

PENNSYLVANIA SOCIETY FOR BIOMEDICAL RESEARCH

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ORIGINAL: 2276

July 9, 2002

Mr. Robert Kline
State Board of Veterinary Medicine
PO Box 2649
Harrisburg, PA 17105-2649

Re: Proposed Rulemaking-Professional Conduct; Prescription Drugs [32Pa.B 2997]

Dear Mr. Kline:

This letter is in response to the request for comments published in the June 24, 2002 edition of the *Pennsylvania Bulletin*.

Please be advised that it is our opinion that pursuant to Section 32 (5) (Exemptions and Exceptions) of the Veterinary Medicine Practice Act (63 P.S. § 485.5 (2)), the proposed regulations would not and cannot apply to: *Accredited schools, institutions, foundations, business corporations or associations, physicians licensed to practice medicine and surgery in all its branches, graduate doctors of veterinary medicine or persons under the direct supervision thereof, which or who conduct experiments, and scientific research on animals in the development of pharmaceuticals, biologicals, serums, or methods of treatment or techniques for the diagnosis or treatment of human ailments or when engaged in the study and development of methods and techniques directly or indirectly applicable to the problems and practice of veterinary medicine.*

In fact, pursuant to the exemption and exception noted above, no rule or regulation issued by the State Board of Veterinary Medicine under 49 PA. Code Ch. 31 applies to: *Accredited schools, institutions, foundations, business corporations or associations, physicians licensed to practice medicine and surgery in all its branches, graduate doctors of veterinary medicine or persons under the direct supervision thereof, which or who conduct experiments, and scientific research on animals in the development of pharmaceuticals, biologicals, serums, or methods of treatment or techniques for the diagnosis or treatment of human ailments or when engaged in the study and development of methods and techniques directly or indirectly applicable to the problems and practice of veterinary medicine.*

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STATE BOARD OF VETERINARY MEDICINE
HARRISBURG, PA

Thank you very much for the opportunity to comment on this proposed amendment.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. S. Ellis', with a long horizontal flourish extending to the right.

John S. Ellis, Ph.D.
Executive Director

cc: Independent Regulatory Review Commission