



Prescription Drug Monitoring Program

Recommended Best Practices for Veterinary Prescriptions

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Prescription drug monitoring programs (PDMPs), or prescription monitoring programs (PMPs), play a key role in the fight against prescription drug abuse, misuse, and diversion. PDMPs support healthcare professionals, state officials, and law enforcement officers—by managing patients’ care; identifying potential high-risk behaviors among patients, prescribers, and dispensers; and aiding drug investigations. Besides being a patient safety tool, PDMPs are increasingly being recognized for their contributions to the development of public health policies and collaborations. As a robust public safety and healthcare management tool, PDMPs give health professionals a patient’s comprehensive prescription history of controlled substances and other monitored drugs. As a regulatory oversight tool, PDMPs collect information on the prescribing and dispensing history of practitioners to patients, providing a complete picture in an accurate, timely, and secure manner. PDMPs monitor the prescribing and dispensing of controlled substances by requiring pharmacies to report the dispensing of controlled substance prescriptions or other drugs of concern issued by prescribers. Some states also require any practitioner dispensing from their office to report to the PDMP.

Compared to other practitioners, the extent of diversion and abuse of opioids—and other controlled substance medications intended for animals—lacked significant research or documentation. Yet, surveys targeting veterinarians showed high potential for abuse. A 2014 Colorado online survey of veterinarians conducted around the issues of opioid misuse in veterinary settings identified the following respondent demographic:

- 64 percent of respondents were female
- 51 percent were working in a suburban environment
- 22 years average of professional veterinary experience
- 73 percent practiced in small animal care

The survey found that “13% of surveyed veterinarians knew that an animal owner had intentionally made an animal ill, injured an animal, or made an animal seem ill or injured to get opioid medications; 44% were aware of opioid abuse or misuse by either a client or a veterinary practice staff member; and 12% were aware of veterinary staff’s opioid abuse and diversion.” Furthermore, 73 percent of surveyed veterinarians reported either fair, poor, or absent training on opioid misuse or abuse from their veterinary medical school, and 64 percent admitted to not completing any continuing education on opioid prescribing best practices since beginning their practices.¹ As part of a study published in January 2021 regarding veterinarians, the researchers reviewed two surveys of veterinarians conducted by two states. The first was the Colorado survey mentioned above. The second, conducted by the Idaho Board of Veterinary Medicine, examined misuse of veterinary medications and found that “The respondents suspected 23% of animal owners misusing vet medicines on themselves, their children, or friends; they alleged that the most misused class of drugs was analgesics. Seventy-two percent answered YES to ‘Have you ever been asked questions by human caregivers of animals you have treated about the use of veterinary medications in humans?’ They identified healthcare workers (including veterinarians

¹ Mason et al. Prescription Opioid Epidemic: Do Veterinarians Have a Dog in the Fight? AJPH September 2018, Vol 108, No. 9.

and veterinarian staff), rural residents, those that lack health insurance, and those involved in animal racing and rodeo, as the most likely to misuse veterinary prescriptions. They also reflected that a self-sufficient attitude, low-cost, convenient availability, and the theory that veterinary medications are more potent than human medications are reasons pet owners misuse this way.”²

There are differences in PDMP requirements for veterinarians compared to other prescribers and dispensers. The differences in laws and requirements highlight an ongoing discussion on whether veterinarians should comply with the same PDMP requirements as other practitioners or have separate requirements. Veterinarians are not always included as major stakeholders with PDMPs, even though most are Drug Enforcement Administration (DEA) registered practitioners who prescribe and dispense controlled substances in the practice of veterinary medicine. Requirements for veterinarians and veterinary prescriptions differ by state. What further concerns both healthcare and regulatory stakeholders is the fact that many of the controlled substances commonly prescribed or dispensed by veterinarians are the same as those prescribed or dispensed for human patients. This includes controlled substances such as morphine, hydrocodone, buprenorphine, benzodiazepines, fentanyl, and barbiturates. While veterinarians’ roles and responsibilities vary across states, federal controlled substances laws view the profession like that of any other prescriber.

Federal law requires certain legal entities to register with the DEA for specific controlled substances activities. The DEA requires manufacturers or distributors of controlled substances to register. Hospitals, clinics, and opioid treatment centers must also have a DEA registration. Included in the various DEA registered activities are practitioners and mid-level practitioners who dispense or prescribe controlled substances to their patients. These categories include, but are not limited to physicians, dentists, podiatrists, osteopathic physicians, physician assistants, nurse practitioners, and veterinarians.

PDMPs define a practitioner as a healthcare provider authorized by state and federal law to prescribe, dispense, and administer controlled substances under their state license and federal DEA registration. All 54 PDMPs define practitioners as physicians, dentists, osteopaths, and podiatrists. As for veterinarians, there are states that include veterinarians in the definition of practitioner and others that do not. This is also true when it comes to defining a dispenser. Most PDMPs include veterinarians in their definition of dispenser, but some states specifically exclude them even though many veterinarians dispense controlled substance medications directly to the animal owner.

While it is not uncommon for only one veterinarian within a clinical practice to possess a DEA registration number to write or dispense controlled drugs, other licensed medical professionals may use multiple DEA numbers as required by law. When practitioners issue a controlled substance prescription, state and federal laws require certain information to be on the prescription, including (but not limited to)—patient name, address, and the date of issuance. In

² Anand A, Hosanagar A. Drug Misuse in the Veterinary Setting: An Under-recognized Avenue. *Curr Psychiatry Rep.* 2021 Jan 6;23(2):3. doi: 10.1007/s11920-020-01214-8. PMID: 33403403.

some states, prescriptions issued by veterinarians must include not only the information required of other practitioners but also the species of the animal and the name of the animal and/or its owner. This additional information must be reported to the PDMP in states that require veterinarians to report dispensations. These and other nuances surrounding veterinarians can be challenging for PDMP programs in the collection and access to PDMP data.

In the first quarter of 2020, the PDMP Training and Technical Assistance Center (TTAC) convened a work group to examine the reporting and processing of veterinarian medication dispensations. The work group consisted of PDMP representatives from Maryland, Massachusetts, Nebraska, New Hampshire, and South Carolina. As a result of the efforts of this working group, PDMP TTAC published a Technical Assistance Guide (TAG) entitled "[Veterinary Best Practices](#)." The report examined the issues facing PDMPs as they relate to veterinarians and offered suggestions on how PDMPs may best address them.

In 2021, the National Association of State Controlled Substances Authorities (NASCSA) requested PDMP TTAC to reexamine and expand upon the issues surrounding veterinarians and work jointly to further explore and enhance the recommended practices of the 2020 "Veterinary Best Practices" TAG. PDMP TTAC and representatives of NASCSA's PMP Committee, comprised of PDMP administrators, held a series of work sessions on recommending best practices for veterinarians. This collaboration reiterated many of PDMP TTAC's initial recommendations and produced several new recommendations.

This report from the PDMP TTAC/NASCSA collaboration provides guidance surrounding veterinary prescription reporting. Due to state laws and policies, the group understands some states will exclude best practices not in alignment with legally acceptable practice. However, PDMPs should plan and implement these practices, as applicable, to standardize the collection and reporting of veterinary prescription data. This report examines the issues facing PDMPs as it relates to veterinarians and offers suggestions on how PDMPs may best address them. The suggestions are a consensus reached as result of the PDMP TTAC/NASCSA work group's efforts and is intended to:

- Show reporting issues of veterinary dispensing and prescribing.
- Find issues in displaying such data in PDMP reports and queries.
- Offer recommended best practices on techniques and policies for PDMPs.

RECOMMENDED BEST PRACTICES

HIGHLIGHTS

1. Enact or change state legislation requiring the same frequency of reporting for both dispensing practitioners and veterinarians.
2. All veterinarians who dispense monitored drugs from their veterinary practice should register and report those prescriptions to their respective state PDMP.
3. Veterinary prescriptions should include the animal owner's or caretaker's identifying information to be reported to PDMPs using the respective fields in the American Society for Automation in Pharmacy (ASAP) format.
4. Veterinary software vendors should incorporate the ability to automate the reporting of ASAP files to PDMPs.
5. Veterinary prescription records should include the prescriber's DEA registration number if the monitored drug is a controlled substance or should include the prescriber's State License number if the monitored drug is a non-controlled substance.
6. Include all NDCs for veterinary medications in the PDMP NDC files.
7. Allow veterinarians to register for the state PDMP within the state they hold a professional license to practice.
8. Veterinarians should query their veterinary patient utilizing the animal owner's first name, last name, and date of birth. Veterinarians should utilize the identifying information of one owner for each animal patient, if possible.
9. Allow veterinarians the authority to query PDMPs to review veterinary prescriptions that were issued to their animal patients. Allow practitioners and pharmacists, who treat human patients, the authority to query and review veterinary prescriptions that were issued for those animal patients.
10. PDMPs should develop a method to identify prescriptions issued by veterinarians on the PDMP report (e.g., animal icon).
11. Each state PDMP should determine how the incorporation of veterinary prescriptions in the patient PDMP report shall impact their unsolicited reporting.

12. [PDMP vendors should exclude veterinary prescriptions from solicited automated analytics by default and allow individual users to incorporate veterinary data based on the clinical judgement of the PDMP user.](#)
13. [Veterinary offices should be treated like other PDMP data uploaders and included in PDMP reporting compliance audits .](#)
14. [PDMPs should collaborate with their respective State Board of Veterinary Medicine and professional associations in creating educational presentations and/or materials outlining veterinary best practices, requirements for veterinarians, and resources for the reporting of veterinary dispensations. Furthermore, education for dispensing pharmacies should be made accessible to ensure that the reporting of veterinary prescriptions is consistent with the reporting standards provided for veterinarians and veterinary clinics.](#)

Reporting Frequency of Veterinary Prescriptions [\(back to list\)](#)

Recommended Best Practice: Enact or modify state legislation requiring the same frequency of reporting for both dispensing practitioners and veterinarians.

Fifty PDMPs require dispensing practitioners to report to the PDMP; 46 of those require reporting within 24 hours or next business day from the time they dispense the medications. Nineteen PDMPs require dispensing veterinarians to report to the PDMP; 13 of those require reporting within 24 hours or next business day from the time they dispense the medications. PDMPs have been changing their laws and policies to shorten the frequency during which they require dispensers to report prescription data to a PDMP. The primary reason is to ensure that providers have the most current data to improve clinical decision making. This reasoning can also apply to veterinarians.

Veterinarian Registration for Reporting Dispensations to their PDMP [\(back to list\)](#)

Recommended Best Practice: All veterinarians who dispense monitored drugs from their veterinary practice should register and report those prescriptions to the respective state PDMP.

The recommended best practice is to require all veterinarians who dispense monitored drugs from their veterinary practice to register and report those prescriptions to their respective state PDMP. Given that veterinarians are not eligible to obtain National Provider Identifier (NPI) numbers, reporting veterinary prescription dispensations will use either a DEA or State License number. For dispensations to be reported properly, many licensed veterinarians will need a DEA registration to comply with PDMP reporting requirements. A DEA registration is required for reporting of controlled substances. Where a DEA number is not required by law, the state professional license number may replace it.

Data Elements to Report for Veterinary Prescriptions ([back to list](#))

Recommended Best Practice: Veterinary prescriptions should include the animal owner's or caretaker's identifying information to be reported to PDMPs using the respective field in American Society for Automation in Pharmacy (ASAP) format. When the animal ownership is with a business entity, veterinary prescriptions should use the entity's identifying information regarding the specific animal—where appropriate—under reporting guidelines from ASAP.

Both state and federal statutes detail the data elements for veterinary prescriptions. Prescription records collected by PDMPs include dispensations for both human and veterinary patients. While they use a standard format for dispensers who submit dispensation data to PDMPs, variability still exists in how veterinary prescriptions are reported. Most states require veterinarians to include additional information not found on other practitioners' prescriptions. Along with the name and date of birth (DOB) of the owner, states may require veterinarians to include species; age; and in some states—the name of the animal; gender of the animal; and the animal's owner. Without this additional information, a pharmacy may not dispense the prescription.

Some confusion and misunderstanding exists among veterinarians and pharmacists regarding what information to include on a prescription. Besides uncertainty caused by statutory language on whose name and information to list on the prescription, some veterinarians enter the age of the owner even when some states may require the animal's age. Another issue is that some owners do not know the age of the animal as they may have adopted the pet from an animal shelter or perhaps from another person, and veterinarians rarely collect the owner's DOB or gender. Since most PDMPs require the reporting of the owner's name, a common challenge faced by veterinarians is that an animal's owner can change from prescription to prescription. Additional confusion occurs when the animal may not have an owner (i.e., strays, animals at zoos, or animal shelters).

Federal law, Title 21 CFR §1306.05(a) shows that "All prescriptions for controlled substances shall be dated as of, and signed on, the day when issued and shall bear the full name and address of the patient, the drug name, strength, dosage form, quantity prescribed, directions for use, and the name, address and registration number of the practitioner." The difference is subtle, but it appears that federal law requires the name of the animal patient (not the owner) be listed on the prescription. However, in the Drug Enforcement Administration's Practitioner's Manual – Section V Valid Prescription Requirements, it indicates that "A prescription is an order for medication which is dispensed to or for an ultimate user." The definition of "ultimate user" is found in Title 21 United States Code (USC) Controlled Substances Act §802 (27): "The term "ultimate user" means a person who has lawfully obtained, and who possesses, a controlled substance for his own use or for the use of a member of his household or for an animal owned by him or by a member of his household." The definition of "person" is found in Title 21 USC Controlled Substance Act §1300.01: "Person includes any individual, corporation, government or governmental subdivision or agency, business trust, partnership, association or other legal entity." NASCSA's Model Prescription Monitoring Act 2021 defines "owner" as ". . . the owner,

client, or person who is responsible for the care of the animal or who arranges for the animal's veterinary care when the prescription is dispensed.”

Therefore, the working group recommends the following when ownership is to a specific person or entity. See [Appendix A](#) for detailed description of ASAP data elements.

Use case one—Ownership by a single person (e.g., human)

- PAT01 through PAT19, PAT21, and PAT22 populated with the animal owner's information
- PAT20 and PAT 23 populated with animal patient's information

Use case two—Ownership by an entity (e.g., zoo, animal shelter, animal rescue organization)

- PAT01 through PAT11, PAT17 through PAT19, and PAT21 through PAT22 populated with information from the person who is responsible for the care of the animal or who arranges for the animal's veterinary care
- PAT12 through PAT16 populated with the address of the entity where the animal resides (e.g., zoo, animal shelter)
- PAT20 and PAT 23 populated with the animal patient's information

ASAP Reporting Standard for Veterinary Prescriptions ([back to list](#))

Recommended Best Practice: Veterinary software vendors should incorporate the ability to automate the reporting of ASAP files to PDMPs.

Anecdotal reports from dispensing veterinarians reveal that the currently available veterinary software makes reporting the required data elements to the PDMP time consuming and difficult. These challenges are like those faced by pharmacies when PDMPs were first introduced. For some pharmacies, when PDMPs were adopted, there was a gradual progression in method of reporting—from reporting manually, to uploading a file, to automating the file via secure file transfer. Dispensing veterinarians may face similar challenges in adopting PDMP reporting into their workflow. Therefore, it is recommended that veterinary software vendors include in their software packages the ability to automate reporting to PDMPs in the ASAP format.

Reporting Veterinary Dispensations to the PDMP [\(back to list\)](#)

Recommended Best Practice: Veterinary prescription records should include the prescriber's DEA registration number if the monitored drug is a controlled substance or the prescriber's State License number if the monitored drug is a non-controlled substance.

When reporting a veterinary prescription dispensation to the PDMP, use the prescriber's DEA number (PRE02) if the monitored drug is a controlled substance. If the monitored drug is a non-controlled substance and a drug that must be reported, use the prescriber's State License number (PRE04). The DEA and State License number are the only prescriber identifiers recommended. Veterinarians do not meet the regulatory definition of a "health care provider" as defined in 45 CFR §160.103 and are not eligible to obtain an NPI.

Inclusion of Veterinary Medications in PDMP National Drug Code (NDC) Files [\(back to list\)](#)

Recommended Best Practice: Include all NDCs for veterinary medications in the PDMP NDC files.

The recommended best practice is to include all NDCs for veterinary medications in the PDMP NDC files. Exclusion of these NDCs may cause incomplete patient reports because of errors generated during file uploads whereby there is no NDC match within the PDMP files. This may cause delays in dispensation data reporting, since submitted prescription records with errors rarely appear in PDMP reports until corrected. Since not all drug databases contain veterinary drugs and their respective NDCs, it is important for the PDMP vendor to use a database that contains this information.

Note: An exception includes the reporting of compounded medications. For compounded medications, the reporting party uses the NDC number for each individual ingredient in the compounded medication.

Mandatory PDMP Registration [\(back to list\)](#)

Recommended Best Practice: Allow veterinarians to register for the state PDMP within the state they hold a professional license to practice.

Results from the 2021 PDMP TTAC veterinarian survey and statutory review showed that there are 14 states that specifically include veterinarians within their mandatory registration provisions and 21 that exempt or exclude. Most states allow the registration of veterinarians to query the PDMP. The enrollment of veterinarians provides for timely review of dispensations by the animal owner and is a valuable tool, which may allow veterinarians to recognize unusual activity. As more states move to requiring veterinarians to report dispensations to PDMPs, veterinarians will recognize the value of the system. Veterinarian enrollment in the PDMP will occur on a voluntary or mandatory basis.

Query Fields [\(back to list\)](#)

Recommended Best Practice: Veterinarians should query their veterinary patient utilizing the animal owner’s first name, last name, and date of birth. Veterinarians should utilize the identifying information of one owner for each animal patient, if possible.

The recommended best practice regarding veterinarians querying a veterinary patient originates from the fact that the recommended reported fields are for the owner of the animal. Since the established best practice for veterinary prescriptions is to report the first name (PAT08), last name (PAT07), and date of birth (PAT18) of the animal owner—the veterinarian should perform the veterinary query with the animal owner’s first name, last name, and date of birth. These query fields would also apply to registered pharmacists and healthcare practitioners of human patients who are querying the animal owner to determine both human and veterinary prescriptions dispensed to that recipient. Challenges may arise in situations where an animal patient has multiple owners, making it difficult to identify who is receiving the prescription and to query the appropriate owner. There is an inherent value of requiring PDMP data submitters to report all prescriptions for a specific animal under one owner’s first name, last name, and date of birth.

Note that due to state laws and interpretation of HIPAA, the following states do not allow human prescriptions to appear on the patient activity report when a veterinarian queries an animal patient:

Arkansas	California	Idaho
Minnesota	Nebraska	North Carolina
North Dakota	South Carolina	Texas
Virginia	Wyoming	

PDMP Access to Veterinary Prescriptions [\(back to list\)](#)

Recommended Best Practice: Allow veterinarians the authority to query PDMPs to review veterinary prescriptions that were issued for their animal patients. Allow practitioners and pharmacists, who treat human patients, the authority to query and review veterinary prescriptions that were issued to their human patients.

There was a fundamental agreement within the working group that the veterinary patient is not at risk for prescription misuse, but rather the human owner of the animal may be. To ensure healthcare providers are well-informed, there should be a mechanism in place that associates veterinary prescriptions with the human owner’s PDMP profile. Linking veterinary and human PDMP profiles provides healthcare practitioners with a comprehensive view of all medications contained within the shared household. Results from the 2021 PDMP TTAC veterinarian survey and statutory review showed that 20 PDMPs—because of law, regulation, or policy—do not

permit veterinarians to query their PDMPs. Eight PDMPs require veterinarians to query the PDMP, and 22 allow veterinarians to query the PDMP. These states do not explicitly show the PDMP information a veterinarian can view. There are three states (Colorado, Indiana, and New Hampshire) that have statutes permitting practitioners, including veterinarians, to access the PDMP records for a human patient as both a patient and an animal owner. Most states allow practitioners (excluding veterinarians) to access PDMP records for a human patient as both a patient and an animal owner. This diverse set of practices produces challenges to interstate data sharing, since it results in some states allowing access while others do not. As states adopt this recommended best practice, these challenges with interstate data exchange should lessen.

Identification of Veterinary Prescriptions on PDMP Reports [\(back to list\)](#)

Recommended Best Practice: PDMPs should develop a method to identify prescriptions issued by veterinarians on the PDMP report (e.g., animal icon).

As mentioned above, most states allow practitioners (excluding veterinarians) to access PDMP records for a human patient as both a patient and an animal owner. The patient report, from over half of the PDMPs, includes a delineator or paw print icon to identify prescriptions issued by veterinarians. It is important to note that some states have enacted laws offering HIPAA-like protection to animal medical records prohibiting disclosure without the owner's consent. The [American Veterinary Medical Association](#) (AVMA) has a compilation of statutory and regulatory provisions regarding the confidentiality of veterinary patient records.

Veterinary Prescriptions and Unsolicited Reporting [\(back to list\)](#)

Recommended Best Practice: Each state PDMP should determine how the incorporation of veterinary prescriptions in the patient PDMP report shall impact their unsolicited reporting.

The working group did not reach a consensus regarding unsolicited reporting of veterinary prescriptions. Many state PDMPs provide clinical alerts and other risk indicators as unsolicited reports to notify data requesters that their patient may be at an increased risk for overdose or a significant adverse event once the patient meets or exceeds an established threshold. Given that the animal patient's owner is identified rather than the animal, unsolicited reporting regarding common clinical alert thresholds may falsely alert healthcare practitioners to risks that do not exist and could negatively affect the care and treatment of the animal owner.

Note: There is inherent value of requiring veterinarian establishments that report their dispensation data to a PDMP to report all prescriptions for a specific animal under one owner's first name, last name, and date of birth.

Veterinary Prescriptions and Solicited Automated Analytics, including Morphine Milligram Equivalent (MME) Calculations, Risk Score Calculations, and Solicited Clinical Alert Thresholds [\(back to list\)](#)

Recommended Best Practice: PDMP vendors should exclude veterinary prescriptions from solicited automated analytics by default and allow individual users to incorporate veterinary data based on the clinical judgement of the PDMP user.

Given that reporting standards require the first name, last name, and date of birth of the veterinary patient's owner, the recommended best practice is that PDMPs exclude veterinary prescriptions (dispensations with species code 02) from MME calculations, risk score calculations, and clinical alerts for the animal's owner. Clinical alerts commonly include multiple prescriber and dispenser thresholds, daily active MME thresholds, excessive opioid duration of treatment thresholds, and opioid and benzodiazepine combination thresholds. Inclusion of veterinary prescriptions in the owner's opioid-related PDMP analytics may create a negative bias to identify individuals (human patients) who have many pets or a pet with significant health issues. However, data requesters should be mindful of all veterinary prescriptions that are included in the animal owner's report and should consider all elements in the PDMP report to make a well-informed prescribing and/or dispensing decision regarding the care and treatment of their patient.

Reporting Compliance Audits of Veterinary Records [\(back to list\)](#)

Recommended Best Practice: Veterinary offices should be treated like other PDMP data uploaders and included in PDMP reporting compliance audits.

In states that require veterinarians who dispense controlled substances to report that information to the PDMPs, it is problematic to ensure that these providers are complying with the reporting requirements. For other health-care providers, who dispense controlled substances (e.g., MDs, DOs, DDSs), PDMPs can obtain copies of the controlled-substance sales reports from manufacturers and distributors listing a provider's information and controlled substances sold to that provider; PDMPs should ensure that they include veterinary medications in those reports. With most veterinarians dispensing directly to their patients, it becomes important to ensure compliance for veterinarians to follow the same processes as for other dispensers. PDMPs should work with controlled-substance manufacturers and distributors to ensure that their reports include veterinarians and veterinary medications for PDMPs to review as part of their reporting compliance process.

Education of Veterinary Utilization of PDMPs and Inclusion of Veterinary Prescriptions in State PDMPs [\(back to list\)](#)

Recommended Best Practices: PDMPs should collaborate with their respective State Board of Veterinary Medicine and professional associations in creating educational presentations and/or materials outlining veterinary best practices, requirements for veterinarians, and resources for the reporting of veterinary dispensations. Furthermore, education for dispensing pharmacies should be made accessible to ensure that the reporting of veterinary prescriptions is consistent with the reporting standards provided for veterinarians and veterinary clinics.

To minimize difficulties associated with the inclusion of veterinary prescriptions within the state PDMPs, the recommended best practice is to collaborate with their respective State Board of Veterinary Medicine and professional associations in creating educational presentations and/or materials outlining veterinary best practices, requirements for veterinarians, and resources for the reporting of veterinary dispensations.

The working group recommends the ongoing education of dispensing pharmacies. The purpose of this is to ensure that reporting of veterinary prescriptions is consistent with reporting standards provided for veterinarians and veterinary clinics. This is important because the reporting entity is not identified as a pharmacy or a veterinary establishment in the patient history report but simply as a dispenser.

For dispensing pharmacies, it is critical for pharmacy systems to differentiate veterinary prescriptions associated with an owner and the human's personal prescriptions. One potential complication is for the veterinary prescription to be filled erroneously as the human's prescription or the human's prescription being processed as if the animal is the recipient. The working group strongly recommends that dispensers clearly differentiate veterinary prescriptions from the human's prescriptions to minimize data entry errors.

APPENDIX A
PATIENT INFORMATION SEGMENT (ASAP 4.2B) ([back to list](#))

ASAP Field ID	Data Element Name	Usage	Purpose
PAT01	ID Qualifier of Patient Identifier	Situational	Code identifying the jurisdiction that issues the ID in PAT03
PAT02	ID Qualifier	Situational	Code to identify the type of ID in PAT03
PAT03	ID of Patient	Situational	Identification number for the patient or animal owner
PAT04	ID Qualifier of Additional Patient Identifier	Situational	Code identifying the jurisdiction that issues the ID in PAT06
PAT05	Additional Patient ID Qualifier	Situational	Code to identify the type of ID in PAT06
PAT06	Additional ID	Situational	Identification that might be required by the PDMP to further identify the patient or animal owner
PAT07	Last Name	Required	Patient's or animal owner's last name
PAT08	First Name	Required	Patient's or animal owner's first name
PAT09	Middle Name	Situational	Patient's or animal owner's middle name or initial if available
PAT10	Name Prefix	Situational	Patient's or animal owner's name prefix (such as Mr. or Dr.)
PAT11	Name Suffix	Situational	Patient's or animal owner's name suffix (such as Jr. or the III)
PAT12	Address Information 1	Required	Patient's or animal owner's address
PAT13	Address Information 2	Situational	Freeform text for additional address information
PAT14	City Address	Required	Freeform text for city name
PAT15	State Address	Situational	U.S. Postal Service state code
PAT16	Zip Code Address	Required	U.S. Postal Service zip code
PAT17	Phone Number	Situational	Complete phone number including area code
PAT18	Date of Birth	Required	Date patient or animal owner was born
PAT19	Gender Code	Situational	Code indicating the sex of the patient or animal owner
PAT20	Species Code	Situational	Used if required by the PDMP to differentiate a prescription for an individual from one prescribed to an animal
PAT21	Patient Location Code	Situational	Code indicating where patient or animal owner is located when receiving pharmacy services
PAT22	Country of Non-U.S. Resident	Situational	Used when the patient's or animal owner's address is a foreign country
PAT23	Name of Animal	Situational	Used if required by the PDMP for prescription written by a veterinarian

PDMP Administrator Question Re: Veterinarian Requirements

Question posed on April 24, 2018 via Basecamp for Alaska Board of Veterinary Examiners: Does your state currently require veterinarians to register with the PDMP? If so, does your state also have mandatory use? What have veterinarians identified as being the biggest challenges in using the PDMP? If your state does not require veterinarians to register and/or use the PDMP, what are the reasons for their exclusion? Lastly, (if your state doesn't currently require this) does your state intend to add veterinarians as mandatory practitioners, if so, when?

Veterinarian Requirements?	State	Response
Yes	Connecticut	<p>1. Initially, there were a lot of questions about pulling patient reports. What criteria should they use to conduct a patient search? Do they search for the pet or the owner?</p> <p>2. There were concerns about pulling the owner's pdmp report because the pet is the patient not the person.</p> <p>3. Connecticut is mandatory registration and utilization. Since veterinarians usually prescribe and dispense at the facility, there was initially a lot of confusion about when to upload into the PMP Clearinghouse and when to look up a patient. Differentiating between the two consisted of a lot of meetings and FAQs development.</p> <p>4. Our state mandates daily reporting. Advocates representing the veterinarian community we're able to push back to remain on the weekly reporting schedule. Some factors: limited resources/staff, small practices, lots of zero reporting, practices without technology (i.e. computers, mobile device, Internet)</p>
Yes	South Carolina	<p>When SC passed the mandatory use law in May 2017, it did not exempt any provider types. Therefore, veterinarians that prescribe more than a 5 day supply of CII medications are required to check PMP. The biggest challenge is animal DOB. Because DOB of animal is often unknown, the veterinarians have a difficult time locating the patient's information in PMP. Animal prescriptions are not associated with owner's profile. Veterinarians are not allowed to look up people profiles since they don't have a practitioner-patient relationship with the owner.</p>
Yes, effective July 1, 2018	Nebraska	<p>Nebraska will begin requiring veterinarians to report CII-IV on July 1.</p> <p>We do not have mandatory use. There have been concerns brought up by lobbyists for the vets whether they have a right under HIPAA to review a patient/client's PDMP report.</p> <p>We have a workgroup of about ten veterinarians from various practice (small animals, large animals, Humane Society, etc.) whom have gone over in some detail the barriers and opportunities. Vets typically don't collect the client DOB. We've seen entries ranging from the patient's estimated DOB, to a default entry of 01/01/1900 and everything in between. Gender can also be a challenge. some enter the patient's gender, while others enter the client. We try to get them to understand that we're interested in the owner's information and not the animal, since it's not Fluffy or Fido who may be misusing or abusing controlled substances. The issue of the owner is also a challenge. I may bring in my pet for tramadol one time, then my wife may be the owner next time if she brings in the animal for a new prescription, then my children may be listed as the owner the next time if they bring in the animal. This is inconsistent and confusing, especially when vets don't collect this information in most cases. We've been working with the vet ambulatory clinic</p>

		<p>software vendors to discover that many can report in ASAP format, but some don't follow the actual ASAP formatting for field length, etc so we're working with them to provide a valid report. Several vets see the potential benefits of reporting and viewing the data, but most don't see that it's worth it, as "I know my clients and they wouldn't do such a thing", or it's a very small population causing the problem, or we can't identify an issue if there's no consistency with collecting a client name and DOB since they'll be paying cash and "forget" their ID when picking up the prescription. Enough of my lengthy tirade. I can go into even more detail if you like. Bottom line - it's a challenge at best.</p>
Yes	Maryland	<p>The bill that created mandatory registration and use created a situation that I don't think is what legislators intended, but it required veterinarians to be registered with PDMP but then didn't provide a valid use case for them to actually access the data.</p> <p>I would strongly urge you to try to insert yourself more actively into the details of definitions / requirements because I wish I had caught that the way they tied PDMP registration to our state-level CDS registration would require us to have veterinarians be registered, which is ridiculous when our definition of a prescriber in our statute (for the purpose of gaining clinical use access to PDMP data) requires that provider to be treating patients (defined as humans).</p> <p>There has been interest in having veterinarians play a role in PDMP here in Maryland by some legislators, but they haven't been able to articulate exactly what their policy goal is.</p> <p>Veterinarian dispensing is not regulated very well here in Maryland and so we have advocated that this part of the equation be beefed up as a first step.</p> <p>Veterinarians in Maryland have voiced discomfort with having access to HIPAA-protected data as that is not part of their general scope of practice. They do not want to be in a position to identify an animal owner with SUD because again, not within their scope of practice to address. Therefore, they would only be looking for individuals who are committing fraud or animal cruelty. They were unclear what appropriate steps could be taken, other than firing the owner or calling police. I think we're at least another legislative session or 2 away from clearing up what veterinarians' role, if any, will be in relation to PDMPs. Very interested to hear how these changes play out in other states!</p>
Yes	West Virginia	<p>WV requires all practitioners who prescribe or dispense controlled substances to have access, including vets. There is mandated use for initial C-II, opioid and benzo prescriptions. New legislation also limits vets to 7-day opioid prescriptions.</p> <p>There have been a couple challenges. One is educating the various practitioners about the PDMP requirements. The other was a PDMP vendor issue that was requiring an NPI #, which vets don't have. We now have that remedied.</p>
No	Georgia	<p>Veterinarians are not pdmp users in GA.</p>

Yes	New Hampshire	<p>In NH – veterinarians are required to register and upload data to the PDMP as dispenser if they are the “owners” of the controlled substances. Veterinarians with DEA numbers associated with their NH licenses are also required to register to utilize the database – however for veterinarians only it is voluntary. The data for a Rx for an animal is uploaded with the human name, DOB, address, and a required species code – 02 for animal that then requires a name field for the animal as well. If they were to query, they would query the owner of the animal. It would show the owners’ controlled prescription history and any animal controlled prescription history attached to them. The “human” provider when querying their patient would also see any animal/pet controlled substance prescriptions filled.</p> <p>For the veterinarian this allows them to view whether the animal/pet has been seen by multiple veterinarians and/or whether there could be a potential issue with the animal receiving their treatment if the opioid prescription was given to the owner if the owners’ controlled substance history showed possible concern of misuse/diversion.</p> <p>For the human provider, they could see if their patient was extending misuse/abuse beyond human practitioners by bring their pets to multiple providers.</p>
No; repealed in 2016	Arizona	<p>The original PMP law in Arizona included veterinarians and veterinary dispenses in CII-IV, but the requirement for them to register and report dispensing was removed effective in 2016.</p> <p>In the 2018 Special Session on the Arizona Opioid Epidemic, it was discussed again about veterinarians and veterinarian dispensing. It was decided that veterinarians would remain exempt from the PMP, but the following was added into statute (sorry about the all caps): 32-2239.01. Duty to report; clients seeking controlled substances; immunity</p> <p>A. A VETERINARIAN WHO REASONABLY SUSPECTS OR BELIEVES THAT A CLIENT OR PERSON IS TRYING TO OBTAIN CONTROLLED SUBSTANCES WITH AN INTENT OTHER THAN TO TREAT THE PATIENT ANIMAL SHALL REPORT THAT SUSPICION, OR CAUSE A REPORT TO BE MADE, TO LOCAL LAW ENFORCEMENT WITHIN FORTY -EIGHT HOURS AFTER THE TREATMENT OR EXAMINATION. THE REPORT SHALL INCLUDE THE NAME AND ADDRESS OF THE CLIENT OR PERSON WHO SOUGHT THE EXAMINATION OR TREATMENT. THE VETERINARY RECORDS PERTAINING TO THE INVESTIGATION INITIATED PURSUANT TO THE REPORT TO LAW ENFORCEMENT UNDER THIS SUBSECTION SHALL BE PROVIDED TO LOCAL LAW ENFORCEMENT ON REQUEST FOR ANY FURTHER CRIMINAL INVESTIGATION.</p> <p>B. A VETERINARIAN WHO FILES A REPORT OR CAUSES A REPORT TO BE FILED PURSUANT TO SUBSECTION A OF THIS SECTION IS IMMUNE FROM CIVIL LIABILITY WITH RESPECT TO ANY REPORT MADE IN GOOD FAITH.</p>

From: [Carrillo, Laura N \(CED\)](#)
To: [Lund, Ilsa M \(CED\)](#); [Powers, Rebecca J \(CED\)](#)
Cc: [Sherrell, Lisa D \(CED\)](#)
Subject: FW: Question re: veterinarians
Date: Friday, March 13, 2020 9:11:00 AM
Attachments: [FAQ PMP Veterinarians Effective 09.05.2019_03.10.2020.pdf](#)
[Veterinarian Confirmation of Approval to Report to Virginia's PMP Template.pdf](#)

Some info to share with your board! Maybe another solution is to seek legislative change to allow regulation of veterinary establishments so licensees can use PHA03 and PRE02 codes for reporting/reviewing. Clarifying through a regulation proposal and with cursory review by law might help the board determine whether they do have the authority to define ownership.

Thank you,

Laura Carrillo, MPH
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From: Brown, Desire [mailto:desire.brown@dhp.virginia.gov]
Sent: Tuesday, March 10, 2020 10:06 AM
To: Carrillo, Laura N (CED) <laura.carrillo@alaska.gov>
Cc: Carolyn Mckann <carolyn.mckann@dhp.virginia.gov>; Ralph Orr <ralph.orr@dhp.virginia.gov>
Subject: Question re: veterinarians

Hi Laura!

I can certainly understand the challenges you are facing as we were once there too.

I think the best advice we can provide is to work with the Veterinary Board to help with any communications about regulatory changes or mandates required by your state and staying consistent with communicating the requirement of reporting to vets. Honestly, most vets are busy, have low staff, or just simply forget to report but the key is to be consistent.

In Virginia, veterinarians are exempt if they meet the following criteria:

§ 54.1-2522. Reporting exemptions.

7. Dispensing of covered substances by veterinarians to animals within the usual course of their professional practice for a course of treatment to last seven days or less or if such covered substance is feline buprenorphine or canine butorphanol.

In collaboration with the Vet Board, we created a list of FAQ's to help veterinarians identify which option they would like to select; not dispense any controlled substances, limiting dispensing to 7 days or less or continue to dispense and report. Veterinarians who selected

to report to the PMP contacted us directly to receive additional instructions. This part was tedious as many vets did not know the difference between "dispensing" and "prescribing", but after explaining, it helped separate those who needed to report from those who requested an exemption.

It's also important to give clear instructions to the reporting vets regarding the criteria necessary for your PMP. Some of the larger facilities have software systems that can automate reporting but I quickly found that many veterinary practices (especially operated solely by a vet or group of vets) do not have a robust system let alone the staff to be able to manually report. To help with this, I created an email template that detailed each section of the Universal Claim Form (UCF) in Clearinghouse (with screenshots), what fields were required and what information needed to be included in those fields. We also allowed for individual reporting and establishment reporting. If a veterinary establishment wanted to continue to dispense they could report for all veterinarians in the practice instead of each vet reporting for themselves, individually. For this, we require the DEA number of the VIC to be the "Pharmacy DEA" (PHA03) and the DEA number of the vet in the practice that dispensed the medication to be listed in the "Prescriber" section (PRE02)

To this day, I still have many vets that are delayed in reporting but we continue to [educate them on the purpose and their role in PMP](#) in hopes they would become consistent and eventually 100% compliant.

I hope this answered your question.

If I did not, please do not hesitate to ask additional questions!

Desiré Brown
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[An Overview of Virginia's Prescription Monitoring Program](#)

Interested in integrating PMP information into your EMR or Pharmacy software application?
Click [here](#) for more information.

State	Required to report to PDMP	Data transmission frequency for Veterinarians	Criteria for veterinarian queries
Alabama		N/A	Animal Owner's name
Alaska	Yes	Daily	Animal Owner's name and date of birth
Arizona			
Arkansas	Yes	Monthly	Animal's Name
California	Yes	weekly	Animal's Name
Colorado			Animal's Name, Animal Owner's Name
Connecticut	Yes	Weekly	Animal's Name and Animal Owner's Last Name
Delaware			
District of Columbia	Yes	Daily	Animal's Name, Animal Owner's Name, Animal Owner's Address

State	Required to report to PDMP	Data transmission frequency for Veterinarians	Criteria for veterinarian queries
Florida			
Georgia		Daily	
Guam			
Hawaii			Animal Owner's Name, Animal Owner's Address
Idaho			Animal's Name
Illinois	Yes	Daily	Animal's Name, Animal Owner's Name
Indiana	Yes	Daily; anything more than a 72 hour supply	Animal's Name or Animal's First Name and Animal Owner's Last Name
Iowa			
Kansas			
Kentucky			
Louisiana			
Maine	Yes	Daily	Animal Owner's Name and Date of Birth

State	Required to report to PDMP	Data transmission frequency for Veterinarians	Criteria for veterinarian queries
Maryland			
Massachusetts		Daily	
Michigan	Yes	Daily	Animal Owner's Name
Minnesota			Animal's Name, Date of Birth
Mississippi			Animal's Name, Animal Owner's Name
Missouri			
Montana			Vets do not have access to the MPDR.
Nebraska	Yes	Daily	Animal Owner's Name
Nevada			Veterinarians in Nevada are not permitted to access the Nevada PMP.

State	Required to report to PDMP	Data transmission frequency for Veterinarians	Criteria for veterinarian queries
New Hampshire	Yes	Weekly	Animal Owner's Name
New Jersey			Animal's Name, Animal Owner's Name, Date of Birth
New Mexico			
New York	Yes	Daily	Vets report but do not search
North Carolina	Yes	Rules are in the process of being developed	
North Dakota			first name, last name, and date of birth
Northern Mariana Islands			
Ohio			Animal's Name, Animal Owner's Address, Date of Birth

State	Required to report to PDMP	Data transmission frequency for Veterinarians	Criteria for veterinarian queries
Oklahoma	Yes	Real-time	Animal Owner's Name
Oregon			
Pennsylvania			
Puerto Rico		48 hours	
Rhode Island			Animal's Name, Animal Owner's Name
South Carolina	Yes	Daily	Animal's Name
South Dakota			
Tennessee	Yes	14 days	Animal's Name
Texas			Animal's Name; veterinarians may not search an owner's prescription history
Utah			Animal Owner's Name, Animal Owner's Address, Date of Birth

State	Required to report to PDMP	Data transmission frequency for Veterinarians	Criteria for veterinarian queries
Vermont			
Virginia	Yes	Daily	Animal Owner's Name, Animal Owner's Address
Washington	Yes	Quarterly	veterinary records are searchable via the animal's name (animal first name + (owner's) last name) and animal's DOB and not by owner's name + animal's DOB. Owner information is recorded as "person dropping off / picking up prescription"
West Virginia	Yes	Daily	Animal Owner's Name
Wisconsin			
Wyoming			

Veterinarian access to owner's prescription history	Veterinarian Reporting Method	Veterinarian Reporting Specifications
Yes	Electronic	
	Fax, Web Portal	Yes
	Electronic	
Yes		
Yes	Web Portal	Yes
Yes	Web Portal	Yes

Veterinarian access to owner's prescription history	Veterinarian Reporting Method	Veterinarian Reporting Specifications
Yes		
Yes	Electronic, Fax	
Yes	Rules not yet promulgated	Yes

Veterinarian access to owner's prescription history	Veterinarian Reporting Method	Veterinarian Reporting Specifications
	Electronic	
Yes	Electronic, Mail, Fax, Web Portal	Yes
Yes		
	Web Portal	

Veterinarian access to owner's prescription history	Veterinarian Reporting Method	Veterinarian Reporting Specifications
Yes	Electronic, Web Portal	Yes
	Electronic	Yes
	Mail, Web Portal	Yes
Yes		

Veterinarian access to owner's prescription history	Veterinarian Reporting Method	Veterinarian Reporting Specifications
Yes	Electronic, Web Portal	Yes
Yes		
	Electronic, Web Portal	Yes
	Electronic, Mail, Fax, Web Portal, email completed form	
Yes		

Veterinarian access to owner's prescription history	Veterinarian Reporting Method	Veterinarian Reporting Specifications
	Electronic, Fax, Web Portal	
Yes	Electronic, Web Portal	Yes

Veterinarian Reporting Specifications Differences	Veterinarian Data Fields
Pharmacists have requested clarification from veterinarians on this as there are discrepancies in reporting certain data fields; however, the Alaska Board of Veterinary Examiners has not established reporting specifications.	PAT08 - Owner's First Name, The Alaska Board of Veterinary Examiners has not determined which ASAP fields they will be required to report.
	PAT07 - Last Name, PAT08 - Animal's First Name, PAT18 - Animal's Date of Birth, PAT19 - Animal's Gender, PAT20 - Species Code, PAT21 - Name of Animal,
	PAT07 - Last Name, PAT08 - Owner's First Name, PAT18 - Animal's Date of Birth, PAT19 - Owner's Gender, PAT20 - Species Code, PAT21 - Name of Animal,
	PAT07 - Last Name, PAT08 - Animal's First Name, PAT18 - Animal's Date of Birth, PAT19 - Animal's Gender, PAT20 - Species Code
	PAT07 - Last Name, PAT08 - Owner's First Name, PAT08 - Animal's First Name, PAT18 - Owner's Date of Birth, PAT18 - Animal's Date of Birth, PAT19 - Owner's Gender, PAT19 - Animal's Gender, PAT20 - Species Code, PAT21 - Name of Animal,

Veterinarian Reporting Specifications Differences	Veterinarian Data Fields
	PAT07 - Last Name, PAT08 - Owner's First Name, PAT08 - Animal's First Name, PAT18 - Owner's Date of Birth, PAT18 - Animal's Date of Birth, PAT19 - Owner's Gender, PAT19 - Animal's Gender, PAT20 - Species Code, PAT21 - Name of Animal
	Rules not yet promulgated

Veterinarian Reporting Specifications Differences	Veterinarian Data Fields
	PAT07 - Last Name, PAT18 - Owner's Date of Birth, PAT20 - Species Code, PAT21 - Name of Animal
	PAT07 - Last Name, PAT08 - Owner's First Name, PAT18 - Owner's Date of Birth, PAT19 - Owner's Gender, PAT20 - Species Code, PAT21 - Name of Animal
<p>Veterinarians are only required to report CS II-V (Human drugs are all dispensed prescriptions regardless of schedule) also veterinarians are not required to provide owners DOB.</p>	<p>PAT07 - Last Name, PAT08 - Owner's First Name, PAT19 - Owner's Gender, PAT20 - Species Code, PAT21 - Name of Animal, Please note that Owner gender and DOB are not required fields but can be provided.</p>

Veterinarian Reporting Specifications Differences	Veterinarian Data Fields
	PAT07 - Last Name, PAT08 - Owner's First Name, PAT18 - Owner's Date of Birth, PAT19 - Owner's Gender, PAT20 - Species Code, PAT21 - Name of Animal,
	Still in development
	For veterinary prescriptions, a separate patient account/profile is created in the pharmacy software containing the animal/pet owner's name in the first name and last name fields and date of birth under species code enter Veterinary patient and under Name

Veterinarian Reporting Specifications Differences	Veterinarian Data Fields
	PAT07 - Last Name, PAT08 - Owner's First Name, PAT18 - Owner's Date of Birth, PAT19 - Owner's Gender, PAT20 - Species Code, PAT21 - Name of Animal
	PAT07 - Last Name, PAT08 - Animal's First Name, PAT18 - Animal's Date of Birth, PAT19 - Animal's Gender, PAT20 - Species Code, PAT21 - Name of Animal
See TCA53-10-304	PAT07 - Last Name, PAT08 - Animal's First Name, PAT18 - Animal's Date of Birth

Veterinarian Reporting Specifications Differences	Veterinarian Data Fields
<p>Requirements for reporting are different for pharmacies and dispensing vets. Interface for direct reporting by Vets (including report by fax) are designed for pet record reporting.</p>	<p>PAT07 - Last Name, PAT08 - Owner's First Name, PAT08 - Animal's First Name, PAT18 - Owner's Date of Birth, PAT18 - Animal's Date of Birth, PAT20 - Species Code, PAT21 - Name of Animal</p>
	<p>PAT07 - Last Name, PAT08 - Animal's First Name, PAT18 - Animal's Date of Birth, PAT19 - Animal's Gender, PAT20 - Species Code</p>

Veterinarian Reporting Description	Veterinarian Reporting Mandate Compliance
Veterinarians are required to report if directly dispensing federally scheduled II - IV controlled substances	Yes
Veterinarians are required to report	Yes
Veterinarians are required to report	Yes
Veterinarians are required to report	Yes
Veterinarians are required to report	Yes

Veterinarian Reporting Description	Veterinarian Reporting Mandate Compliance
Veterinarians are exempted from reporting.	
Veterinarians are required to report	
Veterinarians are required to report	

Veterinarian Reporting Description	Veterinarian Reporting Mandate Compliance
Veterinarians are required to report	Yes
Veterinarians are required to report	Yes
Veterinarians are required to report	Yes

Veterinarian Reporting Description	Veterinarian Reporting Mandate Compliance
Veterinarians are required to report	Yes
Veterinarians are required to report	Yes
Veterinarians are required to report	Yes

Veterinarian Reporting Description	Veterinarian Reporting Mandate Compliance
Veterinarians are required to report	Yes
Veterinarians are required to report	Yes
Veterinarians are required to report	Yes

Veterinarian Reporting Description	Veterinarian Reporting Mandate Compliance
Veterinarians report dispensing for greater than a 7 day course of treatment. Same requirements as other dispensers. Most send prescriptions to pharmacies.	
Veterinarians are required to report	Yes
Veterinarians are required to report	

Veterinarian Reporting Mandate Compliance Details	Veterinarian Reporting Issues
<p>Attorney, board of pharmacy, and PDMP manager have been in communication with the Board of Veterinary Examiners to assist them with how to developing reporting and registration standards.</p>	<p>Veterinarian does not have a DEA or NPI number, Veterinarian does not have animal owner's information, Veterinarians reports non-controlled substances to PDMP, Veterinarian's software does not allow electronic submission of data, Veterinarian's software i</p>
<p>We are educating veterinarians on the method to report to ensure proper reporting.</p>	<p>Veterinarian's software does not allow electronic submission of data, Veterinarian's software s not able to report data in ASAP format</p>
<p>The CA PDMP (CURES) makes data and reports available for the Veterinary Medical Board to ensure veterinarian compliance with the reporting mandate.</p>	<p>Inconsistencies in data reported by veterinarians.</p>
	<p>Veterinarian does not have animal owner's information, Veterinarians sometimes do not have client's DOB and feel uncomfortable asking for it to perform a search. We explain that a "partial name" search can remove the DOB requirement.</p>
<p>Compliance letters are issued.</p>	
	<p>Veterinarian does not have a DEA or NPI number</p>
<p>Pending legislation for mandatory query</p>	<p>Veterinarian does not have a DEA or NPI number, Veterinarians reports non-controlled substances to PDMP, Veterinarian's software does not allow electronic submission of data</p>

Veterinarian Reporting Mandate Compliance Details	Veterinarian Reporting Issues
	Veterinarian does not have a DEA or NPI number, Veterinarian does not have animal owner's information
	Veterinarian does not have a DEA or NPI number, Veterinarians reports non-controlled substances to PDMP, Veterinarian's software s not able to report data in ASAP format
	The only veterinary prescriptions are reported by dispensing pharmacies -- veterinarians are not required to report what they dispense.
	Veterinarian does not have a DEA or NPI number

Veterinarian Reporting Mandate Compliance Details	Veterinarian Reporting Issues
	pharmacy reporting veterinary prescriptions dispensed by them do not complete species code.
Vets are included in general compliance reporting management and SOP	Veterinarian does not have a DEA or NPI number, Veterinarians reports non-controlled substances to PDMP guidance on how to submit ASAP information on pet meds is not sufficient to date. We see a variety of inconsistent data coming across (pets name vs own
Prescription audit project.	
	Veterinarian does not have a DEA or NPI number, It will be a change in process for veterinarians to collect the owner's date of birth.
	they do not report, these would be filled at a retail pharmacy if there were any outside of the clinic.
	Veterinarians don't report, but other pharmacies do report pet prescriptions. Problems: Pharmacies do not use a consistent format for this information, many do not include owner's name or birthdate, and I believe some are using the prescribing Veterinar
We work with veterinarians, their professional associations and licensing to ensure compliance.	Veterinarian does not have a DEA or NPI number, Veterinarian does not have animal owner's information, Veterinarian's software does not allow electronic submission of data, Veterinarian's software s not able to report data in ASAP format
	Veterinarian does not have a DEA or NPI number

Veterinarian Reporting Mandate Compliance Details	Veterinarian Reporting Issues
They will be part of the Audit/Compliance Initiative that the PDMP will be conducting in coordination with Board of Pharmacy compliance staff.	Veterinarian does not have animal owner's information, More and more veterinarians are writing Rx and owners are filling the Rx in human pharmacies and the human pharmacies do not have the owner information either. We have sent out communications on the
	Veterinarian does not have a DEA or NPI number, Veterinarians reports non-controlled substances to PDMP
	Veterinarians are not allowed to have an NPI number. This was a required field for NM data submissions. This was changed to be "situational" rather than "required" to bypass this error.
They are currently reporting using paper then electronic reporting begins on Oct 2019. Rules are in the process of being created.	Veterinarian's software does not allow electronic submission of data, The system did not accept the NDC for the animal version of Tramadol
	Veterinarian does not have a DEA or NPI number, Pharmacies do not report veterinarian prescriptions in a uniform manner. Pet information is mixed with owner information in various ways.

Veterinarian Reporting Mandate Compliance Details	Veterinarian Reporting Issues
We are obtaining a list of dispensing veterinarians through the vet board and reviewing the frequency of reporting if at all.	Veterinarian does not have animal owner's information, Pharmacies even enter the animal name as the patient name instead of the owner name.
	Veterinarian does not have a DEA or NPI number
If we discover a veterinarian that is not reporting that should be, we contact them and explain the requirements and make sure they begin reporting.	Veterinarian's software s not able to report data in ASAP format
	There are not uniform standards in place for retail pharmacies regarding animal prescriptions in reference to who is the patient, pet or owner, and whose dob to use in the profile.
	See TCA53-10-304
	Owners may not provide accurate information about their animals (i.e., name of animal, DOB of animal). Data is not submitted in a consistent format (i.e., pharmacies report the same animal various ways).
	Veterinarian does not have animal owner's information, Veterinarian's software does not allow electronic submission of data, Veterinarian's software s not able to report data in ASAP format,

Veterinarian Reporting Mandate Compliance Details	Veterinarian Reporting Issues
	Veterinarians are not allowed to register as submitters
Education and outreach	Veterinarian does not have a DEA or NPI number, Vets do not have NPI. Vet default NPI for WA = VETERINARY. This will show on query report where NPI field is chosen to be included. We are working with our vendor to make NPI a default for all query reports.
	Veterinarian's software does not allow electronic submission of data, Veterinarian's software s not able to report data in ASAP format,
	Veterinarian's software does not allow electronic submission of data

Veterinary Reporting Misc Information	Veterinarian Enrollment Description
	Veterinarians cannot access PDMP data but can voluntarily report to the PDMP.
Future changes can be addressed through the Board of Veterinary Examiners at BoardOfVeterinaryExaminers@Alaska.Gov	Veterinarians are required to enroll as data requesters with the PDMP
	Veterinarians are exempted from enrollment as data requesters
	Veterinarians are required to enroll as data requesters with the PDMP
	Veterinarians are required to enroll as data requesters with the PDMP
	Veterinarians are required to enroll as data requesters with the PDMP, if they are dispensing controlled substances
	Veterinarians are exempted from enrollment as data requesters
	Veterinarians can voluntarily enroll as data requesters with the PDMP and do enroll as data requesters

Veterinary Reporting Misc Information	Veterinarian Enrollment Description
	Veterinarians are exempted from enrollment as data requesters
	Veterinarians are exempted from enrollment as data requesters
	Veterinarians are exempt by statute.
	Veterinarians can voluntarily enroll as data requesters with the PDMP and do enroll as data requestors
Current Illinois Statute amendments are attempting to remove veterinarians from mandatory reporting.	Veterinarians are required to enroll as data requesters with the PDMP
	Veterinarians can voluntarily enroll as data requesters with the PDMP and do enroll as data requestors
	Veterinarians are exempted from enrollment as data requesters
	Veterinarians can voluntarily enroll as data requesters with the PDMP and do enroll as data requestors
	Veterinarians are exempted from enrollment as data requesters
	Veterinarians can voluntarily enroll as data requesters with the PDMP and do enroll as data requestors

Veterinary Reporting Misc Information	Veterinarian Enrollment Description
	Veterinarians are required to enroll as data requesters with the PDMP
Veterinarian usage of PMP is an ongoing discussion concerning access and data submission consistency	Veterinarians are not required to enroll, nor are they exempt. If a Vet MD wants to enroll, we do not have regs to deny their enrollment
	Required to register if prescribing controlled substances, effective June 1, 2018.
We are moving towards a model where pharmacies report to the PMP using the owner's first and last name and DOB. Upon querying, the veterinarian will only see animal data. However, prescribers for humans will see all data (both animal and human), as will p	
	veterinarians are required to register if they hold a DEA number
	Veterinarians are exempted from enrollment as data requesters
	Veterinarians are not required to report to the MPDR and are not allowed to access MPDR patient histories.
Clear directions for veterinarians reporting requirements are needed. We have found that this population has needed additional instructions on conversion of NADA and NDC numbers to an 11-digit format. Veterinarians also have expressed issues or concerns	Veterinarians are exempted from enrollment as data requesters
	Veterinarians are exempted from enrollment as data requesters

Veterinary Reporting Misc Information	Veterinarian Enrollment Description
	With regards to veterinarian facilities, only the "owner" of the controls would register as the dispenser and the other veterinarians would be reported as the prescriber on the uploaded report. So not every veterinarian has to register as a dispenser unl
	Veterinarians can voluntarily enroll as data requesters with the PDMP and do enroll as data requestors
	Veterinarians are exempted from enrollment as data requesters
	Veterinarians are exempted from enrollment as data requesters
	Veterinarians are exempted from enrollment as data requesters
	Veterinarians can voluntarily enroll as data requesters with the PDMP and do enroll as data requestors

Veterinary Reporting Misc Information	Veterinarian Enrollment Description
	Veterinarians are required to check the PMP before prescribing and if they dispense they can either report through clearinghouse or they are required to register as a data requestor and submit through the website.
	Veterinarians are not eligible for PDMP enrollment.
	Veterinarians are exempted from enrollment as data requesters
	Veterinarians are exempted from enrollment as data requesters
	Under SC law, prescribers issuing prescriptions for greater than a 5 days' supply of a Schedule II drug must consult the PMP prior to prescribing. There is no exception for veterinarians.
Nationwide standards need to be established regarding who is the patient and whose dob to use in the pharmacy profile, pet or owner.	Veterinarians are exempted from enrollment as data requesters
	Veterinarians must submit data to TN, if statutory requirements are met. Veterinarians must register with CSMD as determined by statute.
	Veterinarians can voluntarily enroll as data requesters with the PDMP and do enroll as data requestors
	Veterinarians can voluntarily enroll as data requesters with the PDMP and do enroll as data requestors

Veterinary Reporting Misc Information	Veterinarian Enrollment Description
	Veterinarians are not allowed to enroll as either requestors or submitters
Washington has been working to ensure that veterinary records do not come up under recipient/patient query by owner's name. Our vendor had these fields set up that vet records would come up under owner's name and animal's DOB making it (reports) appear th	Veterinarian enrollment for PMP access is allowed, and is voluntary for vets. Enrollment rates are low.
	Veterinarians are required to enroll as data requesters with the PDMP
	Veterinarians are exempted from enrollment as data requesters
	Veterinarians are required to enroll as data requesters with the PDMP

Veterinarian Enrollment Mandate Criteria	Veterinarian Enrollment Mandate Compliance
Veterinarians are required to enroll only if they have a DEA	
	Yes
Must have a personal DEA license	
As with any prescriber, if the veterinarian holds a CT Controlled Substance Practitioner (CSP) registration they are required to enroll in the PMP	Yes

Veterinarian Enrollment Mandate Criteria	Veterinarian Enrollment Mandate Compliance
Controlled Substance License	Yes

Veterinarian Enrollment Mandate Criteria	Veterinarian Enrollment Mandate Compliance
	Yes
	Yes
<p>We do not have any mandatory enrollment in the state. Veterinarians are not allowed to view PDMP data but are required to submit dispensed data.</p>	

Veterinarian Enrollment Mandate Criteria	Veterinarian Enrollment Mandate Compliance
All veterinarians with a NH license and a DEA # associated with their NH license are required to register with the NH PDMP. This is different than registering as a dispenser, which is a different registration that allows them to upload all dispensations	Yes
None at this time.	

Veterinarian Enrollment Mandate Criteria	Veterinarian Enrollment Mandate Compliance

Veterinarian Enrollment Mandate Criteria	Veterinarian Enrollment Mandate Compliance
	Yes

Veterinarian Enrollment Mandate Compliance Details	Veterinarian Query Description
	Veterinarians are not permitted by statute/rule/policy to query
	Veterinarians are required by statute/rule/policy to query
	Veterinarians are not permitted by statute/rule/policy to query
	Veterinarians are required by statute/rule/policy to query
The CA PDMP (CURES) makes data and reports available for the Veterinary Medical Board to ensure veterinarian compliance with the enrollment mandate.	Veterinarians can voluntarily query and do query
	Veterinarians can query if they suspect the client is abusing drugs or mistreating animals to obtain drugs.
Compliance letters.	Veterinarians are required by statute/rule/policy to query
	Veterinarians are not permitted by statute/rule/policy to query
	Veterinarians can voluntarily query and do query

Veterinarian Enrollment Mandate Compliance Details	Veterinarian Query Description
	Veterinarian access is not authorized.
	Veterinarians are not permitted by statute/rule/policy to query
	Veterinarians can voluntarily query, but do not query
	Veterinarians can voluntarily query and do query
	Veterinarians can voluntarily query and do query
Clinicians with a controlled substance license must enroll in the ILPMP.	Veterinarians are required by statute/rule/policy to query
	Veterinarians can voluntarily query and do query
	Veterinarians are not permitted by statute/rule/policy to query
	Veterinarians can voluntarily query and do query
	Veterinarians are not permitted by statute/rule/policy to query
	Veterinarians are required by statute/rule/policy to query

Veterinarian Enrollment Mandate Compliance Details	Veterinarian Query Description
If a veterinarian attempts to obtain a new or renewal state CDS permit, the state CDS Permit authority will not approve said application unless the veterinarian is PDMP-registered	Veterinarians are not permitted by statute/rule/policy to query
Process to notify prescribers, including Veterinarians, that have issued controlled substance prescriptions and are not registered to the PDMP.	Required to query the PDMP if prescribing in excess of a 3-days supply, except if a pharmacist will be dispensing the prescription.
	Veterinarians must have a DEA registration to enroll. Very low enrollment rate. Very few queries.
	Veterinarians can voluntarily query, but do not query
	Veterinarians are not permitted by statute/rule/policy to query
	Veterinarians are not permitted by statute/rule/policy to query
	Veterinarians are not permitted by statute/rule/policy to query
	Veterinarians are not permitted by statute/rule/policy to query

Veterinarian Enrollment Mandate Compliance Details	Veterinarian Query Description
We have semi-automated registration and access to a list of DEA holders in NH. We will take the DEA list compare it to the licensing list provided by the regulatory board to determine who is required to be registered and then compare that list to the reg	veterinarians minimally query the system.
	Veterinarians can voluntarily query and do query
	Veterinarians can request access to the NM PMP and can voluntarily query the database; however, since veterinarian prescriptions are not standardized in regards to prescription data entry, the queried PMP report may not be all inclusive. Also, there is r
	Veterinarians are not permitted by statute/rule/policy to query
	If registered they can query.
Prescribers (excluding veterinarians) who dispense or prescribe opioids or benzodiazepines are required to have access to the PDMP. Dispensing data is compared with usage data to ensure compliance.	Veterinarians can voluntarily query and do query

Veterinarian Enrollment Mandate Compliance Details	Veterinarian Query Description
	Veterinarians are required by statute/rule/policy to query
	Veterinarians are not permitted by statute/rule/policy to query
	Veterinarians are not permitted by statute/rule/policy to query
	Veterinarians are required by statute/rule/policy to query
	Veterinarians are not permitted by statute/rule/policy to query
	Veterinarians can voluntarily query
	Veterinarians can voluntarily query and do query
	Veterinarians can voluntarily query, but do not query

Veterinarian Enrollment Mandate Compliance Details	Veterinarian Query Description
	Veterinarians are not permitted by statute/rule/policy to query
	Veterinarians can voluntarily query and do query
	Veterinarians can voluntarily query and do query
	Veterinarians are not permitted by statute/rule/policy to query
A list is broken down by credential and sent to the proper regulatory agency each month.	Veterinarians can voluntarily query and do query

Veterinarian Query Mandate Criteria	Veterinarian Query Mandate Compliance
Same criteria as other prescribers in the state.	Yes
Same as other prescribers.	Yes

Veterinarian Query Mandate Criteria	Veterinarian Query Mandate Compliance
A query is required prior to prescribing any controlled substance.	Yes
Practitioners (i.e. prescribers of controlled substances, except veterinarians) are required to enroll in the PMP at the time of renewal of the CSA registration or new CSA registration. If not registered for PMP, the CSA registration is not activated.	

Veterinarian Query Mandate Criteria	Veterinarian Query Mandate Compliance

Veterinarian Query Mandate Criteria	Veterinarian Query Mandate Compliance

Veterinarian Query Mandate Criteria	Veterinarian Query Mandate Compliance
	Yes
Listed earlier. Prior to issuing CII medications greater than a 5 days' supply.	

Veterinarian Query Mandate Criteria	Veterinarian Query Mandate Compliance

Veterinarian Query Mandate Compliance Details	Veterinary Icon on PDMP Report
	Yes
	Yes
	Yes
We run a mandatory audit for a 6 month time period to identify prescribers that wrote for a Schedule II or III opioid has a PDMP account. The list of prescribers identified to not have an account are reported to the professional boards.	
	Yes
Compliance letters.	Yes
	Yes
	Yes

Veterinarian Query Mandate Compliance Details	Veterinary Icon on PDMP Report
	Yes
	Yes
A query is required prior to prescribing any controlled substance.	Yes
	Yes
	Yes

Veterinarian Query Mandate Compliance Details	Veterinary Icon on PDMP Report
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes

Veterinarian Query Mandate Compliance Details	Veterinary Icon on PDMP Report
	Yes
	Yes
	Yes
	Yes

Veterinarian Query Mandate Compliance Details	Veterinary Icon on PDMP Report
We review those registered with the PMP, those that have dispensed or written a prescription and if they are not registered we assume they are not checking, if they are registered we take a sample of their prescriptions or dispensations and crosswalk thos	Yes
	Yes
	Yes
	Yes

Veterinarian Query Mandate Compliance Details	Veterinary Icon on PDMP Report
	Yes
	Yes