



Alaska Pharmacists Association

March 18, 2014

Representative Wes Keller
Capitol Room 118
Juneau, Alaska

RE: HB 324 Controlled Substance Prescription Database

Dear Representative Keller,

The Alaska Pharmacists Association (AKPhA) would once again like to thank you for requesting our input on House Bill 324. Our association has been supportive of the Controlled Substance Prescription Database (CSPD) program from its infancy and worked to insure its creation and passage in 2008. Accordingly, we would like to suggest the following changes and or clarifications to CSHB 324 version N:

- Section 2. Page 2 line 3 and page 3 line 1 clarifying no use of State funds. The bill addresses the need to establish fees to support the CSPD. Presumably the fees would be taken in by the Board of Pharmacy thru the Division of Occupational Licensing. Since this is an arm of State government it seems to us that the current language would not allow such fees to then be use to fund the program.
- Section 4. Page3 line 30. Requiring a **real-time** requirement for data submission may either not be possible or greatly increase the cost to administer the program. It is our understanding the State originally sought to implement such a feature when the program was introduced but this was not found to be possible with the database provider. Ideally the database would be real time but practically we are not sure this is possible.
- Section 5. Page 4 Section C (lines 20-22). While we appreciate the bill's intent to allow for pharmacy staff to access the database, we also suggest that other authorized practitioners be allowed to delegate authority to other **licensed** staff working with them (e.g. RN's and LPN's). This would theoretically allow for more access to check the database prior to prescriptions being written.
- Section 7. Page 4. Sec. 17.30.205. We note that this section is new in its entirety and for discussion purposes all of it should be in bold (currently only first line is bold). Additionally we would suggest adding **/prescribing** after the dispensing in the first line (line 27) and on line 29. To be clear, typically pharmacists dispense and practitioners prescribe controlled substances. This language would allow the Board of Pharmacy to potentially spread out the cost of fees to a greater number of licensee's as discussed during the first hearing on this legislation. As currently written the costs to administer the CSPS falls entirely on the dispensers (pharmacies).

As we stated during the last meeting, we feel the State of Alaska is receiving real value for its citizens by providing the small amount of funding required by the CSPD thru the general fund. Under CSHB 324 law enforcement and the court system would still have access to the database but would not be part of the funding mechanism. We feel this is unfair. Additionally, we would hope that more effort would be expended to get additional practitioners to utilize the system to help prevent prescription drug abuse prior to prescriptions being written.

Sincerely,

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Co-Chair Legislative Committee

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