

March 24, 2021

The Honorable Representatives Zack Fields, Ivy Sponholz, Calvin Schrage and James Kaufman

Co-Chairs and Members of the House Labor & Commerce Committee  
Alaska House of Representatives

Dear Representatives Fields, Sponholz, Schrage, and Kaufman,

As Veterinarians living in Representative Kaufman's district in Anchorage for forty years, and for the last thirty years practicing and owning a clinic in Representative Schrage's district, we write to you asking that you support HB 91, currently being read in the House Labor and Commerce Committee. This is an Act exempting veterinarians from participating in the reporting requirements of the controlled drug monitoring database, known in Alaska as the prescription drug monitoring program (PDMP).

Our profession agrees with the goals of the PDMP and has been complying since its inception, but over time and with modifications to the program, the usefulness of our participation has shrunk while the regulatory burden on us has not. We do and will continue to comply with DEA mandates on ordering, storing, prescribing and accounting for those same controlled drugs.

Currently we are required to report prescriptions filled at our hospital (only those prescribed for more than three days), but not those filled at pharmacies. In our clinic, as in most veterinary clinics, over time we have moved toward keeping fewer controlled drugs in inventory, and outsourcing most prescriptions for those drugs. Those that we do keep are mostly for in-clinic use as well as for compounding and dispensing very small doses for small species (small mammals, birds and reptiles). In those small species, a two or three week prescription might not equal a single dose for an adult human, but does trigger the requirements of the PDMP. Consequently, the reporting that we do accounts for a very small portion of the controlled drugs we use in-clinic or prescribe; the majority are reported by the pharmacy filling the prescription. The regulatory requirements have not diminished, however, and require a labor input out of proportion to any benefit. Regulators are much more likely to catch an unwitting veterinarian in an insignificant error or oversight than they are to catch someone diverting drugs from that veterinarian, and might spend much more time on the former than the latter. For these reasons, we think a veterinary exemption makes sense.

It should be pointed out that thirty-two states have granted veterinarians a waiver from these requirements. We encourage you to support this bill and approve it out of the Labor and Commerce committee.

Thank you very much for your attention.

Respectfully,

Paul Frederickson DVM  
Jacqueline Frederickson DVM  
P.O. Box 110006,  
Anchorage, AK 99511-0006