Veterinary Feed Directive

Frequently Asked Questions for Veterinarians

In 1999, the Animal Drug Availability Act of 1996 implemented a new category of drugs called veterinary feed directive (VFD). The VFD category is a part of the Food and Drug Administration's (FDA) overall directive to ensure the judicious use of human medically important antibiotics. Recently, the VFD category was expanded to include medically important antibiotics fed to animals and is defined in the FDA Guidance Document #213. The revised VFD policy puts into place important control factors dictating the appropriate use of feed-grade antibiotics.

What is my role in the VFD process?

As a veterinarian, it is your responsibility to verify a valid veterinarian-client-patient-relationship with the client receiving the VFD order exists. You also should ensure the order is written correctly and the appropriate information is included. Details on the mandatory and optional information for a lawful VFD order can be found at www.michigan.gov/vfd. Lastly, veterinarians are primarily responsible for distributing copies of the VFD order to the correct parties and maintaining records for a minimum of two years.

What is a VFD order?

According to the FDA, a VFD order is "a written (nonverbal) statement issued by a licensed veterinarian in the course of the veterinarian's professional practice authorizing the use of a VFD drug or combination VFD drug in or on an animal feed. This written statement authorizes the client (the owner of the animal or animals or other caretaker) to obtain and use animal feed bearing or containing a VFD drug or combination VFD drug to treat the client's animals only in accordance with the conditions for use approved, conditionally approved, or indexed by the FDA."

What do I need to have in place to issue a VFD order?

The veterinarian must have a valid VCPR with the client receiving the VFD order, be licensed in the same state as the receiving client and be in compliance with all state and federal regulations.

What is a considered a valid VCPR?

Michigan currently follows the federal definition for a VCPR which states a VCPR is considered valid if the following is observed (Code of Federal Regulations 530.3):

"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;

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

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."

When will this take effect?
The expansion of the order went into effect on October 1, 2015; however, only a small number of antibiotics (tilmicosin, florfenicol, and avilamycin) were affected. Full implementation of FDA Guidance #213, including phasing numerous over-the-counter feed-grade antibiotics to VFD status, will take place on January 1, 2017.

Are all antibiotics now considered VFD drugs?
Not all antibiotics will be considered VFD drugs. The use of injectable antibiotics will not be affected by the revised Act. At this time, FDA has only moved antibiotics essential to human medicine and being fed to animals to VFD status.

According to FDA Guidance Document #213, water soluble antibiotics, which are important to human medicine, now require a prescription from a veterinarian.

Who gets a copy of the VFD order?
The veterinarian retains the original VFD order and gives a copy to both the distributor filling the order and the producer. Both original and copies must be retained for two years.

When can I authorize a reorder (refill)?
A VFD order refill/reorder is based on the drug manufacturer's label. Please follow the manufacturer's label, if the label is silent on refills they are not allowed. As a reminder, the maximum amount of time a VFD order can be written for is six months.

What is a combination VFD drug?
According to the FDA a combination VFD drug is when two or more antimicrobials are used in or on animal feed and at least one of the antimicrobials is an approved VFD drug. An example would be oxytetracycline and monensin.

What is the expiration date on the VFD order?
The expiration date on the VFD order is the last day the VFD feed can be fed and the duration of the order is not to exceed six months.

What is the expiration date on the VFD order?
According to the FDA, while the VFD order "expiration date defines the period of time for which the authorization to feed an animal feed containing a VFD drug is lawful, the duration of use determines the length of time, established as part of the approval, conditional approval, or index listing process, that the animal feed containing the VFD drug is allowed to be fed to the animals."

Where can I get more information?
A website resource has been created by MDARD to help veterinarians and other stakeholders receive the most up-to-date information, www.michigan.gov/vfd. In addition, faculty with Large Animal Clinical Sciences at Michigan State University's College of Veterinary Medicine, 517-355-9593 is available for consultation:

- Drs. Dan Grooms and Ron Erskine, Cattle
- Dr. Madonna Benjamin, Swine
- Dr. Judy Martenuik, Small Ruminants