



DEPARTMENT OF HEALTH

Wes Moore, Governor · Aruna Miller, Lt. Governor · Laura Herrera Scott, M.D., M.P.H., Acting Secretary

February 15, 2023

The Honorable Kumar P. Barve
Chair, House Environment and Transportation Committee
Room 251, House Office Building
Annapolis, MD 21401-1991

RE: HB 325 - Provision of Veterinary Services - Routine Medical Care and Rabies Vaccines - Letter of Support with Amendments

Dear Chair Barve and Committee Members:

The Maryland Department of Health (MDH) respectfully submits this Letter of Support with Amendments for House Bill (HB) 325 - Provision of Veterinary Services - Routine Medical Care and Rabies Vaccines. HB 325 will require the State Board of Veterinary Medical Examiners to authorize a certain veterinary practitioner licensed to practice veterinary medicine in another state or jurisdiction to provide routine medical care in Maryland under certain circumstances. Additionally, HB 325 will require the Secretary of Health to allow individuals who work in or for a certain veterinary hospital or animal control facility to administer rabies vaccines under certain circumstances.

Procedural guidelines for the administration of rabies vaccine in Maryland follow national standards published in the Compendium of Animal Rabies Prevention and Control by the National Association of State Public Health Veterinarians (the Compendium).¹ The recommendations in the Compendium serve as a basis for animal rabies prevention and control programs throughout the United States and facilitate standardization of procedures among jurisdictions, thereby contributing to an effective national rabies control program.

The Compendium states that in most circumstances, the rabies vaccine should be administered by or under the direct supervision of a licensed veterinarian on premises. The Compendium makes an allowance for administering rabies vaccine to animals in a shelter setting, understanding the importance of vaccinating these animals, while acknowledging shelters may not have a licensed veterinarian on site. To ensure vaccination, the Compendium states the rabies vaccine may be administered under the supervision of a licensed veterinarian to animals held in animal shelters, be it through direct or indirect supervision (i.e., a licensed veterinarian is responsible for ensuring proper administration of the vaccine while not being on-site).

The level of supervision is dependent on the setting in which the rabies vaccine is administered. Indirect supervision is not the preferred method of administration given the importance of

¹ Public Veterinary Medicine: Public Health - NASPHV. (n.d.). Retrieved January 31, 2023, from <http://www.nasphv.org/Documents/NASPHVRabiesCompendium.pdf>

appropriate handling and administration of a vaccine. However, the Compendium has agreed that the potential benefit of vaccinating shelter animals prior to release outweighs the potential risk of having it administered by trained, but non-veterinarian, personnel. Veterinary clinics by their very nature should have a veterinarian on site and are recommended, based on the Compendium, to administer the rabies vaccination by their veterinarian or via direct supervision by the licensed veterinarian on site.

MDH supports HB 325, as it expands the number of individuals who can administer the rabies vaccine to domestic animals. This supports MDH's goal of preventing possible transmission of rabies, a potentially fatal disease, to the human population. MDH respectfully suggests clarifying the level of veterinary supervision, either direct or indirect, required for non-veterinarian personnel to administer a rabies vaccine in specific veterinary settings (e.g. shelter/animal control setting versus private veterinary practice). Further, MDH supports the amendments from the Maryland Department of Agriculture that help address licensing changes. These amendments incorporate critical feedback from Maryland's veterinary community and sharpen the bill's focus on the administration of the rabies vaccine.

If you would like to discuss this further, please do not hesitate to contact Megan Peters, Acting Director of Governmental Affairs at megan.peters@maryland.gov or (410) 260-3190.

Sincerely,



Laura Herrera Scott, M.D., M.P.H.
Acting Secretary

MDH Proposed Amendments

HB 325 - Provision of Veterinary Services – Routine Medical Care and Rabies Vaccines First Reader

Amendment 1:

On page 3, in line 28, after **rabies**; strike “AND”.

On page 4, strike in their entirety lines 1 through lines 12, inclusive, and replace with:

(6) TO ALLOW A REGISTERED VETERINARY TECHNICIAN EMPLOYED BY THE VETERINARY HOSPITAL, AS DEFINED IN § 2-304.1 OF THE AGRICULTURE ARTICLE TO ADMINISTER THE RABIES VACCINE UNDER THE DIRECT SUPERVISION OF A LICENSED VETERINARIAN:

(i) IN ACCORDANCE WITH APPLICABLE PROTOCOLS FOR LICENSED VETERINARIANS;

(ii) WHO SIGNS THE RABIES VACCINATION; AND

(iii) WHO RETAINS LEGAL RESPONSIBILITY THAT THE INDIVIDUAL ADMINISTERING THE VACCINE IS:

(A) IDENTIFIED ON THE VACCINE CERTIFICATE;

(B) TRAINED IN VACCINE STORAGE, HANDLING, AND ADMINISTRATION; AND

(C) APPROPRIATELY TRAINED IN THE MANAGEMENT OF ADVERSE EVENTS;

(7) TO ALLOW A REGISTERED VETERINARY TECHNICIAN WORKING IN OR FOR AN ANIMAL CONTROL FACILITY THAT IS LICENSED TO ADMINISTER DRUGS UNDER §2-305 OF THE AGRICULTURE ARTICLE TO ADMINISTER THE RABIES VACCINE UNDER THE DIRECT SUPERVISION OF A LICENSED VETERINARIAN:

(i) IN ACCORDANCE WITH APPLICABLE PROTOCOLS FOR LICENSED VETERINARIANS;

(ii) WHO SIGNS THE RABIES VACCINATION; AND

(iii) WHO RETAINS LEGAL RESPONSIBILITY THAT THE INDIVIDUAL ADMINISTERING THE VACCINE:

(A) IS IDENTIFIED ON THE VACCINE CERTIFICATE;

(B) IS TRAINED IN VACCINE STORAGE, HANDLING, AND ADMINISTRATION; AND

(C) IS APPROPRIATELY TRAINED IN THE MANAGEMENT OF ADVERSE EVENTS; AND

(8) TO ALLOW A REGISTERED VETERINARY TECHNICIAN WORKING IN OR FOR AN ANIMAL CONTROL FACILITY THAT IS LICENSED TO ADMINISTER DRUGS UNDER §2-305 OF THE

AGRICULTURE ARTICLE TO ADMINISTER THE RABIES VACCINE WHEN THE LICENSED, SUPERVISING VETERINARIAN IS READILY AVAILABLE FOR COMMUNICATION WITH THE PERSON ADMINISTERING THE VACCINE AT THE TIME OF ADMINISTRATION AND THE FOLLOWING CONDITIONS ARE MET:

(i) THE VACCINE IS ADMINISTERED IN ACCORDANCE WITH APPLICABLE PROTOCOLS FOR LICENSED VETERINARIANS;

(ii) THE LICENSED, SUPERVISING VETERINARIAN SIGNS THE RABIES VACCINATION; AND

(iii) THE LICENSED, SUPERVISING VETERINARIAN RETAINS LEGAL RESPONSIBILITY THAT THE INDIVIDUAL ADMINISTERING THE VACCINE:

(A) IS IDENTIFIED ON THE VACCINE CERTIFICATE;

(B) IS TRAINED IN VACCINE STORAGE, HANDLING, AND ADMINISTRATION; AND

(C) IS APPROPRIATELY TRAINED IN THE MANAGEMENT OF ADVERSE EVENTS.

Purpose: This amendment clarifies the level of veterinary supervision required for each the animal control facility and veterinary hospital environments and aligns with the procedural guidelines in the Compendium of Animal Rabies Prevention and Control.