

Prescriptions and Drug Distribution: Pharmacy and State Regulations

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Abstract

Laws concerning drug distribution involving veterinarians vary from state to state. The best ones are created when both veterinarians and pharmacists creating the laws understand each other. This manuscript discusses how state pharmacy statutes and regulations pertain to veterinarians and veterinary practice, and how to make sure veterinarians have a voice in the process.

Résumé

Les lois concernant la distribution des médicaments prescrits par les vétérinaires varient d'un État américain à l'autre. Les meilleures lois sont élaborées quand les vétérinaires et les pharmaciens qui les rédigent se comprennent bien entre eux. Le présent manuscrit décrit la façon dont les lois et les règlements des pharmacies d'État rejoignent les vétérinaires et leur profession, et comment les vétérinaires peuvent s'assurer de faire entendre leur voix dans ce processus.

Introduction

Pharmacists and veterinarians are increasingly finding themselves in a position to work together to solve drug distribution issues at both the state and federal level. Optimum outcomes in this venture depend on each group understanding how problems and proposed solutions affect the other. We will define basic strategies and discuss specific issues facing veterinarians and pharmacists today.

Regulatory Perspective

Regulators are faced with a myriad of issues brought to them by an untold number of groups and individuals. They must prioritize action based on their primary mission of protecting the public health and safety. Primary concerns are the scope and extent of the problem, costs of both the problem and the proposed solutions, who will be responsible for performing the duties of the proposed solution, how will the solution be funded, and how will we measure success.

Stakeholder Perspective

Stakeholders have a vital role in ensuring the best outcome for a specific problem. Regulators count on them to provide advice and insight and propose solutions. Stakeholders are most effective when they present a clear, concise, compelling and comprehensively researched message. Success is much more likely if they are able to also gain consensus for the message among all stakeholders.

Issue – Counterfeit Drugs

The Prescription Drug Marketing Act (PDMA) essentially requires a “pedigree” for drugs. A “pedigree” can be thought of as documenting every step of the drug distribution process from “manufacturer to mouth.” Although it is a federal law, each state must create their own statutes and regulations to ensure compliance. Without veterinary stakeholder input, regulators will not create those rules in ways that are sensitive to veterinarians’ needs. For example, there is a knowledge gap concerning the implementation of electronic reporting systems to track a drug’s pedigree. Electronic reporting systems have been in place in pharmacies for decades due to the growth of real-time submission of prescription insurance claims. Adapting these systems for use in a “pedigree” system is an effective and efficient solution for pharmacies. Electronic reporting systems have not flourished in veterinary medicine due to the expense of these systems and the lack of third-party payors. Pharmacy regulators may not be aware that veterinary practitioners likely would not have these systems available.

Issue – Methamphetamine Precursor Tracking

The Combat Methamphetamine Epidemic Act of 2005 requires retailers to track sales of methamphetamine precursors. These include phenylpropanolamine, pseudoephedrine, and ephedrine. Some states are creating their own more restrictive statutes and are working with local law enforcement to create electronic tracking systems. Most pharmacy regulators are not aware that phenylpropanolamine is still available in the veterinary

market and would not realize that they would be affecting veterinary practice.

Issue – Prescription Drug Monitoring Programs

The Drug Enforcement Administration encourages states to develop Prescription Drug Monitoring Programs. These programs usually monitor prescription sales for controlled substances, but some add other drugs of abuse such as tramadol and carisoprodol. Again, the potential for effect on veterinary practice could be high and involvement of veterinary stakeholders in the process is essential

Issue – Internet Pharmacies

Internet pharmacies are considered by some regulators to be the “wild west” of drug distribution. Potential for diversion and misadventures are great, and involvement of both pharmacists and veterinarians in the development of useful laws is essential. A recent positive development is that the National Association of Boards of Pharmacy (NABP) has recently introduced a VET-VIPPS pharmacy certification program that “accredits facilities that dispense prescription drugs and devices for companion and non-food producing animals over the Internet and assures animal care providers that they are purchasing drugs and devices from a facility

that meets the licensing requirements of the state in which the facility is based and each state to which it dispenses pharmaceuticals.”

Conclusion

Regulators have a mountain of problems to address. They need the expertise and insight of veterinary and pharmacy stakeholders when addressing drug distribution issues to ensure that they are spending time on the most pertinent and pressing issues. Veterinary stakeholders can and do play a vital role in this process.

References

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