

Covered Veterinarians & Banned Substances



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.