



## SB19-228 Issue Brief on Veterinary Opioid Use

To: The Colorado Senate

Date: April 19, 2019

The Colorado Veterinary Medical Association is pleased to provide you with information concerning veterinary medicine as it relates to SB19-228. CVMA respectfully requests that if the legislature decides to adopt additional rules and regulations for the education of opioid prescribers that such requirements be effective, equitable, reasonable, necessary, and not unduly burdensome. Please let Leo Boyle, CVMA's lobbyist know at (303) 377-5469 if you have any questions.

### 1. Veterinarians are acutely aware and gravely concerned that the U.S. is in the midst of an opioid epidemic.

Veterinarians want to be an active partner in an effective strategy to combat this problem.

- Veterinarians are highly trained in the appropriate selection, use, handling and prescribing of medications for their (animal) patients, and this includes opioids.
- The drugs and formulations used in veterinary practice and the dosing parameters for opioids differ widely from species to species, and between animals and humans. Some human doses are much smaller than those for animals, and opioids are not effective for some animals.
- Veterinarians are not trained to evaluate the appropriateness of a human opioid prescription.

### 2. Colorado has taken many steps to effectively address the opioid epidemic.

Colorado is among 11 states that have already adopted laws that limit most opioid prescriptions to 7 days' supply.

- CVMA supported SB18-022 in 2018 and is proud to be part of this constructive step in addressing the opioid crisis.

The State Board of Veterinary Medicine, endorsed the Colorado Department of Regulatory Affairs Guidelines for the Safe Prescribing and Dispensing of Opioids revised on March 1, 2014 and March 16, 2018. Adopted on October 15, 2014.

The State Board of Veterinary Medicine approved a revised Veterinary Policy for Prescribing and Dispensing Opioids on December 14, 2017 in response to SB 17-146.

- If a veterinarian is authorized to prescribe controlled substances for animals and suspects a client has committed drug abuse or mistreated an animal, the veterinarian now may access the PDMP to inquire about a current patient or client.
- Previously, the veterinarian could query only the (animal) patient's record.

### 3. U.S. veterinarians write a tiny fraction of the total opioid prescriptions written by all prescribers, and the use of non-opioid pain relievers is increasing.

In 2017, veterinarians wrote 1/3 of 1%, or .0034 of total opioid prescriptions,

- 728,000 prescriptions were written by veterinarians out of a total of 214,000,000 opioid prescriptions written by all prescribers.

- Veterinary sales of opioids, were less than 1% of all opioid sales -- \$66 million out of \$8 billion in the U.S.

Veterinary use of NSAID and non-opioid pain relievers has increased significantly, while opioid use has declined. At the same time, companion animal patient visits to veterinarians have increased.

- Over 4 years from 2015 to 2018, the value of prescriptions written for NSAIDs increased 36%.
- Over the same period, the value of prescriptions written for non-opioid pain relievers increased 23%.
- During those years, the value of prescriptions written for opioids declined by 4%.
- Overall, the dollars spent on non-opioid veterinary pain relievers was 200% or twice the amount spent on opioids: \$136,690,000 for non-opioid pain relievers vs. \$66,421,885 for opioids.

**4. Evidence that “veterinary shopping” is a significant contributor to the opioid epidemic is lacking.**

A 50-state survey of PDMPs by Robert Simpson<sup>1</sup> in 2014 identified fewer than 10 “veterinary shoppers” per year nationwide.

- Media reports of this behavior repeatedly describe the same pets and owners, which does not validate an epidemic of “veterinarian shopping.”

Obtaining the opioid from a veterinarian is not a fast or simple process.

- A veterinary visit must occur with the establishment of a Veterinarian Client Patient Relationship (VCPR).
- The veterinarian must determine if opioids are part of the appropriate treatment.
- The opioid must be secured via prescription at a pharmacy or dispensing from the veterinarian.

**5. Education about the PDMP and its use by veterinarians is complicated by several structural factors and may not be productive.**

Colorado Veterinarians were authorized to query the PDMP by SB17-146, yet effective use of the PDMP currently poses a number of challenges:

- HIPAA violations are a concern, as veterinarians do not have a patient relationship with the owner.
- Veterinarians do not have uniform access to the PDMP, because they are not eligible for National Provider Identification numbers, and not all veterinarians have DEA numbers.
- Animal identification is problematic: not all animals have microchips or tattoos, and animal names can be variable, such as Canine Smith or Fluffy Smith.
- Pets can have multiple owners and be owned by multiple households.
- Pet owners can authorize others such as groomers and pet sitters to take the pets for veterinary care which expands the field of individuals to be researched.
- Some software used by PDMPs does not accommodate veterinary patients.

<sup>1</sup>Robert Simpson, Prescription Drug Monitoring Programs: Applying a One Size Fits All Approach to Human and Veterinary Medical Professionals, Custom Tailoring is Needed. Journal of Animal & Environmental Law (2014).