

Veterinarians, Prescriptions, and Pharmacies

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The California Business and Professions code sections 4170(6) and (7) mandate that veterinarians must offer to provide a written prescription to clients free of charge in lieu of dispensed medication. Veterinary practices must provide written notice of this law to clients. While practices may choose how to provide written notice to clients, the California Veterinary Medical Board (VMB) considers a notice posted in a prominent location in the veterinary practice lobby to be compliant. Many veterinarians interact with pharmacies on a daily basis regarding prescription authorization.

While technically veterinarians are only required by law to give a written prescription to a client, often times veterinarians will call in a prescription to a pharmacy on a client's behalf or pharmacies will contact a veterinarian for verification or clarification of a prescription.

While many pharmacies fill animal prescriptions without complication, issues sometimes occur. The following are some examples of common issues encountered by veterinary practices when filling prescriptions at pharmacies and tips to address them.

Issue	Mitigation Tip
Pharmacy substitutes a generic or similar medication for the one prescribed.	On the prescription pad, include a "Do Not Substitute" box that if checked or initialed, indicates that the pharmacist must dispense the exact drug written on the prescription. (See the sample prescription on the next page.) If a pharmacy substitutes a medication regardless of the specific orders, the pharmacist should be reported to the California Board of Pharmacy via their online reporting form which can be found on their website: pharmacy.ca.gov .
Pharmacies require a Drug Enforcement Administration (DEA) number for non-controlled substances.	The DEA discourages practitioners from providing their registration numbers for non-controlled prescriptions. There is no legal requirement for this number if the prescription is for a non-controlled drug.
Pharmacies require a National Provider Identifier (NPI) number.	NPI numbers are issued to human physicians for the purpose of Medicare billing. Veterinarians are not qualified to obtain NPI numbers. Pharmacists may contact the NPI Registry at 800.465.3203 to verify.
Incorrect dosages on dispensed medication/changes to veterinary dosing or instructions.	Pharmacists are not permitted to alter a prescription without prescriber authorization. If a pharmacist alters a prescription, veterinarians are instructed by the California Board of Pharmacy to report the pharmacist on the Board of Pharmacy website.

Veterinarians who interact directly with pharmacies either by calling in a prescription on their clients' behalf or by signing authorization forms faxed to them from a pharmacy, could be held liable if an animal is harmed by an error on the part of the pharmacist. Veterinarians should consider writing out a prescription on their own prescription pad and handing the prescription to the client. The client carries the responsibility of having the prescription filled at a pharmacy of choice.

According to the California Code of Regulations, Title 16, Division 20, Section 2032.2, a prescription must contain the following information:

1. The name, signature, address, and telephone number of the prescribing veterinarian
2. The veterinarian's license number and his or her federal registry number if a controlled substance is prescribed
3. The name and address of the client
4. The species and name, number or other identifying information for the animal
5. The name, strength, and quantity of the drug(s)
6. Directions for use, including, if applicable, withdrawal time
7. Date of issue
8. The number of refills

The following is a sample veterinary prescription that complies with legal requirements set forth in the California Code of Regulations, Title 16, Division 20, Section 2032.2.

Rx

Veterinary Prescription

Prescription Number: _____ **Date of Issue:** _____

Client Name: _____ **Patient Name:** _____ **Patient Species:** _____

Client Address: _____ **City:** _____ **State:** _____ **Zip:** _____

Drug (Trade Name): _____ **(Generic Name):** _____

Strength: _____ **Quantity:** _____ **Refills:** _____ **Withdrawal Time:** _____ (if applicable)

DO NOT SUBSTITUTE: _____ (Dr. initials)

Directions for Use:

Cautionary Statement(s): Federal law restricts this drug to use by or on the order of a licensed veterinarian.

Dr. Signature:

Doctor Name: _____ **CA License #:** _____ **DEA#:** _____
(if applicable)

Doctor Address: _____ **City:** _____ **State:** _____ **Zip:** _____

Doctor Phone Number: _____

Veterinarians and pharmacists must work together to ensure that animal patients receive the correct medications. Following the law and keeping professional lines of communication open are key to ensuring that the medication, dose, and instructions are appropriate for the patient. ■

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