



THE COLLEGE OF
VETERINARIANS
OF ONTARIO

GUIDE TO THE PROFESSIONAL PRACTICE STANDARD

Prescribing a Drug

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Introduction

Under the *Veterinarians Act* and regulations, a veterinarian licensed by the College of Veterinarians of Ontario is authorized to prescribe and dispense drugs. More specifically, prescribing drugs is an important component of the practice of most veterinarians and one that requires appropriate knowledge and skill, and the use of professional judgment. In most circumstances, prescribing is coupled with the act of dispensing; however, there are acceptable instances when prescribing may be performed independently by a veterinarian. A veterinarian should acknowledge and manage the potential conflict of interest in assuming the dual role of prescriber and dispenser.

Using a question and answer format, this *Guide to the Professional Practice Standard: Prescribing a Drug* addresses questions and offers suggestions on how to apply the Professional Practice Standard in situations that arise in veterinary practice.

Frequently Asked Questions about General Expectations

May I delegate the act of prescribing to an auxiliary?

No, a veterinarian may not delegate the act of prescribing to an auxiliary.

Must I always prescribe a drug approved for veterinary use over a drug approved for human use (and an approved drug over a compounded drug?)

When determining which drug to prescribe, a veterinarian uses their clinical judgment to recommend the most appropriate course of treatment for an animal or animals, taking into consideration the following:

- The availability of any approved veterinary drugs for the species in question and condition (on-label use)
- The availability of veterinary drugs or approved human drugs (extra-label use)
- The need for a compounded drug where no approved drug exists, and a therapeutic need is established
- Current research and evidence of available treatments
- Considerations such as side effects, risks, and benefits

What are the principles of good antibiotic stewardship and prudent use of antimicrobials?

Every veterinarian has a valuable role to play in the effort to combat antimicrobial resistance and to preserve the effectiveness of antimicrobial drugs and their availability for both veterinary and human use. As part of good stewardship, the College expects a veterinarian to assume an active leadership role by ensuring their understanding of the need for antimicrobial oversight, the existing government directives, the evolving science related to pharmaceuticals, and the most appropriate current use of antimicrobial drugs with a specific species. A veterinarian must only prescribe antimicrobial drugs within a veterinarian-client-patient relationship and where strong clinical evidence demonstrates medical need. It is important for veterinarians to be vigilant in their oversight and to remain ever-cognizant that there are risks as well as benefits associated with antimicrobial use for the greater public good.

When is the use of protocols or standard operating protocols (SOPs) advised?

A veterinarian may establish standard operating protocols (SOPs) for an animal or group of animals in advance or anticipation of illness, vaccination, processing, etc. An SOP is a specific direction or series of steps to be undertaken following a specific scenario or indication. An SOP is not a prescription and does not authorize the dispensing of a drug.

May I prescribe a drug prior to establishing a VCPR in order to calm a stressed or anxious animal and make it easier to bring the animal into the clinic, and then establish a VCPR?

A veterinarian may not prescribe, dispense, or administer a drug unless they have established a VCPR and has obtained sufficient knowledge of the animal or group of animals by virtue of a history and inquiry and either physical examination of the animal(s) or medically appropriate and timely visits to the premises where the animal(s) is kept to reach at least a general or preliminary diagnosis.

A veterinarian who encounters barriers to being able to establish a VCPR, and obtain recent and sufficient knowledge of an animal, may want to consider visiting the client's home to establish a VCPR and obtain recent and sufficient knowledge of the animal(s) in order to make a diagnosis, and be able to prescribe a drug. While this type of practice requires an accredited mobile facility, Council has taken the position that there are circumstances where members

working from an accredited hospital or office may on rare occasions attend at an animal's location when attendance at the premise is not in the interest of the client or patient (e.g. euthanasia of a geriatric animal, medication of a fractious cat prior to presentation at the clinic). As long as the service is not part of the regular practice, not advertised, and client consent for the provision of the service by a veterinarian without a Certificate of Accreditation has been obtained, a veterinarian may use their professional discretion.

Do I have reporting obligations in relation to adverse reactions?

A veterinarian is encouraged to report suspected adverse drug reactions that occur in their practice to the Veterinary Drugs Directorate (VDD). The Veterinary Drugs Directorate classifies an adverse reaction to a veterinary drug as:

- any unintended or noxious side effects, injury toxicity or sensitivity reaction associated with the clinical uses, studies, investigations and tests respecting a drug;
- any unusual failure of a drug to produce its expected pharmacological activity.

The VDD suggests that the following kinds of adverse drug reactions be reported:

- all suspected drug adverse reactions which are unexpected: an undesirable patient effect which is not consistent with product information or labelling
- all suspected drug adverse reactions which are serious: an undesirable patient effect which contributes to significant disability or illness, which requires hospitalization or significant medical intervention, or which is more severe or more frequent than expected from product information or labelling
- all suspected drug adverse reactions to recently marketed drugs (commercially available for less than 7 years), regardless of nature or severity
- lack of efficacy when the drug was used according to product labelling (species, dose, indications, route of administration)

Details on how to report can be found here: <https://www.canada.ca/en/health-canada/services/drugs-health-products/veterinary-drugs/factsheets-faq/drug-adverse-reaction-reporting.html>

What is CgFARAD and how do I contact them?

A veterinarian should consult CgFARAD for residue avoidance information when prescribing a drug with a Health Canada Drug Identification Number (DIN) in an extra-label manner.

Canada is part of a global food animal residue avoidance databank program known as CgFARAD (www.cgfarad.usask.ca). Based at the Western College of Veterinary Medicine, Saskatoon, Saskatchewan and the Ontario Veterinary College, Guelph, Ontario, the CgFARAD provides information on residue avoidance to Canadian veterinarians.

What does the “potential conflict of interest” in prescribing and dispensing mean?

The potential for a conflict of interest in veterinary medicine may arise because a veterinarian is in a position to derive financial benefit from dispensing the medications that they prescribe, which has the potential to influence the motivation or decision-making of that veterinarian that may not be in the best interest of the patient or client.

How can you take steps to mitigate a conflict of interest?

A veterinarian should be alert to the potential for conflict of interest, and should ensure that the process of prescribing and dispensing of drugs is transparent, is performed on the basis of medical need, and that the client's choice to have a prescription filled wherever they choose is respected.

Frequently Asked Questions about Prescriptions

Do I have to give my client a written prescription when they request it?

Once a veterinarian has determined that a drug is warranted for a patient, the client is within their right to have their prescription be filled elsewhere. A veterinarian must comply with a client's decision, and provide them with a written prescription to have it dispensed at a pharmacy of the client's choice.

Can I write a prescription that my client wishes to have filled outside of Ontario?

Once the client is provided with a prescription, it is left to them to decide where they will have the prescription filled. The determination of the validity of a veterinary prescription is made by the dispenser. In some cases, some pharmacies will accept prescriptions from veterinarians not licensed in the jurisdiction in which the pharmacy is located, some will not.

If an oral prescription is required, this can only be provided by a veterinarian to a pharmacist licensed in Ontario, another member of the College of Veterinarians of Ontario, or a licensed veterinarian practising outside of Ontario.

In addition, a veterinarian may wish to educate their client about the risks associated with purchasing drugs online, as outlined by Health Canada: <https://www.canada.ca/en/health-canada/services/buying-drugs-over-internet.html>.

If I receive a prescription request from a pharmacy, what should I do?

A veterinarian must determine if the prescription is warranted for the patient first and if any further assessment of the patient is required before issuing the prescription. This will likely require a discussion with the client. Once it is determined that a prescription should be issued, it is suggested that a veterinarian write a prescription to give to a client, rather than fill out a prescription request form from a pharmacy (which may be outside of Ontario). As per Regulation 1093, a veterinarian can only deal directly with a pharmacist/pharmacy licensed by the Ontario College of Pharmacists as a pharmacist is defined as a member of the Ontario College of Pharmacists.

What are my responsibilities for a drug that a client obtains on the basis of my written prescription?

The dispenser is obligated to abide by the laws of their jurisdiction. The prescribing veterinarian is responsible for ensuring that they prescribe a drug in accordance with the College's practice expectations related to prescribing. This includes ensuring that they prescribe a drug within a VCPR with recent and sufficient knowledge of the animal(s), that they abide by the requirements

related to writing a prescription, and that they provide appropriate client education regarding the drug in question.

Is it acceptable to write a prescription for a drug that is to be given to multiple animals (same species) of a single owner for the same purpose?

If you are treating animals of the same species as a group or herd within an established veterinarian-client-patient relationship (VCPR) it is acceptable to provide one prescription or dispensed product with directions for treating the group. It is also acceptable to provide one prescription that can be used to treat multiple animals over an extended period of time, and at different times, for the same disease as long as the VCPR remains valid. However, this does not apply to controlled drugs which may only be prescribed to individual animals.

May I charge a fee for writing a prescription?

Yes, a veterinarian may choose to charge a fee for providing this service.

Is it acceptable to write multiple drugs on a single prescription?

A veterinarian may choose to write multiple drugs on a single prescription or to separate each out individually. In cases of varying start times, it is recommended that separate prescriptions be written for each drug prescribed.

Can I provide an electronic signature on a prescription?

A veterinarian is permitted to electronically sign a prescription only if they have ensured that they are using an electronic computer system that has a secure method that permits only the member to apply an electronic signature.

Frequently Asked Questions about Refills

The Professional Practice Standard: Prescribing a Drug states that a written prescription must state the number of refills permitted, if any, or expiry date, or total amount of drug prescribed. What does this mean?

When writing a prescription, a veterinarian must write down the number of refills that are permitted (for non-controlled drugs) if any are to be provided, the expiry date of the prescription itself, or the total amount of the drug that is being prescribed. In all cases, the amount and duration of a prescription must be determined while ensuring that the veterinarian has and maintains recent and sufficient knowledge of the animal(s).

What are some considerations to keep in mind when authorizing refills?

Prescribing with refills is often appropriate for patients with chronic conditions that are likely to remain stable for the duration of the dispensing period. A veterinarian should ensure processes are in place to monitor the ongoing appropriateness of the drug when prescribing with refills, including conducting periodic re-assessments looking for any changes in the underlying chronic condition, as well as any new drug interactions or contraindications, and/or new side effects of

the prescribed drug. When a client requests that a veterinarian authorize a refill on a prescription that has run out, they must consider whether the drug is still appropriate, and whether the patient's condition is stable enough to warrant the prescription refill without further assessment. It is recommended that a veterinarian also consider whether a request for a prescription refill received earlier or later than expected may indicate poor adherence, possibly leading to inadequate therapy or an adverse event. A veterinarian should be aware of how to recognize behaviours that can indicate drug-seeking and how to prevent abuse and diversion of controlled drugs. A veterinarian should ensure that all requests for refills and all refills that are authorized are documented in the medical record.

Legislative Authority

Food and Drugs Act and Regulations (Federal)
Feeds Act and Regulations (Federal)
Controlled Drugs and Substances Act and Regulations (Federal)
Drug and Pharmacies Regulation Act and Regulations (Provincial)
Drug Interchangeability and Dispensing Fee Act (Provincial)
Veterinarians Act (Provincial)
Regulation 1093, s. 1, 18, 23-33 (Veterinarians Act) (Provincial)

Other References:

Policy on Extra-Label Drug Use in Food Producing Animals, Health Canada, 2015.
http://www.hc-sc.gc.ca/dhp-mps/vet/label-etiquet/pol_eldu-umdde-eng.php
Position Statement: Extra-label Drug Use (ELDU), Canadian Veterinary Medical Association, 2015. <http://www.canadianveterinarians.net/documents/extra-label-drug-use-eldu>
Canadian gFARAD Website:
<https://cqfarad.usask.ca/home.html>
Veterinary Oversight of Antimicrobial Use – A Pan-Canadian Framework of Professional Standards for Veterinarians, Canadian Veterinary Medical Association,
<https://www.canadianveterinarians.net/documents/pan-canadian-framework>

The following can be found on the College's website at www.cvo.org:

Professional Practice Standard: Prescribing a Drug
Professional Practice Standard: Dispensing a Drug
Guide to the Professional Practice Standard: Dispensing a Drug
Professional Practice Standard: Extra-Label Drug Use
Guide to the Professional Practice Standard: Extra-Label Drug Use
Professional Practice Standard: Management and Disposal of Controlled Drugs
Guide to the Professional Practice Standard: Management and Disposal of Controlled Drugs
Professional Practice Standard: Use of Compounded Drugs in Veterinary Practice
Guide to the Professional Practice Standard: Use of Compounded Drugs in Veterinary Practice
Professional Practice Standard: Informed Client Consent
Guide to the Professional Practice Standard: Informed Client Consent
Professional Practice Standard: Medical Records
Guide to the Professional Practice Standard: Medical Records
Professional Practice Standard: Veterinarian Client Patient Relationship
Guide to the Professional Practice Standard: Veterinarian Client Patient Relationship

College publications contain practice parameters and standards which should be considered by all Ontario veterinarians in the care of their patients and in the practice of the profession. College publications are developed in consultation with the profession and describe current professional expectations. It is important to note that these College publications may be used by the College or other bodies in determining whether appropriate standards of practice and professional responsibilities have been maintained. The College encourages you to refer to the website (www.cvo.org) to ensure you are referring to the most recent version of any document.