



American College of
Veterinary Internal Medicine

Mr. David Banasiak
American Board of Veterinary Specialties
1931 N. Meacham Road, Suite 100
Schaumburg, IL 60173-4360

Dear Mr. Banasiak:

We are writing on behalf of the American College of Veterinary Internal Medicine (ACVIM), for which we are currently serving as officers, in regard to the petition by the American College of Veterinary Botanical Medicine (ACVBM) to be recognized as a specialty by the American Board of Veterinary Specialists. The Board advocates rejection of the petition on the grounds presented below.

While a wealth of historical and traditional descriptions exist regarding the use of herbal products as medication, the validation of these applications by an evidence-based body of scientific literature is largely lacking. The absence of rigorous, validated clinical trials assessing the efficacy of botanicals is very troubling. The ACVIM is comprised of specialists, researchers, and scholars, and we reject reliance on undocumented efficacy and safety as a basis for declaration of a specialty. We suggest that the ABVS consider in its deliberations how the body of evidence supporting the use of botanical medicines compares to the body of evidence that exists in other recently approved Specialty(s), such as Sports Medicine and Rehabilitation Medicine.

Secondly, we believe that the veterinary interest in botanical medicine cited in the petition is overstated. Although many conferences do include lectures on “alternative medicine” or “complementary medicine”, herbal medicine is only one component of the different modalities that are discussed, such as acupuncture. Inclusion of lectures on herbal medicine at conferences does not mean that use is being advocated. To the contrary, many lectures emphasize caution in using herbals, provide information on their dangers and potential drug interactions, and highlight that most publications demonstrating efficacy of herbal medicines are case reports or small trials that are not of high quality. The ACVIM was cited specifically as an example of a specialty College that has included such lectures. We have had fewer than 10 lectures on alternative medicine at the ACVIM Forum in the last 5 years (out of hundreds in the same time period). Our current Forum chair and co-chair have not received requests in the last 3 years (the length of tenure in their positions) to provide lectures on herbal medicine.

Thirdly, the field of pharmacognosy already exists as a component of the American College of Veterinary Clinical Pharmacology, and future members of the proposed ACVBM could become board-certified through an existing pathway. Particularly worrisome is the statement in the petition that subjecting potential ACVBM Diplomates to the rigors of the ACVCP credentialing process is unnecessary. Becoming a board-certified specialist must entail a rigorous process that teaches, and then documents, mastery of the evidence-based and scientifically sound body of knowledge that is the basis of the specialty. Veterinary board-certified specialists, including ACVIM diplomates in all our specialties of Small Animal and Large Animal Internal Medicine, Cardiology, Neurology, and Oncology, have become specialists precisely through a well-defined path of clinical training, didactic courses, mentored research and a rigorous examination process. The proposed track to certification by the ACVBM does not require the acquisition of such a body of knowledge, requiring only to keep a case log for 3 years while working under the supervision of an individual similarly trained through an experiential, rather than didactic, pathway.

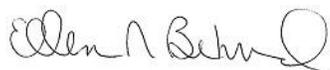
A concern that we believe must be addressed in the application for Specialty status by the ACVBM is that the strength and purity of herbal compounds are not rigorously certified, raising the potential for dosing errors, contamination with deleterious substances and errors in formulation. Lastly, the use of traditional herbal agents may delay more evidence-based medical care for patients, sometimes adversely affecting case outcome.

For these reasons, the Board of Regents of the American College of Veterinary Internal Medicine, on behalf of our membership, requests that you reject the petition for specialty designation by the American College of Veterinary Botanical Medicine. There is no question that the public has an interest in complementary and alternative medicine strategies, including herbal medicine, but public interest does not justify creation of a new specialty designation for practitioners whose prescriptions have not been validated through controlled clinical trials, as is the standard for FDA-approved and licensed medicinal agents. In addition, the ACVIM requests that the ABVS challenge the use of the designation as a "College" that this group has adopted, as this designation will cause confusion to pet owners as to what constitutes a Specialty College.

Thank you for your consideration. Please do not hesitate to contact the ACVIM Board of Regents if you have any questions.



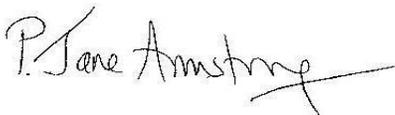
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