

## Jasmin Martin

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**From:** Sen. David Wilson  
**Sent:** Friday, January 28, 2022 9:36 AM  
**To:** Jasmin Martin  
**Subject:** FW: SB132

Jasmin Martin  
Office of Senator David Wilson  
Senate Health and Social Services Committee Alaska State Capitol, Room 121 Juneau, Alaska 99801  
Direct: 907-465-8165  
Jasmin.Martin@akleg.gov

-----Original Message-----

From: Judith Montalbano <judys@mtaonline.net>  
Sent: Monday, May 03, 2021 10:33 PM  
To: Sen. David Wilson <Sen.David.Wilson@akleg.gov>  
Subject: SB132

May 4, 2021

The Honorable Senator Wilson Alaska State Legislature State Capitol Room 121 Juneau AK, 99801-1185  
RE: SB 132 - Exemption for veterinarians from Alaska's Prescription Drug Monitoring Program.

Dear Senator Wilson,

My name is Dr. Judith Montalbano. I am a veterinarian and the Medical Director at All Creatures Veterinary Clinic in Wasilla, Alaska and soon to be Assistant Professor of Veterinary Medicine at UAA. I have been with All Creatures and an active member of the Alaska Veterinary Medical Association (AKVMA) since 1995. As a busy practitioner, I have been exposed to the rules enacted with the Prescription Drug Monitoring Program (PDMP) and have found it not only to be worthless, cumbersome and ineffective, but it has put me in the position where I have felt very uncomfortable having access to my client's medical information. I wholeheartedly urge your support for SB 132 which would exempt Alaska veterinarians from the requirements of the controlled substance prescription database. The current law in place requiring the participation of veterinarians in the PDMP is onerous and potentially subjects veterinarians to legal action by clients. These are some of the reasons as to why it makes sense to exempt veterinarians from the PDMP.

❖ Veterinarians don't treat humans, and animals are not listed in the PDMP independently which renders the PDMP database unusable. Animals are lacking a permanent identifier: There is no permanent identifier for an animal. Animals can have different names and owners throughout their lifetime. The animal can also have different owner names from within the same household.

❖ Potential privacy violations: Searching the PDMP database using the owners name could provide medical information the owner is uncomfortable with their veterinarian knowing and is potentially a violation of the client's HIPPA protections. Secondly, veterinarians are not trained in human medication doses much like physicians are not trained in the dose ranges for dogs, cats, birds, elephants, etc.

❖ Veterinarians already adhere to controlled substance regulations: Veterinarians who prescribe or dispense controlled substances are licensed through Drug Enforcement Administration (DEA). There is already a significant level of accountability, record keeping, and medication storage requirements that these veterinarians adhere to.

❖ Cost: PDMP review and reporting constitutes a disproportionate impact on veterinarians as small business owners. Veterinary clinics lack the standardized software used in human health care facilities, so reporting is more labor-intensive and costly. Additionally, the cost to investigate veterinarians who fail to use the database correctly by the Board of Veterinary Examiners is a waste of very limited resources.

As a medical provider it is important to me that the PDMP is used correctly to track trends of humans opioid shopping. 33 states have found exemption for their veterinarians from participating in the PDMP. The exemption of veterinarians from the PDMP will increase the efficacy for the systems intended purpose, by allowing for accurate interpretation of data and trends in human medicine. Veterinarian exemption will allow them to continue to provide appropriate care and medical management for their patients. Please feel free to contact me if you wish to discuss this issue with me further.

Sincerely,

Judith Montalbano DVM, Medical Director

All Creatures Veterinary Clinic

4360 E. Snider Dr. Wasilla, AK 99654

(907)376-7930 Clinic

Sent from my iPad

## Jasmin Martin

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**From:** Sen. David Wilson  
**Sent:** Friday, January 28, 2022 9:36 AM  
**To:** Jasmin Martin  
**Subject:** FW: SB 132

*Jasmin Martin*

Office of Senator David Wilson  
Senate Health and Social Services Committee  
Alaska State Capitol, Room 121  
Juneau, Alaska 99801  
Direct: 907-465-8165  
Jasmin.Martin@akleg.gov

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**From:** Ariana Anderson <islavet@gmail.com>  
**Sent:** Tuesday, May 04, 2021 9:17 AM  
**To:** Sen. David Wilson <Sen.David.Wilson@akleg.gov>  
**Subject:** SB 132

Dear Senator Wilson,

I am writing to ask you to support SB 132, the exemption for veterinarians from the Prescription Drug Monitoring Program (PDMP). I am a self-employed relief (substitute) veterinarian, and I travel throughout Alaska to work. I am also licensed in Virginia and Arizona. I believe requiring veterinarians to use the PDMP database complicates its intended purpose in monitoring human patients' controlled drug prescriptions. It also results in confusing and burdensome requirements for veterinarians, leading to decreased quality of care for our patients and their owners.

When I want to prescribe a controlled drug to a patient, it is unclear how to look up the patient (since there is no identifier or often even a known birthdate). I am not aware of any clear guidance from the PDMP on how to proceed for animal patients. If I look up the pet owner (inappropriate in light of HIPAA, but one route I have tried) and see that they have controlled drug prescriptions, I have NO way to evaluate these or to know whether that means I should not prescribe their pet a drug that they need. I have no knowledge of appropriate human controlled drug prescriptions or how to respond to this scenario. Moreover, animals often have multiple humans involved in their care.

After realizing how much time it takes to search and especially to enter a prescription dispensed from a veterinary clinic into the PDMP, I quickly realized I must only prescribe within the limits exempted from reporting to the PDMP. I work at several different clinics, and as a relief veterinarian I am paid hourly. Properly entering a dispensed prescription takes 5-10 minutes, and a clinic paying me for this amount of time for each prescription is ridiculous. I cannot delegate this duty, since I work at different clinics and have little knowledge of the staff. Therefore, I am limited to the option of dispensing only a 24-hr supply from a clinic. I could write a prescription to be filled at a pharmacy for a 72-hr supply, but that still severely limits my ability to treat my patients, and many drugs for animals must be compounded to get the appropriate dose (which takes anywhere from 1-7 days, depending on the clinic's location). If I wanted to prescribe my patients longer courses of a controlled drug, I would have to begin filing a report every day, including those I am not working and those I do not prescribe a controlled drug. This is extremely time prohibitive.

Veterinarians are choosing less than optimal drugs for patients due to the burden of PDMP use. Here are two examples: 1. The drug that many think is best for cough suppression, Hydrocodone, is controlled, so we often default to a non-controlled drug that I believe is less effective and has a higher risk of side effects. 2. In cats, we previously often used Buprenorphine for pain control, as it is very effective, the injectable form (which clinics stock) can be absorbed through the mouth, and it does not carry the risk of kidney damage that anti-inflammatories do. The requirement of reporting Buprenorphine prescriptions to the PDMP has made it much more difficult to safely manage feline pain.

Since often I am the only veterinarian working in a clinic, prescribing controlled drugs in some form is important to properly care for my patients. Relief veterinarians are a growing niche in the profession, and the PDMP is even harder for us to navigate alone than a clinic with established protocols. It is especially hard for Alaska clinics to find relief veterinarians. Many clinics are hunting outside the state for relief veterinarians, and having to understand and use the PDMP is an even greater hurdle to a relief vet new to Alaska practice. Moreover, the necessity for the Alaska Veterinary Board to investigate PDMP violations contributes to rising license fees in a state that already has one of the highest license fees in the country – and a shortage of veterinarians. I have worked in Juneau, Fairbanks, and Anchorage during the past two years; pet owners across Alaska are having to wait WEEKS to get appointments, and their pets are suffering from that. Veterinary clinics need to be able to better care for their patients without time-consuming reporting that is ineffective to actually track drug abuse.

Veterinarians across Alaska are struggling with how to comply with the PDMP while still providing the best care to their patients. The majority of other states have exempted veterinarians from their prescription drug reporting requirements, as the DEA already requires significant record-keeping and accountability. I believe the most effective way to accomplish the goal of including veterinarians in the solution for controlled drug abuse would be requiring continuing education on recognizing opioid abuse, as is done in Arizona and some other states. Veterinarians truly do want to be part of the solution but need the tools.

Sincerely,

Ariana Anderson, DVM  
Arianavet Relief Services  
2917 Jackson Rd  
Juneau, AK 99801

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"The great thing, if one can, is to stop regarding all the unpleasant things as interruptions of one's 'own,' or 'real' life. The truth is of course that what one calls the interruptions are precisely one's real life - the life God is sending one day by day."

~ C.S. Lewis

## Jasmin Martin

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**From:** Sen. David Wilson  
**Sent:** Friday, January 28, 2022 9:36 AM  
**To:** Jasmin Martin  
**Subject:** FW: PLEASE support SB 132!

*Jasmin Martin*

Office of Senator David Wilson  
Senate Health and Social Services Committee  
Alaska State Capitol, Room 121  
Juneau, Alaska 99801  
Direct: 907-465-8165  
Jasmin.Martin@akleg.gov

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**From:** Cornerstone Animal Hospital <cornerstone.rads@gmail.com>  
**Sent:** Tuesday, May 04, 2021 9:35 AM  
**To:** Sen. David Wilson <Sen.David.Wilson@akleg.gov>  
**Subject:** PLEASE support SB 132!

Good Morning Senator Wilson,

My name is Paige Davis, and I am the practice manager at Cornerstone Animal Hospital, which celebrates its 20th year in business this Friday. I am writing today on behalf of our business and my employer to ask for your support in voting YES on Senate Bill 132 Veterinary Exemption to the PDMP.

The owner and sole veterinarian at our practice is Dr. Scott Rapp. He has been a veterinarian for over 30 years and is no stranger to the strict requirements enforced by the DEA in order to dispense and prescribe controlled substances. The veterinary profession has been shown to not be a major contributor to the opioid crisis. As a facility/prescriber, we RARELY send home medications that would need to be reported to the state PDMP database, but when we do, there are a number of problems with the way the PDMP is currently set up that make Dr. Rapp's job unnecessarily difficult.

Firstly, in order to prescribe for an animal patient, Dr. Rapp must query the human owner's PRIVATE medical information in the database. This means Dr. Rapp is privy to his client's personal prescription information that they may not want to share. Further, how is Dr. Rapp to determine which owner to query in the database? Animals often have more than one owner/adult in the household responsible for their care.

Secondly, even if Dr. Rapp saw an owner already has prescriptions for controlled substances in their name, he isn't trained in human medicine/drug interaction or substance abuse, so it is inappropriate to make a determination of risk for the human owner. The PDMP was clearly not designed for animal patients, as animals often have no permanent identifier such as a microchip, birthdate, etc. that can be tracked. When we input an animal into the database, they could have been entered under another name-spelling or owner at another clinic. The information the PDMP provides is simply not relevant or useful when treating animal patients.

Third, the reporting requirements unfairly burden Dr. Rapp as a veterinarian and business owner. Large retail pharmacies have software designed to allow for a mass upload of information daily to the database. There is no such software for veterinarians. As it stands now, Dr. Rapp is the sole person in our office licensed to query owners and input prescriptions, and has to do so one by one into the database. He works 13 hours a day at the clinic treating patients. The

added workload of reporting to the PDMP in this manner just doesn't make sense, when it has no benefit to him or his patients.

I urge you to PLEASE support passing Senate Bill 132 to join 33 other states in exempting veterinarians from the PDMP.

Thank you for your time,

Paige Davis  
Practice Manager

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**Cornerstone Animal Hospital**  
1600 E. Tudor Rd.  
Anchorage, AK 99507

**Phone:** 1-907-569-7277 **Fax:** 1-907-569-7280

## Jasmin Martin

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**From:** Sen. David Wilson  
**Sent:** Friday, January 28, 2022 9:35 AM  
**To:** Jasmin Martin  
**Subject:** FW: SB-132 - Exemption for veterinarians from Alaska's Prescription Drug Monitoring Program

*Jasmin Martin*

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Senate Health and Social Services Committee  
Alaska State Capitol, Room 121  
Juneau, Alaska 99801  
Direct: 907-465-8165  
Jasmin.Martin@akleg.gov

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**From:** ravenwoodvetakom@gmail.com <ravenwoodvetakom@gmail.com>  
**Sent:** Tuesday, May 04, 2021 10:18 AM  
**To:** Sen. David Wilson <Sen.David.Wilson@akleg.gov>  
**Cc:** execdir@akvma.org  
**Subject:** SB-132 - Exemption for veterinarians from Alaska's Prescription Drug Monitoring Program

May 4, 2021

The Honorable Senator David Wilson  
Alaska State Capitol  
Room 121  
Juneau AK, 99801

**RE: SB-132 - Exemption for veterinarians from Alaska's Prescription Drug Monitoring Program**

Dear Senator Wilson:

Ravenwood Veterinary Clinic has been providing essential veterinary services to the Eagle River community for over 30 years. We offer care and services for small companion and exotic animals.

**I urge your support for SB-132** – an act exempting veterinarians from the requirements of the controlled substance prescription database, known as the Prescription Drug Monitoring Program (PDMP) in Alaska. The current law in place requiring the participation of veterinarians in the PDMP is not a practical or effective solution for the intended purposes of the PDMP. The system is not useable for veterinarians and animals and is creating unnecessary and disproportionate business burdens for veterinarians, leading to increased taxpayer costs.

These are some of the reasons as to why it makes sense to exempt veterinarians from the PDMP.

- Veterinarians do not treat humans, and animals are not listed in the PDMP independently which renders the PDMP database unusable. Animals are lacking a permanent identifier: There is no permanent identifier for an animal. Animals can have different names and owners throughout their lifetime. The animal can also have different owner names from within the same household.
- Potential privacy violations: Searching the PDMP database by the owner could provide medical information the owner is uncomfortable with their veterinarian knowing. Secondly, veterinarians are not trained in human medication doses much like physicians are not trained in the dose ranges for dogs, cats, birds, elephants, etc.
- Veterinarians already adhere to controlled substance regulations: Veterinarians who prescribe or dispense controlled substances are licensed through Drug Enforcement Administration (DEA). There is already a significant level of accountability, record keeping, and medication storage requirements that these veterinarians adhere to.

- Cost: PDMP review and reporting constitutes a disproportionate impact on veterinarians as small business owners. Veterinary clinics lack the standardized software used in human health care facilities, so reporting is more labor-intensive and costly. Additionally, the cost to investigate veterinarians who fail to use the database correctly is a waste of very limited resources.

As a medical provider it is important to me that the PDMP is used correctly to track trends of humans opioid shopping. 32 states have found exemption for their veterinarians from participating in the PDMP. The exemption of veterinarians from the PDMP will increase the efficacy for the systems intended purpose, by allowing for accurate interpretation of data and trends in human medicine. Veterinarian exemption will allow them to continue to provide appropriate care and medical management for their patients.

Sincerely,

Dr. Jamie Lee Merrigan, clinic owner  
Dr. Lorelei Hass, associate veterinarian  
Dr. Michelle Wetherell, associate veterinarian  
Dr. Megan Turnquist, associate veterinarian  
Dr. Harrison Wellman, associate veterinarian

Ravenwood Veterinary Clinic  
16743 Coronado Road  
Eagle River, Alaska 99577

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**Sent:** Friday, January 28, 2022 9:35 AM  
**To:** Jasmin Martin  
**Subject:** FW: SB 132

*Jasmin Martin*

Office of Senator David Wilson  
Senate Health and Social Services Committee  
Alaska State Capitol, Room 121  
Juneau, Alaska 99801  
Direct: 907-465-8165  
Jasmin.Martin@akleg.gov

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**From:** Frederickson <pandj@alaska.net>  
**Sent:** Tuesday, May 11, 2021 8:35 AM  
**To:** Sen. David Wilson <Sen.David.Wilson@akleg.gov>  
**Subject:** SB 132

May 11, 2021

The Honorable Senator Wilson  
State Capitol Room 121  
Juneau, Alaska 99801

Dear Senator Wilson:

As Veterinarians living and practicing in Anchorage for forty years, we write to **urge your support for SB 132** – An act exempting veterinarians from the requirements of the controlled drug monitoring database, known in Alaska as the prescription drug monitoring program (PDMP).

Our profession agrees with the goals of the PDMP and has been complying since its inception, but over time and with modifications to the program, the usefulness of our participation has shrunk while the regulatory burden on us has not. We do and will continue to comply with DEA mandates on ordering, storing, prescribing and accounting for those same controlled drugs.

Currently we are required to report prescriptions filled at our hospital (only those prescribed for more than three days), but not those filled at pharmacies. In our clinic, as in most veterinary clinics, over time we have moved toward keeping fewer controlled drugs in inventory, and outsourcing most prescriptions for those drugs. Those that we do keep are mostly for in-clinic use as well as for compounding and dispensing very small doses for small species (small mammals, birds and reptiles). In those small species, a two or three week prescription might not equal a single dose for an adult human, but does trigger the requirements of the PDMP. Consequently, the reporting that we do accounts for a very small portion of the controlled drugs we use in-clinic or prescribe; the majority are reported by the pharmacy filling the prescription. The regulatory requirements have not diminished, however, and require a labor input out of proportion to any benefit. Regulators are much more likely to catch an unwitting veterinarian in an insignificant error or oversight than they are to catch someone diverting drugs from that veterinarian, and might spend much more time on the former than the latter. For these reasons, we think a veterinary exemption makes sense.

It should be pointed out that thirty-three states have granted veterinarians a waiver from these requirements. We encourage you to support this bill and approve it out of the Labor and Commerce committee.

Thank you very much for your attention.

Respectfully,

Jacqueline Frederickson DVM

Paul Frederickson DVM

P.O. Box 110006, Anchorage, AK 99511-0006

## Jasmin Martin

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**From:** Sen. David Wilson  
**Sent:** Thursday, January 27, 2022 2:26 PM  
**To:** Jasmin Martin  
**Subject:** FW: HB 91 and SB 132 Big Lake- Schuler

Rachel Zepp  
*Office of Senator David Wilson*  
*Senate District D*  
*Alaska State Capitol, Rm 121*  
*(907) 465-3878*

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**From:** steven schuler <rocknuke68@yahoo.com>  
**Sent:** Thursday, January 27, 2022 10:36 AM  
**To:** Sen. David Wilson <Sen.David.Wilson@akleg.gov>  
**Subject:** HB 91 and SB 132 Big Lake- Schuler

I just read about the hb 91 and sb 132 and my question is why are veterinarian even part of the PDMP ( Prescription Drug Monitoring Program) ? Vote yes on HB 91 and SB 132

## Jasmin Martin

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**From:** Sen. David Wilson  
**Sent:** Thursday, January 27, 2022 1:43 PM  
**To:** Jasmin Martin  
**Subject:** FW: HB 91 and SB 132 Big Lake- Schuler

*Jasmin Martin*

Office of Senator David Wilson  
Senate Health and Social Services Committee  
Alaska State Capitol, Room 121  
Juneau, Alaska 99801  
Direct: 907-465-8165  
Jasmin.Martin@akleg.gov

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**From:** steven schuler <rocknuke68@yahoo.com>  
**Sent:** Thursday, January 27, 2022 10:36 AM  
**To:** Sen. David Wilson <Sen.David.Wilson@akleg.gov>  
**Subject:** HB 91 and SB 132 Big Lake- Schuler

I just read about the hb 91 and sb 132 and my question is why are veterinarian even part of the PDMP ( Prescription Drug Monitoring Program) ? Vote yes on HB 91 and SB 132

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**Sent:** Thursday, January 27, 2022 1:43 PM  
**To:** Jasmin Martin  
**Subject:** FW: SB 132

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Alaska State Capitol, Room 121  
Juneau, Alaska 99801  
Direct: 907-465-8165  
Jasmin.Martin@akleg.gov

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**From:** Hadley Andrukiewicz <hadsterbadster@gmail.com>  
**Sent:** Thursday, January 27, 2022 10:41 AM  
**To:** Sen. David Wilson <Sen.David.Wilson@akleg.gov>  
**Subject:** SB 132

Dear Senator David Wilson.

Please vote YES ON SB 132! I work in a veterinary clinic in Wasilla and we can see several problems with using the Prescription Drug Monitoring Program in tracking animal prescriptions. PDMP is designed for tracking HUMAN prescriptions, not animal prescriptions. The information on PDMP is not even usable by a veterinarian. Viewing the pet owner's prescription information on PDMP raises privacy concerns, as we are prescribing meds for their pet, not the human owner. Going to the trouble to look up the owner on PDMP still does not help identify diversion and abuse of drugs. Veterinarians have not been shown to be a significant source of diversion. This is why, as a veterinary professional, I believe it makes sense to EXEMPT veterinarians from the Prescription Drug Monitoring Program. Thank you for all you do and I hope you'll consider and decide on voting YES on SB 132!

- Hadley Andrukiewicz