

*Why It Makes **Sense** to*



EXEMPT VETERINARIANS

from the Prescription Drug Monitoring Program

By: The Alaska State Veterinary Medical Association



SB 132: AN ACT EXEMPTING VETERINARIANS FROM THE REQUIREMENTS OF THE CONTROLLED SUBSTANCE PRESCRIPTION DATABASE.

THE ALASKA STATE VETERINARY MEDICAL ASSOCIATION (AKVMA),

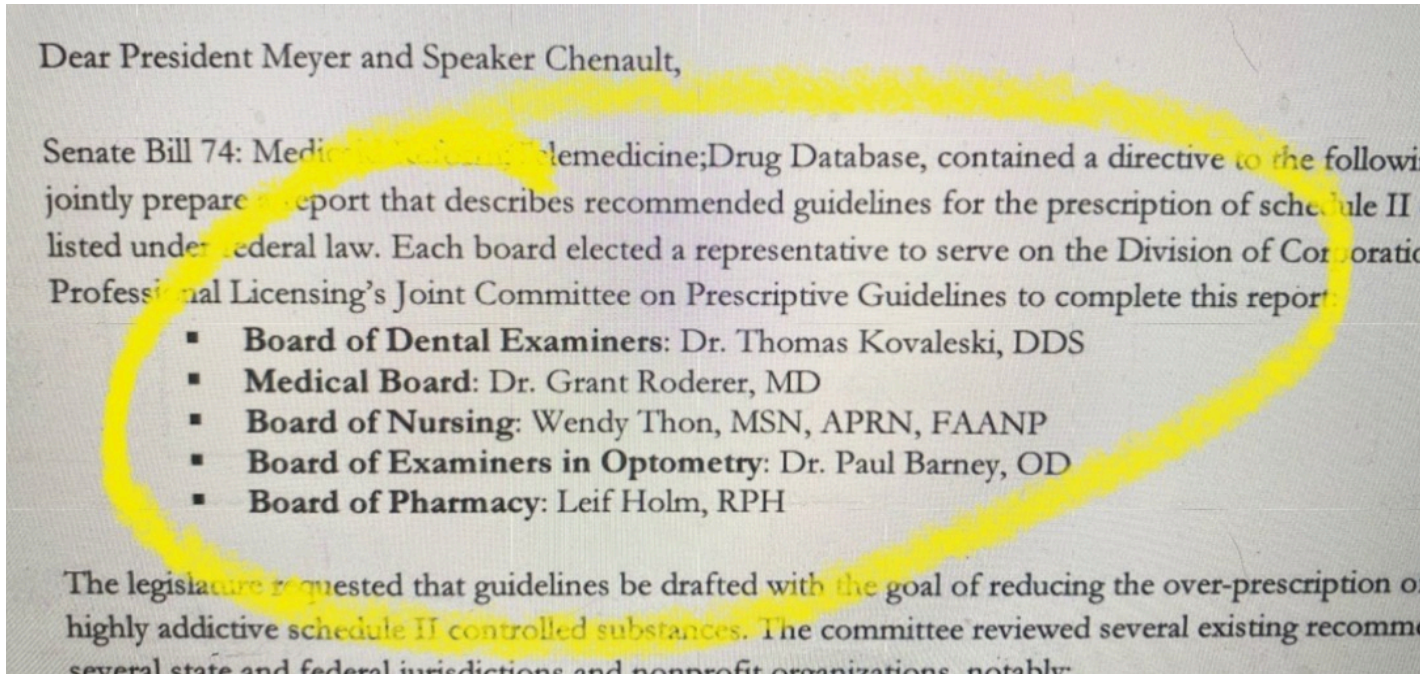
THE ALASKA BOARD OF VETERINARY EXAMINERS (BOVE),

AND THE ALASKA BOARD OF PHARMACY

SUPPORT SB 132.



Background: The PDMP



2008: Alaska's PDMP established by SB 196.

2017: In reaction to growing opioid epidemic, the PDMP was amended by via HB 159 to include all DEA permit holders, including veterinarians.

Neither AKVMA nor BOVE were consulted regarding this amendment.

PDMP reporting is required for all actively licensed practitioners who hold a Federal Drug Enforcement Agency registration number and who **prescribe, administer, or dispense** federally scheduled II – IV controlled substances in the state.



Why It Makes **Sense to Exempt:**

The PDMP is not an effective database for veterinarians or our patients.

- The PDMP was established for human medicine. Querying of PDMP data for animals is not possible with the PDMP (and reported drugs for an animal are not visible in the PDMP database).
- A query is made on the individual(s) that bring the animal to the veterinarian and human data is obtained, not animal data.
- Human data obtained from the PDMP query is not usable for the veterinarian. Veterinarians are not trained in human medicine to understand what the dosages mean.



Why It Makes **Sense to Exempt:**

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

- Clients find it intrusive when the veterinarian is required to query their private health data in the PDMP.
- An individual's private medication information becomes known to the veterinarian for certain drugs, such as narcotics, sedatives, and stimulants.

Examples of some common medications seen include, but are not limited to: Adderall, Ritalin, anabolic steroids such as testosterone, postpartum depression medications, sex hormones, Xanax, Klonopin, Valium, Ativan, Domar, and sleep aids like Ambien and Lunesta.

Why It Makes **Sense to Exempt:**


Veterinarians are monitored by the Drug Enforcement Agency and must adhere to controlled substance regulations.

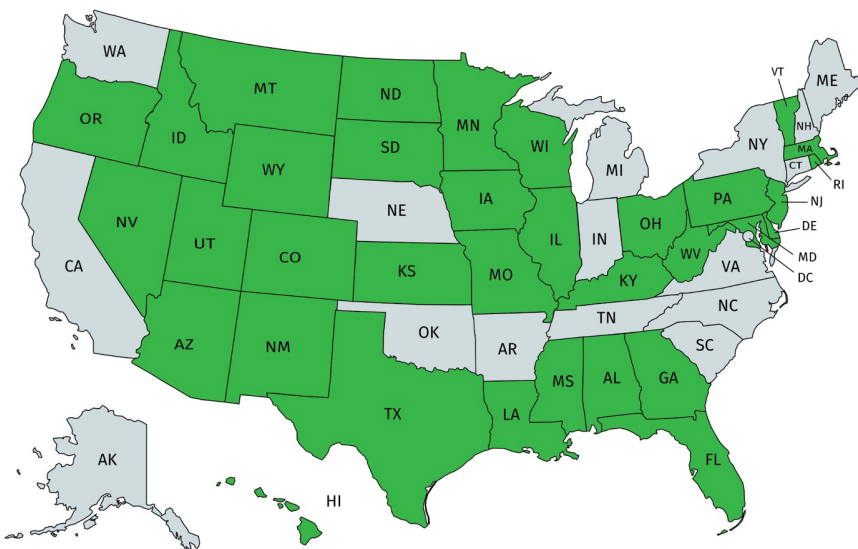
- Veterinarians who prescribe or dispense controlled substances are licensed through Drug Enforcement Agency (DEA). There is already a significant level of accountability, record keeping, and medication storage requirements that veterinarians must adhere to.
- Distributors of controlled substances monitor utilization patterns of veterinarians. The Suspicious Order Monitoring System is in place and data is gathered by distribution companies who are required by the DEA to monitor and report unusual purchase patterns a veterinarian may have. Distributors are required to flag purchases that fall outside of norms for either previous purchase history or the norms for practices of similar size/type. **DEA oversight is to control/prevent diversion from licensed professionals to drug dealers and users.**



Why It Makes **Sense to Exempt:**

34 other states have exempted veterinarians from participating in the PDMP.

 States that exempt veterinarians from PDMP requirements.



- **10 states formerly mandated veterinary reporting but repealed their inclusion** due to the problems experienced, lack of identified benefits to veterinary participation, and demonstration that exempting veterinarians does not decrease protection of public health and safety. These states are Alabama, Arizona, Idaho, Illinois, Kansas, Kentucky, Louisiana, New Mexico, West Virginia (2021), and Wyoming.
- **Missouri implemented the PDMP in 2021 but **did not** require veterinarians to participate.**



Why It Makes **Sense to Exempt:**

Veterinarians are not a source of the drugs of primary concern.

- The Board of Pharmacy reported that veterinarians in Alaska from 2016—2018 prescribed **.3% to 1%** of total Morphine Milligram Equivalents (MMEs).

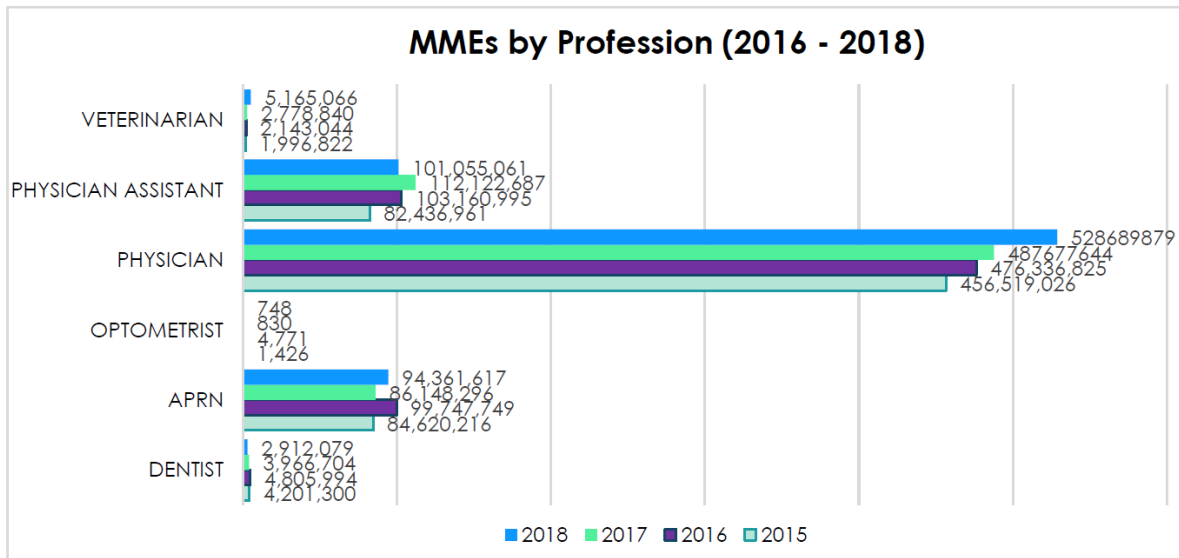


Figure 4. MMEs prescribed by veterinarians in 2016 and 2017 ranged from .3% to 1% of total MMEs by profession. The number of MMEs prescribed was highest in 2018 compared to previous years.

- Opioid medications prescribed by veterinarians (728,223) were only **0.34%** of the total opioid prescriptions (214 million) that were dispensed by U.S. retail pharmacies in 2017.
- There is a natural barrier to vet shopping since costs for veterinary care are paid up front by the pet owner.
- There have been no identified cases of veterinary shopping in Alaska.



Why It Makes **Sense to Exempt:**

Veterinarians are not a source of the drugs of primary concern.

- There are numerous letters and testimony on file from veterinarians, medical doctors (including ER physicians), and animal owners supporting SB 132, for all of the reasons enumerated previously
- There is one letter of opposition, from the Board of Alaska's ER Physicians
 - The literature cited in the letter of opposition is primarily an Editorial (not a research trial) in a medical journal, and a paper citing an increase in "possible" veterinary shopping behavior from 0.19% to 0.64%
- We do not believe that Alaska should be governed based on the precautionary principle, i.e., that something MIGHT happen in the future, and so we should legislate to prevent this possibility.
- There is **NO credible evidence** to support that veterinary drugs are contributing to the opioid crisis and significant evidence to suggest that they are not.

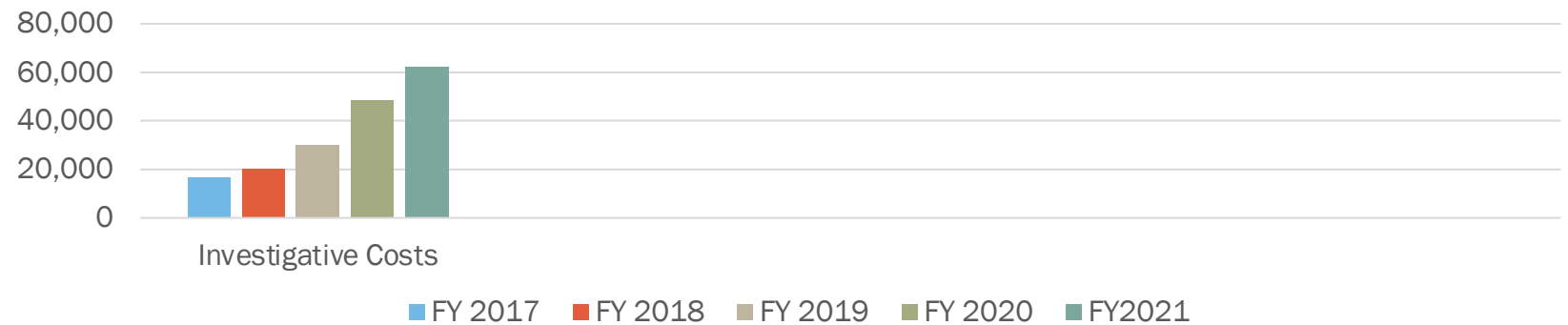


Why It Makes **Sense to Exempt:**

The unwieldy PDMP leads to costly and burdensome investigations of veterinarians by the Alaska Board of Veterinary Examiners.

Costly and onerous requirements for monitoring veterinarians have been placed on the board of veterinary examiners (BOVE).

BOVE Investigative Costs for Veterinarians



Why It Makes **Sense to Exempt:**

Licensing fees for veterinarians will likely increase as a result of the cost to conduct needless investigations of veterinarians with DEA licenses. The cost of doing business will be passed on to consumers.



Alaska has the **highest licensing fees for veterinarians** in the country.

Licensing fees are expected to increase in the State of Alaska as a result of the cost of PDMP investigations.

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.

AKVMA URGES A
YES vote on SB 132



An Exemption of Veterinarians from participating in the PDMP:

Will allow veterinarians to provide the appropriate, timely, medical management appropriate for each patient.

Will increase the efficiency of the PDMP system for its intended purpose, by allowing for accurate interpretation of data and trends in human medicine.

Will allow continued judicious use of controlled substances that is already practiced by veterinarians.

Will eliminate unnecessary and disproportionate business burdens for veterinarians.

Thank you for your time and attention!



What questions can we answer?