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Representative Justin Ruffridge
State Capitol Room 104
Juneau AK, 99801
Phone: 907-465-2693

February 26, 2023

Re. HB 56 (and SB 51)

Dear Representative Ruffridge:

The first point I would like to make is that I am not a veterinarian. I have nothing financially to gain by the passage of HB 56. However, as the public member of the Alaska Board of Veterinary Examiners, I am one of the few non-veterinarians in this state to have witnessed up close the waste and failure associated with forcing veterinarians to work within a system designed for completely different set of professions. In short, I am writing to express my strong support for House Bill 56.

I do understand that veterinarians were included in the PDMP with the very best of intentions. But this system has simply failed to work as intended on the veterinary side. To give you just a small taste of the absurdity that the Board of Veterinary Examiners has had to deal with, the PDMP statute requires veterinarians to do exactly the following:

...a practitioner [must] review the information in the database to check a ***patient's*** prescription records before dispensing, prescribing, or administering a schedule II or III controlled substance...(emphasis added) (AS 17.30.200).

In veterinary medicine the *patient* is the animal receiving treatment, and the *client* is the human that will claim the prescription. It was never anyone's intention to have a prescriber check on the animal's prescription history, even though that is what the statute requires. The animal does not have an unchanging name, it may not have a single owner through time, and it does not have an unchanging identifier like a social security number. This is just one example of chaos and confusion that resulted from tacking veterinarians on to this statute just because it seemed like a good idea. Not surprisingly, as near as we can tell, the PDMP in Alaska has not uncovered a single case of drug diversion or drug seeking on the veterinary side that has come to the attention of authorities. How could it?

Please understand that if veterinarians are exempted from the PDMP, the federal DEA will still be tracking all controlled drugs going into veterinary facilities. If veterinarians are exempted, prescriptions for scheduled drugs will still be entered into the PDMP database if they are filled at Alaska pharmacies. Exempting veterinarians will simply not create any kind of new loophole. If veterinarians are exempted it is hard to see that there will be any loss of useable information about scheduled drug use in Alaska.

Alaska currently has a critical shortage of veterinarians. Maybe not so much in Anchorage, but in just about every other part of the state. Alaska also has the highest licensing fee of any state for veterinarians. Additionally, Alaska is one of the minority of states requiring the participation in a PDMP program—with all the attendant costs and risks for veterinarians. Alaska is not a welcoming or inviting place for veterinarians. I urge you to take a clear-eyed look at the actual problems the PDMP is causing veterinarians in Alaska, and to see that whatever the intended benefits were from including veterinarians, these are simply unobtainable illusions.

Thank you for your consideration.

A handwritten signature in black ink, appearing to read 'Hal Geiger', with a stylized flourish at the end.

Hal Geiger, PhD