

## Jasmin Martin

---

**From:** Sen. David Wilson  
**Sent:** Friday, January 28, 2022 9:36 AM  
**To:** Jasmin Martin  
**Subject:** FW: SB132

Jasmin Martin  
Office of Senator David Wilson  
Senate Health and Social Services Committee Alaska State Capitol, Room 121 Juneau, Alaska 99801  
Direct: 907-465-8165  
Jasmin.Martin@akleg.gov

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

From: Judith Montalbano <judys@mtaonline.net>  
Sent: Monday, May 03, 2021 10:33 PM  
To: Sen. David Wilson <Sen.David.Wilson@akleg.gov>  
Subject: SB132

May 4, 2021

The Honorable Senator Wilson Alaska State Legislature State Capitol Room 121 Juneau AK, 99801-1185  
RE: SB 132 - Exemption for veterinarians from Alaska's Prescription Drug Monitoring Program.

Dear Senator Wilson,

My name is Dr. Judith Montalbano. I am a veterinarian and the Medical Director at All Creatures Veterinary Clinic in Wasilla, Alaska and soon to be Assistant Professor of Veterinary Medicine at UAA. I have been with All Creatures and an active member of the Alaska Veterinary Medical Association (AKVMA) since 1995. As a busy practitioner, I have been exposed to the rules enacted with the Prescription Drug Monitoring Program (PDMP) and have found it not only to be worthless, cumbersome and ineffective, but it has put me in the position where I have felt very uncomfortable having access to my client's medical information. I wholeheartedly urge your support for SB 132 which would exempt Alaska veterinarians from the requirements of the controlled substance prescription database. The current law in place requiring the participation of veterinarians in the PDMP is onerous and potentially subjects veterinarians to legal action by clients. 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 using the owners name could provide medical information the owner is uncomfortable with their veterinarian knowing and is potentially a violation of the client's HIPPA protections. 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 by the Board of Veterinary Examiners 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. 33 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. Please feel free to contact me if you wish to discuss this issue with me further.

Sincerely,

Judith Montalbano DVM, Medical Director

All Creatures Veterinary Clinic

4360 E. Snider Dr. Wasilla, AK 99654

(907)376-7930 Clinic

Sent from my iPad







added workload of reporting to the PDMP in this manner just doesn't make sense, when it has no benefit to him or his patients.

I urge you to PLEASE support passing Senate Bill 132 to join 33 other states in exempting veterinarians from the PDMP.

Thank you for your time,

Paige Davis  
Practice Manager

--

**Cornerstone Animal Hospital**

1600 E. Tudor Rd.  
Anchorage, AK 99507

**Phone:** 1-907-569-7277 **Fax:** 1-907-569-7280

## Jasmin Martin

---

**From:** Sen. David Wilson  
**Sent:** Friday, January 28, 2022 9:35 AM  
**To:** Jasmin Martin  
**Subject:** FW: SB-132 - Exemption for veterinarians from Alaska's Prescription Drug Monitoring Program

*Jasmin Martin*

Office of Senator David Wilson  
Senate Health and Social Services Committee  
Alaska State Capitol, Room 121  
Juneau, Alaska 99801  
Direct: 907-465-8165  
Jasmin.Martin@akleg.gov

---

**From:** ravenwoodvetakom@gmail.com <ravenwoodvetakom@gmail.com>  
**Sent:** Tuesday, May 04, 2021 10:18 AM  
**To:** Sen. David Wilson <Sen.David.Wilson@akleg.gov>  
**Cc:** execdir@akvma.org  
**Subject:** SB-132 - Exemption for veterinarians from Alaska's Prescription Drug Monitoring Program

May 4, 2021

The Honorable Senator David Wilson  
Alaska State Capitol  
Room 121  
Juneau AK, 99801

**RE: SB-132 - Exemption for veterinarians from Alaska's Prescription Drug Monitoring Program**

Dear Senator Wilson:

Ravenwood Veterinary Clinic has been providing essential veterinary services to the Eagle River community for over 30 years. We offer care and services for small companion and exotic animals.

**I urge your support for SB-132** – 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 or effective solution for the intended purposes of the PDMP. The system is not useable for veterinarians and animals and is creating unnecessary and disproportionate business burdens for veterinarians, leading to increased taxpayer costs.

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

- Veterinarians do not 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,

Dr. Jamie Lee Merrigan, clinic owner  
Dr. Lorelei Hass, associate veterinarian  
Dr. Michelle Wetherell, associate veterinarian  
Dr. Megan Turnquist, associate veterinarian  
Dr. Harrison Wellman, associate veterinarian

Ravenwood Veterinary Clinic  
16743 Coronado Road  
Eagle River, Alaska 99577



## Jasmin Martin

---

**From:** Sen. David Wilson  
**Sent:** Friday, January 28, 2022 9:35 AM  
**To:** Jasmin Martin  
**Subject:** FW: SB 132

*Jasmin Martin*

Office of Senator David Wilson  
Senate Health and Social Services Committee  
Alaska State Capitol, Room 121  
Juneau, Alaska 99801  
Direct: 907-465-8165  
Jasmin.Martin@akleg.gov

---

**From:** Frederickson <pandj@alaska.net>  
**Sent:** Tuesday, May 11, 2021 8:35 AM  
**To:** Sen. David Wilson <Sen.David.Wilson@akleg.gov>  
**Subject:** SB 132

May 11, 2021

The Honorable Senator Wilson  
State Capitol Room 121  
Juneau, Alaska 99801

Dear Senator Wilson:

As Veterinarians living and practicing in Anchorage for forty years, we write to **urge your support for SB 132** – An act exempting veterinarians from the requirements of the controlled drug monitoring database, known in Alaska as the prescription drug monitoring program (PDMP).

Our profession agrees with the goals of the PDMP and has been complying since its inception, but over time and with modifications to the program, the usefulness of our participation has shrunk while the regulatory burden on us has not. We do and will continue to comply with DEA mandates on ordering, storing, prescribing and accounting for those same controlled drugs.

Currently we are required to report prescriptions filled at our hospital (only those prescribed for more than three days), but not those filled at pharmacies. In our clinic, as in most veterinary clinics, over time we have moved toward keeping fewer controlled drugs in inventory, and outsourcing most prescriptions for those drugs. Those that we do keep are mostly for in-clinic use as well as for compounding and dispensing very small doses for small species (small mammals, birds and reptiles). In those small species, a two or three week prescription might not equal a single dose for an adult human, but does trigger the requirements of the PDMP. Consequently, the reporting that we do accounts for a very small portion of the controlled drugs we use in-clinic or prescribe; the majority are reported by the pharmacy filling the prescription. The regulatory requirements have not diminished, however, and require a labor input out of proportion to any benefit. Regulators are much more likely to catch an unwitting veterinarian in an insignificant error or oversight than they are to catch someone diverting drugs from that veterinarian, and might spend much more time on the former than the latter. For these reasons, we think a veterinary exemption makes sense.

It should be pointed out that thirty-three states have granted veterinarians a waiver from these requirements. We encourage you to support this bill and approve it out of the Labor and Commerce committee.

Thank you very much for your attention.

Respectfully,

Jacqueline Frederickson DVM

Paul Frederickson DVM

P.O. Box 110006, Anchorage, AK 99511-0006

## Jasmin Martin

---

**From:** Sen. David Wilson  
**Sent:** Thursday, January 27, 2022 2:26 PM  
**To:** Jasmin Martin  
**Subject:** FW: HB 91 and SB 132 Big Lake- Schuler

Rachel Zepp  
*Office of Senator David Wilson*  
*Senate District D*  
*Alaska State Capitol, Rm 121*  
*(907) 465-3878*

---

**From:** steven schuler <rocknuke68@yahoo.com>  
**Sent:** Thursday, January 27, 2022 10:36 AM  
**To:** Sen. David Wilson <Sen.David.Wilson@akleg.gov>  
**Subject:** HB 91 and SB 132 Big Lake- Schuler

I just read about the hb 91 and sb 132 and my question is why are veterinarian even part of the PDMP ( Prescription Drug Monitoring Program) ? Vote yes on HB 91 and SB 132

## Jasmin Martin

---

**From:** Sen. David Wilson  
**Sent:** Thursday, January 27, 2022 1:43 PM  
**To:** Jasmin Martin  
**Subject:** FW: HB 91 and SB 132 Big Lake- Schuler

*Jasmin Martin*

Office of Senator David Wilson  
Senate Health and Social Services Committee  
Alaska State Capitol, Room 121  
Juneau, Alaska 99801  
Direct: 907-465-8165  
Jasmin.Martin@akleg.gov

---

**From:** steven schuler <rocknuke68@yahoo.com>  
**Sent:** Thursday, January 27, 2022 10:36 AM  
**To:** Sen. David Wilson <Sen.David.Wilson@akleg.gov>  
**Subject:** HB 91 and SB 132 Big Lake- Schuler

I just read about the hb 91 and sb 132 and my question is why are veterinarian even part of the PDMP ( Prescription Drug Monitoring Program) ? Vote yes on HB 91 and SB 132

## Jasmin Martin

---

**From:** Sen. David Wilson  
**Sent:** Thursday, January 27, 2022 1:43 PM  
**To:** Jasmin Martin  
**Subject:** FW: SB 132

*Jasmin Martin*

Office of Senator David Wilson  
Senate Health and Social Services Committee  
Alaska State Capitol, Room 121  
Juneau, Alaska 99801  
Direct: 907-465-8165  
Jasmin.Martin@akleg.gov

---

**From:** Hadley Andrukiewicz <hadsterbadster@gmail.com>  
**Sent:** Thursday, January 27, 2022 10:41 AM  
**To:** Sen. David Wilson <Sen.David.Wilson@akleg.gov>  
**Subject:** SB 132

Dear Senator David Wilson.

Please vote YES ON SB 132! I work in a veterinary clinic in Wasilla and we can see several problems with using the Prescription Drug Monitoring Program in tracking animal prescriptions. PDMP is designed for tracking HUMAN prescriptions, not animal prescriptions. The information on PDMP is not even usable by a veterinarian. Viewing the pet owner's prescription information on PDMP raises privacy concerns, as we are prescribing meds for their pet, not the human owner. Going to the trouble to look up the owner on PDMP still does not help identify diversion and abuse of drugs. Veterinarians have not been shown to be a significant source of diversion. This is why, as a veterinary professional, I believe it makes sense to EXEMPT veterinarians from the Prescription Drug Monitoring Program. Thank you for all you do and I hope you'll consider and decide on voting YES on SB 132!

- Hadley Andrukiewicz