



June 16, 2010

Senator Elaine Alquist, Chairperson  
CA State Senate Health Committee  
State Capitol Building, Room 2191  
Sacramento, CA 95814  
FAX: (916) 324-0384

**RE: Follow-up Veterinary Support Letter for AB 2000 (Medical Exemption from Rabies Vaccination), including Response to California Department of Public Health (CDPH) Objections**

Dear Senator Alquist and Committee Members:

I am writing on behalf of the Humane Society Veterinary Medical Association (HSVMA), an organization representing approximately 2,000 veterinary professionals nationwide with a focus on the health and welfare of all animals, including companion dogs and cats, to reiterate our support for AB 2000 and to counter objections voiced in the California Department of Public Health's opposition letter, dated June 8. (Our original letter, dated May 7, in support of the bill, is attached for your reference.)

The CDPH statement that "there is no scientific evidence that rabies vaccines are associated with severe or a high rate of vaccination reactions," is simply incorrect. The USDA Center for Veterinary Biologics (CVB) reports that rabies vaccines are the most common group of biological products named in the adverse event reports they receive. Adverse vaccine-associated reactions are not required to be reported in veterinary medicine. Even in the face of what is probably gross underreporting, the USDA/CVB Report, published in the April 1, 2008 issue of the Journal of the American Medical Association (pages 1000-1002), states that from April 2004 through March 2007 nearly 10,000 adverse event reports were received by rabies vaccine manufacturers, and that about 65% of these concerned dogs. The overall rate of such adverse rabies vaccine reactions during the report period was 8.3 reports/100,000 doses of vaccine. These are by no means trivial findings nor is the magnitude of the numbers insignificant.

Although canine rabies vaccine labels may not enumerate contraindications, the labeling instructions on vaccine products clearly instruct veterinarians to vaccinate *only healthy dogs*. A small number of companion animals have medical conditions for which vaccination is life- or health-threatening and thus, inappropriate. In these cases, a dog's particular exemption from rabies vaccination would be individually substantiated by a veterinarian, and under these stringent circumstances, we do not foresee the submission of illegitimate or frivolous requests.

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Andrew N. Rowan, PhD, Chair  
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Vienna, Va.

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Santa Barbara, Calif.

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Denver, Colo.

Larry Peetz, DVM  
Portland, Ore.

Gordon B. Stull, VMD  
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**ASSOCIATE VETERINARIANS**

Eric Davis, DVM  
Salinas, Calif.

Barbara Hodges, DVM, MBA  
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Susan B. Krebsbach, DVM  
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Veterinarians are well trained in immunology and develop a great respect for both the powerful positive and potential negative consequence of vaccinating their patients. Veterinary schools require detailed study of those zoonotic diseases, like rabies, that are transmissible from animals to humans. State and national veterinary board exams rigorously test this understanding. Veterinary schools and professional advisory bodies regularly update vaccination protocols as new findings emerge. Vaccinology is one of the most active areas of research and discussion in the professional literature, at continuing education venues, and among clinicians around the country and throughout the world.

The Veterinarian's Oath states, "I solemnly swear to use my scientific knowledge and skills for the benefit of society through the protection of animal health, the relief of animal suffering... (and) **the promotion of public health...**" As veterinarians we continuously safeguard the public health by protecting the health and welfare of our patients within the context of their families and our communities. Disallowing veterinary medical exemption from rabies vaccination impugns this professional commitment and puts the public at greater potential risk by those who, concerned about their dogs' health and deprived of a vaccination exemption option, may choose to fly 'under the radar,' eluding both licensing and vaccination entirely.

A number of states, including Alabama, Florida, Colorado, Connecticut, Maine, Massachusetts, New Jersey, New York, Rhode Island, Virginia and Wisconsin, successfully provide medical exemption from rabies vaccination without quarantine provisions. Once again, we encourage your support of this important state legislation, similarly safeguarding the health and welfare of the companion canines of Californians.

Please contact me if you have any questions or if you would like more details about our perspective on these issues. Thank you for your consideration.

Sincerely,



Barbara Hodges, DVM, MBA  
Veterinary Consultant  
Humane Society Veterinary Medical Association (HSVMA)



7 May 2010

Assembly Member Curt Hagman  
State Capitol  
Sacramento, CA 95814

**RE: Veterinary Support for AB 2000 (Medical Exemption from Rabies Vaccination)**

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*Oregon, Wis.*

Dear Assembly Member Hagman:

I am writing on behalf of the Humane Society Veterinary Medical Association (HSVMA), a national veterinary professional organization with a focus on the health and welfare of all animals, in support of AB 2000, a bill that would exempt from rabies vaccination a California dog whom a licensed veterinarian determines may have a potentially lethal reaction to it.

As veterinary professionals, we know that vaccinations should be administered to animals only when the medical benefits outweigh the potential medical risks. A small, but significant, number of companion animals have medical conditions for which vaccination is contraindicated. These may include, but are not limited to, those with terminal diseases such as cancer, immune-mediated diseases, severe allergies and chronic life-threatening conditions such as renal failure, severe endocrine disorders and degenerative neuromuscular diseases. In such cases, the decision to vaccinate should be contingent upon the professional judgment of the veterinarian in the context of the overall medical condition of the animal. Immediate medical exemption from vaccination may be deemed medically necessary and a provision for annual review and re-application for continuation of vaccination exemption, if necessary, is also essential.

In supporting AB 2000, we note that some California communities also require cat licensing and proof of rabies vaccination in conjunction with this requirement. Because the same medical concerns above would apply to cats, we would suggest an amendment to AB 2000 that would clarify that a similar exemption from vaccination should exist for cats in communities which require cat licensing.

The statewide rabies vaccination exemption option offered by AB 2000 is welcome and long overdue. We thank you for introducing this important legislation, which will help safeguard the health and welfare of the companion animals of Californians.

Sincerely,

Barbara Hodges, DVM, MBA  
Veterinary Consultant  
Humane Society Veterinary Medical Association (HSVMA)