



## TECHNOLOGICAL CHALLENGES OF E-PRESCRIBING

- NPI number – all electronic prescriptions issued in NYS require a National Provider Identifier (NPI) number. NPIs are issued by CMS and CMS does not issue NPI numbers to veterinarians as they are not included in the definition of healthcare provider used at the federal level.
- All currently available electronic prescribing systems, except one, do not support veterinarians at this time. All prescriptions are created to meet the standards of the National Council for Prescription Drug Programs (NCPDP) to facilitate the exchange of prescription data between pharmacies, prescribers, intermediaries, facilities, and payers. The latest standard from NCPDP supports prescription transactions for both veterinarian and non-veterinarian prescribers and while it does not require a NPI, the primary e-prescribing network (SureScripts) requires a NPI to be part of the transaction. As a result, all current e-prescribing systems are built to include NPI as a required credential.
- It would take time for e-prescribing software to be integrated into veterinary practice management software. If the e-prescribing exemption for veterinarians is removed from statute in New York, it could take a lot of time before the software becomes available and e-prescribing could actually be implemented. The software and systems currently in the pipeline all require additional time for development, testing, and rollout; it could take over a year before this is all ready. If the exemption remains in statute, it will give the system time to catch up and be adopted, driven by the natural market forces rather than forcing the market to adapt before it is ready. NYSVMS is aware of one company working to develop the technology needed to provide an e-prescribing option that does not require a NPI number, but that company is still in a pilot phase for veterinary medicine and will not likely have a product available until 2022.

## HOW VETERINARIANS DELIVER PATIENT MEDICATIONS

There are several ways clients currently get medications from their veterinarian. Some of these require a written prescription while others do not, but none of them are currently utilized via e-prescribing.

- From the in-house pharmacy at the veterinary hospital. Many animal hospitals run an in-house pharmacy because it is difficult for clients to find specialty animal medications from chain or independent pharmacies. In a rural/farm setting, a veterinarian carries common animal medications in their vehicle to meet the needs of small farms or, occasionally, for emergency use.
- From drop-ship fulfillment pharmacies. Instead of a veterinarian keeping all medications in stock at the animal hospital, he or she partners with a company that can deliver the medications directly to the client.
- From specialty animal health compounding pharmacies. Many pet medications are compounded, and a veterinarian may have an established relationship with a compounding pharmacy from



which he or she orders prescriptions. Prescriptions are not typically written in these scenarios because a compounding pharmacist has all the details on file, using the license number of a veterinarian as the reference and arranging payment and delivery directly with a client.

- From retail pharmacies. Some prescriptions are ordered from retail pharmacies (chain or independent); these prescriptions are written and delivered to the pharmacy by the client. This option allows a client to price-shop for the best bargain, which is of particular importance for low-income clinics and community outreach events.
- From online veterinary pharmacies. Large internet merchants such as Chewy and WalmartPetRx are fighting for their share of the market by offering low prices. When clients send a written prescription to one of these retailers to be filled, the companies generate forms to be approved by veterinarians. This is one driver of veterinarians seeking improved online platforms for prescribing. Other internet merchants have developed online platforms that bring together the best features from third-party online pharmacies and in-house animal hospital pharmacies.

#### **IMPACT OF E-PRESCRIBING MANDATE ON SPECIFIC BRANCHES OF VETERINARY MEDICINE**

- Large-Animal/Food Production. Veterinarians working in these settings will typically have a schedule of regular visits to each farm they work with (weekly or less frequently, depending on herd size and other factors) and have developed long-term relationships with their clients; as a result, the farmer will be left with a set of treatment protocols for his or her animals for common issues. Upon seeing symptoms or signs of a serious issue outside the normal protocol, a farmer will call the veterinarian for direction and sometimes a prescription; on occasion these prescriptions must be written for pickup or delivery from a pharmacy. Veterinarians serving farms are concerned about e-prescribing because they would need to take on the cost of software and that cost would likely be passed on to the patient.
- Community Animal Health Clinics. Community clinics are usually based around rabies clinics. For many low-income families, the only time their animal will see a veterinarian is at one of these clinics. While the focus is rabies vaccination, a veterinarian may notice minor conditions that need to be treated such as skin or ear infections. In these situations, a veterinarian will write a prescription and the owner can take it to their neighborhood pharmacy; often, these individuals need to shop around for the best drug pricing and cannot do so easily without a written prescription in hand. E-prescribing would force a client to use a specific pharmacy and may result in a client choosing to forego a treatment if the price is too high.
- Shelter medicine. Many shelters in New York State do not have access to broadband, and shelter software for recordkeeping is relatively new to the market. There are only a few products to choose from and they are all in development phases; the most popular software system used by shelters in New York does not have e-prescription capabilities. Further, veterinarians at shelters are often volunteers and bring their own prescription pad with them; shelters would need to spend a great deal of money on software for these part-time prescribers. Similar to outreach clinics, clients utilizing shelters for veterinary care are often low-income and are less likely to be



able to get prescribed medications if they cannot carry a prescription after comparing prices and choosing the most affordable option.