

March 31, 2021

The Honorable Representative Kaufman
State Capitol Room 405
Juneau AK, 99801

RE: Exempt Veterinarians from the Prescription Drug Monitoring Program - Vote YES on HB 91

Dear Representative Kaufman,

I am one of your constituents and have been a practicing veterinary surgeon in Alaska since 2002. I have served two terms as president of the Alaska State Veterinary Medical Association and have served on the Alaska State Board of Veterinary Medical Examiners.

We, as veterinary professionals and responsible citizens of this amazing state, are still wrangling with the Prescription Drug Monitoring Program (PDMP), a program designed for use in human medicine to identify doctor shopping by human patients and monitor trends in prescribing practices by health care providers. On a daily basis, I run into people who have elected to treat their infirmed animal companion just as they would an infirmed human companion. The problem really is quite simple. Your aunt or mother or father or child or wife or husband is not a turtle or a cow or a dog or a parrot or a gerbil or anything other than a human. The PDMP provides NOTHING allowing veterinarians to benefit people or animals because it is written for the human side of medicine. It is akin to ordering that veterinarians dose thyroid supplementation for dogs just like one would dose thyroid supplementation for people. Look that up. It won't work.

I remember when I was a member of the Alaska State Board of Veterinary Medical Examiners a few years back and we were visited by an individual responsible for getting the veterinary take on this legislation. We asked quite a few questions. I remember asking about the statistics available pertaining to veterinary drug diversion in Alaska. I was quickly informed that it is a problem in the Lower 48. I again asked about statistics in Alaska. There were none. Because you are a body of intelligent individuals who are capable of doing your own research, I am certain that all of you are aware of the following paragraph from a letter to the Board of Directors of the Alaska State Medical Association from Dr. Sarah Coburn, then president of the Alaska State Veterinary Medical Association dated January 29, 2020:

One national survey found that fewer than 10 cases of veterinary shopping occur annually in the United States and concluded that "veterinarians are a *de minimus* source of controlled substances." Even those few cases of veterinary shopping are typically identified by the veterinarians themselves, not through PDMPs. In 2017 veterinarians prescribed 0.34% of all of the opioids dispensed by retail pharmacies in the country (source IQVIA National Prescription Audit).

As a private citizen of this state which does, in fact, have limited resources, I am not happy that the Alaska State Legislature is fighting a problem that is nearly non-existent with funds that the state does not have. As a veterinarian, I am disgusted that the Alaska State Legislature has put veterinarians in a position in which it is more practicable for them to steer away from pain relief. If you, as a legislator, are in favor of this legislation for whatever reason, please promise me that the next time you are confronted with having to have surgery you will look at your surgeon and anesthesiologist and say, "Please, no narcotic pain relief for me." Countless studies and plain common sense have shown us that animals experience pain just like people do.

Exempting veterinarians from participation in the PDMP is not novel. Thirty-two states currently exempt veterinarians from PDMP requirements. I am not suggesting that we do something just because someone else did it. I am suggesting this because the PDMP for veterinarians does NOTHING to help animals or people. It might make someone feel a little bit better by falsely thinking that we are doing something to keep drugs away from people. However, the reality is that the drug diversion problem in the United States is not one that will be solved or even remotely positively influenced by veterinary participation in this extremely non-veterinary program.

There are other reasons not to support the PDMP for veterinarians and they have been illustrated in other letters. Please consider all that you have heard from veterinarians regarding this issue and vote in favor of HB 91 to exempt veterinarians from participation in the PDMP. It is nothing more than a stellar example of poorly conceived and worthless legislation that wastes limited resources.

Respectfully,

Nelson H. Priddy II, DVM
Diplomate American College of Veterinary Surgeons