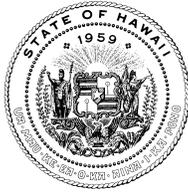


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January 2014

**VETERINARY PRESCRIPTIONS**

Dear Hawaii Pharmacists:

At its January 2014 meeting, the Board of Pharmacy ("Board") unanimously voted to post information/recommendations/guidelines of the Board of Veterinary Examiners for pharmacist who fill veterinary prescriptions. The information/recommendations/guidelines are to assist any pharmacist who may fill veterinary prescriptions.

The Board encourages pharmacist to contact the Veterinarian if you have any questions/concerns with the prescription and recommend that you also defer any questions from the consumer back to the Veterinarian.

The Board also responded to several questions from the Board of Veterinary Examiners as follows:

- 1) If a pharmacy changes or alters the veterinary prescription, who is liable or responsible for any ill consequences to the veterinary patient that may result?

Response: *A pharmacist is not allowed to change or alter a prescription without first consulting with the prescriber.*

- 2) How does the Pharmacy Board feel about diversion of veterinary products and medications?

Response: *The Board's current laws and rules do not dictate where a pharmacy obtains prescription drugs from. To further clarify, a pharmacy may obtain drugs to be dispensed from a wholesale distributor or manufacturer. If the drugs are determined to be misbranded or adulterated then the drugs are returned to the distributor/manufacturer.*

- 3) If diversion occurs, how are quality control, safety and efficacy of products managed if manufacturers void their liability/product guarantees because their products are being sold by non-veterinary sources?

Response: *Same response to question #2. Normally the manufacturer can track the distribution of the drugs and be able to notify the parties.*

- 4) If diversion occurs, how are quality control, safety and efficacy of products managed if a manufacturer recalls a product. For example, recall notices of products may not be sent to online pharmacies or any pharmacy that does not obtain the product directly from the manufacturer?

Response: *Same response to question #3.*

- 5) Will appropriate dispensing equipment be supplied with prescription? Will the pharmacist be responsible for providing the proper implement(s) for delivery of the medication? Veterinarians will usually provide syringes of the proper size to measure and deliver the medication to the patient. They will also clearly indicate the proper measurement on the syringe so that there is no confusion or improper dosage given. Will that be done at the pharmacies?

Response: *A pharmacist will use their professional judgment to assist patient in proper delivery of medications and will consult and/or defer any questions and concerns to the veterinarian.*

- 6) Currently, what information is required by pharmacists in order to process a prescription for a veterinary patient (e.g. breed, drug name, dosage, client information, etc)?

Response: *Hawaii Revised Statutes §16-95-82(a) lists the items required for a "valid" prescription as follows:*

*§16-95-82 Valid prescriptions. (a) A pharmacist may fill and dispense prescriptions provided the prescription is valid. A valid prescription shall be legibly written and contain, at the minimum, the following information:*

- (1) The date of issuance;*
- (2) The original signature of the prescriber;*
- (3) The prescriber's name and business address;*
- (4) The name, strength, quantity, and directions;*
- (5) The name and address of the person for whom the prescription was filled or the name and address of the owner of the animal for which the drug is prescribed (unless the pharmacy filling the prescription has such address on file);*
- (6) The room number and route of administration if the patient is in an institutional facility; and*
- (7) If refillable, the number of allowable refills.*

Thank you for your anticipated cooperation in this matter.

Lastly, in regards to HB 2106 Relating to Pharmacist, which requires pharmacists to complete a training program approved by the board of pharmacy to dispense veterinary prescriptions, the Board, after careful consideration would oppose the bill based on the following::

- Currently, pharmacists are required to complete 30 hours of continuing education every 2 years, approved by the Accreditation Council of Pharmacy Education. The Board is not qualified to develop or approve a training program that would ensure that a pharmacist has sufficient knowledge to provide advice to the animal's owner when dispensing veterinary medications. Also, the availability of such courses is unknown. If a pharmacist is unable to take the required course, that would prevent the pharmacist from filling the veterinary prescription which could severely limit the availability of medications to animals;
- It is unnecessary because most veterinary medications are dispensed by veterinarians; and
- The Board should determine what training, if any, a pharmacist requires in order to fill any prescription to ensure the patient's safety.

The Board understands the Board of Veterinary Examiner's concerns with pharmacists filling these prescriptions, especially providing "advice or consultation". The Board encourages pharmacists who fill veterinary prescriptions to follow the guidelines provided by the Board of Veterinary Examiners and to consult with the veterinarian regarding any questions about the filling, dispensing and administration of the medication.

I understand that the Board of Veterinary Examiners has a meeting scheduled for January 29, 2014. Provided there are no conflicts with any Legislative Hearings I am required to attend, I will be in attendance at your meeting to respond to questions and/or further discuss the Board's responses.

If you have any further questions, please feel free to call me at (808) 586-2695 or email me at [pharmacy@dcca.hawaii.gov](mailto:pharmacy@dcca.hawaii.gov)

Very truly yours,

Lee Ann Teshima  
Executive Officer

c: Board of Pharmacy