



# Midnight Sun

**ANIMAL HOSPITAL + EMERGENCY CARE**

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March 31, 2021

The Honorable Representative Ivy Spohnholz  
State Capitol Room 406  
Juneau AK, 99801-1185

**RE: HB 91 - Exemption for veterinarians from Alaska's Prescription Drug Monitoring Program.**

Dear Representative Spohnholz:

I am writing on behalf of the Doctors at Midnight Sun Animal Hospital + Emergency Care. We collectively represent a bustling 11 doctor practice on Tudor Road in Anchorage serving not only Anchorage and the Matanuska Susitna Valley but also rural Alaska with 24-hour emergency care and general veterinary services. This practice employs approximately 75 extremely dedicated, hard-working professional and para-professional veterinary health care workers.

We are in favor of HB-91, and request that you support this bill. This bill would exempt veterinarians from reporting the prescription of controlled drugs to the Prescription Drug Monitoring Database (PDMD) in Alaska. Veterinarians are very supportive of efforts to decrease the epidemic of opioid abuse and diversion of controlled drugs; however, our mandated reporting requirements are not leading to a positive contribution. The primary issue with the human-based program in relation to our veterinary patients, is that animals lack a unique identifier such as a driver's license or Social Security number. Since, animals do not have the aforementioned identification, or even true birthdays, it becomes near impossible to track their prescriptions they may have received from any clinic within the area. As an example, how many 7-year-old mixed breed dogs with the name of Buddy live in Anchorage or the surrounding areas? Because there is not an animal database and registration with Municipal and Borough Animal Controls are voluntary, the problem is further compounded. Additionally, animals are frequently presented by various owners, friends of owners, or are rehomed to new owners. This has led to the requirement for veterinarian to query the personal medical history of the owner or friend of our patients. This is subsequently a violation of our client's personal medical information. The veterinary community is not qualified to evaluate the



prescription history of patient's owners. We are not trained to critically evaluate a human's medical history in relation to a medication we are dispensing for the animal we are treating. Consequently, this information really has no relevance to our patient which is the spotlight of our treatment protocols.

Veterinarians do not dispense large quantities of controlled drugs to our clients. In Alaska, our profession is estimated to account for 0.3-1 % of all the total morphine equivalents dispensed between 2015 and 2018. In a busy emergency practice, the most common controlled drug that we are using which requires controlled drug dispensing procedures is phenobarbital, an anticonvulsant medication with extremely low abuse potential. We also have the need to dispense pain medication to alleviate the pain and suffering of severely injured animals and terminal cancer patients. The mandated reporting has led many veterinarians to no longer dispense pain medication to their patients beyond non-steroidal anti-inflammatory drugs which are the equivalent of aspirin. We are seeing patients with severe trauma, fractured legs, painful burns, wounds, or injuries from abuse, and we need to preserve our ability to responsibly dispense controlled drugs as analgesia to those animal patients that are in need. These situations generally happen outside of the standard window of when most pharmacies are open to dispense these direly needed and necessary medications.

Lastly, the reporting has led to a very large economic burden on the state's veterinary industry especially those that are privately-owned small businesses. MSAH diverts over 40 hours a month from direct patient care to PDMP reporting requirements. The continued economic impact on our profession will lead to higher costs for veterinary services decreasing access to care for many of our clients and patients. These costs are being compounded both from increased administrative time and the inevitable license fee increases that will be necessary as the Board of Veterinary Examiners start to investigate compliance with the PDMP system.

In conclusion, we hope that you will support HB 91 allowing Alaska to join with the other 32 states that have found exemption for their veterinarians from participating in state-run PDMPs. The exemption of veterinarians from the PDMP will increase the efficacy for the PDMP's intended purpose by allowing for accurate and precise interpretation of data and trends within human medicine.

Sincerely,

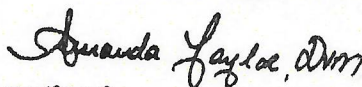
Dr. Cara Elton



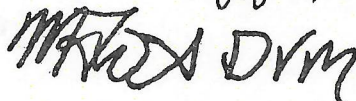
Dr. Amanda Irish



Dr. Amanda Taylor



Dr. Marian Frost





Dr. Emily Mehlman



Dr. Samantha Yeltatzie

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Dr. Melissa Diederich



Dr. Margot Fairbanks

 DVM

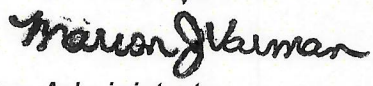
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CC:

Representative Calvin Schrage  
Representative Liz Snyder  
Representative David Nelson  
Representative James Kaufman  
Representative Ken McCarty