

As a practicing veterinarian for 11 years, and the owner of my own animal hospital for 6 years, I feel I have developed a good sense of the issues regarding pet medications.

Issue #1: Ability of pet owners to obtain written, portable prescriptions.

The ability of pet owner to obtain written prescriptions already exists. The pet owner simply has to request a prescription. The American Veterinary Medical Association (AVMA) already encourages veterinarians to provide these prescriptions in their Principles of Veterinary Medical Ethics. There is legislation proposed (HR 1406) that would **require** a written prescription be provided to **all** pet owners and a written disclosure be provided notifying them of their options in filling medications. This is regardless of whether the owner asked for one, and even if they prefer to purchase the medication directly from their veterinary hospital. Blanket mandates such as these are unnecessary, increases administrative and labor costs, and complicates medical record keeping. All this does is complicate and make more expensive a system that already works.

The proposed legislation also prohibits veterinarians from dispensing or asking clients to sign a waiver when a script is written. The purpose of waivers are to document that the risks of the proposed action have been reviewed with the participant, and they knowingly assume the risks. Waivers are commonplace and certainly appropriate in this circumstance. Veterinarians are already expected to document discussions with clients about risks vs. benefits when it comes to medical procedures, so why should product choice be any different? If I am not allowed to caution pet owners about the potential risks of unscrupulous pharmacies what's next? Will I be banned by auto makers from educating pet owners about the risks of letting their dog ride loose in the back of a pick-up truck? Or by the fruit industry for letting them know that their dog might develop kidney failure if it eats grapes?

Furthermore, if this legislation is passed, a veterinarian would be required to authorize all electronic and faxed prescriptions received. Legally, I as a veterinarian must verify that the requesting pharmacy is licensed to practice in my state. With thousands of online pharmacies, this would be an outrageous burden on my staff and myself to verify the validity of all pharmacies.

Issues #2: The dispensing of pet medications in human pharmacies.

The dispensing of pet medications in human pharmacies is blatantly inappropriate. The whole purpose of purchasing prescription medications from a pharmacy is that the pharmacist has the responsibility to make sure the medication is being used appropriately and in a safe manner. This includes double checking for drug interactions and errors in the prescription (dosage, frequency, etc), as well as educating the user on potential side effects, how it should be administered, and what to do if they encounter any problems. Human pharmacists are not trained in veterinary medicine and are incapable of performing these tasks. This puts the consumer's pet at greatly increased risk for serious adverse effects.

Issue #3: Ability of consumers to verify the safety and efficacy of pet medications.

Consumers do not have the ability to verify safety and efficacy of pet medications themselves; they must always rely on another individual or group with training and/or regulatory ability to monitor medications. For example, the FDA approves drugs as a standard of safety and efficacy for consumers. Human pharmacies are careful to only order drugs directly from reputable sources. I as a veterinarian purchase my drugs from distributors who I know follow appropriate procurement, storage, and shipping requirements so that I know the medications arrive to me undamaged. I then store and dispense them in a manner to further ensure their safety and efficacy. The manufacturers of these products realize how important this is. In fact, in many cases if the product has not been purchased directly from a veterinarian, the company will not uphold any of its guarantees – they know how easy it is for their product to be damaged or used incorrectly when purchased through unapproved channels. When a consumer purchases a drug from an internet company, they have no way of knowing if all the appropriate steps were taken.

Large internet and retail companies are known for purchasing “diverted products.” These products have been purchased from the manufacturer and then resold to a secondary company such as an internet pharmacy. I know this practice occurs as I have been solicited by mail on many occasions to participate. There is no regulation during this “diversion” stage to ensure all the above safety steps have been taken, and it is considered unethical within the veterinary profession. The National Association of Boards of Pharmacy developed the Verified Internet Pharmacy Practice Site (VIPPS) designation to try and combat the problem of unethical and illegal internet pharmacies. While this is a helpful step, it still is not a guarantee. This accreditation requires that the *pharmacy* ship and store medications in a safe manner, but it still does not ensure that the “diverter” that they purchased the product from did the same thing. The only way for the consumer to ensure they are purchasing safe and effective medications is to avoid these third party sources and purchase directly from their veterinarian, as the manufacturers of these products intended.