

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,


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