



Frequently Asked Questions by Veterinarians about Prescriptions and Pharmacies

Below are answers to the most common questions we receive at the AVMA about veterinary prescriptions and pharmacies.

Q: What are the requirements for writing veterinary prescriptions?

A: The AVMA's [Principles of Veterinary Medical Ethics](#) require a Veterinarian-Client-Patient Relationship (VCPR) before a veterinarian can write a prescription for an animal patient. In addition, most states have laws that specifically require a VCPR for a veterinarian to be able to write a prescription.

Second, each state's [veterinary medical board](#) regulates how prescriptions must be written – specifically, what information must be included on the prescription.

Although this is not a requirement, a third resource is the FDA's "[A Microgram of Prevention is Worth a Milligram of Cure: Preventing Medication Errors in Animals](#)" document, which provides additional guidance on writing prescriptions.

Q: Is it legal to dispense or write a single prescription for a drug that's to be given to multiple pets?

A: Check your state's pharmacy rules to be sure but, in general, if you are treating animals as a group, herd, or flock and you have an established Veterinarian-Client-Patient Relationship (VCPR), it would be acceptable to provide one prescription or dispensed product with directions for treating the group. For example, within a VCPR you could dispense a dewormer to a client for a litter of puppies that will be treated as a group. If the animals are to be treated as individuals, separate prescriptions would be advisable in order to ensure client compliance and effective treatment.

Regardless of the number of animals for whom the prescription is filled, the AVMA recommends that the following information be clearly included on the label. (For more information, see the AVMA's [Guidelines for Veterinary Prescription Drugs](#) and be sure to check your state's pharmacy and veterinary practice rules, as well.)

- Name, address, and telephone number of veterinarians
- Name of clients
- Identification of animal(s) treated, species and numbers of animals treated, when possible
- Date of treatment, prescribing, or dispensing of drug
- Name, active ingredient, and quantity of the drug (or drug preparation) to be prescribed or dispensed

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- Drug strength (if more than one strength available)
- Dosage and duration
- Route of administration
- Number of refills
- Cautionary statements, as needed
- Expiration date if applicable
- Slaughter withdrawal and/or milk withholding times, if applicable

The actual container must bear the veterinarian's name, address, name of the drug (active ingredient), identification of the animal(s) to be treated, adequate directions for proper use, and cautions/precautions including milk and meat withdrawal times. This information may be on the label applied by the manufacturer, or on a label attached to the product by the veterinarian.

Q: Do I have to give my client a written prescription?

A: As a veterinarian, when you determine that a medication is needed for a patient, you can discuss with your client the benefits of having the drug dispensed directly from your clinic. If your client still wants the prescription filled elsewhere, you should comply with their wish and provide a written prescription. For more information about this, see Section III of the AVMA's [Principles of Veterinary Medical Ethics](#).

Make sure you are aware of your state's rules and regulations regarding prescriptions. Some states *require* veterinarians to write prescriptions for clients to have filled elsewhere if requested by the client, while some are less strict about prescriptions; in addition, specific guidance on ways the prescription can legally be filed (via a written prescription, telephone or fax) might be offered by your state.

Q: Can I charge a fee for writing a prescription?

A: There is no federal law preventing you from charging a fee for your services and time invested in writing a prescription. However, it is important to note that individual states might have specific guidance for veterinarians on prescription fees.

Q: Can I develop my own clinic policy on internet pharmacies?

A: If you believe your clinic should develop a policy on the use of internet pharmacies including your clinic's protocol on filling and writing prescriptions, your clinic policy should be aligned with state rules. If possible, you should try to gain input on your draft policy from your state board of veterinary medicine.

Q: What if my client's preferred pharmacy is located in another state?

A: As the patient's attending veterinarian, as long as you are writing an appropriate prescription in compliance with state rules and regulations, generally it is acceptable to write a prescription that can be filled by a pharmacy in your state or in another state.

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Q: Can my client obtain needed prescription drugs from pharmacies in Canada?

A: No. Drugs from Canada are not approved by the federal government for use in the United States. If your client asks you to help them obtain veterinary drugs from Canada, you should refuse on the grounds that it is illegal to ship prescription drugs from Canada into the United States. In the past, and under very unique circumstances, the FDA has allowed the temporary importation by veterinarians of non-FDA-approved drugs under medical emergency conditions when an FDA-approved product was not available in the U.S. However, personal importation of non-FDA-approved animal drugs is not allowed.

Q: Do I have to fulfill a request for a refill when I receive a fax from an internet pharmacy?

A: If you as the patient's attending veterinarian believe the drug is medically appropriate for your patient, then you can authorize (or not authorize) it at your discretion. When a Veterinarian-Client-Patient Relationship (VCPR) exists, it is your role as the veterinarian to determine a treatment plan for the animal based on your medical assessment of the animal's condition. It is at your discretion, not the pharmacy's, that prescription medications may be included in the treatment plan.

Q: I've been asked to fill a prescription from another veterinarian, but I have not examined the animal and there is no established Veterinarian-Client-Patient Relationship. Is it legal for me to fill the prescription? Am I required to fill the prescription?

A: Most states require a Veterinarian-Client-Patient Relationship (VCPR) in order for you to fill a prescription. However, the rules on this vary by state – a few states do allow veterinarians to fill prescriptions from other veterinarians in certain scenarios. We have a [chart of the states' requirements](#), but we also recommend you check to make sure your state veterinary practice rules have not changed

Q: Is there a way to determine the quality of a pharmacy?

A: Sometimes the best indicator of a pharmacy's quality is your past experience with the pharmacy. However, if you are not familiar with the pharmacy, veterinarians and their clients can inquire with the [state board of pharmacy](#) to determine whether a pharmacy is licensed within the state and the status of the pharmacy's license.

In addition, accreditation by independent bodies may be able to give you and your client more information about a pharmacy. Two examples of third-party accreditation include the [National Association Boards of Pharmacy Vet-VIPPS program](#) and, for compounding pharmacies, the [Pharmacy Compounding Accreditation Board](#).

Q: How can I be sure pharmacies are delivering good quality medications to my clients?

A: The best way to ensure good quality drugs is to use a pharmacy you and your clients trust whenever possible.

It is understandable that you want what is best for your patients but you are not obligated to ensure the quality of a given pharmacy's drug handling and products. It is not likely that you will have any control over the quality of the drugs dispensed to your clients (this is something you may wish to discuss with your client when you are discussing the options of purchasing the product from your clinic or from an outside pharmacy).

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If you have concerns or complaints about a pharmacy's practices or the quality of its products, you can report the pharmacy to your [state board of pharmacy](#). Just as your license is subject to review by the state board of veterinary medicine, a pharmacist's registration is subject to review by the state board of pharmacy.

Q: What is my liability if a client's animal is harmed by drugs obtained from a pharmacy, if I wrote the prescription?

A: In general, veterinary liability is based on the standard of care in your jurisdiction. Standards may vary among jurisdictions, but in general, if you 1) prescribe an appropriate medication at the correct dose for the patient; 2) talk with the client about the various alternatives to the medication (if any); and 3) share risks with the client and get client consent on the medication to be used, then it is less likely that you will be held responsible, even if your patient has an adverse reaction or the pharmacy filled the prescription incorrectly. However, we recommend you contact your liability insurance carrier for confirmation and full details of your coverage.

Q: Whom should I contact to report a problem with a drug obtained from a pharmacy?

A: The state boards of pharmacy oversee the practice of pharmacy within the state and ensure state rules are followed. Contact your state board of pharmacy if you suspect that the pharmacy's dispensing practices may be in violation of the law. Also, if the pharmacy is based out of another state, call that state's board of pharmacy.

The FDA should also be contacted, especially if you suspect the pharmacy has sold prescription drugs in the absence of a prescription. Likewise, if a business seeks to purchase a large quantity of prescription drugs from you, the FDA should be made aware of the situation.

Please fill out the [AVMA's Prescribing and Dispensing Complaint form](#) (pdf) and send it to the applicable agency. Also, please send the AVMA a copy so we know how many veterinarians are experiencing problems with pharmacies and what kinds of problems they're encountering – this allows us to be better advocates on behalf of the veterinary profession.

Q: What should I do if I receive a threatening letter, call, email or fax from a pharmacy?

A: Veterinarians should report perceived threats and/or intimidations to state and federal agencies using the [Prescribing and Dispensing Complaint Form](#). Please also send a copy of the form to the AVMA for monitoring purposes.

Q: What's the AVMA doing about illegal pharmacy practices?

A: The AVMA is not a regulatory agency and cannot enforce rules and regulations that govern pharmacy and drug distribution practices. We also cannot become involved in any activity that might be perceived as using the association's influence to affect trade and fair market competition. What we can do is advocate for the profession and facilitate information-sharing between federal and state agencies, industry, and veterinarians.

The AVMA continues to advocate for the federal need to investigate and police illegal activities associated with prescription drug distribution. We also like to receive copies of complaint forms veterinarians send to FDA and state pharmacy boards so that we know what problems veterinarians encounter with pharmacies. The information helps us determine how best to advocate for

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veterinarians at the federal and state levels in cooperation with your state veterinary medical association. AVMA staff have also repackaged veterinarians' concerns (preserving the veterinarians' anonymity) and shared these concerns with the FDA during discussions about pharmacy practices. We also recommend veterinarians relay their concerns to their respective [state board of pharmacy](#).

We ask you to share your concerns about illegal activities with regulatory agencies that need and want to hear of these concerns, including those associated with illegal drug distribution.

Q: What should I do if someone who isn't a client asks me to sell them prescription drugs or write a prescription for them to use to obtain drugs?

A: According to the AVMA's Principles of Veterinary Medical Ethics, it is unethical for veterinarians to sell prescription drugs outside a VCPR. Most states specifically require a VCPR, so selling prescription drugs outside the VCPR falls outside state veterinary medical practice acts which dictate how veterinarians must practice medicine. Selling prescription drugs outside a VCPR would include sales of prescription drugs to distributors or other companies.

Report fraudulent sales to the product manufacturer, and report requests for prescription drug sales to your state board of pharmacy and the Food and Drug Administration.

Q: What should I do if someone other than a client asks me to sell them flea and tick products that are labeled for distribution only through veterinarians?

A: Most flea/tick products are not prescription drugs, yet some manufacturers choose to sell flea/tick products only through veterinarians or veterinary medical facilities, such as clinics or hospitals, with the expectation that the products will only be sold as agreed between the manufacturer and the individual veterinarian or facility. Before you sell flea and tick products to a non-client, ask yourself if doing so would be in line with state distribution and/or tax laws, with any agreements you have with flea/tick product manufacturers, and with the AVMA's Principles of Veterinary Medical Ethics. To summarize:

- Would your sale of the flea/tick product to them comply with applicable distribution and tax laws?
- Does the flea/tick product package or label include a statement that says the product is only to be sold by or under the direction of a veterinarian?
- When purchasing the flea/tick product, did you agree with the manufacturer how the product must be sold (ie, only to a client, only within a VCPR, etc.)? If so, you should review the specifics of the agreement.
- Would selling the product to them be in line with the AVMA's Principles of Veterinary Medical Ethics?

Q: Can I enter an agreement with a pharmacy that will give me a commission based on drug sales?

A: Gaining an undisclosed commission through an agreement with a pharmacy could be viewed as a deceptive business practice by your state board and thus might be a violation of your state's practice act. You should check with your state veterinary medical board for rules and requirements about disclosure of business relationships and advertising guidelines.

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Q: I'd like to set up an online pharmacy for my clients to use. Is this legal, and what do I need to disclose to my clients?

A: Some clinics choose to enter into agreements with businesses that appear to function as online pharmacies, but dispense medications only to that practice's clients. These arrangements can be very convenient for both the practice and the pet owner, yet veterinarians should be sure they follow state rules, including any requirements for disclosures to clients regarding business relationships and potential conflicts of interest. Please keep in mind that, even if you provide this online pharmacy service for your clients, your clients still have the option of filling a prescription at any pharmacy.

Q: Is it OK if I purchase a large quantity of compounded products from a compounding pharmacy to sell at a later date?

A: No. When you need to have a drug compounded, the drug should be compounded only for a patient's individual needs. Some states allow veterinarians to prescribe and keep a small quantity for administration within the clinic, but states generally do not allow veterinarians to dispense and send patients home with drugs previously compounded by a compounding pharmacy. Also, be suspicious of (and report) any pharmacy that offers to sell you large quantities of compounded drugs for a much cheaper price than what you would normally pay for an FDA-approved drug – some pharmacies illegally manufacture drugs, and the FDA (and for controlled substances, the DEA) is cracking down on these illegal activities.

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Additional resources:

[Kansas suspends veterinarian for drug reselling](#)

[Internet drug sales to U.S. pet owners questioned](#)

[Legal challenges, now and tomorrow](#)

[EPA orders retailers to stop sales of counterfeit flea and tick products for pets](#)

[DEA addresses queries about Internet pharmacies](#)

[Internet pharmacies and compounding are high-priority areas, FDA says](#)

[Prescribing through Canadian pharmacies: Is it legal?](#)

US Food and Drug Administration (FDA)

- [Purchasing Pet Drugs Online: Buyer Beware \(video\)](#)
- [Online Pet Pharmacies: Protect Yourself and Your Pet: Be Online Pet Pharmacy A.W.A.R.E.](#)

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