

**Is there a need for federal legislation requiring veterinarians to notify clients that they have the right to fill their prescriptions at the pharmacy of their choice?** no

**Is it appropriate to deny veterinarians the ability to charge a fee or require a waiver of liability for providing a written prescription to clients?** yes

**How might the passage of HR 1406 affect price, consumer choice and other forms of competition in the pet medications market?**

**What compliance costs would veterinarians face if HR 1406 were enacted?** Additional staff, advertising, change in websites

**What evidence exists to support a need for federal legislation requiring veterinarians to provide written prescriptions to their clients?** I'm not aware of any.

**What risks or inefficiencies may be posed by prescription portability for pet medications?** Lost documentation of refills allowed; patients run out critical medications; medications may be refilled by third party pharmacy without necessary therapeutic drug monitoring; non-veterinary pharmacists and their pharmacy staff may not be aware of side effects in pets with medications (versus what is in the literature for humans)

**How are pet medications distributed to consumers?** Through their veterinarian; through veterinary clinic online pharmacy; through third party pharmacy; through mass pharmacy (grocery store, store chains, purchase thru the internet from another country).

**What are the business rationales for various pet medication distribution practices?** Medications coming directly from the veterinary clinic allows the veterinary practice to control refills, brand of product, notification of potential adverse effects; ensuring appropriate bloodwork and drug monitoring are being completed prior to refills. Veterinary hospital and staff provide support of pet owners whose pets are taking medication.

**How has competition to sell medications to pet owners evolved in light of these distribution practices?** Large internet pharmacies are getting price cut on drugs, thus undercutting the price that the veterinarian charges; several companies have established "private" online pharmacies through the veterinary clinic as well as some distributors are offering home delivery on certain products. Large pharmaceutical companies are now requiring veterinarians to order certain drugs (most likely the least profitable) to be ordered directly through them rather than through a distributor.

**How do these practices affect prices for consumers?** Online pharmacies tend to be less expensive when only looking at the drug cost; however when the shipping gets added in the price often is competitive with that of the veterinary clinic. Product shipped directly to their home may save the consumer gas money.

**How do these practices affect product supply and quality?** Certain online pharmacies have been known to carry non-FDA approved drugs e.g. drugs with European labels-European approved uses, etc.

**How do these practices affect consumer choice?** Customers make choices based on a sales person or internet ad rather than what their veterinarian recommends as the best medication for the pet.

**How do these practices affect entry into the pet medications market?** Online pharmacies are offering off-brand/generic medications for very low cost. Many of the medications are human generics. Development of pet labeled products and pet dosed products are costly to pharmaceutical companies. Thus opening the doors to compounding pharmacies-that are essentially creating new drugs without going through the appropriate FDA CVM approval process.

**How do these practices affect innovation in the pet medications market?** If pharmaceutical companies start losing profit from direct selling or selling directly to veterinarians, there will be less money available for research and development for better medications/new medications/alternative therapies.

**What efficiencies or inefficiencies are associated with these practices?** Prescriptions may be filled and customer (pet owner) receives medication or pays for medication before the treating veterinarian approves filling of the prescription.

**What, if any, product safety or counterfeiting issues exist with respect to these practices? Have there been instances in which false or misleading information about product safety risks was disseminated to consumers?** I personally have talked with pet owners who have received product with labels from Australia. The US approved label was different from that in Australia.

**How varied are current veterinarian practices with respect to providing written, portable prescriptions to clients?** I have never charged a client to write a prescription.

**To what extent are consumers aware that they can request a portable prescription from their veterinarian and have the prescription dispensed elsewhere?** Varies based on consumer's age, time spent on internet, generation, income level, disposable income for pets.

**Which states require prescription portability for pet medications? Which do not? Are there states in which a proposal for prescription portability for pet medications was rejected by the legislature, and if so, why?** I don't know.

**In states that do require prescription portability, what recourse do consumers have if a veterinarian refuses to provide a written, portable prescription?** I don't know.

**Are there other factors that should be considered when analyzing the competition and consumer protection issues related to the distribution of pet medications?** Prescription medications should only be filled upon authorization of the veterinarian who is the primary care veterinarian for the pet.

**How can the prices charged to consumers for pet medications by veterinary clinics and retailers best be quantified and compared?** Look at prices companies charge veterinarians and what they charge retailers; also what pharmaceutical companies charge to sell to veterinarians versus large retail pharmacies. Veterinarians are small business owners not mass marketers. Online pharmacies often

obtain medications through “diverters”-veterinarians willing to buy a large amount of medication that they won’t use in their practice(s) but are willing to sell to a third party.

**To what extent do retailer prices for pet medications affect the prices of medications sold at veterinary practices or other aspects of veterinary clinic operations?** Veterinarians often have to “price match” to keep the business. If veterinarians lose more of their pharmacy income, they will have less income for overhead expenses to treat animals when they are sick. Loss of pharmacy income will cause increase in other service areas.

**To what extent would HR 1406 affect veterinarians’ sales of pet medications?** It would have a heavy impact in practices with educated computer savvy clients as well as clients who like the “one stop” shopping. Veterinarians will be losing money discussing medications available at their practice versus the grocery store (or wherever else the client wants the medication from).

**How might the passage of HR 1406 affect pet medication distribution practices?** More prescriptions would come from pharmacies staffed by pharmacists who are not knowledgeable about effects of medications on pets. Also, internet pharmacies will continue to fill prescriptions-often without waiting for approval from the pets’ veterinarian. They are also known to substitute medication without the veterinarians’ authorization. Additionally, they will sell regulatory discretion products such as medicated shampoos without approval from the pets’ veterinarian.

**What price and non-price benefits can accrue to consumers from prescription portability for pet medications?** Large chain retailers can charge less for medication. Consumers can pick up their pets’ prescriptions where they pick up their own prescriptions.

**Should possible amendments to HR 1406 be considered? Are there other factors that should be considered when analyzing the competition and consumer protection issues related to the portability of pet medication prescriptions?**

Pharmacies should not fill prescriptions without documentation of who authorized the prescription, confirming the medication, confirming the dosage, brand name versus generic, etc.

Pharmacists are not trained in veterinary medicine. They learn about drugs in pharmacy school or just from day to day activity will not appear in textbooks regarding the various requirements to properly dose various species. A cat is not a small dog. One dose of antibiotic does not fit all adult dogs. There is variability between species, sometimes breeds and variability with dosing based on the disease that is being treated. Also some medications are dosed on body surface area rather than weight. All of these things should be determined by the veterinarian not the pharmacist. Veterinarians need to be seeing patients to generate income. Spending time on third party pharmacies will reduce veterinarians ability to see patients. While veterinary staff are trained, they must be supervised when filling medications in the veterinary clinic or through a third party pharmacy.

Veterinarians should be allowed to earn money from the consultation regarding the proper use of medications, treatment expectation/outcome and potential side effects. Certain medications need regular bloodwork and therapeutic drug monitoring. Pharmacists are not trained in these areas.

The majority of the time there is not a third party insurance company helping to cover the cost of the medications. There is certainly no government subsidies/welfare to cover the cost of medications for pets.

A federal regulation requiring veterinarians to discuss prescription portability defies the basis of capitalistic business environment.