

January 24, 2022

The Honorable Representative Wool  
State Capitol Room 501  
Juneau AK, 99801-1185

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

Dear Representative Wool:

My name is Evdokia Wise, and I am a constituent of your legislative district. I have worked in the field of veterinary medicine for almost six years as a veterinary assistant and am currently pursuing my technician's license. I hope to attend vet school and receive my DMV once I finish my undergraduate degree. I have been in the veterinary field for most of my adult life and know the struggles of the field well.

**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 nor an effective solution for the intended purposes of the PDMP. The system is not useable for veterinarians, has created unnecessary and disproportionate business burdens for veterinarians, and leading to increased business costs.

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

The PDMP was established for human medicine and is ineffective in the veterinary field. Reported drugs to the PDMP for an animal are entered under a human's name; animals don't have a common identifier and any reported drugs to the PDMP for an animal are not visible in the PDMP. Additionally, human data obtained from the PDMP is unusable. Veterinarians are not trained in human medicine to understand what the dosages mean.

**Requesting human PDMP information is invasion into an individual's medical privacy.** To participate in the PDMP, veterinarians ask a client for their ID, full name, DOB, address, and phone number, which is very intrusive. An individual's private medication information becomes exposed for certain drugs: I.e., narcotics, sedatives, and stimulants. Common medications seen include but are not limited to: Adderall, Ritalin, anabolic steroids like testosterone, postpartum depression medications, sex hormones, Xanax, Klonopin, Valium, Ativan, Domar, and sleep aids like Ambien and Lunesta. Veterinarians have access to human medical information that they are not trained to be responsible for.

**Veterinarians who prescribe or dispense controlled substances are already licensed through Drug Enforcement Agency (DEA). DEA oversight is to control/prevent diversion from licensed professionals to drug dealers and users.** There is already a significant level of accountability, record keeping, and medication storage requirements that these veterinarians adhere to. Distributors of controlled substances monitor utilization patterns of veterinarians. Data collected by distribution companies are required by DEA to monitor and report unusual purchase patterns a veterinarian may have.

**Veterinarians have not been shown to be a significant diversion for drugs.** Opioid medications prescribed by veterinarians were only 0.34% of the total opioid prescriptions that were dispensed by U.S. retail pharmacies in 2017 (source: American Veterinary Medical Association). There have been **no identified cases of veterinary shopping in Alaska** and there is a natural barrier to vet shopping since costs for veterinary care are paid up front by the pet owner.

**Charging Veterinarians for a system they cannot use and regulations with which they are unable to comply is a senseless use of resources.** The board of veterinary examiners investigative costs (many related to the PDMP) have more than doubled from FY 18-19 to FY 20-21. The Alaska Board of Veterinary Examiners has reported that the PDMP is an unusable database and the cost to investigate veterinarians who fail to use it correctly is a waste of limited resources.

As a medical provider it is important to me that the PDMP is used correctly to track trends of human's opioid shopping. **I urge you to support HB 91 and join 34 other states that have exemptions 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. A Veterinarian exemption will allow them to continue to provide appropriate care and medical management for their patients while eliminating additional business burdens and costs that do not provide an effective solution for the intended purposes of the PDMP.

Sincerely,

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