

1. While Miss. Corrilo stated the pdmp is in most states she is correct however, 34 states have EXEMPT their veterinarians since there has been NO identifiable benefit to having them in the system. 10 of those state have actually removed veterinarians after previously including them; most recently West Virginia.
 - a. Veterinarians see animals not humans – therefore they have NO identifier
 - b. Substantial violation of privacy – veterinarians are not bound or trained in HIPAA
 - c. Human doctors can't interpret veterinary doses and vice versa
2. MME is a human tool not utilized by veterinarians; again, trying to put a square peg in a round hole, you cannot expect a system to work when the patients are different species.
3. We cannot speak as to why the dentist are not pushing back but the professions are not comparable.
 - a. The ER doctors are saying we prescribe twice the MME of dentists (still < 1%), but it's not comparable because the ones we prescribe are not as abusable.
 - i. They see humans and they DO prescribe the opioids that addicts are seeking. Veterinarians do not.
 - ii. One of our most prescribed opioids is butorphanol; the MME of butorphanol is 7 making our numbers higher than dentists, but NO ONE abuses butorphanol! Although the MME of buprenorphine is huge it's used to TREAT opioid addiction because it is an agonist/antagonist. In cats it's used for a three-day supply to treat pain after tooth extractions.
4. The Board of Veterinary Examiners has proposed regulations in an attempt to make the pdmp work; however, it has resulted in numerous investigations for clerical issues and around \$200,000 dollars that falls back on our licensees.
 - a. The state of AK has the highest veterinary licensee fee in the country.
 - b. Veterinarians have the highest compliance rate despite being unable to use the system.
 - c. Mrs. Chambers states in a previous hearing they do not have the personnel to adequately regulate the pdmp but thousands of dollars are being spent on veterinarians when not one case has been proven and there is no identifiable benefit.
5. The Board of Pharmacy is in support of veterinary exemption from the pdmp because they know we can't comply, and our data is useless.
 - a. Justin Ruffridge the Chair of the Board of Pharmacy and Dr. Eric Noll were registered May 3, 2022 for invited testimony and questions and were not able to speak.