



# MEMORANDUM

<b>DATE</b>	October 15, 2021
<b>TO</b>	Veterinary Medical Board (Board)
<b>FROM</b>	Jessica Sieferman, Executive Officer
<b>SUBJECT</b>	<b>Agenda Item 9. Discussion and Possible Action Regarding Pharmacies Requiring National Provider Identifier (NPI) and Drug Enforcement Administration (DEA) Numbers to Fill Veterinary Prescriptions</b>

**National Provider Identifier (NPI) Number**

An NPI is a unique identification number for human health care providers for billing Medicare and Medicaid. According to Centers for Medicare and Medicaid Services, “Veterinarians are not eligible for NPIs because they do not meet the regulatory definition of ‘health care provider’ as defined in 45 CFR 160.103.”

**Drug Enforcement Administration (DEA) Number**

A DEA number is a unique identification number required to be included on prescriptions for any controlled substances. The primary purpose of a DEA number is to track the prescribing and dispensing of controlled substances, drive accountability of prescribers and dispensers, and maintain greater control of controlled substance abuse. The DEA strongly opposes using a DEA number for non-controlled substances, as it would lead to a weakened registration system and defeat the purpose of the DEA number.

**Pharmacies Requiring NPI or DEA Numbers**

During a meeting with California Registered Veterinary Technicians Association (CaRVTA) representatives, they raised a concern that multiple pharmacies throughout California require an NPI or DEA number in order to fill veterinary prescriptions. This often leads to significant delays in animal patients receiving their medications, because veterinary staff must spend time explaining to the pharmacies that veterinarians do not have NPI numbers and they should not use their DEA numbers for non-controlled substances. After reaching out to the California Veterinary Medical Association (CVMA), they confirmed veterinarians frequently experience the same issue.

Shortly after the CaRVTA meeting, the Board’s Executive Officer (EO) contacted the Board of Pharmacy (BOP) EO to discuss ways to address the issue. On September 16, 2021, the Presidents and EOs of both Boards virtually met and provided perspectives

from each side. According to the BOP President (a licensed pharmacist), pharmacies require the NPI or DEA number in order to dispense the medications at a discounted rate. For example, a prescription medication may cost \$75 from a veterinarian, but a client may take that prescription to a retail pharmacy and pay significantly less. The reason why the cost is significantly less is because retail pharmacies often contract with discount prescription programs, like Good Rx, to provide the discounted medications. The BOP President further explained that the client and the veterinarian often are not aware discounted programs are even being used. These discounted programs, he claimed, are who require the NPI or DEA number.

The BOP President was aware veterinarians cannot obtain an NPI number and that the DEA discourages DEA numbers for non-controlled substances. However, in order to help the clients obtain cheaper medications, pharmacies will often still enter the DEA numbers. The BOP recommended contacting the [National Association of Chain Drug Stores](#) (NACDS), other national retail chain stores, various discount programs, and the Department of Managed Healthcare. In addition, the BOP agreed to assist in disseminating educational materials to their licensees regarding this issue.

On September 22, 2021, the Board President and EO met with representatives from NACDS and CVS Pharmacy. The CVS representative previously was the EO of the Ohio Board of Pharmacy for over seven years, and he fielded many similar concerns. He explained that CVS has recently updated its national system to address this issue by adding a field for a veterinarian's license number in lieu of an NPI or DEA number. However, it appears not all pharmacies are aware of the change, which could factor into the problem.

The NACDS representative shared that the American Veterinary Medical Association (AVMA) recently worked to address this issue and recommended contacting the AVMA. Both representatives agreed to disseminating education materials to their members/retail pharmacies clarifying pharmacies should use veterinarian license numbers when filling veterinary prescriptions rather in lieu of requiring NPI or DEA numbers.

During the October AAVSB Annual Conference, the Board EO spoke with an AVMA representative who confirmed their involvement in addressing this issue. AVMA also posted [guidance](#) to veterinarians when pharmacies request an NPI or DEA.

### **Next Steps**

The Board President and EO will continue meeting with large chain drug stores, such as Walgreens, Rite Aid, and Costco, large pharmacy discount programs, such as Good Rx, and the Department of Managed Healthcare.

In addition, the Board will partner with DCA's Office of Public Affairs to develop educational materials that can be disseminated to all BOP licensees, NACDS members, and national retail pharmacies.