



Dear Sirs,

Thank you for the opportunity to comment regarding the Project No. P12-1201; Explore Competition and Consumer Protection Issues Related to the Pet Medications Industry; Project No. P12-1201.

First, HR 1406 Fairness to Pet Owners Act is redundant, burdensome regulation that will actually increase consumer costs for veterinary care. The increase in administrative time and costs will ultimately be passed on to the client. As was noted by the ASPCA, keeping veterinary costs reasonable is vital in efforts to ensure pets continue to get the medical care they need. Increasing the burden on veterinary clinics will, in the end, increase cost of veterinary care.

The current market has already forced veterinarians to provide the client with a prescription to whichever pharmacy they choose. This is most often done electronically which makes a hand written prescription an outdated burdensome activity. There are few if any barriers at this point for pet owners wishing to get prescriptions from sources other than veterinarians. If the client is refused that option, the client will seek out a different veterinarian and that business is lost. This regulation increases the obligation on small business only to accommodate large retailers. Veterinarians willingly provide a prescription to a client if it is more convenient or economical for that client to get the medication at a pharmacy instead of the veterinary clinic. Over 90% of veterinarians will provide this prescription service at no charge.

Next, the unrestricted dispensing of veterinary pharmaceuticals by untrained pharmacists has placed the veterinarians in a very precarious position. The profession by oath strives to protect animal health above all other considerations and does so by building and maintaining the veterinary client patient relationship. This is the livelihood of the profession. Untrained pharmacists are inadequately prepared to participate in the VCP relationship. Situations in which bad advice is offered, inappropriate substitutions for the prescribed product, inaccurate dosing, or dispensing the wrong concentration of a drug occur on a regular basis. Pharmacy schools do not train their students in veterinary physiology. Dogs and cats are not simply small people, and the physiologic and pharmacological differences between species should make obvious the need for adequate education to properly dispense for them. Veterinarians are legally and ethically responsible for the well-being of the animals in our care. Veterinarians carry the liability but must rely on pharmacies that lack the education and specific training in the veterinary medical field. This circumstance is actually putting the consumer at greater risk for adverse events related to pet medications.

Lastly, many of the drugs dispensed possibly have been diverted from the pharmaceutical companies who manufacture them. Veterinarians and clients rely on the companies to provide quality products that are effective for the diseases we treat. Many of these medications are approved by the FDA for sale to veterinarians only. Once diverted, there is no quality control to insure the integrity of the medications clients are receiving and we have been told the companies can no longer guarantee the product. As mentioned before, the veterinarian bears much of the liability legally and ethically for the well-being of the animal. Until the generic and human drug companies can list all the possible animal species on their drug inserts, then veterinary dispensing should be controlled by veterinarians.

In conclusion, HR 1406 does not protect the consumer as intended and as the pet pharmaceutical market opens, pharmacists must be required to achieve and demonstrate professional competence at least equal to that which they exercise in dispensing for human patients.

Respectfully,

Idaho Veterinary Medical Association

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