

April 10, 2021

The Honorable Representative Shelly Hughes

Juneau AK, 99801-1185

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

Dear Representative Hughes

My name is Dr. Judith Montalbano. I am a veterinarian and the Medical Director at All Creatures Veterinary Clinic in Wasilla, Alaska and soon to be Assistant Professor of Veterinary Medicine at UAA. I have been with All Creatures and an active member of the Alaska Veterinary Medical Association (AKVMA) since 1995. As a busy practitioner, I have been exposed to the rules enacted with the Prescription Drug Monitoring Program (PDMP) and have found it not only to be worthless, cumbersome and ineffective, but it has put me in the position where I have felt very uncomfortable having access to my client's medical information. I wholeheartedly **urge your support for HB 91** which would exempt Alaska veterinarians from the requirements of the controlled substance prescription database. The current law in place requiring the participation of veterinarians in the PDMP is onerous and potentially subjects veterinarians to legal action by clients. These are some of the reasons as to why it makes sense to exempt veterinarians from the PDMP.

- ❖ Veterinarians don't 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 using the owners name could provide medical information the owner is uncomfortable with their veterinarian knowing and is potentially a violation of the client's HIPPA protections. 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 by the Board of Veterinary Examiners 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. Please feel free to contact me if you wish to discuss this issue with me further.

Sincerely,



Judith Montalbano DVM, Medical Director

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