

Dispensing 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, dispensing 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 dispensing is an activity 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: Dispensing a Drug* addresses questions and offers suggestions on how to apply the *Professional Practice Standard* in situations that arise in veterinary practice.



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Frequently Asked Questions about General Expectations

1. May I delegate the act of dispensing to an auxiliary?

Yes, a veterinarian may delegate the act of dispensing to an auxiliary.

2. Can I dispense a drug for a client whose animal(s) or group of animals I have not examined or visited within the past year?

The current *Professional Practice Standard: Establishing, Maintaining, and Discontinuing a Veterinary-Client-Patient Relationship (VCPR)* states that a veterinarian must use their professional judgment to determine if they should provide veterinary treatment, inclusive of prescribing, dispensing, or administering a drug. Depending on their recent knowledge of the animal(s) or groups of animals, the purpose of the drug, and the risks and benefits to the animal(s) or group of animals, they will determine what information they need regarding whether to dispense the drug in question. The appropriate time between physical examinations or visits to the premise can vary depending on the factors mentioned above and the specific circumstances. There is no requirement for an examination within one year.

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

A veterinarian may only prescribe, dispense, or administer a drug within a valid VCPR and when they determine that they have recent and sufficient knowledge of the animal(s) or group of animals and the drug is therapeutically or prophylactically indicated.

4. Do I have to inform a client about common side effects, serious risks associated with the administration of a drug, and the proper storage, handling, and the means of administration of a prescribed drug each time the drug is dispensed?

As a part of the informed consent discussion with a client, a veterinarian should discuss the risks associated with a prescribed drug. This should include a discussion of the common side effects, any serious risks associated with the administration of a drug, proper storage and handling, and the means of administration. This information can also be provided in a handout. A notation that the information was provided should be made in the medical record.

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5. Can I dispense a drug, including a controlled drug, to another veterinarian or pharmacist for resale?

A veterinarian may not dispense a drug for resale except where the drug is dispensed to another member of the College of Veterinarians of Ontario or a member of the Ontario College of Pharmacists in reasonably limited quantities in order to address a temporary shortage experienced by that other professional. The repeated sale of drugs to any source by a veterinarian is considered wholesaling and is not permitted by law.

6. Does the number of refills permitted allow for “unlimited” refills on a written prescription?

The number of refills authorized by a veterinarian is constrained by the fact that a veterinarian must maintain “recent and sufficient knowledge” of an animal(s) or animals within a VCPR in order to prescribe, dispense, or administer a drug.

7. May I give away expired or previously dispensed and returned drugs in order to assist an individual or organization, such as a rescue group?

Redistributing unused or expired drugs, even those in their original packaging, is not permitted because the chain of custody and the integrity of the drugs cannot be ensured. Once the expiration date has passed there is no assurance that the drugs have the safety, identity, strength, quality and purity characteristics they purport or represent to possess. As such, Health Canada considers the sale of expired drugs to be the sale of unlicensed drugs.

A veterinarian must meet the same standards of care in all circumstances and for all clients and animals. Returned drugs must be disposed of in a safe and secure manner. Expired drugs should be discarded or returned to the manufacturer, in accordance with the College’s *Accreditation Standards for Veterinary Facilities in Ontario*.

8. How do I trace drugs in case of a recall?

The College considers it a best practice for a veterinarian to note the lot number of a drug when they purchase the drug in question and receives it into the inventory of the facility.

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9. May I fill a prescription from another veterinarian when I have not examined the animal and there is no established VCPR?

Regulation 1093 outlines a veterinarian's obligations related to dispensing a medication that is prescribed by another veterinarian. There is a narrowly-defined exemption that allows a veterinarian to dispense a non-controlled drug pursuant to a prescription from another veterinarian who is licensed in Ontario (the prescribing veterinarian) when the following conditions are met:

- (a) it is not reasonably possible for the client to obtain the drug from the prescribing veterinarian or a pharmacy;
- (b) it is necessary in the interests of the animal to administer or dispense the drug without the delay that would be associated with returning to the prescribing veterinarian;
- (c) the dispensing veterinarian makes a reasonable effort to discuss the matter with the prescribing member;
- (d) the dispensing veterinarian conducts a sufficient assessment of the animal's circumstances, which may not require a physical examination in every case, to ascertain that it is unlikely that there has been a material change in the circumstances since the prescription was given;
- (e) the quantity of the drug dispensed is no more than would reasonably enable the client to return to the prescribing veterinarian for future prescriptions or quantities of the drug; and
- (f) the dispensing veterinarian makes a written record of the transaction.

Alternatively, a veterinarian may decide to establish a VCPR with the individual in question, for the purpose of prescribing and dispensing the drug.

A prescribing veterinarian may also choose to courier drugs to their clients when the client is unable to attend the veterinarian's veterinary facility or provide an oral prescription to an Ontario pharmacy in the area that the client is located.

10. The Professional Practice Standard: Dispensing a Drug states that a veterinarian must make a written record when dispensing a drug stating the name of the prescribing veterinarian if the veterinarian prescribing the drug is not the same as the veterinarian dispensing the drug. If the prescribing veterinarian and dispensing veterinarian work in the same facility, must the name of the prescribing veterinarian still be included?

Yes, the name of the prescribing veterinarian should be included even in cases where both

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veterinarians work in the same facility, as they have individual responsibilities and accountabilities related to the standards of practice of the profession.

11. The Professional Practice Standard: Dispensing a Drug requires me to include the Drug Identification Number (DIN) in a written record when dispensing a drug and on the label of a dispensed drug. What is a DIN and why is it important?

A Drug Identification Number (DIN) is a computer-generated eight-digit number assigned by Health Canada to a drug product, which uniquely identifies all drug products sold in a dosage form in Canada. It is located on the label of prescription and over-the-counter drug products that have been evaluated and authorized for sale in Canada. A DIN uniquely identifies the following product characteristics: manufacturer; product name; active ingredient(s); strength(s) of active ingredient(s); pharmaceutical form; route of administration. A DIN lets a user know that the product has undergone and passed a review of its formulation, labeling and instructions for use. A drug product sold in Canada without a DIN is not in compliance with Canadian law. The DIN is unique and serves as a tool to help in the follow-up of products on the market, recall of products, inspections, and quality monitoring.

<https://www.canada.ca/en/health-canada/services/drugs-health-products/drug-products/fact-sheets/drug-identification-number.html>

Frequently Asked Questions about Potential Diversion

12. How can I recognize red flags that can indicate drug-seeking behaviour and take steps to avoid drug diversion?

A veterinarian should be aware of how to recognize behaviours that can indicate drug-seeking and how to assist in preventing abuse and diversion of controlled drugs. Health Canada has created “Abuse and Diversion of Controlled Substances: A Guide for Health Professionals” to assist health professionals and can be found here: http://publications.gc.ca/collections/collection_2018/sc-hc/H128-1-06-467-eng.pdf

Frequently Asked Questions about Recordkeeping

13. What are the best practices for recordkeeping with respect to antimicrobial drugs?

A veterinarian should maintain a medical record that contains sufficient information regarding the

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history, consultations, laboratory investigations and physical examination findings to justify the prescription and use of an antimicrobial drug. A tentative or final diagnosis or purpose for use of a drug should be recorded.

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)

Resources

The following can be found at the following links or at the College's website at cvo.org:

1. [Policy on Extra-Label Drug Use in Food Producing Animals](#), Health Canada, 2015.
2. [Position Statement: Extra-label Drug Use \(ELDU\)](#), Canadian Veterinary Medical Association, 2021.
3. [Canadian qFARAD Website](#)
4. [Veterinary Oversight of Antimicrobial Use – A Pan-Canadian Framework of Professional Standards for Veterinarians](#) – Canadian Veterinary Medical Association
5. *Professional Practice Standard: Dispensing a Drug*
6. *Professional Practice Standard: Prescribing a Drug*
7. *Guide to the Professional Practice Standard: Prescribing a Drug*
8. *Professional Practice Standard: Extra-Label Drug Use*
9. *Guide to the Professional Practice Standard: Extra-Label Drug Use*
10. *Professional Practice Standard: Management and Disposal of Controlled Drugs*
11. *Guide to the Professional Practice Standard: Management and Disposal of Controlled Drugs*
12. *Guide to the Professional Practice Standard: Use of Compounded Drugs in Veterinary Practice*
13. *Professional Practice Standard: Informed Client Consent*
14. *Guide to the Professional Practice Standard: Informed Client Consent*
15. *Professional Practice Standard: Medical Records*
16. *Guide to the Professional Practice Standard: Medical Records*
17. *Professional Practice Standard: Establishing, Maintaining, and Discontinuing a Veterinarian-Client-Patient Relationship (VCPR)*



18. *Guide to the Professional Practice Standard: Establishing, Maintaining, and Discontinuing a Veterinarian-Client-Patient Relationship (VCPR)*

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