



State of Vermont
Office of the Secretary of State

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University Veterinarian
University of Vermont
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[via email to dr Ruth@uvm.edu]

February 10, 2017

Dear Dr. Blauwikel:

The University of Vermont has asked that the Office of Professional Regulation, which houses the Vermont Board of Pharmacy, assess whether UVM Medical Center investigators who employ prescription drugs as end users in animal research must obtain a license from the Board to do so. Under Vermont law, the function described is not the "practice of pharmacy" as defined by 26 V.S.A. § 2022(14). It follows that Board licenses are not required of individual investigators or research faculty.

Please do not hesitate to call me at 802.828.2492 if you have questions, and please feel free to share this correspondence with other regulatory authorities.

Very truly yours,

Gabriel M. Gilman
General Counsel

cc: Agent George Lutz, United States Drug Enforcement Agency
[via email to george.j.lutz@usdoj.gov]