



Alaska Pharmacists Association

March 14, 2016

Representative Paul Seaton
Alaska State Capitol Building
Capitol Room 102
Rep.Paul.Seaton@akleg.gov
Juneau, AK 99801

Dear Representative Seaton:

I am writing to thank you for making several changes to House Bill 344 recently suggested by members of AKPhA and the Alaska pharmacist community. The changes allowing for weekly PDMP downloads and query delegation by licensed agents of pharmacist and prescribers are both much appreciated changes to this bill. AKPhA feels that several additional changes to House Bill 344 are absolutely necessary to ensure the Prescription Drug Monitoring Program (PDMP) is as effective and as efficient as possible. Essentially, we feel that Alaska's PDMP is currently functioning fairly well and only needs small tweaks to make it more effective, rather than some of the wholesale changes contained in HB 344.

While this bill addresses a very important issue, namely attempts at reducing prescription drug abuse in Alaska through changes to the PDMP, we feel that there are several necessary changes to the bill that need to be made in order to minimize unnecessary and unhelpful administrative burdens on pharmacists and physicians. In particular, we feel that the requirement in HB344 for both pharmacists and prescribers (or their licensed "agents") to check the Prescription Drug Monitoring Program database prior to prescribing and dispensing all controlled substances is overly prescriptive and burdensome for pharmacists and prescribers, and it would NOT help stem the tide of prescription drug abuse as it is intended.

For this reason, we would respectfully ask that the language in Section 18 (AS17.30.200(k) subsection 4) be removed from the bill. We feel that professional judgment should be allowed for prescribers/pharmacists for when to utilize the database. The PDMP database is only one tool pharmacists use when trying to rule out possible narcotic abuse. For example, we also use real time insurance data to help identify possible prescription drug abuse. Mandatory checking by prescribers and pharmacists on all controlled substance prescriptions is not logistically feasible, AT ALL! Furthermore, it would not pass the "common sense" test to require pharmacists to check the PDMP database on all controlled substance prescriptions dispensed if those same prescriptions (for the same patients) were already checked by the prescriber of said controlled substance prescription(s). These regulations are overly heavy-handed in that they basically require license revocation of pharmacists and physicians for not checking the database when prescribing or dispensing a controlled substance. This is completely overboard and does not leave any room for flexibility. It also does not address our concern with the enforcement mechanisms that are

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available to implement the mandatory PDMP queries in HB 344. Without significant investments in technology and manpower, enforcement of the regulations in HB 344 will not be feasible.

As you know, opioid abuse is a national epidemic that Alaska is not immune from. Legislation, such as HB 344, is an important step in the right direction to reducing opioid abuse and addiction issues. However, Alaska has one of the lowest rates of opioid prescriptions on a per capita basis. Further, numerous studies have shown that the vast majority of abused prescription opioids are not from doctor or pharmacy shopping (that would be addressed by HB 344), but from prescriptions taken, borrowed or stolen from friends or family members. It will be the continued deliberate collaboration between pharmacists, prescribers, patients and politicians to truly put a dent in the prescription drug abuse in Alaska.

AKPhA represents over 200 pharmacists and pharmacy technicians in the State of Alaska. Our mission is to **Preserve, Promote, and Lead the Profession of pharmacy in Alaska**. Alaska HB 344 is a step in the right direction, but there are several strongly needed revisions to make it feasible and effective. Pharmacists in all parts of our state are dedicated to helping reduce prescription drug abuse. We feel that our professional judgement should supersede micromanagement of mandatory PDMP database prior to dispensing all controlled substance prescriptions.

Again, we appreciate your efforts and leadership on this critical issue. Should there be anything that I or the Alaska Pharmacists Association can do to help improve upon this legislation, please let me know.

Sincerely,

Tara Ruffner, PharmD.
President
Alaska Pharmacists Association