

March 19, 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:

I own the After Hours Veterinary Emergency Clinic. We have been providing emergency and critical care to the Interior Alaska pets for over 20 years. Part of this care and treatment involves pain control. We don't tend to dispense a lot of narcotics but some animals suffering from major trauma, surgery or cancer require more than just a non-steroid pain medication. I have used the PDMP and found it to be complicated and time consuming. When faced with an emergency, I don't have the time to do the online forms, track down all the information I need to enter. Human pharmacies have their data online and it is easier for them to do the PDMP. Not all veterinarians have the same technology.

I support the exemption for veterinarians from Alaska's Prescription Drug Monitoring Program (PDMP) for multiple reasons. First and foremost, 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.

- 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.
- 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.
- Veterinarians already adhere to controlled substance regulations: Veterinarians who prescribe or dispense controlled substances are licensed through Drug Enforcement Administration (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 is 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 humans 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.

Sincerely,



Elizabeth A. Rodger, DVM
After Hours Veterinary Emergency Clinic, Inc.
8 Bonnie Ave
Fairbanks, AK 99701
(907) 479-2700