

What counts as “compelling justification”?

Under HISA's Anti-Doping and Medication Control (ADMC) Program, Covered Persons, **including veterinarians**, are prohibited from possessing Banned Substances or Banned Methods at all times in facilities or jurisdictions covered by HISA unless they can show a “compelling justification” for the possession.

1. *The burden is on the veterinarian to prove a compelling justification for the Possession of a Banned Substance or Banned Method.*

2. *How can a veterinarian prove a compelling justification to Possess a Banned Substance or Banned Method?*

- Provide detailed and reliable **medical records** (not billing records) showing medically necessary treatment of non-Covered Horses or other non-covered animals with the Banned Substance(s)/Method(s). The records should include the thoughts and impressions of the veterinarian and notes related to any examination, diagnosis, or treatment administered to a specific patient, e.g., Subjective, Objective, Assessment, and Plan (SOAP) notes.
- If a veterinarian claims a compelling justification based on treatments limited to non-Covered Horses or non-covered animals, they may be required to provide the complete veterinary medical records for *all* horses and other animals in their practice to substantiate that claim.
- **Context matters:** the veterinarian must establish a compelling justification for carrying each Banned Substance or Method on the specific date, time, and location it was found.

3. *Based on previous ADMC Program Possession cases involving veterinarians, what circumstances do not – on their own - establish a compelling justification to Possess a Banned Substance or Banned Method?*

- Treating Covered Horses with a Banned Substance/Method in jurisdictions not covered by HISA.
- Having a practice that treats non-Covered Horses or non-covered animals.
- Convenience.
- **Important Note:** Possessing Banned Substances for non-emergency use, or for which permitted FDA-approved alternatives exist, is unlikely to meet the criteria for a compelling justification.

Questions?

Veterinarians should contact HIWU's Acting Chief of Science, Dr. Michael Hardy, at mhardy@hiwu.org if they have questions about the Possession rule or their specific practice.