

**From:** [Megan Holland](#)  
**To:** [House Labor and Commerce](#)  
**Subject:** Fwd: Vote YES on HB 91  
**Date:** Friday, April 23, 2021 12:28:46 PM

---

Get [Outlook for iOS](#)

---

**From:** Pakak Boerner <Pakak.Boerner@akleg.gov>  
**Sent:** Wednesday, April 21, 2021 8:23:12 AM  
**To:** Megan Holland <Megan.Holland@akleg.gov>  
**Subject:** FW: Vote YES on HB 91

-----Original Message-----

From: Ty Miller <tymiller56@hotmail.com>  
Sent: Tuesday, April 20, 2021 9:07 PM  
To: Rep. Adam Wool <Rep.Adam.Wool@akleg.gov>; Rep. Andi Story <Rep.Andi.Story@akleg.gov>; Rep. Andy Josephson <Rep.Andy.Josephson@akleg.gov>; Rep. Bart LeBon <Rep.Bart.Lebon@akleg.gov>; Rep. Ben Carpenter <Rep.Ben.Carpenter@akleg.gov>; Rep. Bryce Edgmon <Rep.Bryce.Edgmon@akleg.gov>; Rep. Calvin Schrage <Rep.Calvin.Schrage@akleg.gov>; Rep. Cathy Tilton <Rep.Cathy.Tilton@akleg.gov>; Rep. Christopher Kurka <Rep.Christopher.Kurka@akleg.gov>; Rep. Chris Tuck <Rep.Chris.Tuck@akleg.gov>; Rep. Daniel Ortiz <Rep.Daniel.Ortiz@akleg.gov>; Rep. David Eastman <Rep.David.Eastman@akleg.gov>; Rep. David Nelson <Rep.David.Nelson@akleg.gov>; Rep. DeLena Johnson <Rep.DeLena.Johnson@akleg.gov>; Rep. George Rauscher <Rep.George.Rauscher@akleg.gov>; Rep. Geran Tarr <Rep.Geran.Tarr@akleg.gov>; Rep. Grier Hopkins <Rep.Grier.Hopkins@akleg.gov>; Rep. Harriet Drummond <Rep.Harriet.Drummond@akleg.gov>; Rep. Ivy Spohnholz <Rep.Ivy.Spohnholz@akleg.gov>; Rep. James Kaufman <Rep.James.Kaufman@akleg.gov>; Rep. Jonathan Kreiss-Tomkins <Rep.Jonathan.Kreiss-Tomkins@akleg.gov>; Rep. Josiah Patkotak <Rep.Josiah.Patkotak@akleg.gov>; Rep. Kelly Merrick <Rep.Kelly.Merrick@akleg.gov>; Rep. Ken McCarty <Rep.Ken.McCarty@akleg.gov>; Rep. Kevin McCabe <Rep.Kevin.McCabe@akleg.gov>; Rep. Laddie Shaw <Rep.Laddie.Shaw@akleg.gov>; Rep. Liz Snyder <Rep.Liz.Snyder@akleg.gov>; Rep. Louise Stutes <Rep.Louise.Stutes@akleg.gov>; Rep. Matt Claman <Rep.Matt.Claman@akleg.gov>; Rep. Mike Cronk <Rep.Mike.Cronk@akleg.gov>; Rep. Mike Prax <Rep.Mike.Prax@akleg.gov>; Rep. Neal Foster <Rep.Neal.Foster@akleg.gov>; Rep. Ronald Gillham <Rep.Ronald.Gillham@akleg.gov>; Rep. Sara Hannan <Rep.Sara.Hannan@akleg.gov>; Rep. Sara Rasmussen <Rep.Sara.Rasmussen@akleg.gov>; Rep. Sarah Vance <Rep.Sarah.Vance@akleg.gov>; Rep. Steve Thompson <Rep.Steve.Thompson@akleg.gov>; Rep. Tiffany Zulkosky <Rep.Tiffany.Zulkosky@akleg.gov>; Rep. Thomas McKay <Rep.Thomas.McKay@akleg.gov>; Rep. Zack Fields <Rep.Zack.Fields@akleg.gov>  
Subject: Vote YES on HB 91

Dear Representative

I could take the time to put down the many reasons to remove Vets from PDMP but it's really simple. The original bill from 2016 was for humans not animals. Vets prescribe 0.34% of the total opioid prescriptions.

Other states recognize this and exempt vets. It is a waist of time and money for everyone.

If you're worried about vets and their less than 1% of perceptions then write something specific to them. Don't throw them in with humans.

Please stop this nonsense

Ty Miller

**From:** [Carol](#)  
**To:** [Rep. Ivy Spohnholz](#)  
**Subject:** HB 91  
**Date:** Tuesday, April 6, 2021 9:51:24 PM

---

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

Dear Representative Spohnholz,

My name is Carol Hedges. I am a veterinarian in Anchorage. I work as a full-time in Anchorage at VCA East Anchorage Animal Hospital.

**I urge your support for HB 91** – an ACT exempting veterinarians from the requirements of the controlled substance prescription database, known as the prescription drug monitoring program (PDMP) in Alaska. The current law in place requiring the participation of veterinarians in the PDMP is not a practical and effective solution for the intended purposes of the PDMP. The system is not useable for veterinarians and animals, it is creating unnecessary and disproportionate business burdens for veterinarians and it is leading to increased taxpayer costs.

These are some of the reasons as to why it makes sense to exempt veterinarians from the PDMP.

- Veterinarians don't treat humans and animals are not listed in the PDMP independently which renders the PDMP database unusable. Animals are lacking a permanent identifier: There is no permanent identifier for an animal. Animals can have different names and owners throughout their lifetime. The animal can also have different owner names from within the same household.
- Potential privacy violations: Searching the PDMP database by the owner could provide medical information the owner is uncomfortable with their veterinarian knowing. Secondly, veterinarians are not trained in human medication doses much like physicians are not trained in the dose ranges for dogs, cats, birds, elephants, etc.
- Veterinarians already adhere to controlled substance regulations: Veterinarians who prescribe or dispense controlled substances are licensed through Drug Enforcement Administration (DEA). There is already a significant level of accountability, record keeping, and medication storage requirements that these veterinarians adhere to.
- Cost: PDMP review and reporting constitutes a disproportionate impact on veterinarians as small business owners. Veterinary clinics lack the standardized software used in human health care facilities, so reporting is more labor-intensive and costly. Additionally, the cost to investigate veterinarians who fail to use the database correctly is a waste of very limited resources.

As a medical provider it is important to me that the PDMP is used correctly to track trends of humans opioid shopping. 32 states have found exemption for their veterinarians from participating in the PDMP. The exemption of veterinarians from the PDMP will increase the efficacy for the systems intended purpose, by allowing for accurate interpretation of data and trends in human medicine. Veterinarian exemption will allow them to continue to provide appropriate care and medical management for their patients.

Sincerely,

Carol L. Hedges, DVM

2924 Bass St.

Anchorage, AK 99507

**From:** [Hal Geiger](#)  
**To:** [House Labor and Commerce](#)  
**Subject:** House Bill 91  
**Date:** Tuesday, April 13, 2021 3:38:04 PM

---

My name is Hal Geiger, and I am currently the public member of the Alaskan Board of Veterinary Examiners. I am writing to urge you to support House Bill 91, the bill that exempts veterinarians from the Prescription Drug Monitoring Program (PDMP). To be clear, I am not a veterinarian, I am not related to any veterinarians, and I have no financial stake in this one way or the other. However, I am one of the only non-veterinarians in this state who has watched up close all of the problems, the waste, and the disfunction that has followed tacking veterinarians on to a program that was designed for human medicine. If veterinarians are exempted from the PDMP, all veterinary prescriptions for scheduled II and III drugs that are filled at pharmacies will still be entered into the PDMP database by the pharmacy. That leaves a question about drugs that are distributed by the veterinary clinics themselves. It turns out all of those scheduled drugs going in and out of veterinary clinics are carefully tracked by the Federal DEA. **Exempting veterinarians from the PDMP will not result in a loss of useful information.**

House Bill 91, is not simply a matter of being either for drug addiction or against it. Let me start by assuring you I am absolutely against drug addiction. But the current PDMP program on the veterinary side has done absolutely nothing to discourage illegal drug use. The current program has unintended consequences and costs that are not obvious. The cost of this program is enormous. This program has generated a huge and expensive backlog of small technical violations, mostly the result of veterinarians not understanding how to comply. This system was dumped on veterinarians with almost no training and understandable explanation of what was expected of them.

My understanding is that Alaska currently has the most expensive initial licensing fee of any state for veterinarians. The information I looked at is a couple of years old, so if that statement is not currently correct, then it is very nearly the most expensive. Typically these fees are between \$100 to \$300 in most states. Maine does not charge for an annual license, just an initial fee of \$95 the first year. Alaska charges an initial fee of \$1000 (\$200 application fee, \$600 license, \$200 jurisprudence test fee). So where is this money going? Well, one item that is really burning up money is investigations. FY14 was a very unusual year for investigations, and the state spent almost \$60,000 in investigations. Several veterinarians lost their licenses that year. Loosing a license is an economic death sentence for a veterinarian, and this is not undertaken lightly. This outcome is very drastic and usually very expensive for the Board. Apart from that outlier year, it looks like a typical year might involve between \$20,000 and \$35,000 in investigative charges against veterinarians, depending on the random number of referrals for veterinary misconduct. Then in FY20 costs just skyrocket to \$48,627 . We did not have a large number of cases, or even a few complex cases. Yet the costs is just out of control.

And now, in just **half of a year**, the cost of investigations for FY21 is already \$41,547! Currently there are 44 open cases under investigation for small technical violations of PDMP regulations called "failure to query." These are expensive, and require a lot of staff time. These also potentially horrible for honest veterinarians just trying to comply, but who for one reason or another have not been able to make their software work, who did not understand the confusing process and rules, or who are maybe just completely innocent and wrongly flagged.

The Vet Board recently reviewed 14 expensive investigations for “failure to query” that involved department staff getting subpoenas, going through records, and so on. These cases came about because the PDMP somehow flagged these 14 veterinarians. Yet it turns out these veterinarians had really done nothing wrong. And we have gotten no explanation as to why they were flagged. Every Board meeting there is some new Kofkaesque story involving the PDMP and veterinarians. We have learned that the data from the PDMP is not reliable for veterinarians. From my time on the Board I have come to see that veterinarians, as a group, are not a bunch of lawless rule breakers. As a group they are careful people, who have been trained to comply and follow procedures. The real story is that this PDMP system is simply set up to fail on the veterinary side.

In contrast, currently there are eight open case of what we might call normal alleged violations, like “unprofessional conduct,” or “negligence”—what I would think the Vet Board should be dealing with. The complete time wasters from the PDMP have totally taken over the process. I want to stress that for all the cost, for all the pain and disruption to veterinarians, for all the additional burden on the Board of Veterinary Examiners, for all the waste, the PDMP has not resulted in one, single case of actual misconduct with a controlled substance by a veterinarian or one single case of drug seeking by anyone!

The only people who can clearly see the problems are veterinarians, and there are about 400 hundred or less of them in the whole state and I think that none of them are in the legislature. This system was set up for human medicine and it just does not work for veterinarians for so many, many reasons. All this cost, all this waste, all this burden on veterinarians, and this whole effort has produced nothing that can help our board form policy, nothing to help identify actual drug diversion or drug seeking, or nothing in the way of real help to someone suffering from drug addiction. And moreover, someone has to pay for all of this waste.

Thanks so much for your time and interest in this problem.

—Hal

Hal Geiger, PhD  
907.723.3234  
[geiger@ak.net](mailto:geiger@ak.net)