

January 12, 2022

The Honorable Senator Robert Myers

The Honorable Representative Mike Prax

State Capitol Juneau AK, 99801-1185

RE: SB 132 and HB 91 - Exemption for veterinarians from Alaska's Prescription Drug Monitoring Program.

I am a small animal veterinarian at North Pole Veterinary Hospital, located close to where you grew up in Fairbanks. As you know from living here, quality veterinary care in interior Alaska is extremely important to your constituents, and I am proud to work at a hospital that practices at the upper echelon of compassionate and modern medicine. Unfortunately, the restrictions and inconveniences that affect veterinarians under the current Prescription Drug Monitoring Program can directly and negatively affect the quality of care we can provide, in addition to being overly restrictive in a field where it bears no proven efficacy.

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 and effective solution for the intended purposes of the PDMP. The system is not useable for veterinarians and animals, it is creating unnecessary and disproportionate business burdens for veterinarians, and it is leading to increased taxpayer costs.

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

1. **Animals don't have social security numbers:** 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. Therefore, tracking animals under the PDMP system is irrelevant and futile.
2. **Companion animals aren't small humans:** Veterinarians don't treat humans and animals are not listed in the PDMP independently, making the PDMP database intrinsically flawed. Further, the dosing regimens for pets can differ dramatically than that for humans, meaning that the warning systems in place at the heart of the PDMP system are unnecessarily triggered by appropriate dosing from veterinarians.
3. **Potential privacy violations:** Searching the PDMP database by the owner could provide medical information the owner is uncomfortable with their veterinarian knowing. Linking a pet's medication history to an owner's medication history makes all this private information inexplicably joined for no benefit.
4. **Redundancy:** 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.

5. **Cost to your constituents:** 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.
6. **Cost to the state:** In the past 6 months alone, over \$40,000 has been spent investigating 56 veterinary cases, all but 7 being related to the PDMP. All 49 cases were later proven to be related to PDMP reporting compliance and clerical errors, and not to drug diversion at all. In essence, the state of Alaska is wasting an inordinate amount of money on a program that has been proven to have NO BENEFIT in drug diversion related to veterinary medicine.

As a medical provider it is important to me that the PDMP is used correctly to track trends of human opioid shopping. 34 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,

Bentley Lynn Richards, DVM

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