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August 18, 2008

Drug Enforcement Administration
Attention: DEA Federal Register Representative/ODL
8701 Morrissette Drive
Springfield, VA 22152

Docket No. DEA-218 – Electronic Prescriptions for Controlled Substances

Dear Sir/Madam:

I am writing on behalf of the American Veterinary Medical Association (AVMA), established in 1863 and the largest veterinary medical association in the world. As a not-for-profit association established to advance the science and art of veterinary medicine, the AVMA is the recognized national voice for the veterinary profession. The association's more than 76,000 members represent approximately 86% of U.S. veterinarians, all of whom are involved in a myriad of areas of veterinary medical practice including private, corporate, academic, industrial, governmental, military, and public health services.

The AVMA commends the Drug Enforcement Administration (DEA) on its identification of ways to facilitate the prescribing and dispensing of therapeutic controlled substances, and on its ability to do so while also safeguarding the public health.

While the AVMA appreciates that electronic prescriptions are helpful to many healthcare professionals, in veterinary medicine the use of electronic prescriptions would be very limited. Virtually all controlled substances used in veterinary medicine will continue to be dispensed directly from veterinary clinics (or administered therein), or they will be prescribed by veterinarians using written or oral prescriptions.

The AVMA recognizes that the rule, if finalized, would create an *option* of electronic prescribing but would not *mandate* its use. This flexibility is necessary to meet the needs of veterinary practitioner registrants.

The AVMA appreciates the opportunity to share its recommendations regarding the option to utilize electronic prescriptions, and specifically regarding the relative non-applicability of electronic prescriptions to the veterinary profession. For additional information and/or explanation of AVMA's comments, feel free to contact Dr. Lynne White-Shim (800-248-2862 ext. 6784 or lwhite@avma.org).

Respectfully,

W. Ron DeHaven, DVM, MBA
CEO
American Veterinary Medical Association