

Mock Letter Example

Dear Licensees,

To answer some questions and concerns about compliance related to the Prescription Drug Monitoring Program (PDMP), the Board of Veterinary Examiners has held conversations with the Board of Pharmacy, State Investigators, and the Department of Law. Here are some answers to address some common situations and concerns:

Registering with the PDMP

- Under AS 17.30.200, any veterinarian that possesses a DEA registration must register with the PDMP.

Reviewing the PDMP

- Under AS 17.30.200(k), the “*patient*” a veterinarian reviews in the prescription database is the client / owner. The Board of Veterinary Examiners will be further defining this in a future regulation project.
- On July 7, 2020, Assistant Attorney General Harriet Milks attended our board meeting and advised the board that reviewing the owner / client is not a breach of the Health Insurance Portability and Accountability Act (HIPAA).
- Pharmacists use a national standard to determine a prescription days’ supply, i.e. how long it should last for the “*patient*”.
 - The qty of medication given x it’s frequency = daily dose (1 po q4h = 6/day)
 - Total qty / daily dose = days’ supply (30cc prescribed / 6cc per day = 5 day supply)
 - If you intend a control substance to last a specific period of time, it is advisable to include that information on the prescription, otherwise, the national standard calculation above will be used to determine a medication days’ supply limit.
- Under AS 17.30.200(k)(4), a practitioner, including veterinarians, is only required to review the PDMP before dispensing, prescribing, or administering a federally schedule II or III controlled substance;
 - tramadol, phenobarbital, and benzodiazepines are examples of medications that are NOT schedule II or III and thus do not require a review of PDMP data.
- There are exemptions to reviewing the PDMP for schedule II or III controlled substances and can be found in AS 17.30.200(k)(4). The Board of Veterinary Examiners will be further defining some of these in a future regulation project.
- Reviewing a client requires only 3 fields of entry to conduct a search:
 - Client first name
 - Client last name
 - Client date of birth
- Reviewing data within the PDMP is limited to delegates who possess a state license or registration under AS 08. Under AS 17.30.200(l)
 - A non-licensed person improperly accessing the PDMP is a violation and is a Class C felony;
 - A veterinarian or delegate who allows another person to access the database who is not authorized to access the database is a violation and is a Class C felony.
- Practitioners, including Veterinarians, are under no obligation to utilize the tools built within the PDMP, i.e. NarxCare, Clinical Alerts, etc. The obligatory action under 17.30.200(k) is “*to check a patient’s prescription records before dispensing, prescribing, or administering a schedule II or III controlled substance under federal law to the patient...*”

Submitting data to the PDMP:

- Prescription numbers can be any non-duplicated number the veterinarian chooses to use to identify the prescription. A recommendation of using the following format has been suggested YYYYMMDD#. Ex: 202007081 represents the first prescription prescribed on 7/8/2020.
- Use the “*compound*” checkbox next to the NDC number field if you are submitting a compounded control substance prescription to the PDMP. This will open further fields for you to enter the NDC of the actual control substance(s) used and their respective quantities.

- Since the veterinarian is acting as the dispensing “pharmacist”, the dispensing veterinarian information goes in the corresponding “pharmacist” fields.
- If a Veterinarian is required to submit a prescription to the PDMP but it’s a Saturday, Sunday or state holiday, the reporting / submitting requirement is extended to the next regular state business day. This allowable exception is already authorized under 12 AAC 52.865(c). This case also holds true for any correction of incorrect data under 12 AAC 52.865(e).

As the Board of Veterinary Examiners learns of new questions, situations or obstacles we will continue to partner with the stakeholders who can assist us. We hope this assists you in evaluating situations and compliance with the PDMP.