



RE: Information – HB 1227 Prescription Drug Monitoring Program - Dispensers - Veterinarians

Dear Members of the Health and Government Operations Committee,

The Maryland Veterinary Medical Association (MDVMA) is closely following HB 1227 which alters the definition of “dispenser” for purposes of the Prescription Drug Monitoring Program (PDMP) to include veterinarians. We met with representatives from the Maryland Department of Health late Friday, March 10 to discuss the legislation.

As veterinarians, we are sworn to protect public health and as prescribers, and dispensers, we take seriously our obligation to prevent the misuse of potentially dangerous, controlled substances. We were made aware of HB1227 only a couple of weeks ago and have not had ample time to fully uncover exactly how this proposed legislation would affect our membership. However, we are committed to working collaboratively with the Maryland Department of Health (MDH) to ensure their ability to comply with the statute requiring monitoring of Schedule II-V controlled substances.

At present, we simply have concerns that our state’s veterinary infrastructure is not set up in a way that will allow for comprehensive compliance without compromising some providers’ ability to deliver care to their patients, particularly providers in rural areas of our state. Another concern is that the current manual reporting system is potentially quite time-consuming. Many veterinary practices began as and remain very small businesses with limited staff. In addition, some veterinary practices do not have computerized systems at all. Practices that do have computerized point-of-care systems are unlikely to be capable of tracking inventory or automatic reporting to PDMP without significant overhauls of their technology. Regarding veterinarians who do not dispense controlled substances, we are unclear what the exemption process will look like, and we wish very much to work with MDH to elucidate a clear way to exempt veterinarians who agree to forego dispensing controlled substances altogether either because they don’t want to report or because their practice is not equipped with the necessary technology to report.

Through our discussions with MDH we learned that it may be possible to integrate most software systems, but again, we don’t have time to determine the potential impact on practice owners, their clients and especially their patients. There are more than 25 software systems in veterinary practices in the US, and the overwhelming majority are server-based where even one-way API integration is complex and frequently takes

years to implement. MDH has offered to gather information from neighboring states that require veterinarians to report but it cannot be done prior to the March 15 bill hearing.

Right now, what would be most helpful to our membership is to have more time. Time to allow us the opportunity to gather the necessary information to help veterinarians understand the PDMP system, its importance and ultimately to prepare them for the steps necessary to begin the process of reporting. We have made clear to MDH our intent as an association, on behalf of our members, to assist in coming up with a solution to incorporate veterinary reporting.

Due to not being made aware of this legislation until its introduction we simply are not prepared to offer a formal position on HB1227. As the committee decides how to proceed with this legislation, we would appreciate consideration of at least allowing for a delay of the proposed reporting dates. However, a preferable outcome would be to table HB1227 until next legislative session as we offer our assurances that we will collaborate with MDH over the next 10 months to support the PDMP in fulfilling its requirement in a practical, real-life manner that reflects the unique challenges of veterinary patient reporting.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew Weeman". The signature is fluid and cursive, with the first name "Matthew" written in a larger, more prominent script than the last name "Weeman".

Matthew Weeman DVM, MS
Legislative Committee Chair
Maryland Veterinary Medical Association