

From: [Sunset Advisory Commission](#)
To: [Trisha Linebarger](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Friday, October 28, 2016 8:06:18 AM

-----Original Message-----

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Thursday, October 27, 2016 10:32 PM
To: Sunset Advisory Commission
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: STATE BOARD VETERINARY MEDICAL EXAMINERS

First Name: Rianne

Last Name: Decker

Title: Veterinarian

Organization you are affiliated with: Texas Veterinary Medical Association

Email:

City: Abilene

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed: I do not support the proposal for mandated reporting by veterinarians into the PMP for several reasons. More discussion is needed to determine how to apply a PMP program specifically created for use by human medical practitioners to veterinarians because veterinary practice differs in so many key ways that simply do not translate to modern veterinary practice. Key information needed for the PMP program cannot be accurately or consistently provided by veterinarians. Information from the veterinary profession will skew human data and potentially confuse information with the ongoing opioid and barbiturate addiction concerns. Finally, the workflow issues that this plan would incur upon private practices could be devastating. We hope that any mandated reporting takes into account the workflow issues that such a system would present for veterinarians, who would undoubtedly be required to report at a rate that far exceeds human medical practitioners.

Any Alternative or New Recommendations on This Agency: Currently, the states that mandate veterinary reporting for controlled substances have programs that have less frequent and/or less strenuous reporting requirements that better suit veterinary practice than a blanket mandate. I would strongly recommend other alternatives that can be less detrimental to such small businesses. Any mandated use of the PMP system for the veterinary profession should only be after fundamental changes are made to the system to specially tailor it for veterinary use. As a private practitioner, my clinic would also need an appropriate amount of time to prepare for any approved laws regarding controlled substance reporting.

My Comment Will Be Made Public: I agree