Veterinary-Verified Internet Pharmacy Practice Sites™
(Vet-VIPPS™)

American Association of Veterinary State Boards
September 25, 2009

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National Association of Boards of Pharmacy®
The National Association of Boards of Pharmacy® (NABP®) is the international association for all jurisdictions involved in regulating pharmacy practice in the United States, the District of Columbia, Guam, Puerto Rico, the Virgin Islands, New Zealand, nine Canadian provinces, and two Australian states.

**Mission:**

To assist the boards of pharmacy in protecting the public health.
NABP ACCREDITATION PROGRAMS

- Durable medical equipment, prosthetics, orthotics, and supplies (DMEPOS)
- Verified Internet Pharmacy Practice Sites™ (VIPPS®)
- Verified-Accredited Wholesale Distributors® (VAWD®)
- Veterinary-Verified Internet Pharmacy Practice Sites™ (Vet-VIPPS™)
Durable medical equipment, prosthetics, orthotics, and supplies (DMEPOS)

- Program ensures
  - Medicare beneficiaries receive the appropriate products, services, and patient care associated with DMEPOS products
  - Pharmacies are positioned to participate in CMS’s competitive bidding process
Verified Internet Pharmacy Practice Sites (VIPPS)

- Ensures the pharmacy is properly licensed and in compliance in states to which they dispense pharmaceuticals

- Ensures the pharmacy is compliant with criteria
  - Patient rights to privacy
  - Authentication and security of prescription orders
  - Adherence to a recognized quality assurance standards
  - Provisions for meaningful patient consultation

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Verified-Accredited Wholesale Distributors (VAWD)

- Provides assurance that wholesale drug distribution facilities
  - Operate legitimately
  - Are licensed and in good standing
  - Are employing security and best practices for safely distributing prescription drugs
Veterinary-Verified Internet Pharmacy Practice Sites (Vet-VIPPS)

Today’s Syllabus

• History
• Program Launch
• Program Requirements
What is a Rogue Internet Pharmacy?

- Selling prescription products without valid prescriptions
- Prescriptions based on online consult; no physical exam; or “physical assessment” by non-physician/veterinarian
- Selling unapproved products
  - Unapproved generic versions of brand medications
  - Counterfeit products

★ Confirmed death from counterfeit drugs purchased over the Internet (March 2007)
  - Coroner's report – pills bought from an online pharmacy
  - Drugs contaminated with extremely high quantities of metal
What’s Out There?

• **State board shut down two Internet pharmacies**
  – One business had as many as 20 Internet addresses
  – Over 7,700,000 dosage units of controlled substances were received during a five-week period
  – Virtually all products were shipped out, via Internet orders, the same day shipments arrived
  – A second but related pharmacy was closed the following month
    • Shipping approximately 4,000 to 5,000 orders a day

• **Both businesses registered with the board**
Covert Purchase

Testosterone purchased online:

- Thai manufacturer
- Supplier based in Republic of Seychelles
- Web site registered in Slovenia
- Payment processed in Canada
- Package arrived with Greek stamps
Enforcement Challenges

- Lack of jurisdiction
- State & federal agencies are short of resources
- Difficulty identifying location/owner
- Consumer education
- Society and technology allow for unabated illegal operations
  - Internet
  - Imports
  - Cross border
The VIPPS & Vet-VIPPS Concept

- Allows consumers to identify legal sites
- Compliance with defined standards across state lines
- Criteria more stringent than laws and regulations
- Initially voluntary
  - NC & KY now require
- Supported by FDA
- **NOT** industry-regulated or maintained
  - All cost borne by businesses
History

VIPPS

• Launched 1999
• First VIPPS Seal presented September 1999
• Currently 17 accredited pharmacies representing over 12,000 brick-and-mortar pharmacies.

Vet-VIPPS

• Launched 2009
• First pharmacy accredited February 2009
Benefits

• Provides consumers with important information

• Empowers consumers to make informed decisions about their medications and health care

• Assists insurers and third-party payors to identify legitimate sites

• Helps state boards regulate developing areas of Internet practice

• Examines practice from perspective of patient outcomes and quality assurance

• Provides a reliable database of information that is easily accessible, free of charge, no advertising
Accreditation Seal

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Requirements

• Application disclosing verifiable ownership
• Licensure verification
• Compliance with 19 criteria
• On-site survey pre-accreditation and then every 3 years thereafter
• Click to verified data
• Post-accreditation QA/QI
To Qualify for Vet-VIPPS

• Internet pharmacy

• Dispensing prescription veterinary drugs

• Clients/patients are non-food producing animals, such as dogs and cats
NABP Actions

• Pre-survey
  – Verify application information, licenses, Web page design, and supplemental documents

• On-site survey
  – Verify operations are in compliance

• Post-survey
  – Notify applicant of deficiencies
  – Work with applicant to correct deficiencies
  – If warranted, schedule a follow-up survey
Licensure and Policy Maintenance

1. Verify business is licensed with all applicable jurisdictions

2. Verify all persons are licensed in all applicable jurisdictions

3. Processes for the organization, authorization, implementation, revision, retiring, and archiving policy and procedure

4. Comply with all applicable statutes/regulations, and comply with the more stringent law or regulation

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5. Assure the integrity, legitimacy, and authenticity of prescription orders and prevent prescriptions being submitted, honored, and filled by multiple pharmacies.

Assure prescriptions are not prescribed or dispensed based on telephonic, electronic, or online medical consultations without there being a pre-existing patient-prescriber relationship that has included an in-person physical examination.
Patient Information

6. Verification of the identity of the patient, prescriber

7. Maintain patient medication profiles

8. Drug use review (DUR) prior to the dispensing

9. Assure confidentiality of patient identity, medical, and financial information
Communication

10. Offer of an interactive and meaningful consultation to the patient

11. A mechanism for patients to report suspected adverse drug reactions and errors

12. A mechanism to contact the patient and prescriber if an undue delay in delivery

13. A mechanism to inform patients about drug recalls

14. A mechanism to educate patients about the appropriate means to dispose of expired, damaged, and unusable medications
Storage and Shipment

15. Shipment of controlled substances via a secure means that ensures proper delivery

16. Maintenance products in appropriate temperature, light, and humidity standards, during storage and shipment

Over-the-Counter Products

17. Compliance with laws on the sale of over-the-counter products identified as precursors to the manufacture of illegal drugs
Quality Improvement Programs


Reporting to NABP

19. Notify NABP of any change of information provided as part of the verification process ceasing operations.
QUESTIONS?
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Visit the NABP Web site at www.nabp.net
- VIPPS Accreditation Program and Criteria
- VAWD Accreditation Program and Criteria