



Comments on Colorado PDMP, Opioid Prescribing Laws and Xylazine
Presentation to
Opioid and Other Substance Use Disorders Study Committee
August 30, 2023

Colorado Veterinary Medical Association

- Is the voice of veterinary medicine in Colorado
- Represents more than 1,800 Colorado veterinarians statewide
- Founded in 1888 – 135 years ago
- Provides Substance Use Prevention Training free to members and to non-members for a fee
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Parts of PDMP law not clear for veterinarians

12-280-404 (3)(c), 12-280-404 (4)(a-a.5)

1. The law specifies certain human conditions that exempt required PDMP queries for opioid or benzodiazepine prescriptions.
2. Exemptions for veterinary conditions are missing.
3. There are conflicting requirements for required PDMP use by veterinarians
4. The law uses stigmatized language such as “committed drug abuse” and “monitor a patient’s drug abuse” rather than substance use disorder.

➤ Veterinarians must interpret confusing requirements for PDMP queries

Law limiting duration of opioid prescriptions does not address veterinary usage

12-280-404 (3)(c), 12-280-404 (4)(a-a.5)

1. The law limits new prescriptions of opioids to seven days
 2. The law exempts certain human conditions from the seven-day limit.
 3. No exemptions for veterinary conditions are given.
- The seven-day prescribing limit for humans may not meet the medical needs of animals be inappropriate for certain veterinary situations.
 - Human exemptions are not relevant to veterinary patient conditions.

Laws on compounded drugs for veterinary office use may not meet the medical needs of animals

12-280-404 (3)(c), 12-280-404 (4)(a-a.5)

1. Dispensing a compounded drug for a limit of five days may not meet the animal's medical needs
2. Compounded drugs may / may not include controlled substances
3. Specific legal requirements for sourcing compounded drugs from prescription drug outlets intended 1) for office use or 2) for a specific animal patient, are not clear

➤ Unclear requirements can result in prescribing problems that may affect animal health

Xylazine is an essential, legitimate veterinary drug

1. Xylazine is an essential, safe, effective prescription sedative and pain relief drug used in cattle, horses, dogs, cats, as well as elk, deer, and many other species to calm them, facilitate safe handling, and to perform diagnostic and surgical procedures
2. CVMA appreciates the illicit xylazine public health crisis and at the same time understands how essential the animal sedative is to veterinary medicine –
3. CVMA and AVMA have endorsed the Federal Combating Illicit Xylazine Act
 - Would make the manufacture, distribution, dispensing, or possession of xylazine with intent to traffic for human use subject to Schedule III penalties under the federal Controlled Substances Act
 - Legitimate veterinary uses would remain under their current prescription status and would not be scheduled

➤ CVMA request: preserve Colorado's veterinary access to Xylazine

CVMA can help!

CVMA will recruit veterinarian experts to work with the committee to determine changes or additions to laws that will address these concerns

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Thank you!

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