

## THE OKLAHOMA BOARD OF VETERINARY MEDICAL EXAMINERS FALL CONFERENCE 2023

Rebekah Hartfield, Board Secretary/Treasurer  
Brian Veazey, Chief Investigator

### The Board

Consists of six members, **five licensed veterinarians** and **one lay person**.

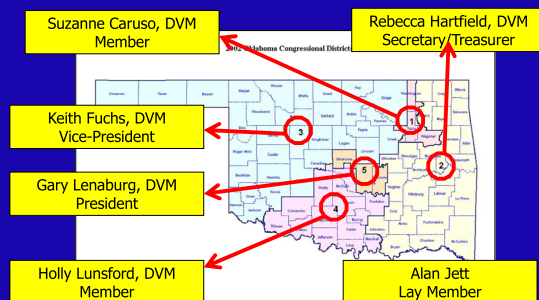
Appointed by the Governor for **5 year terms** and confirmed by the Senate.

Meets approximately **every other month**.

**Administers** licensing examinations.

**Regulates** the veterinary industry.

### Board Members



### NEWEST BOARD MEMBER

Suzanne Caruso, DVM – Graduate of OSU - 1999  
Urgent care practice in Tulsa

Term began May 9, 2023 for five year's

Appointed by Governor Stitt and confirmed by the  
Senate for Congressional District 1

## Continuing Education Opportunity

Attend a Board Meeting and earn hours for your license renewal

Office location: 2920 N Lincoln Blvd (Board Room)

Board meeting dates for 2023 - 2024 dates posted on Website in December

December 1st – Begin at 2:00pm

Website: [www.okvetboard.com](http://www.okvetboard.com)

## New Compounding Rules

In response to the FDA Guidance documents – the Board of Pharmacy have new rules for Non-Sterile and Sterile compounded drugs. Compounding with bulk chemicals for food producing animals **is not** permitted.

### Compounding veterinarian preparations

Allows a veterinarian to dispense or transfer compounded medications to the owner of an animal patient or a veterinarian in the same practice. Allows a pharmacy to compound animal drugs from bulk substances for office use without patient-specific prescriptions for nonfood-producing animals if the drug is 1) compounded under direct supervision of a pharmacist, 2) listed on the FDA's "List of Bulk Drug Substances for Compounding Office Stock Drugs for Use in Nonfood-Producing Animals", 3) all inactive ingredients and finished drug products meet applicable standards, 4) upon awareness of adverse event, the compounding pharmacist alerts the FDA in 15 days, 5) specified labelling requirements are met.

## New Compounding Rules

### Compounding veterinarian sterile preparations

Allows veterinarians to transfer compounded medications to the owner/caretaker of an animal patient, or veterinarian in the same practice. Removes the ability of a licensed pharmacy to compound veterinary drug products to be used by veterinarians in their office for single treatment, not to exceed 120 hour supply. Allows a pharmacy to compound animal drugs from bulk substances for office use without patient-specific prescriptions for NONFOOD-PRODUCING ANIMALS if: 1) drug is compounded by/under direct supervision of pharmacist in state-licensed pharmacy or federal facility 2) the drug is on the FDA's 'List of Bulk Drug Substances for Compounding Office Stock Drugs for Use in Nonfood-Producing Animals'. Compounding pharmacist must report any adverse event or product defect to FDA within 15 days.

## New Over the Counter Antibiotic Changes

June 11, antibiotics that are currently Over the Counter (OTC) became prescription drugs (Rx). This is an attempt by FDA to cause antibiotic use in animals to be better regulated and used appropriately to prevent antibiotic resistance. This change impacts any product that contains the following:

Oxytetracycline  
Penicillin  
Sulfa-based antibiotics (sulfadimethoxine and sulfamethazine)  
Tylosin  
Cephapirin and Cephapirin Benzathine  
Swine medications Lincomycin and Gentamicin

## New Over the Counter Antibiotic Changes Coming (Con't)

Stores that currently sell these OTC products will have to become licensed through the Oklahoma Board of Pharmacy as a Wholesale Distributor. The Board of Pharmacy will require \$400, completion of the application, inspection of their facility and if they are selling veterinary prescription medications they register annually with the Oklahoma Board of Veterinary Examiners. The Wholesale Distributor annual renewal is \$200. The application is on the Pharmacy Board website and if you have any questions, please contact them. They have someone available daily 8:30 to 4:30 to answer questions and their number is 405-521-3815. The application may be found here: [Wholesale Distributor App 110222.pdf \(ok.gov\)](#)

## New Over the Counter Antibiotic Changes Coming (Con't)

The approved/registered wholesaler/distributor will have to have the Rx drugs in a locked area that can only be accessed by staff, so drugs like penicillin will not be allowed to be in a refrigerator with vaccine so the purchaser can pull it out and take it to the register. The Rx drugs may only be purchased with a prescription from a licensed veterinarian who has a Veterinary/Client/Patient relationship with the producer/purchaser. It is not legal, ethical, or acceptable for a veterinarian to lend their name and prescription pad to a Wholesale Distributor to make it easier for a business to sell Rx antibiotics.

## List of Approved New Animal Drug Affected by GFI #263

A limited number of other dosage forms (e.g. injectables) of approved medically important antimicrobials remain available over-the-counter (OTC). All new animal drug applications <https://www.fda.gov/animal-veterinary/antimicrobial-resistance/list-approved-new-animal-drug-applications-affected-gfi-263> - have been identified as medically important antimicrobial drugs that currently remain approved as over-the-counter products.

## List of Approved New Animal Drug Affected by GFI #263

GFI #263 had a two-year implementation period that began June 11, 2021. To provide for a more predictable timeline for when revised (prescription) labels were expected to enter the market, the affected drug companies made plans to ensure that, after June 11, 2023, all new product entering distribution channels be labeled as prescription products. FDA intends to allow existing inventory of OTC-labeled product that may already be in distribution channels to deplete.

## Veterinarian - Client - Patient Relationship

Needed for any aspect of practicing veterinary medicine other than the Good Samaritan act

Veterinarian assumed responsibility for medical judgements, client has agreed to follow instructions

Has knowledge of the animal(s)

Available for follow-up care

Essential for veterinary prescription drugs or CDS

## Providing prescriptions without a valid VCPR

Be cautious if a wholesaler/distributor asks you:

- to be a “consultant”
- to sign a “blanket script”
- sign a prescription without a valid VCPR

Remember: You and the wholesaler/distributor are required to ensure there is proper labeling and you maintain the original written order on file.

## NEW or RENEWING a DEA REGISTRATION

Beginning on June 27, 2023, practitioners will be required to check a box on their online DEA registration form - regardless of whether a registrant is completing their initial registration application or renewing their registration - affirming that they have completed the new eight hour training requirement on the treatment and management of patients with opioid or other substance use disorders. This DOES NOT apply to veterinarians.

## OKLAHOMA BOARD OF VETERINARY MEDICAL EXAMINERS



**Brian Veazey**

Investigator

## Drug Trends, CDS Records – Guarding against Diversion,

- Most abused and Diverted Drugs, Drug Cocktail
- Overdose Deaths – US and OK
- Current Drug Trends
- Diverted Veterinary Use Drugs
- Update on Xylazine
- “The Practice” VCPR, Records
- Protection against Theft and Diversion
- Recommendations and Take-Aways

## Most abused and diverted prescription drugs:

1. **Hydrocodone** (Schedule II CDS)  
Lortab, Vicodin, Norco, Tussionex
2. **Oxycodone** (Schedule II CDS)  
Oxycontin, Roxicodone, Percocet
3. **Alprazolam** (Schedule IV CDS)  
Xanax
4. **Promethazine with Codeine** (Schedule IV CDS)

## Hydrocodone Top Countries:

- Guatemala 10 Kilograms
- Mexico 10 Kilograms
- Vietnam 20 Kilograms
- China 20 Kilograms
- Denmark 25 Kilograms
- Syrian Republic 50 Kilograms
- Germany 60 Kilograms
- Canada 100 Kilograms
- **United States 79,700 Kilograms (99.5%)**

Source: UN International Narcotics Control Board Website. Estimated World Requirements of Narcotic Drugs in grams for 2015. [www.incb.org](http://www.incb.org)

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## Common Opioids



- Oxycodone  
OxyContin, Percocet ; Percodan
- Hydrocodone  
Vicodin; Lortab  
Zohydro
- Methadone
- Dilaudid
- Fentanyl
- Tramadol

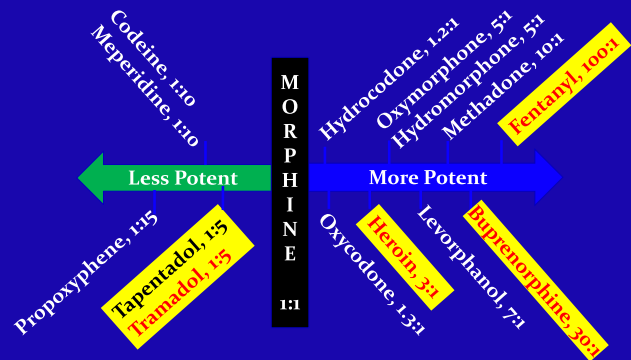
## Common Opiates



- Morphine
- Codeine
- Heroin
- Opium

## General Potency Comparison - MME

<https://www1.nyc.gov/site/doh/providers/health-topics/mme-calculator.page>



## Top 5 Drugs Nationwide by Drug Strength - Sales to Retail Registrants\* January 2021 – March 2022



### #1 Hydrocodone

- Hydrocodone w/acetaminophen 10/325mg
- Hydrocodone w/acetaminophen 5/325mg
- Hydrocodone w/acetaminophen 7.5/325mg

### #2 Oxycodone

- Oxycodone w/acetaminophen 10/325mg
- Oxycodone 5mg
- Oxycodone w/acetaminophen 5/325mg

### #3 Amphetamine

- Amphetamine 20mg
- Amphetamine 10mg
- Amphetamine 30mg

### #4 Methylphenidate

- Methylphenidate 10mg
- Methylphenidate 20mg
- Methylphenidate 5mg

### #5 Buprenorphine

- Buprenorphine w/Naloxone Film 8/2mg
- Buprenorphine w/Naloxone Tablets 8/2mg
- Suboxone Film 8/2mg

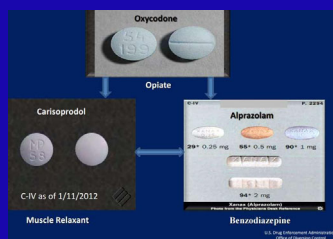
Source: ARCOS  
Date Prepared: 06/17/2022



Drug Enforcement Administration, Diversion Control Division, Targeting & Special Projects Section, Reports Analysis Unit

## Drug Cocktail

- More than half of all fatal overdoses involved a "cocktail" of several prescription drugs. (Centers for Disease Control and Prevention)



**Opiate + Benzodiazepine + Muscle Relaxer**  
"Trio" or "Trinity" – combination of Hydrocodone, Alprazolam, & Carisoprodol  
"Holy Trinity" – Oxycodone, Xanax, & Soma or Xylazine

## National Opioid Epidemic...

- Drug OD is the leading cause of accidental death in the US, with over 107,622 lethal drug overdoses 2021 all time highest drug overdose deaths, primarily synthetic Opioids, (per CDC)

- 107,622 equal 295 deaths per day over 12 per hour 1 life around every 5 minutes
- Opioids were responsible for nearly (72%) of all drug overdose deaths. Overdose deaths from opioids increased from 50,963 in 2019 to an estimated 69,710 in 2020 CDC-NCHS
- Fentanyl and Methamphetamine largest increases

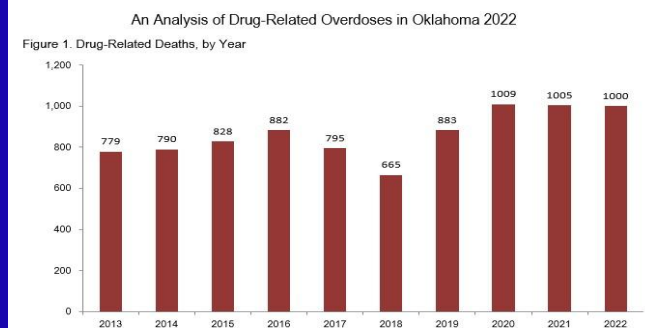
- In 2012, 259 million prescriptions were written for opioids, which is more than enough to give every American adult their own bottle of pills.

- OD deaths rank just below diabetes in terms of highest death count.

- Rate of OD deaths involving synthetic opioids increased at an annual rate of 580% over five years (2012-2017).



## STATE OF OKLAHOMA- Drug Related Overdoses (OBN – Medical Examiners)



In Oklahoma, the CDC's estimates show the state saw an even greater rise in overdose deaths — Analysis (Quote Wizard) show 1027 Died of an overdose in Oklahoma in 2022 up from 2021

State ME Office: OBN reports any drugs listed under Probable cause and significant conditions contributing to death

OBN - CAD Feb 2023 Source: State ME 2022 Data not complete

## STATE OF OKLAHOMA- Drug Related Overdoses

Figure 2. 2022- Pharmaceutical vs. Illicit

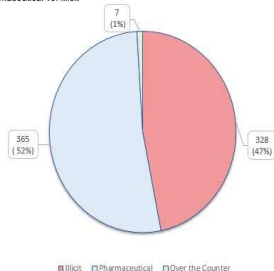


Figure 5. Gender

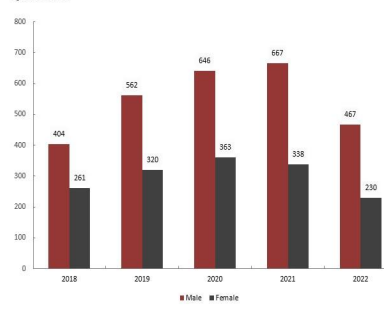


Figure 4. Drug-Related Death (Drug Comparison- Percent Change 2020-2021)

Drug	2017	2018	2019	2020	2021	% Change	2022
Methadone	29	18	22	18	30	66%	1
Diazepam	23	5	11	9	9	0	1
Hydrocodone	72	51	39	30	26	-13%	5
Oxycodone	97	56	49	44	43	-2.2%	7
Cocaine	51	47	59	85	63	-25.8%	20
Morphine	61	35	24	16	22	37.5%	7
Fentanyl	54	39	54	137	299	118.24%	69
Alprazolam	73	39	44	36	56	55.5%	4
Methamphetamine	330	341	523	629	604	-3.97%	81
Diphenhydramine	20	11	22	14	8	-42.85%	3
Tramadol	23	12	12	8	12	50%	1
Heroin	59	58	71	86	43	-50%	5
Codeine	15	19	9	7	9	28.57%	1

Benzo

Opioids

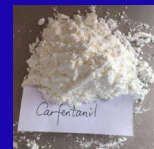
## Drug Trends 2012-Present

- Mom and Pop Meth Labs to Mexican Methamphetamine Super Labs
- Transition from Prescribed Opioids to Street Opioids (Heroin and Fentanyl)
- Pill Mills to Pills presses ( Xanax, Opioids Fentanyl, Steroids )
- From forged prescriptions to ordering drugs online
- Veterinarian use Ketamine to Illicit and Ketamine infusions.
- Imported low Quality Mexican Marijuana to "legal" highly potent Medical Marijuana

## Current Drug Trends

### Fentanyl and Carfentanil

- Street sources for fentanyl:
  - Diversion of medications
  - Patches
  - Lollipops
  - Nasal sprays
  - Inhalers
  - Fentanyl Citrate
  - Clandestinely produced



Carfentanil; synthetic opioid, banned by the Chemical Weapons Convention; Available for <\$3000/kilo to buyers 10,000 times more potent than morphine and 100 times more potent than Fentanyl! Drug is also used to tranquilize elephants and other large mammals. So powerful it poses a significant threat to first responders and Law Enforcement



## Pill Press Operations ( Multiple Drugs)



## Pill Pressed Fentanyl pills



Counterfeit M30- Pills (containing: Methamphetamine , Tramadol, Heroin and fentanyl)

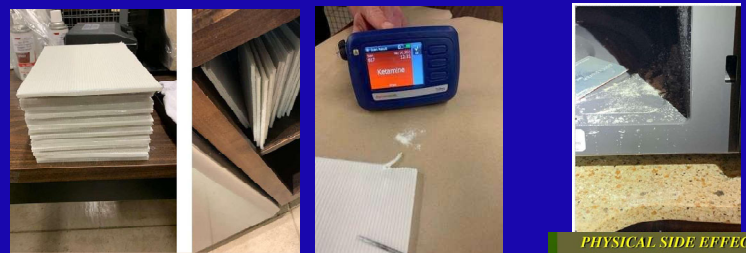


## Multistate Effort Urging President Biden to Classify Fentanyl as a Weapon of Mass Destruction ( Sept 15, 2022)

- "Fentanyl is cheap to produce, deadly in very small amounts, and is everywhere. This is a chemical weapon," Former OK. Attorney General O'Connor.
- "Just two milligrams of fentanyl is needed to kill an adult, and it can easily be placed in other substances.
- **Based on Lab Results , 2 out of 5 seized counterfeit pills contain lethal doses**
- More than **75,000** Americans died from overdose of synthetic opioids, mainly fentanyl, in the 12-month period ending in February 2022. This substance is now the number one **killer** of adults aged 18-45
- This action would require the Department of Homeland Security and the Drug Enforcement Administration to coordinate a response with other agencies, including the Department of Defense.
- **18 States Attorney Generals sign letter to President Biden.**

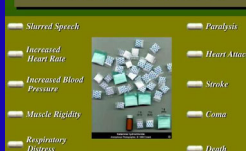


## Illicit Ketamine in Oklahoma



- **OBN Seized over 200 lbs. of Illicit Ketamine** in 2022.
- **Oklahoma Clinic** - Mental health treatments. A patient may undergo Ketamine therapy through IV, IM, PO infusions, with lozenges, oral mints
- May 2023 (Health Day News) -- Seizures of illicit ketamine by drug enforcement agents have surged throughout the United States, growing 349% from 2017 through 2022, a new study finds

### PHYSICAL SIDE EFFECTS





## Emerging Xylazine Threat:



The drug, called Xylazine, is a sedative used in veterinary medicine, and it is not approved for use in humans. Recently, the tranquilizer began popping up in the U.S. illegal drug supply, frequently in combination with Heroin and Fentanyl.

Xylazine is newly emerging in the continental US  
A drug of abuse in Puerto Rico since the early 2000s.

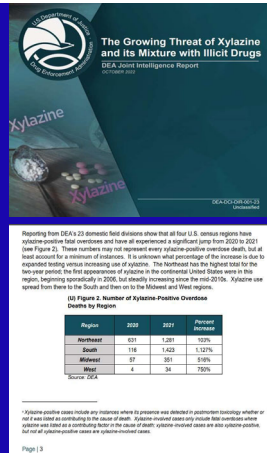
A study found that the prevalence of xylazine use among drug users sampled in the San Juan metropolitan area was 80.7%.

Philadelphia, —according to a new study, the vet tranquilizer is now implicated in **1/3 of fatal overdoses** involving heroin and/or fentanyl in the city

The study calls on jurisdictions who don't test for xylazine in toxicology reports to include it. Also pushing for more education about the drug.

NYPD Bulletin: Xylazine May Increase Risk of Overdose Deaths by **Limiting Narcan Effectiveness, Challenging First Responder Efforts**

. Adulterant added to Heroin, Fentanyl or other drugs to Manipulate the high.



➤ Details Xylazine is a **non-opiate sedative, analgesic, and muscle relaxant only authorized in the United States for veterinary use** according to the U.S. Food and Drug Administration. It is not currently a controlled substance under the U.S. Controlled Substances Act.

➤ In licit sales for veterinary use, Xylazine is available in **liquid form and sold in vials or preloaded syringes**. These solutions are prepared at a concentration appropriate for administration by injection based on the general size and weight of the species.

➤ Xylazine is also readily available for purchase on other **Internet sites in liquid and powder form, often with no association to the veterinary profession nor requirements to prove legitimate need.**

➤ At this low price, **its use as an adulterant may increase the profit for illicit drug traffickers, as its psychoactive effects allows them to reduce the amount of fentanyl or heroin used in a mixture.**

➤ It may also attract customers looking for a longer high since xylazine is described as having many of the same effects for users as opioids, but with a **longer-lasting effect than fentanyl alone**

## XYLAZINE "Zombie Drug" or "Tranq" - the Flesh Eating Drug in the USA

❑ Xylazine overdoses are increasing rapidly.  
Xylazine found in 8 Overdose deaths in Oklahoma 2022.  
non controlled prescription for animal use only

❑ After consumption, painful wounds appear at the injection site and other parts of the body, which appear to be chemical burns.

❑ The wounds burn, ooze and, if left untreated, can begin to rot, ultimately leading to amputation, (NY Times)

❑ Its major "advantage" over heroin and fentanyl is its price.  
According to the *NY Times*, a bag of heroin costs \$10 Tranq is said to cost just half that.



College Student Overdose - A toxicologist found the ketamine level was "below the range of levels that would typically cause death" and her alcohol intake would have caused "moderate intoxication in an average social drinker".

## Xylazine Users and the side Effects in Humans

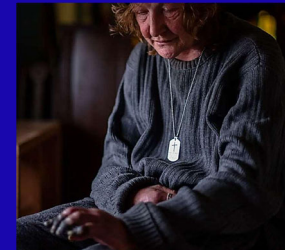


After consumption, painful wounds appear at the injection site and other parts of the body, which appear to be chemical burns.



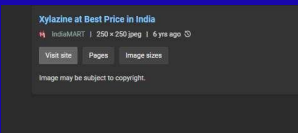
fifth month of sobriety and back to a healthy weight

"The tranq dope literally eats your flesh,"  
"It's self-destruction at its finest."



she accidentally injected tranq into an artery, she felt like her hands had been dipped in acid. Her fingertips may need to be amputated.

- When combined with fentanyl or other synthetic opioids, Xylazine can increase the potential for fatal overdoses, as the similarity in pharmacological effects can further reduce the already decreased respiratory function.
- Xylazine has no approved antidote for human use, and as Xylazine is not an opioid, **naloxone does not reverse its effects. Consequently the presence of Xylazine may render naloxone less effective**; however, the administration of naloxone can **still address the effect of an opioid on breathing** which may be sufficient to prevent death.
- Xylazine has been encountered in various forms including capsules, liquid, powder, solid material (chunks) and tablets (counterfeit M30s)



A kilogram of Xylazine powder can be purchased online from China or India suppliers with common prices ranging from **\$6-\$20 U.S. dollars per kilogram**

## XYLAZINE “Zombie Drug”

APRIL 17, 2023

### Xylazine: The new overdose crisis

by Farrell Greenwald Brenner, Johns Hopkins University Bloomberg School of Public Health

Dr. Rahul Gupta, director of the White House Office of National Drug Control Policy, said he is “deeply troubled about the devastating impact of the fentanyl-xylazine combination.”

While the drug is not an opioid, producers of illicit drugs will frequently mix it with opioids, such as fentanyl, to create a potent cocktail that can lead to severe skin ulcers, difficulty breathing and death.

### White House Designates Animal Sedative as an ‘Emerging Drug Threat’

Officials said the formal designation was a sign of the grave

The US Drug Enforcement Administration issued a [public health alert](#) this month noting that xylazine is widespread and has been detected in about **23% of fentanyl powder** and **7% of fentanyl pill seizures**.

Local News

### DEA has seized xylazine mixed with fentanyl in 48 of 50 states

### What is xylazine? Why Congress is cracking down on this animal tranquilizer in fentanyl fight

Candy Woodall  
USA TODAY

Published 10:25 a.m. ET March 30, 2023 | Updated 12:49 p.m. ET April 2, 2023



Bureau of Narcotics & Dangerous Drugs Control  
Oklahoma

Findings from DEA’s report covering “Xylazine-Positive Overdose Deaths by Region” include:

Region	2020	2021	% Increase
Northeast	631	1,281	103%
South	116	1,423	1,127%
Midwest	57	351	516%
West	4	34	750%

Source: DEA

#### Xylazine Played Role in Over 3,000 Drug Overdose Deaths in 2021

The animal sedative is most commonly mixed with fentanyl

■ Overdose deaths involving xylazine



Source: Centers for Disease Control and Prevention



Bureau of Narcotics & Dangerous Drugs Control  
Oklahoma

Oklahoma Bureau of Narcotics and Dangerous Drugs  
Watch Center  
410 S.E. 10<sup>th</sup> Street  
Oklahoma City, Oklahoma 73101  
(405) 521-2851  
Date of Issue: June 2023

### Intelligence Bulletin

#### Drug Threat - Xylazine

Xylazine known as “trunq” or “trunq dope”, a powerful tranquilizer that is approved by the Federal Drug Administration (FDA) for use in animals such as horses has become a sought-out substance and is spreading into the nation’s drug supply making its way into Oklahoma.

Xylazine is being added to drugs like fentanyl, heroin, and methamphetamine to extend the high. Xylazine is not an opioid, so such, naloxone (Narcan) does not reverse its effects and is being linked to an increasing number of overdose deaths. Injecting drug mixtures containing xylazine can develop severe wounds, including necrosis – the rotting of human tissue, as seen here in photos below taken from a target of an ongoing OBN investigation.

Office of National Drug Control Policy (ONDCP) officially designated fentanyl associated with xylazine as an emerging threat in the United States April 12, 2023. OBN has seen xylazine test positive as drug substances in the past year to the Oklahoma State Bureau of Investigations (OSBI) laboratory in ongoing cases and have heard of batches of fentanyl being laced with xylazine hitting the streets of Oklahoma causing the severe wounds as shown above.

Where  
we are  
right now





Bureau of Narcotics & Dangerous Drugs Control  
Oklahoma



**FIGURE 1.** Photos showing skin lesions among drug users in San Juan, Puerto Rico. 1 Cellulites in a female's leg. 2 Abscesses and cellulites in legs among male injection drug users.

Where we  
don't want  
to be



## TUSI – “Pink Cocaine”

According to the United Nations Office on Drugs and Crime (UNODC), pink cocaine can refer to cocaine that has been dyed pink called TUSI

- pink cocaine is a synthetic drug made from phenylethylamine and mixed with **other drugs**
- produce psychoactive effects.
- It is not derived from the coca plant like traditional cocaine



- TUSI is a pink powdery substance that usually contains a mixture of **Ketamine**, tramadol and caffeine may or may not contain Cocaine. It is a hallucinogenic drug that was developed in Colombia and is easily produced in clandestine labs.
- Very Popular in Latin America and Europe emerging in NYC night clubs

## Gabapentin

- Gabapentin is an anticonvulsant prescribed by veterinarians predominantly to treat chronic pain in dogs, cats, and other animals.
- In Humans Gabapentin may be prescribed, also abused for euphoria, **potentiating the high from opiates**, reduction of alcohol cravings, a cocaine-like high, as well as sedation or sleep.
- Individuals at the highest risk for abusing gabapentin include those with opioid abuse, mental illness, or previous history of prescription drug abuse.
- States are now taking action to **track gabapentin use through prescription monitoring programs**, and some states have reclassified it as a Schedule V controlled substance.
- In February 2022, the nonprofit advocacy group Public Citizen filed a petition with the DEA and U.S. Food and Drug Administration (FDA) to make a Controlled substance.



### THE GABAPENTIN HIGH

GABAPENTIN USERS HAVE REPORTED A RANGE OF SUBJECTIVE EXPERIENCES:

- EUPHORIA (GOLDEN BLISS OF THE WORLD)
- ENHANCED SOCIABILITY
- A STATE OF RELAXATION, BUT ALSO "ZOMBIE-LIKE" EFFECTS
- A SEDATIVE-COCAINE-LIKE BUZZ WITH NO DISCERNIBLE COMEDOWN
- PSYCHEDELIC / MONA-LIKE EFFECTS

METHYLENEDIOXY-METHAMPHETAMINE (MDMA)



**12 States monitor and 7 state have classified gabapentin as a controlled substance.**

Alabama  
Kentucky  
Tennessee  
West Virginia

North Dakota  
Michigan  
Virginia

## Non Controlled and Over the Counter

**FDA: People are overdosing on anti-diarrhea drugs**



Prescription opioids, benzodiazepines and over-the-counter medications, like the anti-diarrheal medicine, loperamide (Imodium AD). Mixing kratom, other opioids, and other types of medication can be dangerous.

**Loperamide -31 Oklahoma Deaths since 2016**



**“Loperamide Addiction” (100 mg/day, 50+ caplets).**

This addiction to loperamide developed secondary to an opioid addiction

High-dose Loperamide used as an opioid substitute.

10 boxes per day or 2 bottles

## Legislation Effective November 01, 2018

- **SB-1078 Criminal Fentanyl Trafficking** - 1 gram or higher ( Sentencing Addressed 2022)
- **HB 2931 E-Prescribing- All CDS Mandatory by Jan 2020.**
  - **Veterinary Medicine exempt**
  - Temporary Tech Problems
  - Onsite Pharmacy, Hospital, Federal Facilities, LTC, hospices
  - Waivers from Licensing Board
  - Jan 01, 2020 OBN will issue official forms for Waivered prescribers.
- **HB 2795 Medical Facility owners Register with OBN**
  - Pain Management clinics ( register the business )
  - Majority patients receive on a monthly basis OBC medication
- **HB 2796 Require out of state CDS Distributors to register and report to OBN**
- **SB 1367 - Good Samaritan Law** – Certain immunity for drug related offenses
- **SB 1446 - 7 Day Limit on Opioid Prescribing**
  - 1<sup>st</sup> time prescribing of Opioid – acute pain, surgery can prescribe 7 days at a time.
  - CE Training for Prescribers
  - Several restrictions on prescribers ( OBN Emergency Rules 2 7 day scripts)
- **HB 2798 Opioid Overdose Death Review Board** - Several agencies involved



## Effective Controls

### 21 CFR § 1301.71(a)

*“All applicants and registrants shall provide effective controls and procedures to guard against theft and diversion of controlled substances.”*

U.S. Drug Enforcement Administration  
Office of Diversion Control

## Protect Yourself, Staff and Clients

Opioids are a small part of a veterinarian's medical arsenal for controlling pain in animals, but stocking, prescribing, and administering these products also makes veterinarians vulnerable to abuse from those seeking these drugs for personal use. ( FDA )

- ❑ **Follow All State Regulations on Storing, Prescribing, Administering, Dispensing Opioids** -Title 59 and OBN 475
  - .
  - Oklahoma PMP Reporting and Mandatory PMP Checks of pet owners past medication history
  - States are enacting new laws or strengthening existing ones to restrict access to opioids. PMP Reporting, Oklahoma, requires veterinarians to look at a pet owner's past medication history before dispensing opioids or writing an opioid or Benzo prescription.
- ❑ **Follow All Federal Regulations on Prescribing, Administering, Dispensing Opioids.** The Drug Enforcement Administration (DEA), however, creates and enforces the regulations regarding controlled substances. When controlled substances are stolen from the clinic, veterinarians must report the theft to DEA and to their local police department as soon as possible. (DEA Form 106)
- ❑ **Use Alternatives to Opioids**
  - Pain management is an important issue in veterinary medicine, and in many cases non-opioid protocols may adequately control pain in animals. [The International Association of Veterinary Pain Management](#) [External Link Disclaimer](#) is a good resource for pain management information for companion animals,

Source: [www.FDA.gov](http://www.FDA.gov)

## Protect Yourself, Staff and Clients –

- ❑ **Educate Pet Owners on Safe Storage and Disposal of Opioids and other CDS**
  - Whenever pets are actively receiving opioids, you should advise pet owners to lock up the opioids and [secure them](#) out of sight or [take back boxes](#) at local Police.
- ❑ **Know What to Do If a Dog Overdoses on Fentanyl or Other Opioids**
  - Not only can people overdose on opioids, but so can pets. Working dogs, like narcotics detection dogs, are particularly susceptible because they may inhale the powdered drug. Because fentanyl and fentanyl-related drugs are potent, it only takes a tiny amount of drug to cause an overdose. ( Narcan for dogs)
- ❑ **Have a Safety Plan and Know the Signs of Opioid Abuse**
  - In the event you encounter a situation involving opioid diversion or clients seeking opioids under the guise of treating their pets, you should have a safety plan in place. Local police departments, OBN or the Vet Board can advise you about what to do in these situations.
- **Guard against Internal Employee Theft and Diversion**

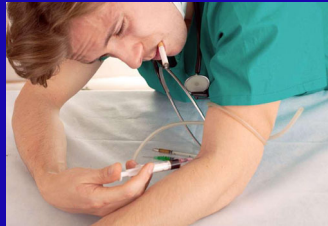
Source: [www.FDA.gov](http://www.FDA.gov)





## Popular Methods of Internal Diversion

- Theft of vials or syringes
- **Under-dosing patients -**
- Taking medication from patients on PRN medications
- **Not wasting/documenting** to support waste occurred
- Excessive Doses and heavy use of a certain CDS
- Raiding sharps disposal containers
- **Tampering with patient medications** by replacing controlled substances with another product, such as saline
- Calling or faxing prescriptions



- A 30-year-old Sarasota woman was arrested and charged after she stole drugs from two veterinary clinics where she worked.
- A veterinary technician stole fentanyl, midazolam and diazepam from Critical Vet Care and Companion Animal Neurology to support her drug habit.
- A vet tech stole diazepam tablets and three 10-milliliter vials of ketamine from the animal hospital where she worked.
- A veterinary technician in East Brookfield, Massachusetts was charged with stealing 7,800 opioid pills and trying to cover her tracks by changing clinic records.

### Former Mayo Clinic technician Steven Beumel sentenced to 30 years in drug tampering case

Tampering with painkillers resulted in 5 Hepatitis C infections, 1 patient death

#### Tampering

##### Exeter Hospital -

- 8 states
- 3,798 tested from Exeter alone
- 44 cases of hepatitis C



David Kwiatkowski

##### St Cloud Hospital -

- Siphoned fentanyl from IV bags
- Replaced fentanyl with saline
- 24 patients infected with bacteria

5 infected after nurse tampered with syringes, diverted drugs in Wisconsin hospital

## Employee Tampering and Theft

### Potential signs employee abusing opioids include:

- ❖ Mood swings, anxiety, or depression,
- ❖ Unexplained Weight loss,
- ❖ Mental confusion and an inability to concentrate,
- ❖ Withdrawing from family, friends, or coworkers,
- ❖ Making frequent mistakes at work, and
- ❖ Not showing up for work.

Former Pharmacy Tech Who Admitted Diluting Drugs At Des Moines Hospital Faces Federal Tampering Charge



## CDS Monitoring - Recommendations



- Check OSCN, check with local law enforcement.
- Have the applicant provide a recent OSBI records check.
- Check with OBN, and the Veterinary Board about applicant.
- Checks and Balances in Place
- Drug Testing

## CDS Monitoring - Recommendations



- When hiring employees and they have access to Controlled Dangerous Substances (CDS) **you must do a thorough background check.**
- Anyone convicted or who pled guilty for a **misdemeanor or felony related to CDS must obtain a waiver** from the Director of the OK Bureau of Narcotics (OBN). This waiver must be given in writing.



## CDS Monitoring - Recommendations



- Consider purchasing (and using) a video camera system in the area where CDS is stored and also throughout the clinic.

## CDS Registrations

- Administering, prescribing or dispensing of any CDS in Oklahoma an OBNDD registration is required.
- If **ordering** or prescribing of any **CDS** a **DEA** registration is also required.
- OBNDD Registration are now only valid for 1 year. (October 31) and DEA registrations are valid for a three year period, before renewing your veterinary license ensure your drug registrations are current.

Oklahoma is a *dual-registration* state...

- All **DEA** laws apply unless they are superseded by a more restrictive **OBN** rule.
- The **OBN** requires a registration to administer, dispense, prescribe, and order **CDS**. Whereas a **DEA** registration is only required if you order or prescribe **CDS**.

## PMP Clinical Alerts implemented Feb 2018

- **Combination Alert -Benzo and Opioid Combination**
- **Dr. Shopper Alert - 5 Pharmacies, 5 Prescribers w/in 90 days**
- **High MME Alert - > 100 Morphine Milligram equivalencies**

**Alerts will show up on the dash board and on the patient profile**

## Maintenance of Effective Controls Against Diversion – Proper Record Keeping

Title 59 § 775:25-1-2.

(a) Each veterinarian shall maintain a legible patient record for three years, unless the records contain information with respect to the dispensation of veterinary prescription drugs, in which case the records shall be maintained for no less than five years. All patient records shall include the following necessary elements. (See Title 59 § 775:25-1-2.)

What are the Required Drug Laws for Veterinarians to follow?

Agencies that regulate controlled, dangerous drugs

You should be familiar with the following:

1. DEA
2. OBNDD
3. FDA
4. OKLAHOMA PHARMACY BOARD
5. OSBVME



## TAKE AWAYS

1. Establish effective controls against Diversion Backgrounds checks, Checks and balances - Xylazine – Lock up and Guard against Diversion ( Treat like a CDS)
2. Check the PMP on owners if you are prescribing an Opioid or a Benzodiazepine (Especially new clients or clients who ask for a specific drug)
3. Be cautious if owner is receiving opioids or benzos from another prescriber, assess the situation, consider on site administration of medication.
4. Document, Document, Document – remember if it isn't written down it didn't happen.
5. Keep All Records for five (5) years. 1yr. Readily Retrievable

## QUESTIONS – COMMENTS



vet shopping and drug diversion  
**A GUIDE FOR VETERINARIANS**

"Vet shopping" refers to the practice of soliciting multiple veterinarians under false pretenses to obtain prescriptions for controlled substances. Drug diversion is the illegal distribution or abuse of prescription drugs.

<b>HOW TO RECOGNIZE A VET SHOPPER</b>	<b>WAYS TO MINIMIZE DRUG DIVERSION</b>
<ul style="list-style-type: none"><li>• New clients bringing in seriously injured animals with vague histories</li><li>• Old, incomplete, or missing veterinary care records</li><li>• Describing clinical signs that are inconsistent with findings on examination of the patient</li><li>• Describing clinical signs that require specific medications</li><li>• Requesting medications by name (e.g., Tramadol or Xanax)</li><li>• Refusing medications as prescribed and requesting alternatives</li><li>• Requesting early refills of medication</li><li>• Claiming medications were lost or stolen</li><li>• Requesting refills, while missing appointments</li><li>• Uncooperative and aggressive behavior</li></ul>	<ul style="list-style-type: none"><li>• Be thorough about documentation when using or prescribing narcotics</li><li>• Restrict access to prescription pads</li><li>• Maintain strict refill policies</li><li>• Remind clients to turn in unused portions of medications to a controlled substance disposal location</li><li>• Minimize the use of commonly abused drugs, if possible</li><li>• Strictly control access, and regularly check inventory</li><li>• Look for signs of animal abuse during physical exams</li><li>• Contact police if you see suspicious behavior</li></ul>

For more information visit:  
[AVMA.org/opioids](http://AVMA.org/opioids)