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Budget Testimony 2021

Please accept the following and the attached as the written testimony submitted by the New York State Veterinary Medical Society:

The Governor's budget proposal includes a repeal of the current veterinary exemption from the e-prescribing mandate. The New York State Veterinary Medical Society opposes this repeal as it would be burdensome to many veterinarians, difficult to adapt to quickly due to the lack of existing e-prescribing software and could be very costly for consumers.

The veterinary medicine industry consists primarily of small operations and sometimes, particularly in rural areas, a single mobile veterinarian making house and farm calls. Independent or solo-practice veterinarians often work without administrative or support staff and operate on thin margins. These veterinarians would not necessarily find it easy to purchase e-prescribing software without passing much of the cost on to their clients. Further, and again of particular importance in rural areas of New York State, there is a shortage of veterinarians; adding to the administrative burden of practicing in farming communities could result in driving more veterinarians from rural practice.

Veterinarians often work without internet access due to broadband limitations in certain areas of New York State; this is true of mobile veterinarians who cannot easily access the internet until they are back in their office or home at the end of the day as well as for some smaller practices who routinely operate with limited or unreliable internet service. Though there are existing exemptions in statute and regulation, they do not cover the typical circumstances of veterinarians operating in these instances; they would result in an increase in time allocated to administrative duties rather than patient care, which is not conducive to ensuring the maintenance of animal health.

The cost of an e-prescribing mandate will fall primarily on low-income or underserved communities, where veterinarians often work in temporary or community clinic settings. Pop-up clinics and outreach activities that occur in low-income communities focus on the goal of providing quality care to all animal owners regardless of their economic situation, and veterinarians working in these settings strive to ensure that their clientele does not need to spend a great deal of money to secure the best medications and treatment. This clientele relies on taking a paper prescription to various pharmacies to find a medication they can afford; a mandate for electronic prescriptions could bind clients to a particular pharmacy and price point or force them to return to visit the veterinarian to have a prescription re-issued. The veterinary community is concerned this could result in clients choosing to forego treatment for their animals if they are met with increased costs.

Animal shelters would also be impacted by the elimination of this exemption, as current shelter software systems do not support electronic prescribing and veterinarians working in shelters are often part-time or working in multiple settings, adding to the challenges of implementation.



Overall technological challenges also exist as barriers to implementing e-prescribing in veterinary medicine. All currently available e-prescribing systems do not and cannot support veterinarians; e-prescribing systems are required to conform to the standards of the National Council for Prescription Drug Programs and these standards require a National Provider Identifier (NPI) number. NPIs are issued by CMS and CMS does not issue NPI numbers to veterinarians as they are not included in the definition of healthcare provider used by CMS.

The New York State Veterinary Medical Society has provided information to the Executive and legislature explaining the challenges of adapting to an e-prescribing mandate and we are happy to continue to answer questions and provide additional information.

Yours sincerely,

A handwritten signature in black ink that reads "Mark E. Will".

Dr. Mark Will,
President,
New York State Veterinary Medical Society