

Board of Veterinary Medicine

Frequently Asked Questions

Prescription Monitoring Program

Mandatory PMP Reporting Requirements for Veterinarians

- 1. What is the Prescription Monitoring Program (PMP)?**
- 2. What are the PMP reporting requirements for an individual veterinarian?**
- 3. May a veterinary establishment report on behalf of some or all of the veterinarians in a group practice?**
- 4. Are the PMP reporting requirements mandatory for veterinarians?**
- 5. What controlled substances have to be reported to the PMP?**
- 6. Does every veterinarian need a DEA registration to comply with the PMP reporting requirements?**
- 7. How does a veterinarian obtain a DEA registration?**
- 8. What is the contact information for PMP and DEA questions?**
- 9. What amendments to the *Code of Virginia* were made to require veterinarians to report to the PMP?**
- 10. Do the PMP requirements apply to a veterinarian practicing as an employee of the Department of Defense (United States Army, Navy, Coast Guard, Air Force), another federal agency or state government?**
- 11. May a veterinarian dispense seven days of a covered substance for a course of treatment and subsequently write a prescription for the same substance to be filled at a pharmacy?**
- 12. Are there any special dispensing or prescribing considerations for gabapentin?**
- 13. If reporting dispensed prescriptions to the PMP, how are vacations or extended leave handled?**
- 14. If a veterinarian is waived and not dispensing more than seven days of a covered substance, what is the required length of time between another seven days?**
- 15. Must a veterinarian reporting dispensed covered substances, report all dispensing regardless of the length of time?**
- 16. Is a veterinarian required to declare waiver or reporting status annually?**
- 17. What is a National Drug Code (NDC) number?**
- 18. Are veterinarians that report to the PMP required to have a prescription number for dispensed covered substances?**
- 19. For an animal owned by a company such as pet store or a public or private shelter, what information should be submitted for the owner's name and date of birth?**
- 20. Are pharmacies located outside of Virginia required to report to the PMP?**
- 21. When prescribing a covered substance to be filled in a commercial pharmacy, is the veterinarian required to provide the owner's date of birth on the written prescription?**
- 22. What is the process for updating a waiver or account development form?**
- 23. Is there a tutorial on helping the veterinarian understand new reporting requirements?**
- 24. Why is it important for all of a pet's dispensed prescriptions to be linked to the same owner?**

1. What is the Prescription Monitoring Program (PMP)?

Virginia's Prescription Monitoring Program (PMP) is a 24/7 database containing information on dispensed covered substances (see FAQ #5 and #9 for information on covered substances). The primary purpose of the PMP is to promote safe prescribing and dispensing practices for covered substances by providing timely and essential information to healthcare providers. Law enforcement and health profession licensing boards use the PMP to support investigations related to doctor shopping, diversion, and inappropriate prescribing and dispensing.

Note: The PMP reporting requirements and regulations for prescribing opioids (see [Regulations Governing the Practice of Veterinary Medicine, 18VAC150-20-174](#)) are two separate actions. Please ensure compliance with both actions.

2. What are the PMP reporting requirements for an individual veterinarian?

There are two legislative actions that affect PMP reporting requirements for veterinarians. The links to the legislative actions are provided below or see FAQ#9:

- [SB226](#) (effective July 1, 2018)
- [SB1653](#) (effective July 1, 2019)

All individual veterinarians must decide which option provided below best fits his/her dispensing and/or prescribing practices, as requirements are specific, and complete the required PMP paperwork.

Option 1:

IF

Veterinarian **only writes prescriptions** for reportable covered substances to be filled at a pharmacy; **OR** veterinarian **does not dispense** any reportable covered substances

THEN

Submit a waiver request: [Request for a Waiver or an Exemption from Reporting for Veterinarians](#)

Option 2:

IF

Veterinarian only dispenses reportable covered substances for **a course of treatment to last seven days or less** (Note: A veterinarian **may not** dispense multiple seven-day prescriptions of reportable covered substances for the same course of treatment to circumvent the law)

THEN

Submit a waiver request: [Request for a Waiver or an Exemption from Reporting for Veterinarians](#)

Option 3:**IF**

Veterinarian dispenses reportable covered substances for a **course of treatment to last more than seven days**

THEN

Complete and submit an Account Development Form: [Dispenser Registration Form for PMP Reporting Account](#) (NOTE: For Option 3, the reporting of covered substances dispensed must occur within 24 hours or next business day, whichever comes later AND a Zero Report must be submitted if no dispensing takes place within a 24-hour period. The link to the reporting guidelines is provided below under Helpful Hints.)

Helpful Hints for Option 3:

- **Links to Important Reporting Guidance:**
 - Link to the reporting guidance information at [Virginia Prescription Monitoring Program Reporting Requirements](#).
 - Prior to creating an account in the PMP Clearinghouse, the first step is to complete the Account Development Form located on the PMP Homepage. You may send the completed form to the PMP via email or fax. Once received further instructions regarding set-up and use of the PMP Clearinghouse will be provided.
 - Link to the Virginia Data Submission Dispenser Guide at [Virginia Data Submission Dispenser Guide](#).
- The Account Development Form contains information to set up the dispenser's account. Be sure to answer questions on this form with detailed information about business hours to set up your account accurately. Information in your account is used for PMP reports and for compliance tracking.
- Most veterinarians will use a web-based form to report prescription information. *See Dispenser Guide for more information.*
- **Reminder:** Reporting of dispensed covered substances must occur within 24 hours or next business day, whichever comes later.
- **Reminder:** If no dispensing or dispensing of a covered substance for 7-days or less takes place within a 24-hour period, a Zero Report is required.

3. May a veterinary establishment report on behalf of some or all of the veterinarians in a group practice?

Yes. Please contact the PMP directly for additional instructions if the registered veterinary establishment will report dispensing on your behalf. The email address is pmp@dhp.virginia.gov.

4. Are the PMP reporting requirements mandatory for veterinarians?

Yes. The *Code of Virginia* states the following:

§ 54.1-2521. Reporting requirements.

A. The failure by any person subject to the reporting requirements set forth in this section and the Department's regulations to report the dispensing of covered substances shall constitute grounds for disciplinary action by the relevant health regulatory board.

5. What controlled substances have to be reported to the PMP?

The *Code of Virginia* states the following:

§ 54.1-2519. Definitions.

"Covered substance" means all controlled substances included in Schedules II, III, and IV; controlled substances included in Schedule V for which a prescription is required; naloxone; and all drugs of concern that are required to be reported to the Prescription Monitoring Program, pursuant to this chapter. "Covered substance" also includes cannabidiol oil or THC-A oil dispensed by a pharmaceutical processor in Virginia.

Exemption Note: The dispensing of covered substances by veterinarians to animals within the usual course of their professional practice for a course of treatment to last seven days or less is not required to be reported to the PMP. In addition, feline buprenorphine and canine butorphanol are exempt from the reporting requirement. However, every veterinary establishment licensed by the Board of Veterinary Medicine must maintain records of the dispensing of feline buprenorphine and canine butorphanol, reconcile such records monthly, and make such records available for inspection upon request.

6. Does every veterinarian need a DEA registration to comply with the PMP reporting requirements?

A majority of the licensed veterinarians in Virginia will need a DEA registration to comply with the PMP reporting requirements. The purpose of the PMP is to capture an individual veterinarian's prescribing habits for identified covered substances. The DEA registration number is the unique identifier for a veterinarian when reporting to the PMP.

7. How does a veterinarian obtain a DEA registration?

To obtain a DEA registration go to <https://www.deadiversion.usdoj.gov/>; locate on the upper right-hand side of the screen "Registration Support"; click on "New Applications"; select "Practitioner" as your "Business Category."

Note: The registration process utilizes "DVM" as the broad category to identify all veterinarians.

8. What is the contact information for PMP and DEA questions?

Questions related to the PMP should be directed to pmp@dhp.virginia.gov
Questions related to DEA registration support is the following:

Call: 1-800-882-9539 (8:30 a.m. – 5:50 p.m. ET)
Email: DEA.Registration.Help@usdoj.gov
[Locate Field Registration Specialists](#)

9. What amendments to the *Code of Virginia* were made to require veterinarians to report to the PMP?

2018 VIRGINIA ACTS OF ASSEMBLY:

§ 54.1-2519. Definitions.

"Dispense" means to deliver a controlled substance to an ultimate user, research subject, *or owner of an animal patient* by or pursuant to the lawful order of a practitioner, including the prescribing and administering, packaging, labeling or compounding necessary to prepare the substance for that delivery.

"Recipient" means a person who receives a covered substance from a *dispenser and includes the owner of an animal patient.*

"Relevant health regulatory board" means any such board that licenses persons or entities with the authority to prescribe or dispense covered substances, including the Board of Dentistry, the Board of Medicine, *the Board of Veterinary Medicine,* and the Board of Pharmacy.

§ 54.1-2521. Reporting requirements.

A. The failure by any person subject to the reporting requirements set forth in this section and the Department's regulations to report the dispensing of covered substances shall constitute grounds for disciplinary action by the relevant health regulatory board.

B. Upon dispensing a covered substance, a dispenser of such covered substance shall report the following information:

1. The recipient's name and address.
2. The recipient's date of birth.
3. The covered substance that was dispensed to the recipient.
4. The quantity of the covered substance that was dispensed.
5. The date of the dispensing.
6. The prescriber's identifier number.
7. The dispenser's identifier number.
8. The method of payment for the prescription.

9. Any other non-clinical information that is designated by the Director as necessary for the implementation of this chapter in accordance with the Department's regulations.

10. Any other information specified in regulations promulgated by the Director as required in order for the Prescription Monitoring Program to be eligible to receive federal funds.

C. *Except as provided in subdivision 7 of § 54.1-2522, in cases where the ultimate user of a covered substance is an animal, the dispenser shall report the relevant information required by subsection B for the owner of the animal.*

D. The reports required herein shall be made to the Department or its agent within 24 hours or the dispenser's next business day, whichever comes later, and shall be made and transmitted in such manner and format and according to the standards and schedule established in the Department's regulations.

§ 54.1-2522. Reporting exemptions.

The dispensing of covered substances under the following circumstances shall be exempt from the reporting requirements set forth in § 54.1-2521:...

7. Dispensing of covered substances by veterinarians to animals within the usual course of their professional practice *for a course of treatment to last seven days or less...*

2019 VIRGINIA ACTS OF ASSEMBLY

§ 54.1-2522. Reporting exemptions.

The dispensing of covered substances under the following circumstances shall be exempt from the reporting requirements set forth in § 54.1-2521:...

7. Dispensing of covered substances by veterinarians to animals within the usual course of their professional practice for a course of treatment to last seven days or *less or if such covered substance is feline buprenorphine or canine butorphanol...*

2. That every veterinary establishment licensed by the Board of Veterinary Medicine shall maintain records of the dispensing of feline buprenorphine and canine butorphanol, reconcile such records monthly, and make such records available for inspection upon request.

10. Do the PMP requirements apply to a veterinarian holding a Virginia license practicing as an employee of the Department of Defense (United States Army, Navy, Coast Guard, Air Force), another federal agency or state government?

Yes. PMP requirements apply to all veterinarians that hold a current active license from the Virginia Board of Veterinary Medicine. However, a licensee who does not dispense to citizens of the Commonwealth of Virginia outside of his/her official duties is eligible for a waiver. To submit a waiver request, go to [Request for a Waiver or an Exemption from Reporting for Veterinarians](#).

11. May a veterinarian dispense seven days of a covered substance for a course of treatment and subsequently write a prescription for the same substance to be filled at a commercial pharmacy?

The statute explicitly creates an exemption for veterinarians dispensing a covered substance for seven days or less for a course of treatment and does not address an additional prescription that would be dispensed by a commercial pharmacy.

12. Are there any special dispensing or prescribing considerations for gabapentin?

As of July 1, 2019, gabapentin is a Schedule V controlled substance in Virginia. The Drug Enforcement Administration (DEA) has not yet scheduled gabapentin. Therefore, a prescriber is not required to hold a DEA registration in order to possess or prescribe gabapentin.

13. If reporting dispensed prescriptions to the PMP, how are vacations or extended leave handled?

If you have completed an Account Development Form and are required to report, you may not submit future zero reports to accommodate vacations or extended leave. For extended leave, you may assign an individual to report on your behalf. However, this would not apply if you have relief veterinarians practicing and dispensing to patients in your absence.

14. If a veterinarian is waived and not dispensing more than seven days of a covered substance, what is the required length of time between dispensing another seven days?

The *Code of Virginia* does not address how long the wait period is before you may dispense another seven days of a covered controlled substance. However, the *Code of Virginia* does state that the dispensing is exempt for a course of treatment to last seven days or less as provided below:

§ 54.1-2522. Reporting exemptions.

The dispensing of covered substances under the following circumstances shall be exempt from the reporting requirements set forth in § 54.1-2521:

7. Dispensing of covered substances by veterinarians to animals within the usual course of their professional practice for a course of treatment to last seven days or less or if such covered substance is feline buprenorphine or canine butorphanol.

In addition, FAQ#2 (<https://www.dhp.virginia.gov/vet/docs/FAQonPMP.docx>) states the following:

*(Note: A veterinarian **may not** dispense multiple seven-day prescriptions of reportable covered substances for the same course of treatment to circumvent the law.)*

15. Must a veterinarian reporting dispensed covered substances, report all dispensing regardless of the length of time?

If a veterinarian is required to report dispensed covered substances, he or she is not required to report the dispensing of covered substances for a course of treatment to last seven days or less; however, he or she may choose to report all dispensed covered substances.

16. Is a veterinarian required to declare waiver or reporting status annually?

Waiver status is intended to be permanent. However, if you experience a change in waiver/reporting status please notify PMP staff in order for those changes to be accommodated. The PMP program does not send notices of approval of waiver requests; however you may request a confirmation at the time you send your waiver. Relief veterinarians may only file one waiver form; therefore, it is the relief veterinarian's responsibility to determine if the hospital they are considering working for can accommodate his/her waiver status.

17. What is a National Drug Code (NDC) number?

A National Drug Code number is a universal product identifier and is present on all nonprescription and prescription medication packages. The NDC number can be found on the medication/tablet package, if not please contact your distributor. NDC's will always be 11 numbers and will be formatted in a 5-4-2 grouping (12345-1234-12). However, some labelers will sometimes drop a leading zero in one of the groupings creating a 10-digit number. These occurrences must be "normalized". To normalize an NDC number add a leading zero to whichever section is missing a digit; 1234-123-1 becomes 01234-0123-01. The NDC number must be entered without dashes or spaces for it to be accepted.

18. Are veterinarians that report to the PMP required to have a prescription number for dispensed covered substances?

A prescription number is required for covered substances reported to the PMP as indicated in the Data Submission Dispenser Guide. The prescription number is also a required element in the American Society for Automation in Pharmacy (ASAP) reporting standard. Veterinarians must establish a numbering system to report dispensing to the PMP.

19. For an animal owned by a company such as a pet store or a public or private shelter, what information should be submitted for the owner's name and date of birth?

The dispensing entity must report the dispensing of the covered substance to the PMP. When reporting these prescriptions, please use the following data elements:

1. first name: the animal name
2. last name: the pet store/shelter name
3. date of birth: 1/1/1900

The remaining required reporting elements should not be affected.

20. Are pharmacies located outside of Virginia required to report to the PMP?

Out-of-state pharmacies, including compounding pharmacies, that ship into Virginia are required to be registered by the Virginia Board of Pharmacy as a non-resident pharmacy. Holding such a registration requires the pharmacy to comply with the laws related to Virginia's PMP reporting requirements for dispensed covered substances.

21. When prescribing a covered substance to be filled in a commercial pharmacy, is the veterinarian required to provide the owner's date of birth on the written prescription?

Either the veterinarian or the pharmacist filling the prescription may obtain or record an owner's date of birth on the prescription.

22. What is the process for updating a waiver or account development form?

If your waiver and/or reporting status has changed, please contact the Virginia PMP staff at pmp@dhp.virginia.gov. If you have previously been waived but need to begin reporting, you can begin the process by completing an Account Development Form. If you have previously been reporting but have decided to discontinue dispensing covered substances that are not exempt from reporting, please contact the Virginia PMP and complete a Waiver Form.

23. Is there a tutorial on helping the veterinarian understand new reporting requirements?

Please review the tutorial on [Understanding the Veterinarian's Role in Safe Prescribing](#) to learn more.

24. Why is it important for all of a pet's dispensed prescriptions to be linked to the same owner?

When querying the PMP regarding a human patient, an authorized user must be able to review all dispensed covered substances for that human and all of his/her pets. Therefore, it is important to report the same owner's information for the same pet. For example, if different family members pick up a prescription on different occasions and the dispensed covered substance is reported using different names and dates of birth, the pet's prescriptions will show up on multiple human patient profiles.