

Honorable Representative Shaw  
Alaska State Legislature  
State Capitol Room 426  
Juneau AK 99801

April 5, 2021

Dear Honorable Representative Shaw,

I am an Alaska resident and I reside in District 26. I have practiced Veterinary medicine as a clinic co-owner and operator for the last 30 years. This correspondence is to serve as a letter of support for HB 91, a bill which would hold Alaskan Veterinarians exempt from the PDMP (prescription drug monitoring program). The PDMP as written and administered is not compatible with the practice of Veterinary medicine. The PDMP is designed to track prescription drug usage in human medicine. Medical Doctors can access medical records of individual patients to track a medical usage of therapeutic drugs and identify potential drug abuses. Veterinarians cannot access pet owner medical records, due to privacy laws, to screen for potential drug abuse. Human patients have permanent trackable identifiers that can be helpful in tracking prescription drug usage. Animals do not have permanent tracker identifiers and therefore are subjected to a poorly designed system that does not help identify diversion and abuse of controlled substances by the pet owner.

Opioid medications prescribed by Veterinarians accounted for only 0.34% of the total opioid prescriptions that were dispensed by U.S. retail pharmacies in 2017. Many other states (32 to be exact) have exempted Veterinarians from the PDMP reporting requirement, citing that Veterinarians are not a significant source of abused or diverted drugs. The Alaska Board of Veterinary Examiners has reported the PDMP as an unusable database and the cost to investigate Veterinarians who fail to use it correctly is a waste of limited resources.

Aside from being an inefficient system and incompatible with the practice of Veterinary medicine, there also exists the monetary costs of maintaining such an inefficient system. Licensing fees for Veterinarians will sharply increase as a result of the cost to conduct needless investigations of Veterinarians with DEA licenses. In return, the costs of doing business will be passed to the consumer.

The current opioid crisis in our country has been widely reported to be driven in large part by Pharmaceutical companies courting Medical Doctors to increase sales of opioids. In my 30 years of practice and practice ownership, I have never been approached by a Pharmaceutical sales representative with the motive of increasing the dispensing of opioids. As a profession, Veterinarians dispense very few drugs that could be labeled as drugs with abuse potential. Most of the pain medication that has an opioid base are drugs that are used preoperatively and postoperatively, tightly controlled and recorded. Having a DEA license automatically requires the licensee to be monitored and

have reporting requirements by DEA regulation. To require redundancy with an inefficient program is counterproductive.

The Veterinary profession should not be exempt from being vigilant for prescription drug abuse. The AVMA has recommended numerous strategies to help to mitigate the opioid epidemic as it pertains to the Veterinary industry.

- >Continuing education on judicious use compliance, security and prescribing of opioids and other controlled substances.
- > Exempt Veterinarians from accessing private health information and prescription data on a person prior to prescribing or dispensing controlled substances for their animal.
- > Exemptions of Veterinarians from mandatory electronic prescribing for controlled substances for an animal.
- >Provide options for reporting suspected opioid and controlled substance shoppers with immunity from prosecution for the reporter.
- > Research to determine the prevalence of Veterinary drug shoppers and clarify the degree to which Veterinary prescriptions impact the human opioid epidemic.

While the opioid epidemic is a very real and serious epidemic in our country, I and many of my colleagues feel that a one size fits all solution is not the answer. With such a low percentage of controlled prescription drugs being prescribed by Veterinarians, it is reasonable to question the heavy-handed nature of legislation that impacts a profession so profoundly and realizes such a minimal return on the investment. On behalf of the Alaska Veterinary profession, I respectfully request your serious consideration and support for the passage of HB 91. Thank you for your support.

Sincerely,

Willard C. Gump DVM