



West Virginia Veterinary Medical Association
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Letter of Support to AK Exemption

We are writing to give our full support to pending legislation that will exempt Alaska's veterinarians from the state's Prescription Drug Monitoring Program (PDMP).

Similar regulations were previously in effect for our state. However, after several years, they were rescinded when it was conclusively shown they imposed significant regulatory and administrative burdens on the veterinary profession without having any measurable (i.e., positive) impact on controlled substance misuse or diversion in West Virginia.

As you have undoubtedly heard from your own Alaskan veterinarians, a PDMP is specifically designed for human medicine and intended to prevent one individual from being able to obtain multiple prescriptions for controlled substances from different providers (also commonly known as "doctor shopping").

Our experience has shown this is not the case in veterinary medicine for the following reasons:

- A valid veterinarian-client-patient-relationship (VCPR) is required for a veterinarian to provide services and treatments to animals
- Veterinarians do not prescribe medications (controlled or not controlled) exclusively based on an owner's "complaint of pain," without a diagnosis that is confirmed by a complete physical exam and diagnostic tests as indicated.
- Most pets are not insured, and costs for these services are typically paid out of pocket by the owner.
- The use of opioids and other controlled substances by veterinarians, and other medical professionals, is strictly regulated by the U.S. Drug Enforcement Agency (DEA). DEA issues licenses for the use of controlled substances and conducts routine audits of licensed individuals to verify compliance with these requirements.
- Other safeguards have been implemented by industry, including monitoring orders for controlled substances placed by veterinarians and veterinary hospitals. Suspicious orders and patterns must be reported to the authorities.

Another important legal consideration is whether veterinarians should be allowed access to a client's protected health information by querying their personal prescription history. Veterinarians are not trained to review or analyze human medical records, and requiring them to access sensitive records could be interpreted as a violation of HIPAA protections if challenged.

For all these reasons, we offer our support to exempt Alaska's veterinarians from the PDMP.

Sincerely,

Danny Montgomery, DVM
President, West Virginia Veterinary Medical Association