

March 9, 2021

The Honorable Representative Ken McCarty
Alaska State Capitol
Juneau AK, 99801-1185

RE: HB 91 - Exemption for veterinarians from Alaska's Prescription Drug Monitoring Program.

Dear Representative McCarty:

Ravenwood Veterinary Clinic has been providing essential veterinary services to the Eagle River community for over 30 years. We offer care and services for small companion and exotic animals.

I urge your support for HB 91 – an ACT exempting veterinarians from the requirements of the controlled substance prescription database, known as the Prescription Drug Monitoring Program (PDMP) in Alaska. The current law in place requiring the participation of veterinarians in the PDMP is not a practical or effective solution for the intended purposes of the PDMP. The system is not useable for veterinarians and animals and is creating unnecessary and disproportionate business burdens for veterinarians, leading to increased taxpayer costs.

These are some of the reasons as to why it makes sense to exempt veterinarians from the PDMP.

- Veterinarians do not treat humans, and animals are not listed in the PDMP independently which renders the PDMP database unusable. 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,

Dr. Jamie Lee Merrigan, clinic owner
Dr. Lorelei Hass, associate veterinarian
Dr. Michelle Wetherell, associate veterinarian
Dr. Megan Turnquist, associate veterinarian
Dr. Harrison Wellman, associate veterinarian
Dr. Susan Wagnon, associate veterinarian

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