VFD Field Pilot

USAHA Pharmaceutical Committee 2016

The 2016 VFD inspection assignment.
Providing education to producers, veterinarians, feed mills, and retailers.

The inspection tool guides our investigators through the necessary parts of the VFD order.
These necessary parts of the VFD order come directly from the VFD regulations.

These necessary parts are also in the VFD brochures we have developed for producers, veterinarians, and distributors.
The first stop in an inspection for an investigator is the distributor.

The investigator will examine 3 randomly selected VFD orders for the necessary parts.
The inspector will pick one VFD order to follow back to the veterinarian and forward to the producer.

The following elements are included in the inspection tool.
a. Veterinarian’s name, address, and telephone number
b. Client’s name, business or home address, and telephone number
c. Premises where the animals specified in the VFD order are located
d. Date the VFD order was issued
e. Expiration date of the VFD order
f. Is the name of the VFD drug or drugs identified on the form?
g. Species and production class of animals to be fed the VFD feed
h. Approximate number of animals to be fed the VFD feed by the expiration date of the VFD order
i. Reason the VFD order was issued (the indication)

j. Level of VFD drug in the feed and duration of use
k. Withdrawal time, special instructions, and cautionary statements necessary to use the drug according to its approved labeling.
I. The number of reorders (refills) authorized, if permitted by the drug’s approval, conditional approval, or index listing
m. This required statement: “Use of feed containing this veterinary feed directive (VFD) drug in a manner other than as directed on the labeling (extralabel use), is not permitted”

n. Affirmation of intent for combination VFD drugs (see instructions)

o. Veterinarian’s electronic or written signature

Questions specific to distributors who manufacture VFD feed

1. Does the feed label contain the VFD Caution statement?
2. Do the drug inventory or production records show the correct amount of drug added?
3. Do the labels and formulas match the VFD orders?
Questions specific to veterinarians

1. Does the veterinarian have a valid license in those states where VFD feed is being fed?
   a. If No, can the veterinarian provide any evidence that he or she is complying with applicable state veterinary licensing and practice requirements in the states in which the veterinarian does not have a license?

2. Does the veterinarian know that either the state or federal requirements for veterinary client patient relationship (VCPR) apply in each state?
   a. Can the veterinarian show any medical record(s) for the client’s animals named on the VFD?

3. Does the veterinarian keep copies of VFD orders for at least 2 years?
Questions specific to Producers (clients)

1. Does the client keep copies of VFD orders for at least 2 years?

2. Did the client feed the VFD feed to the authorized number of animals on the VFD order?

3. Did the client feed the VFD feed for the identified duration on the VFD order?

4. Did the client stop feeding the VFD feed prior to the expiration date on the VFD order?

5. Did the client follow the withdrawal period for the VFD feed, if any?

6. Did the client follow any special instructions or caution statements on the VFD order, if any?
Questions specific to Producers (clients)

7. If a combination VFD feed was fed, was its use consistent with the affirmation statement on the VFD order?

8. Does the client have labels for VFD feeds? If Yes, 
   a. Does the feed label contain the VFD Caution statement? 
   b. Did the drug level on the label match the drug level on the VFD form? 
   c. Is the drug level and indication on the VFD form consistent with the approval?

The investigators have been asked to use phased enforcement with an emphasis on education about the VFD rule requirements.
Thank You