Nevada Veterinary Board Fall Bulletin 2024

A Dose of Prevention

How to Avoid and Report Medication Errors

The FDA's Center for Veterinary Medicine (CVM) is responsible for monitoring and addressing issues that affect both animal and human health, including veterinary medication errors.

When drug label information is misinterpreted or when one drug is mistaken for another, the treated animal's health may be harmed. Medication errors involving animal drugs can also affect human health. Medication errors involving drugs used in food-producing animals could cause unsafe drug residues in human food. Also, there is a potential risk to people handling animal drugs if the drugs are handled or used improperly.

Examples of Medication Errors:

Case 1: Animal drug name confusion and error
- An illegible handwritten order resulted in Convenia being dispensed instead of Cerenia.

Case 2: The use of error-prone notations (trailing zero)
- A patient was injected with 5mL of an antibiotic. The next day the LVT noticed that the patient had been injected with a 10x overdose because order was written as .50 mL instead of 0.5 and misread, resulting in the error.

Case 3: Labels and packaging
- A drug known to cause luteolysis in cattle was mistakenly dispensed instead of the drug used to prevent and treat selenium-Vitamin E deficiency in breeding beef cattle because the packaging was nearly identical.

Examples of Adverse Events:

- Side effects in animals: vomiting, diarrhea, colic, seizures, fever
- Side effects in people exposed to drugs and devices used in animals, such as needle stick injuries, rashes, or headache/ nausea secondary to product contact.
- Product defects, such as broken product seals or leaking bottles,
- Giving the wrong drug or dose, or giving a drug too frequently
- Lack of effectiveness, such as a product not working, a product that stops working, or a product that isn't working as well as it did.

The FDA encourages reporting of all medication errors, including those that are not associated with an adverse event as it allows the CVM to monitor and be proactive in preventing adverse events that may result from medication errors.

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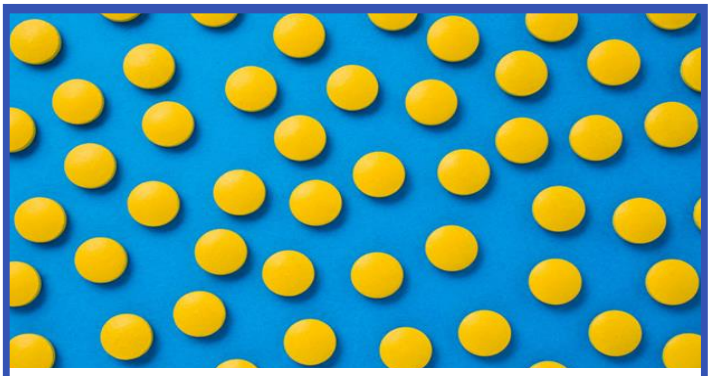

What is the CVM?

The FDA Center for Veterinary Medicine (CVM) works to prevent veterinary drug medication errors.

What is a medication error?

A medication error is any preventable event that may cause or lead to inappropriate medication use or patient harm while the medication is in the control of the health care professional, patient, or consumer.

Errors may be related to professional practice, health care products, procedures, and systems, including: prescribing, order communication, labeling, packaging, compounding, dispensing, distribution, administration, education, monitoring, and/or use.

What's an adverse event?

A medication error may cause a serious adverse event for the treated animal. If a veterinary professional or an animal owner reports a serious adverse event to the drug company, the drug company is obligated to comply with the regulations in 21 CFR 514.80 (b)(2) for reporting of all serious, unexpected adverse experiences to CVM.

How can I report a medication error?

You can report all medication errors for any drug or device by filling out 'FORM FDA1932a' and emailing it to: CVM1932a@fda.hhs.gov.

Find FORM FDA1932a and more information about adverse events and medication error reporting by clicking here.

VCPR and Telemedicine in Nevada: Frequently Asked Questions

What is a veterinarian's role in dispensing animal prescription drugs?
An animal prescription drug (APD) is one that is deemed by the FDA as unsafe for use except under the professional supervision and is dispensed under lawful order of a licensed veterinarian.

What does "dispensed by or on the lawful order of" mean?
An APD must be "dispensed by or upon the lawful order of a licensed veterinarian" A veterinarian may dispense an APD directly to the animal owner/caretaker with appropriate directions for use, or issue an order, consistent with applicable Federal and State requirements.

What is meant by professional supervision or oversight?
Certain APDs are designated as such because the FDA determined that the drug cannot be safely used without the oversight of a licensed veterinarian. A licensed veterinarian has the expertise and training to provide directions for the safe use of the APD and it's expectation that the veterinarian will ensure that directions for safe use are conveyed.

Can someone other than a licensed veterinarian dispense an APD?
Federal law says that a licensed veterinarian's oversight is required. A licensed veterinarian may direct staff, such as veterinary technicians, to dispense an APD. Without that continued oversight, it's unlawful for anyone other than a licensed veterinarian to prescribe an animal drug.

What is a veterinarian's role in 'extralabel use'?
'Extralabel use' is when an APD's use differs from the labeled directions or when an approved human drug is used in animals. Extralabel use can differ in dosage, species, or treatment of a different disease. The FDA allows the extralabel use of approved drugs in animals under a valid VCPR.

Can a Federal VCPR be established through telemedicine?
The federal VCPR definition (21 CFR 530.3(i)): "*The practicing veterinarian is readily available for follow-up in case of adverse reactions or failure of the regimen of therapy. Such a relationship can exist only when the veterinarian has recently seen and is personally acquainted with the keeping and care of the animal(s) by virtue of examination of the animal(s) and/or by medically appropriate and timely visits to the premises where the animal(s) are kept. To meet the federal requirements, a valid VCPR cannot be established solely through telemedicine (e.g., photos, videos, or other electronic means that do not involve examination of the animal(s) or timely visits to the premises)."*

A veterinarian must have a valid VCPR to prescribe, dispense, or order the extralabel use of approved animal or human drugs, and to issue a Veterinary Feed Directive (VFD) for a VFD drug.

What are Nevada's VCPR requirements?

In order to practice veterinary medicine in Nevada, a licensed veterinarian must have a valid VCPR which must meet all the following criteria. A VCPR is considered valid when the veterinarian:

1. Assumes responsibility for making medical judgments and the need for medical treatment
2. Obtains sufficient knowledge of the present care and health of the animal to give at least a preliminary diagnosis
    a. Knowledge of the patient's condition must be acquired by:
        (1) Conducting a physical examination of the animal; or
        (2) Visiting the premise where the animal is kept with an appropriate time for the medical issue.
3. Obtains an agreement with the client to follow the instructions for the care and treatment of the animal
4. Is readily available for follow-up evaluation or has arranged for:
    a. Emergency or urgent care coverage; or
    b. Continuing care/treatment as designated by the veterinarian to be provided by another licensed veterinarian who:
        (1) Has access to the medical records of the animal; or
        (2) Can provide reasonable and appropriate medical care; and
5. Provides oversight of treatment.

A VCPR cannot be established solely through telemedicine until all the above criteria are met. However, once established, a VCPR may be maintained via veterinary telemedicine between medically necessary exams or visits within a period of time that is appropriate for the care, treatment or diagnosis of the patient.

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Top Tips for Preventing Medication Errors

Review Drug Names Carefully
- Avoid confusion between look-alike or sound-alike drug names
- Verify drug names with clear, unique identifiers to prevent mix-ups.

Enhance Drug Labeling and Packaging
- Ensure labels have high contrast and avoid overcrowding of information.
- Use legible, clear, and consistent hand-writing or type.
- Evaluate packaging for user-friendliness and clear instructions.

Improve Dosage Devices
- Use syringes and other dosage tools that are user friendly and provide clear instructions to owners.
- Regularly assess and update devices.

Avoid Error-Prone Abbreviations
- Use standard abbreviations and symbols to prevent misinterpretation.
- Prefer full terms over abbreviations when possible to reduce confusion.

Clear Communication
- Double-check verbal prescriptions and ensure clarity.
- Use electronic prescribing systems where possible to reduce handwritten errors.

Medication Storage and Disposal
- Store animal drugs separately from human medications.
- Ensure proper disposal of expired or unused medications to prevent accidental exposure.

Educate and Train
- Conduct regular training for veterinarians, technicians, and staff on medication safety.
- Update education materials with the latest best practices and error prevention strategies.

Engage in Reporting and Monitoring
- Report all medication errors, whether they resulted in adverse events or not, to improve safety.
- Use available reporting forms and resources to submit error reports to relevant authorities.

Communicate with Pet Owners
- Clearly explain medication use, side effects, and administration details to pet owners.
- Encourage owners to ask questions and provide complete information about their pet's health and current medications.

Regularly Review and Improve Processes
- Monitor adverse drug event reports and assess drug safety profiles post-approval.
- Continuously improve labels, packaging, and processes based on feedback and reported errors.

VCPR (continued from page 2)

What is allowed without a VCPR?

1. General advice: Advice must be general and not specific to a particular animal or its diagnosis or treatment.
2. Emergency Recommendations: Recommendations may be provided via veterinary telemedicine in an emergency, but only until the animal can be examined in person by a licensed veterinarian.

Additional Resources:

Click here to find read CFR 21:530

Click here for FDA guidance info

Click here to read the VCPR requirements in Nevada.

Find the 2025 Schedule of Board meetings and upcoming agendas:

https://nvvetboard.nv.gov/Meetings/home/

Important Dates for 2025 Renewals

Earn your CE: 7/1/2023-6/30/2025

Renewals Open: 4/1/2025

License Expire: 6/30/2025

$50 late fee to renew: 7/1/25

$100 late fee to renew 8/1/25

Licenses not renewed become Forfeit: 9/1/2025

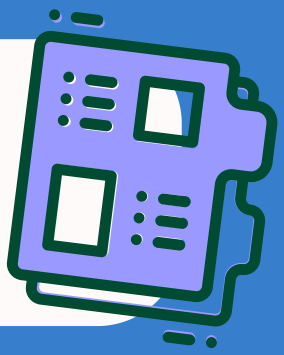
Important Reminders

Earn your CE: 7/1/2023-6/30/2025
License Renewals Open: 4/1/2025
License Expire: 6/30/2025

CE must be earned between 7/1/2023 and 6/30/2025 to count towards your renewal and at least half of your hours must be done in-person.

Required hours = 40 hours DVMs, 20 hours for LVTs, 30 hours for ACs, 10 hours for APTs.

Anatomy of a Complaint will be offered in-person in Las Vegas in early 2025. The Board is in development for online course offerings as well.



The Board office is no longer accepting DEA Form-41 Per the DEA, the DEA registrant is responsible for keeping a copy of the form for 2 years. Any copies sent to our office will not be kept.