This FAQ is specific to frequently asked questions from licensees and the public in the context of the COVID-19 situation. This FAQ will be updated on an as-needed basis. Check back periodically for updates. If you have a question regarding COVID-19 and Board of Veterinary Medicine licensing that is not on this FAQ you can e-mail department staff directly at dlibsdvet@mt.gov.

If you have general questions pertaining to licensure and the board that are not specifically related to the COVID-19 situation we recommend you review the board website at www.vet.mt.gov. For questions that are not specifically related to the COVID-19 situation you can continue to e-mail customer service staff at dlibsdhelp@mt.gov.

General Message Concerning the Governor's Stay-in-Place Directive

Below is an excerpt from the Governor's directive concerning essential businesses.

- For further questions you are encouraged to review the Governor's directive which can be found at https://covid19.mt.gov/.
- If a business has questions, or believe they should be categorized differently/want further clarity you should contact the Governor's Office call line at 1-800-755-6672. That is the quickest way to get a final response.

Language from Directive of Interest to Board of Veterinary Medicine Licensees:

"Health Care and Public Health Operations. For purposes of this Directive, individuals may leave their residence to work for or obtain services through Health Care and Public Health Operations hospitals; clinics; dental offices; pharmacies...other Health Care facilities and suppliers and providers of any related and/or ancillary Health Care services; and entities that transport and dispose of medical materials and remains.

Specifically included in Health Care and Public Health Operations are manufacturers, technicians, logistics, and warehouse operators and distributors of medical equipment, personal protective equipment (PPE), medical gases, pharmaceuticals, blood and blood products, vaccines, testing materials, laboratory supplies, cleaning, sanitizing, disinfecting or sterilization supplies, and tissue and paper towel products.

Health Care and Public Health Operations also includes veterinary care and all Health Care services provided to animals..."
...**Essential Businesses and Operations.** For the purposes of this Directive, Essential Businesses and Operations means Health Care and Public Health Operations, Human Services Operations, Essential Governmental Functions, and Essential Infrastructure, and the following:... Food and beverage production and agriculture. Food and beverage manufacturing, production, processing, and cultivation, including farming, livestock, fishing, baking, and other production agriculture, including cultivation, marketing, production, and wholesale or retail distribution of animals and goods for consumption; licensed medical cannabis dispensaries and licensed cannabis cultivation centers; and businesses that provide food, shelter, and other necessities of life for animals, including veterinary and animal health services, animal shelters, rescues, shelters, kennels, and adoption facilities; businesses that provide equipment, transportation, seed, feed, fertilizer, or other products or services critical to food and livestock production...

...**Essential Businesses and Operation should also employ, where feasible, telework or other remote working opportunities to limit disease spread...".**

**Question 1:**
I am currently licensed as a veterinarian under the Montana Board Veterinary Medicine. Am I allowed to practice using telehealth/telemedicine in order to provide services to clients located in Montana?

**Response 1:**
The board does not specifically define telehealth/telemedicine which is a method of delivery of services. As a veterinarian licensed under this board you are held to all the board's laws, including the definition of a veterinary/client/patient/relationship in ARM 24.225.301(5) when you are engaging in the practice of veterinary medicine and delivering services.

**ARM 24.225.301(5)** "Veterinarian/client/patient relationship" exists when all of the following conditions have been met:

(a) the veterinarian has assumed the responsibility for making clinical judgments regarding the health of the animal(s) and the need for medical treatment, and the client has agreed to follow the veterinarian's instructions;

(b) the veterinarian has sufficient knowledge of the animal(s) to initiate at least a general or preliminary diagnosis of the medical condition of the animal(s). This means that the veterinarian has recently seen and is personally acquainted with the keeping and care of the animal(s) by:

(i) virtue of an examination of the animal(s); or

(ii) medically appropriate and timely visits to the premises where the animal(s) are kept; and

(c) the veterinarian is available for follow-up evaluation in the event of adverse reactions or failure of the treatment regimen.

**Question 2:**
Has the board changed any of its laws pertaining to its definition of VCPR? Has the federal definition of VCPR changed in order to facilitate telehealth/telemedicine? Specifically, are there
changes to the FDA requirement for animal examination and premises visit relevant to the FDA regulations governing Extralabel Drug Use in Animals and Veterinary Feed Directive (VFD) drugs?

**Response 2:**
The board has not changed its definition of VCPR which does not have specific requirements regarding physical examination, just “examination” (see Response #1 for Montana's definition of VCPR). However, licensees must still follow all applicable state and federal laws pertaining to the practice of veterinary medicine, including state and federal drug laws.

With that said, the FDA sent out a press release on 3/24/20, which in part reads: "... In order to help veterinarians utilize telemedicine to address animal health needs during the COVID-19 pandemic, the FDA generally does not intend to enforce the animal examination and premises visit portion of the VCPR requirements relevant to the FDA regulations governing Extralabel Drug Use in Animals and Veterinary Feed Directive (VFD) drugs. This will allow veterinarians to prescribe drugs in an extralabel manner or authorize the use of VFD drugs without direct examination of or making visits to their patients, which will limit human-to-human interaction and potential spread of COVID-19 in the community...".

For further information from the FDA on this issue and its increased flexibility see the 3/24/20 [FDA press release concerning veterinary telemedicine](https://www.fda.gov/news-events/press-announcements/fda-press-release-concerning-veterinary-telemedicine). Generally speaking, other FDA press releases which may or may not be relevant to veterinarians can be found on its [newsroom page](https://www.fda.gov/news-events/press-announcements).

**Question 3:**
I am currently licensed as a veterinarian under the Montana Board Veterinary Medicine and may be engaging in telehealth/telemedicine for the first time. Does the board have any training requirements or recommend any particular types of training so I have more information on how to engage with clients and patients while complying with all of the laws under this board?

**Response 3:**
Staff and the board cannot give legal advice so we cannot recommend nor endorse any particular trainings or protocols/best practices. As stated in Response #1, the board does not specifically define telemedicine/telehealth and you are held to all the boards statutes and rules, including the definition of "VCPR" when engaging in the practice of veterinary medicine.

You might try contacting your state and/or national professional association(s) to see if they have any recommendations regarding training and best practices (e.g. AVMA, MVMA, etc.). As a licensee you are still held not only to the regulations cited in Response #1, but also all the other statutes and rules including unprofessional conduct, privacy, etc. regardless of the method you are using to deliver those services. If recommendations from other organizations conflict with Montana’s laws you must adhere to Montana’s laws.
Question 4:
I am licensed as a veterinarian in another jurisdiction. Can I practice in Montana without obtaining a Montana license?

Response 4:
Under 37-18-104(1)(c), MCA, veterinarians licensed and in good standing in another jurisdiction are allowed to practice for three days without a license as defined under the board's occasional case exemption, ARM 24.225.301(3): "... veterinarian actively licensed and in good standing in another state or jurisdiction who practices veterinary medicine in this state no more than three days in any calendar year who is supervised by a veterinarian licensed in this state." It is an exemption, so no registration is required.

Question 5:
I read your response to Question #4. Is there a way to obtain some type of temporary or emergency license as a veterinarian to provide services to clients who are located in Montana while under the states of emergency declared federally and in Montana?

Response 5:
The Department of Labor and Industry Business Standards Division (BSD) has implemented an interstate licensure recognition registration process to allow expedited registration of professionals who hold an active, unrestricted license in another state to begin working in Montana. There is no cost to that registration.

For more information and access to the registration form visit http://bsd.dli.mt.gov/ or the board's homepage at www.vet.mt.gov. This registration will only enable people to work in Montana when they have registered appropriately with the department and have been granted a registration. This registration will only be valid during the period of time the Governor has declared a state of emergency related to COVID-19. While a future date may show in Licensee Lookup, it should be understood to only be valid when a state of emergency is in effect if next to name it says “Covid-19 Reg”.

Otherwise, in order to practice in Montana you must be licensed in Montana or fall under one of the exemptions listed in 37-18-104, MCA, including but not limited to the occasional case exemption described in Response #3.

Question 6:
I am licensed as veterinary technician in a jurisdiction(s) that licenses veterinary technicians. Can I engage in practice under that license in Montana?

Response 6:
Veterinary technicians are not licensed in Montana. In order to practice veterinary medicine in Montana you must be licensed as a veterinarian or fall under the exemptions listed in 37-18-
Since veterinary technicians are not licensed in Montana you would be unlicensed support personnel and would need to be supervised by a Montana licensed veterinarian as described in ARM 24.225.405.

**Question 7:**
Does the board have any recommendations on best practices for disinfectants. A fact sheet on the virus, etc.?

**Response 7:**
Staff and the board cannot give legal advice so we cannot recommend nor endorse any particular trainings or protocols/best practices as this is outside the scope of the board's statutes and rules. You might try contacting your state and/or national professional association(s) to see if they have any recommendations best practice recommendations and links to other resources (e.g. AVMA, MVMA, etc.).

**Question 8:**
Are Montana veterinarians considered "essential" under the Governor's Stay-in-Place Directive which took effect on 3/27/20?

**Response 8:**
Yes. See General Message Concerning the Governor's Stay-in-Place Directive on page 1 of this FAQ for further details. Keep in mind definitions of "essential" vary from state to state. Generally speaking veterinarians have been defined as essential in most—if not all—jurisdictions that have defined "essential" and "nonessential." Definitions of "essential" and "nonessential" are jurisdiction-specific so if you have questions about another jurisdiction's specific definition you will need to contact/visit that state's website for information.

**Question 9:**
Is the Department of Livestock Animal Health Bureau (i.e. state veterinarian's office) still open and conducting business (e.g. import permits, diagnostic laboratory, etc.)?

**Response 9:**
The Animal Health Bureau is implementing contingency planning, just like this department and board and all state agencies. However, at this time the bureau is maintaining all of its services, including providing import permits, disease management, bison management, meat, milk, and egg inspection as well as the diagnostic laboratory, so veterinarians should not see any disruption—at least in the short term. We have been told that the Animal Health Bureau also intends to maintain contact with regard to with veterinarians regarding impacts related to its authority through its e-mail distribution list (i.e. MDOL update).
**Question 10:**
I am applying for a new "regular" Montana license. Will issues related to COVID-19 impact the amount of time it takes me to become licensed?

**Response 10:**
The department and board recognize that the current COVID-19 pandemic has created discord in the normal application, examination, background check, and licensure process. We are striving to address these concerns and potential roadblocks as quickly as possible; however, please understand that this will not occur overnight. The board must continue its public safety mission while adapting to daily changes occurring from the pandemic. This will take time. Applicants are encouraged to begin their application for licensure and to complete as much of the required information as possible. Applications remain valid for one year under normal circumstances. If you submit your application and an item is missing, our licensing specialist will work with you to complete the application. We do not deny applicants for submitting an incomplete application. By completing the application’s remaining parts, exempting exams, etc., you can get ahead on the licensure process.

[Online applications](#) are always the most efficient application method and allow you to upload your own supplemental forms directly into your application at any time. Paying the fee triggers the beginning of the staff review process. Be aware that to verify authenticity, some documents such as exam results, transcripts, and background checks must be sent to the department directly from the source and cannot be uploaded by the applicant.

View the licensing requirements and application checklists which will assist you with your application process.

- [Veterinarian Licensing Requirements & Application Submission Checklist – veterinarian applicant NOT CURRENTLY licensed out-of-state](#)
- [Veterinarian Licensing Requirements & Application Submission Checklist - veterinarian applicant CURRENTLY licensed out-of-state](#)
- [Certified Euthanasia Technician Licensing Requirements & Application Submission Checklist](#)
- [Certified Euthanasia Agency Licensing Requirements & Application Submission Checklist](#)

**Question 11:**
I am applying for a license and have completed all requirements except for passing an approved national exam (veterinarians) or required training course and exam (certified euthanasia technicians). I have contacted the exam entity and they are not administering exams and/or testing centers are currently closed due to the COVID-19 pandemic. Can I be issued a full license without having passed the exam?

**Response 11:**
The issues of cancelled licensing exams/training courses and/or closed testing centers are issues that face many licensees and applicants. These issues impact many boards and many...
licensed professions across the U.S. and other jurisdictions. Just in Montana there are approximately 200 professional and occupational license types under the Department of Labor and Industry, a majority of which require passage of a national exam. The department along with high level state officials are currently exploring options for applicants and licensees. Check back to this FAQ for future updates.

Question 12:
I am currently licensed as a [veterinarian/embryo transfer technician/certified euthanasia technician]. Many conferences and training courses are being cancelled or changed to online due to health and safety concerns, etc. What should I do if I cannot meet my annual continuing education (CE) requirements?

Response 12:
The issue of conferences and training courses being cancelled is affecting licensees nationwide in many professions. For the time being, keep in mind that this board allows veterinarians to obtain 10 of the required 20 hours as online CE. Under proposed rules, the board would allow embryo transfer technicians to obtain 5 of the 10 necessary hours as online CE.

At this time there are many larger issues facing licensees across many professions. If this board needs to take action in the future to deal with licensees’ legitimate inability to obtain CE due to the COVID-19 situation it can do so. There is no need to apply for a hardship exemption at this time unless you had already intended to do so for non-COVID-19 reasons. Veterinarians and embryo transfer technicians do not renew their licenses until November 1. Certified euthanasia technicians who were planning to renew their licenses during the upcoming renewal which opens on April 1 and ends May 29 should plan to renew as normal (online renewal through your eBiz account is recommend).