

January 13, 2022

Eva Carey, MD

17706 North Barb Ct

Sutton, AK 99674

907-440-2436

Representative Zack Fields, Co-Chair

Representative Ivy Spohnholz, Co-Chair House Labor
and Commerce Committee

State Capitol

Juneau, AK 99801

Dear Co-Chairs Fields and Spohnholz:

I am a board certified emergency medicine physician with more than 30 years of practice at Providence Alaska Medical Center, Anchorage, Alaska. I am writing in support of HB 91 exempting veterinarians from the PDMP requirements. Thirty four states have determined that a PDMP is unworkable for animals and have exempted veterinary practice. Alaska should do the same.

PDMP requires consulting a database, but there is no such animal database to consult. In practice, veterinarians access the personal prescription history of the owners. This raises major privacy concerns. I would certainly not wish for my patients' medical records to be accessed for this purpose.

One letter opposing this bill suggested that people might intentionally injure their pets to obtain prescriptions. This is impractical for several reasons. Unlike humans, animals cannot "doctor shop" by complaining about pain. An injury or illness severe enough to require opioids, would require a complete diagnostic work-up, a stay in the veterinary hospital, and likely surgery. This would be very expensive since pets do not have insurance. Since opioid dose is based upon body weight, this would only result in a prescription for a much smaller dose than for a human.

Of course, everyone is concerned about opioid abuse. The state of Alaska should put its resources to work on the major causes of this problem and its most effective solutions. In my more than 30 years of

emergency medical practice in Alaska, I have never encountered a single case of diversion from a veterinary prescription.

Sincerely, Eva Carey, MD

February 1, 2022

The Honorable Senator Holland
State Capitol Room 115
Juneau AK, 99801-1185

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

Dear Senator Holland,

I am one of your constituents and have been practicing veterinary medicine for 37 years. I have been practicing in Alaska since 1986. In that time, I have been an associate veterinarian at 2 locally owned practices, a staff veterinarian and administrator at Pet Emergency Treatment, and worked at Anchorage Animal Care and Control as well as operated a house call practice which provided services to Girdwood for many years. I volunteered on the Iditarod for several years in the late 1980's and early 1990's and returned to it in 2021 and again this year. I have also done veterinary mission work in the Kingdom of Tonga. I have served on various veterinary boards for most of my years in Alaska, most recently the Alaska State Veterinary Medical Board until 2020. I thank you for sponsoring SB 132.

I maintain a DEA license which regulates the use and dispensing of controlled substances. In the last few years, we are also required to adhere to a Prescription drug Monitoring Program (PDMP). This PDMP is not working. It is unusable in our situation.

- **The PDMP database was established for human medicine.** We cannot inquire about prescriptions for an animal patient. If we go into the system, we get information on the person who's name we are putting in. It may or may not be the same person who brought that pet in previously. Pet's do not have unique identifiers. They may be listed under several owners, roommates, spouses, or friend bringing it in. They may be called different names by different people. The next time someone brings that pet in for a refill, it doesn't show up under the pet's name. That is not visible. But we can get a lot of confidential health information on the person's name we input. I have never taken a HIPPA class and am certain my clients do not want me knowing about their confidential health information. **This is an invasion of privacy.**
- **I already am licensed through Drug Enforcement Agency (DEA).** This carries a significant level of accountability, record keeping, and medication storage requirements. Distributors of controlled substances monitor utilization patterns of veterinarians. Data collected by distribution companies are required by DEA to monitor and report unusual purchase patterns a veterinarian may have. This oversight is to control/prevent diversion from licensed professionals to drug dealers and users.
- **Veterinarians have not been shown to be a significant source of diversion for drugs.** Veterinarians in Alaska from 2015-2018 prescribed .3% to 1% of total Morphine Milligram Equivalents (source: Board of Pharmacy). Opioid medications prescribed by veterinarians were only 0.34% of the total opioid prescriptions that were dispensed by U.S. retail pharmacies in

2017 (source: American Veterinary Medical Association). There have been **no identified cases of veterinary shopping in Alaska.**

- **The cost of obtaining a professional license to practice veterinary medicine in Alaska is the highest in the nation.** Add to that the cost of our DEA license, it is significantly detracting veterinarians from coming to Alaska to practice. There is a significant shortage of veterinarians in Alaska. Call around and see how many places are taking new clients and you will need to make many calls to find someone. With the current requirement that the Board of Veterinary Examiners investigate veterinarians that fail to use a non-usable database correctly, and the costs associated with forcing use of an unusable database, our licensing fees are expected to escalate. This is a waste of resources in an already overburdened sector. It has become a vicious cycle of lack of veterinarians practicing medicine and making it difficult to find veterinarians willing to volunteer to be on the Board of Veterinary Examiners. We simply cannot attract new veterinarians.

As a medical provider it is important to me that the PDMP is used correctly to track trends of human's opioid shopping. **I thank you for your sponsorship and urge you to promote and support SB 132 and join thirty-four other states that have exemptions 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. A Veterinarian exemption will allow veterinarians to continue to provide appropriate care and medical management for our patients while eliminating additional business burdens and costs that do not provide an effective solution for the intended purposes of the PDMP. Sincerely,

Michelle Leibold DVM
19025 Villages Scenic Parkway
Anchorage, AK 99516
(907)250-73421

To Senator Holland and Representative Wool,

I am Will McKenna, an obstetrician/gynecologist practicing in Fairbanks AK. I am writing this letter in support of SB 132 and HB 91, the Exemption of Veterinarians from the Prescription Drug Monitoring Program (PDMP). As the owner of two dogs, I have been in and out of veterinary hospitals for wellness care, illnesses, and emergencies.

For starters, veterinarians see animals NOT people. I do not expect my veterinarian to investigate my medical records let alone medications prescribed in the PDMP. As an MD I find it alarming that veterinarians have access to the owners' records when they are not bound by HIPPA regulations. This violation of privacy is worrisome. In addition to privacy issues, I am not trained in animal dose ranges and if medications prescribed by the veterinarian are visible when querying the PDMP (data is often not visible due to the different systems) I am unable to interpret them in a meaningful fashion and I assume the veterinarian who is not trained in human medicine cannot interpret my medications either.

Second, what I can say from my personal experience is it that veterinarians require payment at the time of service. They don't have the luxury of billing insurance making them a difficult and unlikely route of diversion.

Third, veterinarians are overseen by the Drug Enforcement Agency (DEA), their Board of Veterinary Examiners, and they work closely with their local Animal Control. Exempting them from the PDMP is simply removing a defective tool from the toolbox while they continue to adhere to a significant level of accountability, record keeping, and medical storage requirements.

Lastly, 34 states have exempted their veterinarians; this is clearly not an unreasonable ask. Exempting veterinarians from the PDMP will allow the PDMP to work as it was intended and remove the incumbrance that the PDMP has placed on their profession and their clients.

Sincerely,



J. William McKenna, MD

. William McKenna, MD 466
Slater Dr.
Fairbanks, AK 99701

February 1, 2022

The Honorable Senator Holland
State Capitol Room 115
Juneau AK, 99801-1185

January 27, 2022

RE:HB91 – Exemption for veterinarians from Alaska’s Prescription Drug Monitoring Program.

Dear Alaska State Veterinary Medical Association, Alaska State House and Senate Representatives ,

I am writing this letter in favor of HB-91 and request your support this bill making veterinarians exempt from reporting the prescription of controlled drugs to the Prescription Drug Monitoring Database (PDMP) in Alaska. I have practiced in Fairbanks Alaska at Mt. McKinley Animal hospital over 19 years, providing emergency, surgical referral and general veterinary services to Fairbanks and outside areas (Barrow, Kotzebue, Nome and Tok etc). I have also had the honor serving on the Alaska State Veterinary Board.

Veterinarian’s are very supportive of efforts to decrease the epidemic of opioid abuse and the diversion of controlled dugs, however our mandated reporting requirements are not leading to a positive contribution. The use of a human database used for veterinary patients whom do not have a Social security number, driver’s license or any permanent identifiers making it impossible to accurately track their prescriptions. While serving on the Alaska State Veterinary Board this point was brought up many times to the Pharmacy board. All the Boroughs’ do not have an animal database or mandated registration programs, let alone keeping track of rehomed animals, animals presented to veterinary clinics by the friends or family members this just compounds the problem. Look at the mandated requirement for Veterinarians to query personal information, medical history for the individual presenting the patient in need of care. This is something that Veterinarian community is not qualified, or trained to evaluate a human’s medical history in relation to a medication we are dispensing for the animal we are treating, let alone running the risk for HIPPA violations.

I have spent countless hours on the phone with other boards like Illinois to find out how they can make these human based databases work..... they couldn’t and the state of Illinois passed the same type of bill that is before you making Veterinarian exempt from reporting. California has tried a hybrid human database for animals, I have talked to the company that designed it..... but it is funded by 11 million dollars and they have a huge veterinary licensee base unlike Alaska. What do they do with the data? Nothing, because Veterinarians DO NOT DISPENSE LARGE QUANTIES OF CONTROLLED SUBSTANCES (0.3-1 % total morphine equivalents) data from 2015-2018.

I have spent time talking to local drug enforcement as well as the new DEA task force Alaska Special Agent Tarentino in regards to “Operation Engage”. Recent statistics released by

the Centers for Disease Control show an alarming rise in drug overdose deaths, with synthetic opioids driving record-high fatalities. The vast majority of deaths involve illicitly manufactured fentanyl, including fentanyl analogs. These drugs are not coming from Veterinary clinics they are coming in from outside sources (mail, airports and smuggling from the Mexican US border).

I have been practicing for almost 20 years. The bulk of my controlled drug dispensing is for phenobarbital, an anticonvulsant medication than has low abuse potential. I do a lot of orthopedic procedures and extensive soft tissue procedures, the bulk of controlled substances are used during anesthesia as well as for 48-72 hrs post op which is when patients are under hospitalized care. If I do dispense controlled substances for pain control, patients have severe trauma like fractured legs, thermal burns (frost bite included) or terminal illness. This program has deterred my ability to provide the best possible care for our patients especially after hours which is when the bulk of emergencies occur and pharmacies are closed. Please be mindful how big Alaska is (Not everyone lives in Anchorage) and the extreme weather conditions (freezing rain, snow, extreme cold temperatures). The caregiver or owner of the animal has to get necessary medications for their pet and they can get only get a limited supply. This program puts owner at risk for travel and can prevent the timely access for pain relief for their pet. Another misconception is that people "doctor shop" for drugs or break their pets leg to seek out drugs..... not true in Veterinary medicine. Veterinary care costs money... Lastly the economic burden on the state's privately owned small veterinary practices. The hours of PDMP reporting requirements for Veterinary practioners costs money as well as PDMP investigative costs of the Board of Veterinary Examiners. Alaska already pays this highest Veterinary license fees in the United States.

Please support HB91 this will increase the efficiency for the intended purpose for accurate, purposeful data for a human medicine.

Respectfully,

Dr. Scott Flamme DVM.

From: Ariana Anderson <islavet@gmail.com>

Date: February 1, 2022 at 16:08:13 AKST

To: tracyward2413@gmail.com

Subject: PDMP letter

Dear Senator Kiehl,

I am writing to request your support for SB 132. I am a self-employed relief (substitute) veterinarian, and I travel throughout Alaska to work. I have also worked in Virginia, Arizona, and Washington. I believe requiring veterinarians to use the PDMP database results in complications to its true purpose in monitoring human patients' controlled drug prescriptions. It also results in burdensome requirements for veterinarians.

When we veterinarians want to prescribe a controlled drug to a patient, we are supposed to look up the owner's name and birthdate in a database first. The ability to see their history is inappropriate in light of HIPAA laws. If I see that they have controlled drug prescriptions, I have NO way to evaluate this. I am not aware of any guidelines on how to proceed in this scenario, and I have no knowledge of appropriate human controlled drug prescriptions. I am more alarmed to realize that when a controlled drug prescription is assigned to a particular owner under their pet, the owner may have a harder time obtaining a controlled drug if they need one. This could endanger proper medical care of humans.

After realizing how much time it took to enter a full prescription dispensed from a veterinary clinic into the PDMP, I quickly decided I could only write prescriptions, since searching the database takes far less time. I work at several different clinics as a relief veterinarian, and I am paid hourly. Dispensing a single prescription took me 10-15 minutes, as I had to enter all the client's information, my information, the clinic information, and track down the owner veterinarian's DEA number. A clinic paying me for this amount of time for each controlled drug prescription is ridiculous. I cannot delegate this duty, since I work at different clinics and have no long-term relationship with the staff. Even more appalling in terms of time is the requirement of a Zero Daily Report. I estimate this would take me about an hour per week of admin time. Since sometimes I am the only veterinarian in a clinic, substituting for the regular veterinarian, I have to be able to prescribe controlled drugs to properly care for my patients. Unfortunately, writing prescriptions still takes some time to look up an owner in the database, and human pharmacies do not carry all the controlled drug forms best used in animals. Like many veterinarians, I have chosen the option of only dispensing 72 hours of medication to avoid the reporting requirement - but some patients need more than that.

Relief veterinarians are a growing niche in the profession, and the PDMP is even harder for us to navigate. It is especially hard for Alaska clinics to find relief veterinarians; without even advertising I am booking many months out and turning down work. Many clinics look outside the state despite our expensive licensing fee (which is rising due in part to the Veterinary Board's duty of pursuing PDMP violations). Having to use the PDMP is an even greater hurdle to a relief vet providing help for clinics (and their clients and patients) suffering from a

veterinarian shortage. You may have heard about the desperate shortage of veterinarians in Juneau; our time spent on the PDMP, which provides NO benefit to pets or people, means more sick patients and worried clients we have to turn away.

I hear of vets choosing less than optimal drugs for patients due to the burden of PDMP reporting, and I am finding myself doing the same. Just a couple of examples: the drug that I think is best for cough suppression is controlled, so we often default to a non-controlled drug that I personally think is less effective and has a higher risk of side effects. In cats, we used to frequently use Buprenorphine for pain control, as it is very effective, the injectable form can be absorbed through the tissues of the mouth, and it does not carry the risk of kidney damage that non-steroidal anti-inflammatories do to sensitive cat kidneys. The requirement of reporting Buprenorphine prescriptions to the PDMP has made it much more difficult to safely manage feline pain.

I have spoken with veterinarians in multiple clinics in Alaska as I work in various locations, and all seem to be struggling with how to comply with the PDMP while still providing the best care to their patients. These complications and burdens to veterinarians attempting to use the PDMP database lead to my belief that veterinarians should be exempted, as has been decided in the majority of other states.

Thank you for reading my concerns as you consider this issue.

Sincerely,
Ariana Anderson, DVM
Ariavet Relief Services
2917 Jackson Rd
Juneau, AK 99801
206-715-7417

January 31, 2022

The honorable Senator David Wilson
State Capitol Room 121
Juneau AK 99801
(907)-465-3878

Re; SB 132 – Exemption for veterinarians from Alaska’s Prescription Drug Monitoring Program.

Dear Senator Wilson,

My name is Dr. Amanda Taylor. I am a veterinarian that has been practicing in Alaska since 2010 in the field of emergency veterinary medicine. I grew up in Eagle River Alaska and returned home after obtaining my doctorate degree from Oregon State University in 2009. I currently reside in Wasilla and am one of your constituents. Currently, I practice at Midnight Sun Animal Hospital and Emergency Services as an associate emergency veterinarian. In addition to clinical practice, I am also the alternate delegate for the state of Alaska in the American Veterinary Medical Association and an active board member for the Alaska Veterinary Medical Association. The professional organizations I volunteer with are nonprofit organizations that serve to preserve and protect the best interests of both the veterinary community and society both statewide and at a national level.

I am writing today to let you know that I am in support of Senate Bill 132 and I am asking for you to support this bill by voting YES on SB 132. The prescription drug monitoring program (PDMP) is a very important program in fighting the opioid epidemic in our community. Unfortunately, the utility and practical implementation of this program does not extend into the field of veterinary medicine. There are fundamental aspects of this program that do not extrapolate to my profession. The inclusion of veterinary professionals in this program has caused significant challenges to our small professional community and our participation has not yielded a meaningful contribution to the PDMP program. I would like to explain how this program does not work for veterinarians by means of a realistic narrative in day-to-day clinical practice.

I am presented with an 11-year-old overweight black lab named “Lucky” Jones for examination. The client reports Lucky has been limping since Christmas eve on the right hind leg. I perform a physical exam and identify a firm, painful swelling near the knee on the right hind leg. I recommend radiographs of the leg to the owners, a pleasant older woman named Ms. Jones and her adult son. The radiographs reveal a very aggressive and extremely painful condition on Lucky’s leg called Osteosarcoma, a form of bone cancer. I explain to the owners that this condition is terminal and that it has likely already metastasized based on the nature of this disease. We discuss the options including chemotherapy, amputation, as well as palliative care for pain. The owners elect to keep Lucky comfortable, and we set out to formulate a pain control plan until the

owners are ready to let Lucky go. Now, enter the practical reality of the PDMP mandates and implementation. I must now decide which client I would like to query in the PDMP database prior to prescribing the controlled pain medication for Lucky, Ms. Jones or her adult son. You see, Lucky is a dog. He has no unique identifiers like a date of birth or a social security number. Consequently, **I am required to query his OWNERS personal medical information prior to dispensing the pain medication.** I must choose which owner to query as **there are often numerous individuals that own or present animals for care at a veterinary clinic.** I choose to ask Ms. Jones for her ID and information so I may query her in the PDMP database. Ms. Jones is understandably distraught with the news and is quite frankly agitated and confused as to why her dogs doctor needs her personal information. Now, I proceed to enter her personal information into the database where I learn she has numerous previous prescriptions including pain medications, hormone replacement therapy, sleep aids and anti-anxiety medications. I noted she was using a cane in the exam room, I suspect she has some previous orthopedic issues, but I am not her doctor and feel uncomfortable with the personal information that I now have for my client, as she is not my patient. I feel as though I have violated her personal privacy rights in adhering to the mandates that affect my licensing in the state of Alaska. I do not have the knowledge or training in HIPPA that my human counterparts do, additionally, I am not familiar with all the medications listed in her query as only a small fraction of these medications are used in my profession. I decide that regardless of her personal query, Lucky is still in tremendous pain and needs his pain medication, so I prescribe his medications for two weeks and instruct her to follow up with her primary veterinarian in 2 weeks as we have seen her on an emergency basis today. I am required to report into the PDMP database the prescription for Lucky that I dispensed which takes a significant amount of time to navigate while the current wait time at the ER today is 8 hours to see a veterinarian.

One week later, Ms. Jones slips on the ice and tears her ACL . She sees a human ER provider who queries the same PDMP database prior to dispensing pain medication for Ms. Jones. . This provider has extensive HIPPA privacy training as well as the medical knowledge to critically evaluate her history of drug prescriptions, interactions and abuse potential. **There is no information available to this ER physician that a veterinarian prescribed her Labrador Retriever pain medication a week ago.** The information that I have provided and contributed to the PDMP database is nonexistent in a query and does not help that practitioner with his care of Ms. Jones and in preventing opioid abuse.

Two weeks after I see Lucky and Ms. Jones, he is rechecked at his primary veterinary clinic. He is doing great on the pain medication the owner reports. Mr. Jones presents Lucky at this visit as Ms. Jones is home with a painful knee. The veterinarian that sees Lucky today decides additional pain medication is needed. Following the PDMP requirements, they now query Mr. Jones in the database. A new owner, with new information, completely independent of the query and prescriptions that I provided a week ago. **It is not possible to look up Lucky in the database as animals cannot be queried.** Even if we were able to query an animal, His last name and date of birth at the

second clinic is likely not the same as the information that I had at my appointment in the original presentation.

This story is meant to highlight an example of why the PDMP mandates are not relevant to the veterinary industry and have no practical utility in the fight against the opioid crisis.

Veterinarians are conscientious and caring individuals. We care about the health and wellbeing of the community and we would truly like to be able to make a meaningful contribution in the fight against addiction, diversion and abuse involving opioids. The PDMP requirements and mandates are not allowing veterinarians to provide a meaningful contribution by the sheer nature of being designed for human health care.

Please join the other 34 states that have exempted veterinarians from the PDMP mandates. The data shows that we are responsible for a very small percentage of all controlled substance prescriptions in both Alaska and nationwide (between 0.34 and 1 % of all morphine equivalents prescribed). Additionally, these mandates are leading to expensive investigations by the Board of Veterinary Examiners that has effectively doubled their investigative costs in the past few years. This cost will be passed on to the veterinary professionals by way of increases in their professional licensing dues. Currently, our professional licensing dues are the highest in the nation. Further increases in these dues will become more of a deterrent to recruiting professionals to our state in a time of a severe shortage of veterinarians in Alaska.

If you have any questions, concerns or would like clarification on any of these issues, please reach out. I am happy to discuss this on the phone, via zoom or to answer any questions via email.

Thank you for your time and support.

Sincerely,

Amanda Taylor, DVM

ataylor@mtaonline.net

(907) 232-8332

441 East Ravenswood Loop

Wasilla, AK 99654

January 13, 2022

Eva Carey, MD
17706 North Barb Ct
Sutton, AK 99674
907-440-2436

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

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One letter opposing this bill suggested that people might intentionally injure their pets to obtain prescriptions. This is impractical for several reasons. Unlike humans, animals cannot "doctor shop" by complaining about pain. An injury or illness severe enough to require opioids, would require a complete diagnostic work-up, a stay in the veterinary hospital, and likely surgery. This would be very expensive since pets do not have insurance. Since opioid dose is based upon body weight, this would only result in a prescription for a much smaller dose than for a human.

Of course, everyone is concerned about opioid abuse. The state of Alaska should put its resources to work on the major causes of this problem and its most effective solutions. In my more than 30 years of emergency medical practice in Alaska, I have never encountered a single case of diversion from a veterinary prescription.

Sincerely, Eva Carey, MD

A handwritten signature in cursive script that reads "Eva Carey MD".

Interior Mobile Vet LLC
PO Box 80366
Fairbanks, AK 99708
919-307-6893
interiorombilevet@gmail.com

January 23, 2022

Dear Senator Scott Kawasaki,

I am writing as a concerned veterinarian and practice owner regarding the SB132. I believe Veterinarians should be exempt from the PDMP because the cost to enforce it will cause licensing fees to prove cost prohibitive.

Alaska already has the highest cost for veterinary licensing (\$1000 to get licensed and \$600/2years to keep licensed). On top of this is the cost for a DEA license of ~\$700/3 years.

The cost to investigate misuse is covered by the licensing board. This PDMP is VERY difficult to navigate and has the potential to further drive up licensing fees. Along with adding another stressor to an already very stressful career.

There is a shortage of veterinarians in Alaska as well as the US in general. With all the veterinarians working very hard to provide care to Alaska's pet and farm population, we are getting worn out and frustrated. The incredibly high licensing fees are certainly a deterrent to getting new vets to move to the state or provide relief work for existing practices.

Licensing fees aside I simply do not think this program is something that can be successfully applied to the veterinary field in general. There are too many variables with different owners and different pet names that the current system does not take into account. All it is currently doing is adding to our already high stress levels.

As the owner of the Interior Mobile Vet LLC, I urge you to vote YES on SB132.

Please give the veterinary community a break.

If you would like to discuss this further, please feel free to contact me with the contact information in the heading.

Thank you.

Sincerely,

Annette Llanes, DVM

Dear Representative Wool:

I am a veterinary assistant currently working at North Pole Veterinary Hospital. I would like to express my support for HB 91 to Exempt Veterinarians from the Prescription Drug Monitoring Program. The PDMP was designed to combat the opioid crisis and while this is a great effort to better monitor drugs, it simply does not apply to veterinary medicine. Animals often change owners and there is no way to track medications prescribed to that specific animal.

Veterinarians have access to PDMP information that applies to owners and this can potentially violate privacy rights. Veterinarians are not trained on human medicine and they already adhere to DEA regulations. Implementing the PDMP will be costly to veterinary clinics and this will reflect on increased prices to clients. Increased prices can potentially interfere with the medical care given to the animal. Furthermore, the inability to track an animal throughout its life makes the PDMP useless and a waste of time and money for the state of Alaska.

Vote yes to HB 91.

Nelcy Evans

January 27, 2022

RE:HB91 – Exemption for veterinarians from Alaska’s Prescription Drug Monitoring Program.

Dear Alaska State Veterinary Medical Association, Alaska State House and Senate Representatives ,

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Respectfully,

Dr. Scott Flamme DVM.

January 23rd, 2022

The Honorable Senator Scott Kawasaki
State Capitol Room 7
Juneau AK, 99801-1185

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

Dear Senator Kawasaki:

My name is Irene Fisher. I am a veterinarian working in your district and am writing to **urge you to support SB 132**, which would exempt veterinarians from the requirements of the prescription drug monitoring program (PDMP). **Veterinarians' inclusion in this program is not only ineffective but also a huge infringement of the privacy rights of our clients.**

First, the PDMP was created in an effort to decrease controlled drug misuse among humans, which is a serious issue that needs to be addressed. However, as veterinarians, our inclusion in this program is not an effective means of tracking controlled substance prescriptions among our clients. Instead, **it is forcing veterinarians to use an unusable database that is wasting valuable time and resources in an already overworked and understaffed profession.** For example, when prescribing controlled substances for our patients, we must look up our human clients because there is no way of searching animals in the database, as they lack any reliable form of identification. Then when reporting drugs under the animal, there is no way to link this to their human counterpart. So, when we look up the animal again or a human physician looks up their client none of the information about that pet's medications is visible. This fact alone deems the entire program useless for the veterinary profession. The whole process of querying the system, obtaining private medical information about an owner (or whoever brought the animal in that day), then entering the animal and its medications (that will be lost to the system, never to be seen again) takes up time and puts unneeded stressors on the whole practice.

Additionally, if we do not comply appropriately and are deemed non-compliant with the program, the Alaskan Board of Veterinary Examiners (BOVE) must launch investigations that, again, are taking up resources that could be better used elsewhere. The Alaskan BOVE is independently funded, and the added costs of these investigations is passed along to Alaskan veterinarians in the form of increased licensing fees (already the highest in the nation), and in turn will be passed along to our clients. The financial ramifications of this program on the veterinary profession are a whole different topic. So, I will stop there.

Secondly, as a veterinarian or a veterinary technician/assistant (who are also able to query the database) **we have NO HIPAA training** and are not considered a covered entity under the HIPAA Privacy Rule. The fact that we and our staff are able to access clients personal and private medical information is inappropriate and dangerous. Many clients find it intrusive just when asked for full name and mailing address to make an appointment, let alone when we need to see ID, ask for date of birth, physical address and telephone number to query the PDMP database. Most clients do not know that we have access to such information and when told, are very upset, as they should be.

As a medical professional and member of the community, **I urge you to support SB 132 and join 34 other states that have exemptions for their veterinarians from participating in the PDMP.** Exempting

veterinarians from this program will help our profession continue to provide care for our patients without having to navigate an unusable system, waste resources, incur added costs, or infringe on the privacy of our clients.

Thank you for your time and consideration,

Irene Fisher, DVM

481 Gold Dust Drive
Fairbanks, AK 99709

Dear Honorable Senator Reinbold,

I have been an Eagle River resident since the early 1990's. Since that time, I've been fortunate to serve my Eagle River neighbors as a veterinarian, working in local practices, caring for their beloved pets.

I am urging you to support **SB 132**, and exemption for veterinarians from Alaska's Prescription Drug Monitoring Program. I'm enclosing a copy of the **white paper**, detailing the reasons that this program just does not work for monitoring veterinary controlled drug prescriptions. The paper is an excellent source of information. I'd like to highlight a few specific points that affect Alaskans every day.

One of the most concerning aspects of the PDMP's requirement for veterinarians is that we are invading our client's privacy. If I prescribe a controlled substance for a person's pet, I am required to access their private information online, to see what certain medications they are being prescribed. I must ask clients for their full name, date of birth, and address to look them up on the PDMP. Clients can find this intrusive.

I am qualified to practice veterinary medicine, not human medicine. There is no way for me to make medical judgements on the appropriateness of human medical prescriptions or the doses used. Some of the medications included on the PDMP might include Adderall, Ritalin, Anabolic Steroids and sex hormones (like testosterone), Xanax, Klonopin, Valium, Ativan, Domar, and sleep aids (like Ambien and Lunesta).

Moreover, there is no course of action that a veterinarian is supposed to take up if controlled drugs are noted on a person's prescription history.

Veterinarians already adhere to controlled drug regulations, through the Drug Enforcement Administration's requirements for record keeping.

The costs of monitoring veterinarians have been passed on to the Board of Veterinary Examiners. As the costs for the state Veterinary Board goes up, our licensing fees can be increased as well to offset costs. Alaska already has the highest licensing fees for veterinarians in the nation. This can be a factor that discourages veterinarians from wanting to work in Alaska, making it even more difficult for Alaskans to receive care for their pets/livestock. Higher administrative costs to small business owners like veterinarians can also lead to higher costs for Alaskans to receive quality veterinary services.

I care deeply about my Eagle River friends and neighbors, as well as all Alaskans. As a medical provider, it is important to me that the PDMP is used correctly to track trends of people's opioid shopping. I urge you to support SB 132 and join 34 other states that have exemptions for their veterinarians from participating in the PDMP.

Sincerely,

Dr. Lorelei Hass

January 20, 2022

The Honorable Senator Myers
State Capitol Room 510
Juneau AK, 99801-1185

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

Dear Senator Myers:

My name is Dr. Cristina (Nina) Hansen, and I'm a veterinarian (lic. #571) and one of your constituents. I have lived and worked in Fairbanks for nearly 15 years. I am writing to urge you to support **SB 132**, and offer two different veterinary perspectives.

My full-time job is as an Assistant Professor in the Department of Veterinary Medicine at the University of Alaska Fairbanks (UAF). I am lucky enough to contribute to the education of future veterinarians that are enrolled in UAF and CSU's (Colorado State University) 2+2 Veterinary Medicine program. Our program is relatively new, and was developed to give Alaska residents a more financially viable pathway to becoming veterinarians, and to (hopefully) keep some of the best and brightest Alaskan veterinary hopefuls in the state. Despite this, our students face crushing student loan debt (the average 2019 graduate of American veterinary schools incurred >\$180,000 in debt). Prior to starting their first jobs, new veterinarians need to apply for licensure. Currently, the cost of a new veterinary license in Alaska is \$1,000. **This is the highest in the nation.** I will pay \$600 this renewal cycle for my license (also the highest in the nation). For many years, the cost of a renewal in Alaska was \$375. It has ballooned in the years since the institution of the PDMP, because the BOVE (Board of Veterinary Examiners) is having to pay to needlessly investigate the licenses of veterinarians in AK with DEA (Drug Enforcement Agency) controlled substance registrations.

Our new graduates, whom we so desperately need to fill veterinary vacancies in Alaska, may find this cost of licensure prohibitive, and may elect to obtain their initial license outside of Alaska. Once they become licensed and established in other states, it becomes less and less likely we will see them return.

My other perspective comes from my part-time job. Each February for the last 7 years I have led the veterinary team for the Yukon Quest International Dog Sled Race (YQ) as its head veterinarian. The YQ is an Alaskan institution, and has even been inducted into the Alaska Sports Hall of Fame. The YQ touts that "it takes 1,000 volunteers to go 1,000 miles", and it's true, even of the veterinary team. The entire 15-person veterinary team (except for me – my position is paid) consists of volunteers, including out-of-state veterinarians. Each out-of-state veterinarian must obtain a "courtesy license" from the BOVE for the duration of the race. Similar to the above, the cost of courtesy licenses has doubled in recent years (from \$125 to \$250). The YQ is a non-profit organization, and one of their largest expenses is the veterinary team. Each year the YQ pays for 4-6 courtesy licenses. A doubling of the courtesy license fee is not insignificant to the veterinary team, and means that the budget for other veterinary supplies must suffer.

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 nor an effective solution for the intended purposes of the PDMP. The system is not useable for veterinarians, has created unnecessary and disproportionate business burdens for veterinarians, and leading to increased business costs.

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

1) The PDMP is an unusable database for veterinarians.

- The PDMP was established for human medicine; querying of PDMP data for animals is not possible with the PDMP.
- Reported drugs to the PDMP for an animal are entered under a human's name; animals don't have a common identifier and any reported drugs to the PDMP for an animal are not visible in the PDMP.
- Human data obtained from the PDMP is unusable. Veterinarians are not trained in human medicine.
- Veterinarians cannot use the PDMP to increase quality of care, confidence when prescribing and dispensing or improve efficiency of medical care.

2) Querying of human PDMP information is invasion into an individual's medical privacy.

- To participate in the PDMP, veterinarians ask a client for their ID, full name, DOB, address, and phone number.
- An individual's private medication information becomes exposed for certain drugs: i.e., narcotics, sedatives, and stimulants. Common medications seen include but are not limited to: Adderall, Ritalin, anabolic steroids like testosterone, postpartum depression medications, sex hormones, Xanax, Klonopin, Valium, Ativan, Domar, and sleep aids like Ambien and Lunesta.
- There is no responsibility on the part of the veterinarian to do anything with the information that is queried.

3) Controlled substances reported to the PDMP for an animal are not visible to veterinarians or human health care practitioners.

4) Veterinarians are monitored by the Drug Enforcement Agency and already adhere to controlled substance regulations.

- Veterinarians who prescribe or dispense controlled substances are licensed through Drug Enforcement Agency (DEA). There is already a significant level of accountability, record keeping, and medication storage requirements that these veterinarians adhere to.
- Distributors of controlled substances monitor utilization patterns of veterinarians.

5) Veterinarians have not been shown to be a significant source of diversion for drugs.

- Veterinarians in Alaska from 2015-2018 prescribed .3% to 1% of total Morphine Milligram Equivalents (source: Board of Pharmacy).
- Opioid medications prescribed by veterinarians were only 0.34% of the total opioid prescriptions that were dispensed by U.S. retail pharmacies in 2017 (source: American Veterinary Medical Association).

- There have been **no identified cases of veterinary shopping in Alaska.**

6) Charging Veterinarians for the cost of enforcement of an unusable PDMP system, and regulations with which they are unable to comply, is not responsible stewardship of resources.

- The board of veterinary examiners investigative costs (many related to the PDMP) have more than doubled from FY 18-19 to FY 20-21.
- The Alaska Board of Veterinary Examiners has reported that the PDMP is an unusable database and the cost to investigate veterinarians who fail to use it correctly is a waste of limited resources.
- Alaska has the highest licensing fees for veterinarians in the country. Fees are expected to increase in the State of Alaska because of PDMP investigations.

As a medical provider it is important to me that the PDMP is used correctly to track trends of human's opioid shopping. **I urge you to support SB 132 and join 34 other states that have exemptions 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. A Veterinarian exemption will allow them to continue to provide appropriate care and medical management for their patients while eliminating additional business burdens and costs that do not provide an effective solution for the intended purposes of the PDMP.

Sincerely,

A handwritten signature in blue ink that reads "Cristina Hansen". The signature is fluid and cursive, with the first name "Cristina" being larger and more prominent than the last name "Hansen".

Cristina M. (Nina) Hansen, DVM, Ph.D.

PO Box 80551
Fairbanks, AK 99708



NORTH POLE
VETERINARY HOSPITAL

2942 Hurst Road • North Pole, AK 99705

January 8th, 2022

Dear Senator Bishop,

My wife and I own North Pole Veterinary Hospital. I am the director of business operations for the veterinary hospital.

I am offering you my perspective on the PDMP as a veterinary business owner.

Please understand that the main point I am trying to convey to you is that including veterinarians in the PDMP is completely ineffective in our state as way to fight the opioid epidemic.

Veterinarians are already regulated by the DEA and the Know Your Customer Act, there is no need for strenuous duplicate regulatory processes. We have colleagues in human medicine and the PDMP does work for them, however in does not work for veterinarians.

Veterinarians were included in the PDMP with little thought on why they were included, how including them would be useful in fighting the opioid epidemic or more importantly how they would be able to merge animal patients' information into the human owner's medical information. Nor was it thought out as to what the labor cost to a private veterinary hospital would be in relation to any realized benefit to society of stopping this epidemic.

First, human medicine prescribed 99.66% of all opioids in 2017 in the US. Please understand this number. It means that veterinarians only prescribed .34%. This number has likely gone down even more as our country has come to grips with this epidemic. The problem of prescribing these drugs inappropriately lies squarely in the human medical realm. The human medicine industry has larger revenue compared to veterinary medicine and an enormous staff infrastructure to use the PDMP. In our industry the only revenue generating people in our clinics are the veterinarians and they are the ones spending time using the PDMP. Veterinarians are not human doctors. Their education does not teach them about what drugs or medications are appropriate for humans. When a veterinarian uses the PDMP they do not know what they are looking at as they were not trained in human medicine. It is a waste of time. At our clinic we rarely prescribe these drugs.

Time, money and energy should be spent in the human medical realm. We in the veterinary industry understand that we too are part of a community that is struggling with opioids, however we should not be forced to spend valuable time and money on a misguided program that is completely inappropriate for veterinarians and of no use to our society in the fight of this epidemic. Nor should our profession need to deal with all of the confidentiality issues surrounding human medicine.

Patrick Lovely

To Senator Holland and Representative Wool,

I am Will McKenna, an obstetrician/gynecologist practicing in Fairbanks AK. I am writing this letter in support of SB 132 and HB 91, the Exemption of Veterinarians from the Prescription Drug Monitoring Program (PDMP). As the owner of two dogs, I have been in and out of veterinary hospitals for wellness care, illnesses, and emergencies.

For starters, veterinarians see animals NOT people. I do not expect my veterinarian to investigate my medical records let alone medications prescribed in the PDMP. As an MD I find it alarming that veterinarians have access to the owners' records when they are not bound by HIPPA regulations. This violation of privacy is worrisome. In addition to privacy issues, I am not trained in animal dose ranges and if medications prescribed by the veterinarian are visible when querying the PDMP (data is often not visible due to the different systems) I am unable to interpret them in a meaningful fashion and I assume the veterinarian who is not trained in human medicine cannot interpret my medications either.

Second, what I can say from my personal experience is it that veterinarians require payment at the time of service. They don't have the luxury of billing insurance making them a difficult and unlikely route of diversion.

Third, veterinarians are overseen by the Drug Enforcement Agency (DEA), their Board of Veterinary Examiners, and they work closely with their local Animal Control. Exempting them from the PDMP is simply removing a defective tool from the toolbox while they continue to adhere to a significant level of accountability, record keeping, and medical storage requirements.

Lastly, 34 states have exempted their veterinarians; this is clearly not an unreasonable ask. Exempting veterinarians from the PDMP will allow the PDMP to work as it was intended and remove the incumbrance that the PDMP has placed on their profession and their clients.

Sincerely,



J. William McKenna, MD

466 Slater Dr.

Fairbanks, AK 99701

January 24, 2022

The Honorable Senator Bishop
State Capitol Room 516
Juneau AK, 99801-1185

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

Dear Senator Bishop:

My name is Evdokia Wise, and I am a constituent of your legislative district. I have worked in the field of veterinary medicine for almost six years as a veterinary assistant and am currently pursuing my technician's license. I hope to attend vet school and receive my DMV once I finish my undergraduate degree. I have been in the veterinary field for most of my adult life and know the struggles of the field well.

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 nor an effective solution for the intended purposes of the PDMP. The system is not useable for veterinarians, has created unnecessary and disproportionate business burdens for veterinarians, and leading to increased business costs.

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

The PDMP was established for human medicine and is ineffective in the veterinary field. Reported drugs to the PDMP for an animal are entered under a human's name; animals don't have a common identifier and any reported drugs to the PDMP for an animal are not visible in the PDMP. Additionally, human data obtained from the PDMP is unusable. Veterinarians are not trained in human medicine to understand what the dosages mean.

Requesting human PDMP information is invasion into an individual's medical privacy. To participate in the PDMP, veterinarians ask a client for their ID, full name, DOB, address, and phone number, which is very intrusive. An individual's private medication information becomes exposed for certain drugs: I.e., narcotics, sedatives, and stimulants. Common medications seen include but are not limited to: Adderall, Ritalin, anabolic steroids like testosterone, postpartum depression medications, sex hormones, Xanax, Klonopin, Valium, Ativan, Domar, and sleep aids like Ambien and Lunesta. Veterinarians have access to human medical information that they are not trained to be responsible for.

Veterinarians who prescribe or dispense controlled substances are already licensed through Drug Enforcement Agency (DEA). DEA oversight is to control/prevent diversion from licensed professionals to drug dealers and users. There is already a significant level of accountability, record keeping, and medication storage requirements that these veterinarians adhere to. Distributors of controlled substances monitor utilization patterns of veterinarians. Data collected by distribution companies are required by DEA to monitor and report unusual purchase patterns a veterinarian may have.

Veterinarians have not been shown to be a significant diversion for drugs. Opioid medications prescribed by veterinarians were only 0.34% of the total opioid prescriptions that were dispensed by U.S. retail pharmacies in 2017 (source: American Veterinary Medical Association). There have been **no identified cases of veterinary shopping in Alaska** and there is a natural barrier to vet shopping since costs for veterinary care are paid up front by the pet owner.

Charging Veterinarians for a system they cannot use and regulations with which they are unable to comply is a senseless use of resources. The board of veterinary examiners investigative costs (many related to the PDMP) have more than doubled from FY 18-19 to FY 20-21. The Alaska Board of Veterinary Examiners has reported that the PDMP is an unusable database and the cost to investigate veterinarians who fail to use it correctly is a waste of limited resources.

As a medical provider it is important to me that the PDMP is used correctly to track trends of human's opioid shopping. **I urge you to support SB 132 and join 34 other states that have exemptions 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. A Veterinarian exemption will allow them to continue to provide appropriate care and medical management for their patients while eliminating additional business burdens and costs that do not provide an effective solution for the intended purposes of the PDMP.

Sincerely,

Evdokia Arina Wise

Evdokia Wise

2215 Chief John Dr

Fairbanks, AK 99709

Senator Shelley Hughes
Majority Leader
State Capitol Building, Room 30
Juneau, Alaska 99801
sen.shelley.hughes@akleg.gov

I am writing in support of SB 132 and HB 91, and want to particularly offer my perspective from serving rural communities. My practice included 32 years of regular rural clinics in Bethel and 37 years in King Salmon caring for animals. It is important to recognize that serving rural communities requires a significant commitment. Operating remote clinics in rural Alaska meant significant time away from my day practice, my family and sleeping on the floor of whatever community facility that could accommodate me. The ability to return home was often questionable due to weather. I did this because I love huskies and dogs and cats in general and enjoy the people who live in the remote areas of Alaska. In nearly 40 years of practice across both urban and rural Alaska, I was never once asked for opioids directly, or a prescription for them.

If the PDMP is unworkable in the accessible parts of Alaska, it is doubly so in rural areas. Good, secure computer access, and the privacy concerns about looking at owners' personal prescription history are of huge concern in small communities. This will certainly deter veterinarians from wanting to serve rural areas where veterinary service is already very limited.

Veterinarians are aware of the opioid crisis in Alaska. These medications are never our first choice, Veterinary medicine much more commonly uses non steroidal anti-inflammatory medications such as Rimadyl. These are not controlled drugs and are non addictive and more comparable to Ibuprofen use for people.

Adhering to the requirements of the PDMP is entirely unworkable because there is no database for animals or a practicable way for the State to create such a database. It is an egregious invasion of my clients' privacy since it requires me to look at their personal human prescription information. In rural areas, it may be unfeasible to even look at a database of owners' prescriptions. It adds to the cost of veterinary care for clients through my time finding access and researching a database which does not even exist for animals. I ask for your support for SB 132 and HB 91.

Sincerely,

Robert Sept, DVM

Jan. 7, 2022

The Honorable Senator Robert Myers
The Honorable Representative Mike Prax

RE: SB 132 and HB 91 - Exemption for veterinarians from Alaska's Prescription Drug Monitoring Program.

I have been a practicing veterinarian in Fairbanks and North Pole since 2005.

PDMP does not work for pets. Each Pharmacy is putting pets in the system a different way, which may, or may not be associated with a human name. Even when I did look up my patient, I know was on an opioid pain medication, I could not find her. Not under her name and not under her owner's name. Then my report from PDMP says I did not check the system since I was unable to find a dog patient that does not have any identifier. I did, didn't work.

Dogs have multiple owners or are presented by a roommate, a teenager, a friend a house sitter and I don't have access to whoever's personal information the animal may have had a prescription under in the past. People make up pet's birthdays, they can easily change the name or birthday of the pet when presented or purposefully put the pet under someone else's name. The person who supposedly owns the pet or presents the pet is not my patient so I do not want the break in confidentiality with their medical provider put on me.

The system is NOT useable for veterinarians and animals.

Searching the PDMP database by the owner could provide medical information the owner is uncomfortable with their veterinarian knowing-such as medications for mental health, sex change or sleeping medications. 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.

As a medical provider it is important to me that the PDMP is used correctly to track trends of humans' opioid shopping. 34 states have found exemption for their veterinarians from participating in the PDMP. The PDMP's intended purpose is for accurate interpretation of data and trends in human medicine. Veterinarian exemption will allow us to continue to provide appropriate care and medical management for our patients.

Melissa M. Rouge, DVM
North Pole Veterinary Hospital, INC.
2942 Hurst Rd. North Pole AK. 99712
907-488-2335

January 20, 2022

The Honorable Senator Robert Myers
State Capitol Room 510
Juneau AK, 99801-1185

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

Dear Senator Myers:

I am asking you to support for SB 132 – which exempts veterinarians from the requirements of the PDMP, the controlled substance prescription database. Requiring veterinarians to participate in the PDMP is nonsensical for numerous reasons. The current law is written for human medicine and is unusable, a violation of client privacy, and is a huge unnecessary burden to veterinary businesses.

The current law simply does not fit for veterinary businesses that deal with animals, not their human owners. Reporting drugs to the PDMP for animals (under a human name) is illogical. There is no 'fingerprint', ownership can change, it's an untraceable dog, not a human. This inappropriate inclusion of the veterinary industry does not fulfill the viable intent of the law and has cost small business owners, like myself, significant time and expense to try to decipher how to follow an inappropriate law.

As a medical provider it is important to me that the PDMP is used correctly to track trends of human's opioid shopping. **I urge you to support SB 132 and join 34 other states that have exemptions 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. A Veterinarian exemption will allow them to continue to provide appropriate care and medical management for their patients while eliminating additional business burdens and costs that do not provide an effective solution for the intended purposes of the PDMP.

Sincerely,



Tamara L. Rose, DVM

T Rose Veterinary Service

3875 Geist Rd. Ste E, PMB 314

Fairbanks, AK 99709

January 12, 2022

The Honorable Senator Robert Myers

The Honorable Representative Mike Prax

State Capitol Juneau AK, 99801-1185

RE: SB 132 and HB 91 - Exemption for veterinarians from Alaska's Prescription Drug Monitoring Program.

I am a small animal veterinarian at North Pole Veterinary Hospital, located close to where you grew up in Fairbanks. As you know from living here, quality veterinary care in interior Alaska is extremely important to your constituents, and I am proud to work at a hospital that practices at the upper echelon of compassionate and modern medicine. Unfortunately, the restrictions and inconveniences that affect veterinarians under the current Prescription Drug Monitoring Program can directly and negatively affect the quality of care we can provide, in addition to being overly restrictive in a field where it bears no proven efficacy.

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.

1. **Animals don't have social security numbers:** 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. Therefore, tracking animals under the PDMP system is irrelevant and futile.
2. **Companion animals aren't small humans:** Veterinarians don't treat humans and animals are not listed in the PDMP independently, making the PDMP database intrinsically flawed. Further, the dosing regimens for pets can differ dramatically than that for humans, meaning that the warning systems in place at the heart of the PDMP system are unnecessarily triggered by appropriate dosing from veterinarians.
3. **Potential privacy violations:** Searching the PDMP database by the owner could provide medical information the owner is uncomfortable with their veterinarian knowing. Linking a pet's medication history to an owner's medication history makes all this private information inexplicably joined for no benefit.
4. **Redundancy:** 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.

5. **Cost to your constituents:** 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.
6. **Cost to the state:** In the past 6 months alone, over \$40,000 has been spent investigating 56 veterinary cases, all but 7 being related to the PDMP. All 49 cases were later proven to be related to PDMP reporting compliance and clerical errors, and not to drug diversion at all. In essence, the state of Alaska is wasting an inordinate amount of money on a program that has been proven to have NO BENEFIT in drug diversion related to veterinary medicine.

As a medical provider it is important to me that the PDMP is used correctly to track trends of human opioid shopping. 34 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,

Bentley Lynn Richards, DVM

2983 Doughchee Ave

North Pole, AK 99705

Mercedes Pinto, DVM
Arrolladora Veterinary, LLC
1271 W Chena Hills Dr. Fairbanks, AK 99709
907-347-6387c
ArrollaVet@gmail.com

January 29, 2022

Senator Click Bishop
State Capital Room 516
Juneau AK, 99801

Dear Senator Bishop,

My name is Mercedes Pinto, DVM (Alaska license VETV504) and I am writing to ask for your **support of Senate Bill 132**, which will exempt veterinarians from Alaska's Prescription Drug Monitoring Program (PDMP). I am currently the veterinarian contracted to provide veterinary services to the Fairbanks North Star Borough Animal Shelter, and I live in District C. I assume you are familiar with the bullet points provided by the Alaska State Veterinary Medical Association in **support of Senate Bill 132**, and I would like to provide personal insight.

As you may know, the veterinary field is in a period of crisis, and Alaska's veterinarians are no exception. As a society we are struggling with a shortage of veterinarians and veterinary care. As a profession we are struggling with increasing patient burdens, crippling debt, long hours, low pay, lack of emergency facilities, inadequate support staff, compassion fatigue, professional burnout, high suicide rates, and increasingly, with abusive clients. Aside from the fact that Alaska's Prescription Drug Monitoring Program does an extremely poor job of utilizing veterinary controlled drug information, and that veterinary participation has not been shown to have any impact on protecting the public from opioid exposure, it adds an inordinate amount of time, financial, and emotional burden to veterinarians, their staff, and their clients. I am truly concerned that the added burden is enough to prevent veterinarians from working in Alaska. Personally, I can tell you the PDMP is a definite reason that I do not plan to return to private practice.

Are you aware that the PDMP expects veterinarians to access private, personal information about owners, and analyze and interpret their opioid risk every time, before we prescribe a controlled medication for their pet? As veterinarians we are not trained on the PDMP computer system, not trained in HIPAA, and not trained on what a morphine milligram equivalent is, much less how it relates to human opioid addiction.

As a shelter veterinarian I work with pets who either do not have owners, or who as strays, do not have owners I can contact, much less collect the information I would need to look them up in the PDMP database. This means that every single time I have a patient who needs a controlled medication prescribed (like the sweet stray who was run over and has 2 broken legs, or the lovely lab who was relinquished but needs seizure medication) I am in violation of the PDMP, and there is no way for me to resolve this. I am not only concerned about my violation, but that the State Board of Veterinary Examiners is expected to investigate me for this unresolvable violation, and to pay for the investigation by further raising our licensing fees, which are already the highest in the nation.

Please **vote yes on Senate Bill 132** to exempt veterinarians from the PDMP.

Sincerely,

Mercedes Pinto, DVM



SOUTHEAST ALASKA ANIMAL MEDICAL CENTER

8231 Glacier Highway, Juneau, Alaska 99801

Phone (907) 789-7551

Fax (907) 789-3067

Steven M. Torrence, DVM
Gerald G. Nance, DVM

Lisa J. Kramer, DVM
Tracy I. Ward, DVM

March 5, 2021

The Honorable Senator Jesse Kiehl
State Capitol Room 419
Juneau AK, 99801-1185

RE: Exemption for veterinarians from Alaska's Prescription Drug Monitoring Program.

Dear Senator Kiehl:

We are the owners and associate veterinarians of Southeast Alaska Animal Medical Center in Juneau. We are Alaskan small business owners and veterinarians, and are all members of the Alaska Veterinary Medical Association, including Dr. Ward as the association's President-Elect.

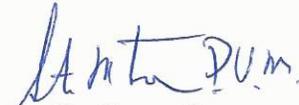
We support the exemption for veterinarians from Alaska's Prescription Drug Monitoring Program (PDMP) for many reasons, including:

- Animals are lacking a permanent identifier: There are no permanent identifiers for animals. In fact, animals can have different names and owners throughout their lifetime. As well, at any given time, an animal can also have multiple owner names from within the same household, making knowing which person to search in the PDMP database impossible.
- 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, just as physicians are not trained in the dose ranges for dogs, cats, birds, horses, 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 significantly 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 medical providers it is important to us that the PDMP is used correctly to track trends of human opioid shopping. Thirty-three states currently exempt veterinarians from participating in the PDMP,

because they recognize that the system was not set up for, nor is conducive to, veterinary use. Exemption of veterinarians from the Alaska PDMP will improve the efficacy of the system's intended purpose, by allowing for accurate interpretation of data and trends in human medicine. In addition, veterinarian exemption will allow us to continue to provide appropriate care and medical management of our patients.

Sincerely,



Dr. Steven Torrence



Dr. Lisa Kramer



Dr. Gerald Nance



Dr. Tracy Ward

Southeast Alaska Animal Medical Center

8231 Glacier Highway

Juneau, AK 99801

(907) 789-7551



April 09, 2021

The Honorable Senator Shelley Hughes
Juneau AK, 99801-1185

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

Dear Senator Hughes:

It was great to meet you in person when I unveiled the Bronze Working Dog Memorial. As you know, I am the owner and CEO of Tier 1 Veterinary Medical Center. I employ 60 personnel, which includes 11 Doctors of Veterinary Medicine. Tier 1 Veterinary Medical Center is the largest veterinary hospital in the state of Alaska, and also the North West United States.

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 usable 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 human 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 system's 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,

A handwritten signature in black ink, appearing to read 'S. McPeck' followed by 'DVM' in a smaller font.

Sean McPeck, DVM
CEO, Owner
Tier 1 Veterinary Medical Center
6623 East Blue Lupine Dr.
Palmer, Alaska 99645

The Following veterinarians, who work at Tier 1 Veterinary Medical Center, have agreed to have their name's included in this letter.

Dr. Brad Schmidt
Dr. Ciara Vollaro
Dr. Brooke Wilson
Dr. Tegan Alce
Dr. Vanessa Serratore
Dr. Paige Wallace
Dr. Emily Clinton
Dr. Kevin Snyder
Dr. SaraRose McPeck
Dr. Christen Bolotov

February 23, 2021
The Honorable Representative Wool
State Capitol Room 501
Juneau AK, 99801-1185

RE: Exempt Veterinarians from the Prescription Drug Monitoring Program - Vote YES on HB 91

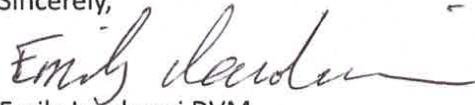
Dear Representative Wool:

Introduction paragraph – We are veterinarians at Kodiak Veterinary Clinic, the only vet clinic on Kodiak, Ak. We support the exemption for veterinarians from Alaska’s Prescription Drug Monitoring Program (PDMP) for multiple reasons. First and foremost, the PDMP acts as a one size fits all program that animals do not fit into. The PDMP database is not useful as animals are lacking a permanent identifier. Logging client information within a useless database creates potential privacy violations, and veterinarians already adhere to controlled substance regulations. Upkeep of a useless database is a needless drain on the state budget.

- **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 medical providers it is important to us that the PDMP is used correctly to track trends of human 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 system's intended purpose, by allowing for accurate interpretation of data and trends in human medicine. Veterinarian exemption will allow human practitioners to continue to provide appropriate care and medical management for their patients.

Sincerely,



Emily Iacobucci DVM
Kodiak Veterinary Clinic
1914 Mill Bay Rd.
Kodiak, AK 99615



Melissa Smith DVM



Midnight Sun

ANIMAL HOSPITAL + EMERGENCY CARE

2545 East Tudor Road
Anchorage, AK 99507
(907) 562-8384
Fax (907) 562-6737

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.

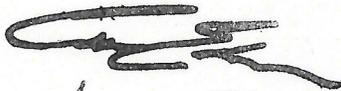
Veterinarians do not dispense large quantities of controlled drugs to our clients. In Alaska, our profession is estimated to account for 0.3-1 % of all the total morphine equivalents dispensed between 2015 and 2018. In a busy emergency practice, the most common controlled drug that we are using which 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,

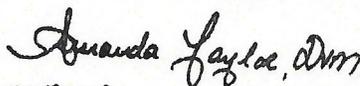
Dr. Cara Elton



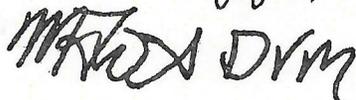
Dr. Amanda Irish



Dr. Amanda Taylor



Dr. Marian Frost



Dr. Emily Mehlman



Dr. Samantha Yeltatzie



Dr. Melissa Diederich



Dr. Margot Fairbanks



Dr. Tes Mutton



Dr. Cat Hefley



Dr. Marian Varman



Chris Buchholdt, Practice Administrator



Midnight Sun Animal Hospital + Emergency Care
2545 E Tudor Road
Anchorage, AK 99507

CC:

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

24 February 2021

The Honorable Representative Wool
State Capitol Room 501
Juneau AK, 99801-1185

RE: Exempt Veterinarians from the Prescription Drug Monitoring Program - Vote YES on HB 91

Dear Representative Wool:

My name is Eric Noll and I came to Alaska after being fortunate enough to get stationed at Eielson AFB in 2016. I have since separated and joined the AF reserves to work in the civilian world, and just recently purchased Kodiak Vision Clinic. Between Kodiak, Anchorage, and Fairbanks I will fairly busy with vision care in Alaska.

I support the exemption for veterinarians from Alaska's Prescription Drug Monitoring Program (PDMP) for multiple reasons. It seems to me the PDMP acts as a one size fits all program that animals do not fit into. Animals are lacking a permanent identifier, potential privacy violations, veterinarians already adhere to controlled substance regulations, and the cost to the state is high.

- 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. This makes the purpose of tracking medication prescriptions to individuals very difficult, cumbersome, and impossible.
- 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.
- From my personal knowledge and friendships with veterinarians, it seems they adhere to controlled substance regulations: Veterinarians who prescribe or dispense controlled substances are licensed through the 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 could be seen as 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 human 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.

Respectfully,


Eric J Noll, OD FAAO/MBA
MAJ USAF
Kodiak Vision Clinic
214 W Rezanof Dr
Kodiak AK 99615



1651 College Road
Fairbanks, Alaska 99709
907 452-6055
www.auroraanimal.com
info@auroraanimal.com

March 31, 2021

RE: HB 91 – Exemption for veterinarians from Alaska's Prescription Drug Monitoring Program

To whom it may concern:

I am the owner of a busy, 4 doctor, small animal veterinary practice located in Fairbanks, Alaska. I writing to you today as a veterinarian, but also as a business owner to express my support for HB 91 and hope that the current legislature will pass this bill.

The requirement to participate in Alaska's Prescription Drug Monitoring Program (PDMP) system was introduced to our profession with minimal notice and zero training. Despite this, the veterinarians at our practice did sign up and attempt to comply with the requirements, a task that has been difficult, time consuming and frustrating.

When it comes to utilizing the current system for animal patients, there are many flaws in how the system works. For instance, many pet owners will give different variations of their pet's name as well as estimated birth dates when they go to different veterinary practices.

Most veterinary practices in the state will tell you that they are understaffed, especially when it comes to professional staff (DVMs as well as certified technicians). Since we are understaffed, our schedules have tremendous pressure put upon them just in dealing with our case load. The requirement to participate in the PDMP adds an additional time consuming burden within our daily practice, and that time is essentially wasted because currently, veterinary participation in the PDMP is not preventing diversion from pet prescriptions to the human market.

The opioid crisis is a significant concern in today's society. Even without the PDMP program in place, my associates and I do our best to prescribe opiates carefully and taking into consideration any potential for abuse while also providing quality care and medicine for my patients. Perhaps continuing education and training in how we can better help with the opioid crisis would be a better use of the state's resources.

Barbara J Cole DVM
Owner
Aurora Animal Clinic

March 19, 2021

The Honorable Representative Wool
State Capitol Room 501
Juneau AK, 99801-1185

RE: Exempt Veterinarians from the Prescription Drug Monitoring Program - Vote YES on HB 91

Dear Representative Wool:

I own the After Hours Veterinary Emergency Clinic. We have been providing emergency and critical care to the Interior Alaska pets for over 20 years. Part of this care and treatment involves pain control. We don't tend to dispense a lot of narcotics but some animals suffering from major trauma, surgery or cancer require more than just a non-steroid pain medication. I have used the PDMP and found it to be complicated and time consuming. When faced with an emergency, I don't have the time to do the online forms, track down all the information I need to enter. Human pharmacies have their data online and it is easier for them to do the PDMP. Not all veterinarians have the same technology.

I support the exemption for veterinarians from Alaska's Prescription Drug Monitoring Program (PDMP) for multiple reasons. First and foremost, the PDMP acts as a one size fits all program that animals do not fit into. Animals are lacking a permanent identifier, potential privacy violations, veterinarians already adhere to controlled substance regulations, and the cost to the state.

- 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,



Elizabeth A. Rodger, DVM
After Hours Veterinary Emergency Clinic, Inc.
8 Bonnie Ave
Fairbanks, AK 99701
(907) 479-2700

March 31, 2021

The Honorable Representative Kaufman
State Capitol Room 405
Juneau AK, 99801

RE: Exempt Veterinarians from the Prescription Drug Monitoring Program - Vote YES on HB 91

Dear Representative Kaufman,

I am one of your constituents and have been a practicing veterinary surgeon in Alaska since 2002. I have served two terms as president of the Alaska State Veterinary Medical Association and have served on the Alaska State Board of Veterinary Medical Examiners.

We, as veterinary professionals and responsible citizens of this amazing state, are still wrangling with the Prescription Drug Monitoring Program (PDMP), a program designed for use in human medicine to identify doctor shopping by human patients and monitor trends in prescribing practices by health care providers. On a daily basis, I run into people who have elected to treat their infirmed animal companion just as they would an infirmed human companion. The problem really is quite simple. Your aunt or mother or father or child or wife or husband is not a turtle or a cow or a dog or a parrot or a gerbil or anything other than a human. The PDMP provides NOTHING allowing veterinarians to benefit people or animals because it is written for the human side of medicine. It is akin to ordering that veterinarians dose thyroid supplementation for dogs just like one would dose thyroid supplementation for people. Look that up. It won't work.

I remember when I was a member of the Alaska State Board of Veterinary Medical Examiners a few years back and we were visited by an individual responsible for getting the veterinary take on this legislation. We asked quite a few questions. I remember asking about the statistics available pertaining to veterinary drug diversion in Alaska. I was quickly informed that it is a problem in the Lower 48. I again asked about statistics in Alaska. There were none. Because you are a body of intelligent individuals who are capable of doing your own research, I am certain that all of you are aware of the following paragraph from a letter to the Board of Directors of the Alaska State Medical Association from Dr. Sarah Coburn, then president of the Alaska State Veterinary Medical Association dated January 29, 2020:

One national survey found that fewer than 10 cases of veterinary shopping occur annually in the United States and concluded that "veterinarians are a *de minimus* source of controlled substances." Even those few cases of veterinary shopping are typically identified by the veterinarians themselves, not through PDMPs. In 2017 veterinarians prescribed 0.34% of all of the opioids dispensed by retail pharmacies in the country (source IQVIA National Prescription Audit).

As a private citizen of this state which does, in fact, have limited resources, I am not happy that the Alaska State Legislature is fighting a problem that is nearly non-existent with funds that the state does not have. As a veterinarian, I am disgusted that the Alaska State Legislature has put veterinarians in a position in which it is more practicable for them to steer away from pain relief. If you, as a legislator, are in favor of this legislation for whatever reason, please promise me that the next time you are confronted with having to have surgery you will look at your surgeon and anesthesiologist and say, "Please, no narcotic pain relief for me." Countless studies and plain common sense have shown us that animals experience pain just like people do.

Exempting veterinarians from participation in the PDMP is not novel. Thirty-two states currently exempt veterinarians from PDMP requirements. I am not suggesting that we do something just because someone else did it. I am suggesting this because the PDMP for veterinarians does NOTHING to help animals or people. It might make someone feel a little bit better by falsely thinking that we are doing something to keep drugs away from people. However, the reality is that the drug diversion problem in the United States is not one that will be solved or even remotely positively influenced by veterinary participation in this extremely non-veterinary program.

There are other reasons not to support the PDMP for veterinarians and they have been illustrated in other letters. Please consider all that you have heard from veterinarians regarding this issue and vote in favor of HB 91 to exempt veterinarians from participation in the PDMP. It is nothing more than a stellar example of poorly conceived and worthless legislation that wastes limited resources.

Respectfully,

Nelson H. Priddy II, DVM
Diplomate American College of Veterinary Surgeons

March 9, 2021

The Honorable Representative Ken McCarty
Alaska State Capitol
Juneau AK, 99801-1185

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

Dear Representative McCarty:

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 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 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
Dr. Susan Wagnon, associate veterinarian

Ravenwood Veterinary Clinic
16743 Coronado Road
Eagle River, Alaska 99577