-Veterinarian Relationship	Resources	Impact on Business	Practice of Medicine	Client Relationships
Purpose	Dosing	Logistics	Disease Conditions	VPCR
Government	Forms	Staff Edu	Ab Use/Choice	Client Edu
	Improve	Economics		Compliance
				Vet View
				Better Farm

# Results (to date)

- Example of Definitions Used

Impact on Business	Definition
Logistics	Participant opinions and comments about the logistics of getting the forms where they need to go in the right amount of time as well as opinions/comments about difficulty/ease of getting to the farm for re-checks and to renew prescriptions.
Staff Edu	Participant comments about things they have done/time put in to train staff (office, other veterinarians), and self in VFD regulations. Can include resources used to do this that are useful.
Economics	Participant comments about charging for the VFD, VFD visits, renewal visits. Increased client load (or decreased client load).



# Results

- FDA-Veterinarian Relationship
  - Purpose

“...to assure the public that FDA is doing something to ensure veterinary oversight of antibiotic use.”

“Decrease antibiotic use in food animals.”

“Veterinary oversight.”

“Help prevent antibiotic resistance by decreasing the low-level, chronic usage [of antibiotics].”

**“It is to ensure the judicious use of medically important antibiotics.”**

# Results

- FDA-Veterinarian Relationship
  - Government

“the FDA completely did not understand the nature of Integrated Agriculture.... It would have helped matters a lot if FDA would have listened to those of us who were trying to explain the nature of integrated agriculture to them, **rather than insisting on crafting regulations almost solely to fit the parameters of fee for service veterinary medicine.**” (100% poultry, industry)

“And sometimes, you know policy and government regulation don't necessarily think about the practical aspect of certain policies that are put together **or they maybe don't take into account having industry involved with a policy.**” (100% poultry, industry)

# Results

- Impact on Business
  - Economics

“I would say the price thing is still a challenge. I just charge by the hour or by the half hour depending on how long it takes me. I mentioned that **it's just hard to know when to charge or when not to...** Our practice hasn't necessarily gotten a ton more money from this because it's not a money maker; **if anything we've lost money because I have to spend a lot of extra time and the staff has to spend a lot of extra time.**”

(60% bovine, private practice)

“Since a lot of the medications have gone from over-the-counter prescription and also the Hygromycin B has gone from over-the-counter to VFD, a lot of my clients do not have access to medications anymore. So I am essentially their only gateway to get it for backyard flocks unless they want to use an injectable. **So it's been great for me.**” (60% poultry, private practice)

# Results

- Impact on Business
  - Economics

“So I was originally licensed in North Carolina and Iowa. Since implementation and to comply with specific demands for VFD and to meet the demands of a VPCR, I've acquired, in addition to North Carolina and Iowa, I've acquired South Carolina; South Dakota; and Minnesota. So that is a burden. But, it's now a necessity. **It's a professional responsibility and it's an additional expense.**” (100% poultry, industry)

# Results

- Practice of Medicine
  - Conditions

“...especially in rural Virginia **there's a lot of people who don't have good facilities to work cattle**. So like, for instance, if you had a cow with a **sore foot** [the client] might ask you for a prescription for some tetracycline crumble so that they could feed her where she is until they could get her to a better facility. And now they can't do that anymore so they're forced to have a better facility.” (60% bovine, private practice)

“But for me it is really frustrating because I may have to go treat the very worst [cases of pinkeye], **but if there's an outbreak, it's running them, you know 50 to 100 animals... It's really frustrating for myself and the producer because I can't write a VFD for those things – for pinkeye or foot rot**. It's only for pneumonia, and that's frustrating for me because **it's really dangerous to work on a blind animal**. I mean cattle can be really dangerous. I think it's debilitating and it's a painful condition and I know in our area sometimes **the preventive things are hard to use** due to the weather, some of it's weather related. You know decreasing weeds in your field and that sort of thing, but if it's too wet you can't do anything about that.” (50% bovine, private practice).

# Results

- Practice of Medicine
  - Antibiotic Use/Choice

“Actually, I’ve **potentially increased the use of injectable antibiotics**, for better or for worse.”  
(50-60% bovine, private practice)

“We stopped using Virginiamycin in the feed, it's a medically important drug. **But we still use Bacitracin in the feed.** But if we want to use Virginiamycin in the feed we just use a VFD, it’s no big deal.”  
(100% poultry, industry)

“**Yes I think we use less medication.** I mean the producers feed less medication through the feed than they used to before the rule... I think we've also paid more attention to **trying to generate laboratory diagnostics to justify our medication decisions.**” (100% swine, private practice)

# Results

- Client Relationships
  - VPCR

“I think, you know **it's a good thing that we started making people sign a [VPCR form]**. Before we never made them actually sign it on paper and go through what products they're actually using. So I think that's good. (60% bovine, private practice)

“We are more careful to ensure that we maintain enough animal contact and site visits **to be able to defend our veterinarian client patient relationship**. So that's the primary change that we've made.”  
(100% swine, private practice)

# Results

- Client Relationships
  - Compliance

I've had several people who have **tried to stockpile the meds** and they'll use it for a certain amount of time and then... which is why I go to the farm. Right. You don't just write a VFD and just have them pick it up from the office. There's a couple of [veterinarians] who are doing that, and I'm like, you do realize they're not giving that to their cows. And if you're okay with that, okay, but they're not giving it to them.”  
(40% bovine, private practice).

[Backyard flock producers] **are going online and getting drugs illegally on the Internet**. The other thing too is they are using medications that we do not use in the United States for poultry. So they're using Denagard or coumarin to treat mycoplasma on their flocks. Yeah. Yep. If they can find it online they'll go get it off Amazon. And they'll buy it from a seller on Amazon. So they are trying to buy medications online, where they are not being required to show a prescription. (60% poultry, private practice)



# Results

- Client Relationships
  - Compliance

“Probably the only time where I think maybe we run into issues sometimes , if they're supposed to be administering the feed medication say it's a 14 day duration. You know it's obviously always an estimate about how much feed that needs to get mixed up with this medication **and sometimes there's leftover feed medication in the feed bin right, and who wants to throw that out, which I understand.** But you know if your over the 14 days then you're not compliant. But I would say probably a lot of people are still going to end up feeding that medication . You know it doesn't happen too often but it certainly happens.”

(100% swine, private practice)

# Results

- Client Relationships
  - Better Farm

“So they've had to figure out how to tighten up their vaccination schedule a little bit and how to assess early signs of disease and that kind of thing. **So I think it's made them better farmers really.**”  
(60% bovine, private practice)

“Most of the time it's been a good discussion and some of [my clients] have been really good and given feedback like, your advice changed how I used this and it's worked better. **So I think some of them have actually been really pleased.**” (50% bovine, private practice)

“So you have people that are like, well this is a three dollar chicken that I got and I don't care about it and I'll just let it die. **They just don't want to pay for veterinary care.**” (60% poultry, private practice)

# Next Steps

- Finish interviews (7 pending)
- Collate and summarize data
- Disseminate findings
- Can recommendations be made?
- Develop a quantitative survey

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