



May 4, 2022

House Health and Social Services Committee  
[House.Health.And.Social.Services@akleg.gov](mailto:House.Health.And.Social.Services@akleg.gov)

Dear House Health and Social Services Committee,

This letter provides essential information to further clarify information discussed during the May 3 HSS committee meeting regarding SB 132. We believe this information is indispensable in helping the committee make important decisions regarding SB 132.

**First, it is critical to understand that the PDMP processes implemented for veterinarians to use for their participation in the PDMP and the current system does not provide any useable data and it raises privacy issues. The issue is not about veterinarians' unwillingness to use the PDMP or that veterinarians are not buying in to utilize the tools to make it work as was conveyed by Sara Chambers.**

With the current PDMP system the shortfalls are as follows:

- Querying of human data provides no useable information to the veterinarian and does not impact the treatment for the animal. Veterinarians query the human controlled substance prescription data because it is required but they cannot intersect human prescriptions with animal prescriptions. The data is non-useable to veterinarians.
- Querying of human data violates a person's privacy of their health care data and veterinarians are not required by HIPPA to protect that data.
- Controlled substances dispensed to pets is entered into the PDMP under the client's name and entered in a special area designated for animal information. The animal information is not extractable once it has been entered into the PDMP.
- Veterinarians cannot retrieve previous drug information entered in for a pet nor can human practitioners extract the information when a query is performed by human practitioners.
- The cost to investigate technical issues of practitioners in utilizing the PDMP is a vast waste of resources and investigative costs have risen because of the PDMP violations.

**Second, the information that Dr. Nicholas Papacostas stated that would be useful to the medical community from the PDMP veterinary data is currently not available from the system.**

- Animal drug prescription data entered to the PDMP is not extractable from the PDMP system.
- If the drug data was available to the physicians, the drugs used in veterinary medicine are of very low risk to the opioid crisis.
- The overall prescription of opioids in veterinary medicine is less than 1% of all prescribed opioids.
- The opioids prescribed in veterinary medicine are not high abuse drugs to the opioid crisis.

Alaska veterinarians share in the concerns of opioid abuse, and we understand the implications to public health as well as the devastation to many individuals, families, and the burdens placed onto society. We understand that the legislature had good intentions to help combat the opioid problem in Alaska by implementing the PDMP requirements for DEA holders. The veterinary participation in the PDMP however is not contributing to the goals of the PDMP (identification of overprescribing; data for education to practitioners; opioid shopping) with the current system.

It is important to understand that amending the current law to eliminate one or more of the PDMP requirements (i.e querying) for veterinarians will not address the issue that the PDMP does not provide any useable data for practitioners. **This is not about a LAW change but rather systems change to the PDMP as the current system does not provide any useable data.**

**The options to address the PDMP shortfalls are:**

- 1) Exempt veterinarians from the PDMP (34 other states have taken such action because veterinarian participation has not shown benefits to public health).
- 2) Exempt the participation of veterinarians from the PDMP until the system can be fixed to meet the clearcut goals for the PDMP.
  - Identify goals for the PDMP.
  - Develop software that captures accurate data from veterinary opioid prescriptions to benefit human health.
  - Automatic PDMP reporting that encompasses effective prescription software equivalent to human healthcare.
  - The cost of implementing such an enhancement to the PDMP system needs to be considered to any benefit.

Thank you for the opportunity to provide testimony at the committee hearings and your further consideration of the information. Please let us know if you have additional questions.

Sincerely,

Dr. Tracy Ward  
AKVMA President

