



Senator Leone, Representative Baram, members of the General Law Committee,

My name is Dr. Arnold Goldman and I am here today representing the Connecticut Veterinary Medical Association, which includes the majority of licensed veterinarians in Connecticut. The CVMA supports Senate Bill 194, An Act Concerning Electronic Prescription Drug Monitoring Program Reporting

Senate Bill 194 allows for a change in the reporting timeframe for dispensers. The CVMA seeks additional changes to the prescription drug monitoring program.

We are seeking to exempt veterinarians from this system in order to better provide for the health and welfare of our animal patients. We understand that “drug seeking” and “doctor shopping” for prescription narcotics are a problem in human patients. However, it is the CVMA’s position that veterinarians are not a source of illegitimately obtained prescription drugs.

Yes, we minister to animals in ways analogous to physicians ministering to humans, including the dispensing or prescribing of scheduled pharmaceuticals, but unlike physicians, we only provide medication in exacting amounts appropriate for animals, and inappropriate for human therapy or abuse.

Animals do not feign pain to improperly obtain medication. They do not abuse drugs nor resell improperly obtained drugs. Indeed, if anything, animals are not getting the medication they need now, precisely because of the burdens on veterinarians established by the PMP. The cost alone of trying to subvert us is prohibitive. Consultation fees, laboratory testing and imaging studies all cost clients money and any effort to obtain what for a human would be a miniscule amount of pain relief medication, may cost many hundreds if not a thousand dollars or more, far in excess of what the medications might cost if sought on the street to abuse or resell. Additionally, the prescription drug of perhaps most concern for abuse, OxyContin - is rarely if ever prescribed in veterinary medicine as animals have poor ability to absorb and utilize it.

Should an animal owner with nefarious intent take advantage by claiming their pet is in pain? Yes, animal owners seeking medication to abuse or resell could lie and claim their pet is falsely in pain, but animals themselves never lie. As the basis of our relationships with our patients is the history, physical examination and necessary testing, no veterinarian is going to be fooled by such a person. Animals not found to be in pain are simply not prescribed for.

Our members have made a diligent effort to comply with the monitoring program, in the spirit of assisting the state in curbing prescription abuse that has led to many tragic deaths. We have polled the members and heard repeatedly of the challenges they face in complying with this legislation due to insufficient time, incompatible technology, and insufficient staff. Many have changed how they treat patients as a result – and not for the better. They have stopped prescribing needed medications in order to avoid involvement with this complicated mandate.

The PMP was designed for physicians and pharmacies and the data entry required of those entities is considerable. For our patients and their owners most of that data doesn't exist or apply. Unlike physicians and pharmacies veterinarians and veterinary hospitals do not have and can never have software directly compatible with the PMP due to its cost, its requirement for advanced in house technological expertise and its lack of suitability for veterinarians. All our PMP data must therefore be entered manually, one medication and one client at a time. Further, there are no other "licensees" in animal hospitals besides veterinarians who by regulation must now do data entry personally

It's true some of us are trying to comply, but many of us are simply shortening the course of medication against medical propriety, to avoid the burden of PMP compliance. Others have gone to solely writing prescriptions, shifting the burden to pharmacies such as Walgreen, Rite Aid and CVS. With 28% of veterinary practice income tied to medication sales, such behavior is unsustainable without causing increased cost of professional fees, job losses and a reduction in care seeking in the first place.

Thus it makes little sense to include us in the PMP as it harms both our animal patients and us by unnecessarily complicating and burdening patient care.