

This report contains summary data from the Prescription Drug Monitoring Program (PDMP). Data is provided as a courtesy for the board and is intended to be used for informational purposes only.

News as of February 16, 2022

- The PDMP fee was reduced to \$0 and the PDMP Registration has been discontinued effective December 23, 2021. Registration status will be reflected on the professional license.
- We have hired an Occupational Licensing Examiner (OLE) to assist with the processing and migration of data as we implement changes in the licensing system.
- We are currently advertising for a Project Assistant to work on Reporting.
- License integration was successfully launched on January 11, 2022.
- The Communications module was enabled on February 8, 2022. Configurations are still be enabled and we expect to go live before March 2022.
- We are now data sharing with 17 states and the Military Health System. We recently started sharing with Arizona and Florida.
- We will begin conducting a delegate audit during the month of March. An announcement will be sent out through AWARxE and a guide will be made available next week on the PDMP website.
- The Institute for Intergovernmental Research (IIR) put out guidance on Recommended Best Practice for Veterinary Prescriptions on January 28, 2022. The document is attached to this report.

There are differences in the number of pharmacists licensed by the Board of Pharmacy and the number of pharmacists registered in the PDMP. The registration counts in the federal user role categories also include non-Alaska licensed pharmacists and some Alaska-licensed pharmacists have opted to register even though not required to by statute and regulations.

Registration

Portal (Professional license system)

Number of licensed Pharmacists: 1,118
Number of PDMP Pharmacist registrations: 787
Number of Pharmacists dispensing: 803

AWARxE (PDMP)

Number registered with the PDMP: 1,129
Pharmacists – 673
PIC – 83
IHS Dispenser – 118
VA Dispenser – 19
Military Dispenser – 13
Out of State Pharmacist – 214
Out of State PIC – 9
Pharmacist Delegates – 104 (1,938 technicians and interns)

Delinquent Reporters

The process for addressing delinquent reporters is under revision, pending further discussion from the Board of Pharmacy and ongoing work with Bamboo.

Recommendations

- Encourage the use of authorized delegates.

Prescription Drug Monitoring Program

Recommended Best Practices for Veterinary Prescriptions

January 2022

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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? AJPB 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