



April 13, 2021

Representative Zack Fields, Co-Chair
Representative Ivy Spohnholz, Co-Chair
House Labor and Commerce Committee
State Capitol
Juneau, AK 99801

RE: HB 91 Veterinarians/PDMP Requirements

Dear Co-Chairs Fields and Spohnholz:

The Alaska Chapter of the American College of Emergency Physicians opposes HB 91. We see daily the devastating impacts of opioids on our community and feel that all providers with DEA licenses who prescribe controlled substances need to be held to the same standard. This includes Veterinarians.

Notably, the current PDMP use requirements have exception for short term prescriptions, for inpatient care and for emergency care. These exceptions minimize the burden of PDMP and all prescribing of controlled substances, outside of the current exceptions should be consistent with current requirements. This must include prescribing done by veterinarians as well as physicians.

We recognize that veterinarians will face different challenges than physicians in implementation these requirements. But the concerns we have heard about difficulties in PDMP usage for vets speak to the need for thoughtful implementation not exception from participation. Though animal medicine is certainly different than human, we are confident the human and animal medical fields can learn from each other and work together to increase the safety of our community.

As you know, animal clinics not only prescribe but dispense opioids. Veterinarians have noted that this increases the difficulty of compliance. Please remember that it also increases risk for misuse and diversion —a risk that will increase if animal clinics are granted an exception. If these clinics are not able to enter dispensing data into the PDMP, they should not be allowed to dispense opioids and should instead refer their patients to pharmacists that can access and use the PDMP. This step will improve community safety and may save lives.

PDMP Data

Data on morphine milligram equivalents (MMEs) prescribed by professionals 2016-2018 demonstrate the veterinarians in Alaska now surpass dentists in prescribing opioids with 5 million MME prescribed in 2018 for animals and 2.9 million to dentists. This is a clear and substantial opioid contribution to the community.

Peer Reviewed Published Data

Opioid prescription rates have been increasing nationally and are now recognized as a significant public health issue that is resulting in tragic loss of life and deep damage to communities. A 2019 article published in JAMA Network Open found the field of animal medicine also had a *"parallel trend of escalating opioid prescriptions and potency between 2007 and 2017. The substantial and increasing volume of opioids prescribed highlights analogous concerns about excessive opioid prescribing in humans."*¹ The authors concluded that there is opportunity to *"assess the risk associated with veterinarian opioid prescriptions and develop mitigation strategies, including expanding veterinary PDMP reporting nationally to safeguard public health."* These authors suggest Alaska is on the right track in requiring PDMP compliance.

Taking on new regulations always presents challenges. But, as we consider those challenges we cannot forget the opportunity here: saving lives and preserving communities. Though it may be uncomfortable to implement, we must remember that we are on the right track. We need to keep moving forward to finalize implementation of that participation. We need to keep saving lives.

A recent study in the state of Colorado illustrates that veterinarians may not understand the extent of this problem.² The study reported that *"seventy-three percent of respondents indicated that their veterinary medical school training on opioid abuse or misuse was either fair, poor, or absent."* Additionally, *"13% of surveyed veterinarians were aware that an animal owner had intentionally made an animal ill, injured an animal, or made an animal seem ill or injured to obtain opioid medications; 44% were aware of opioid abuse or misuse by either a client or a veterinary practice staff member; and 12% were aware of veterinary staff opioid abuse and diversion."*

Many vets may not feel adequately trained to handle these situations and the study authors had the same conclusion that we would advocate for Alaska:

"Steps should be taken in the veterinary medicine community to align with other DEA license holders in prevention measures, leading to congruent efforts

¹ Clarke DL, Drobatz KJ, Korzekwa C, Nelson LS, Perrone J. Trends in Opioid Prescribing and Dispensing by Veterinarians in Pennsylvania. *JAMA Netw Open*. 2019;2(1):e186950.

² Derek S. Mason, Liliana Tenney, Peter W. Hellyer, and Lee S. Newman, 2018:

[Prescription Opioid Epidemic: Do Veterinarians Have a Dog in the Fight?](https://doi.org/10.2105/AJPH.2018.304603)

American Journal of Public Health 108, 1162-1163, <https://doi.org/10.2105/AJPH.2018.304603>

by all prescribers of opioids in the United States. This should include setting expectations for veterinarians to meet the same levels of compliance required of other prescribers for logging prescriptions of scheduled drugs into state PDMP systems."

Summary

All providers with DEA licenses who prescribe controlled substances need to be held to the same standard. Opioid prescriptions from Veterinarians are a substantial contribution to the presence and availability of opioids in our communities. Our review of public health literature suggests that the veterinarian community may not be aware of the degree of their contribution to risk for the human population. Alaska has an opportunity to save lives by establishing a consistent practice of PDMP usage; repealing the requirement for Veterinarians to participate should not be considered.

Thank you for the opportunity to put our comments regarding HB 91 on the record.

Sincerely,

A handwritten signature in black ink, appearing to read 'N. Papacostas', written in a cursive style.

Nicholas Papacostas MD, FACEP
President, Alaska ACEP

cc: Representative Adam Wool
Members of Labor and Commerce Committee
Dr. Anne Zink, State Medical Officer