

# Alaska State Medical Association

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February 25, 2016

The Honorable Donny Olson  
Alaska State Senate  
State Capitol Room 504  
Juneau, AK 99801

RE: Senate Bill 74

Dear Senator Olson:

The Alaska State Medical Association (ASMA) represents physicians statewide and is primarily concerned with the health of all Alaskans.

ASMA appreciates your past efforts and willingness to work with us and values our relationship with you.

By and large we support the Senate Finance Committee Substitute for SB 74. However, we would like the Committee to consider the following changes:

- 1) Section 8 Page 14 Lines 7-9. Currently the bill requires a company to check the database prior to “administering” a controlled substance. A physician administering a controlled substance to a patient is not an area where one is likely to see abuse of controlled substance occurs as the administration is under the supervision of a physician. Physicians administering a controlled substance are usually responding to acute pain in an emergent situation. Requiring a physician to search the database prior to administering such medicine will impair patient care with no identifiable upside in preventing abuse.
- 2) Section 8 Page 14 Lines 7-9. Eliminate the requirement that practitioners search the database before prescribing any controlled substances. Although we appreciate the problem the language is trying to address there is a balance between requiring every practitioner to utilize the database for all controlled substances and reducing abuse of controlled substances. ASMA has been and continues to be an advocate for utilizing the Prescription Drug Database. Every year we have seen significant and positive growth in utilization with 2014 seeing a 205% increase over 2013 in solicited reports by prescribers. If the bill passes and prescribers are able to designate staff to search the database we expect even stronger growth going forward. Furthermore, the bill requires that pharmacists check the database prior to filling any prescription for controlled substances.

All controlled substances is a wide net. This wide net would include dentists prescribing controlled drugs in conjunction with the removal of wisdom teeth to pediatricians prescribing cough syrup with codeine. Removing any discretion for the practitioner to utilize common sense creates an unnecessary burden and increases costs.

In the event the Committee decides against removing the mandate for practitioners we suggest the mandate only be required for Schedule II drugs.

- 3) Section 9 Page 14 Line 6 or 14. If registration for use of Prescription Drug Database is required for all practitioners, then we request the registration be automatic and tied to license renewals or at a minimum require the registration process be fully computer based and not require utilization of paper documents.
- 4) Section 16 Page 17. Self-Audit of All Claims. Requiring an annual self-audit of all Medicaid claims will be overly burdensome and expensive. Such expenses will necessarily have to be passed on to the State through Medicaid rates. Suggest providing an option to audit all claims or audit "a statistically significant number" and sample the claims.
- 5) Section 9 Lines 15-17. This section requires that the Pharmacy Board notify the Medical Board of all registrations. It is unclear what the purpose of such a list would be or how it would be used. Unless a purpose can be identified and that purpose provides value the provision may just result inefficient use of employee time.

Thank you for considering these changes and let us know if we can be of further assistance.

Sincerely,

A handwritten signature in dark ink, appearing to read "Michael Haugen", with a long horizontal flourish extending to the right.

Michael Haugen  
Executive Director  
Alaska State Medical Association