

January 27, 2022

RE:HB91 – Exemption for veterinarians from Alaska’s Prescription Drug Monitoring Program.

Dear Alaska State Veterinary Medical Association, Alaska State House and Senate Representatives ,

I am writing this letter in favor of HB-91 and request your support this bill making veterinarians exempt from reporting the prescription of controlled drugs to the Prescription Drug Monitoring Database (PDMP) in Alaska. I have practiced in Fairbanks Alaska at Mt. McKinley Animal hospital over 19 years, providing emergency, surgical referral and general veterinary services to Fairbanks and outside areas (Barrow, Kotzebue, Nome and Tok etc). I have also had the honor serving on the Alaska State Veterinary Board.

Veterinarian’s are very supportive of efforts to decrease the epidemic of opioid abuse and the diversion of controlled dugs, however our mandated reporting requirements are not leading to a positive contribution. The use of a human database used for veterinary patients whom do not have a Social security number, driver’s license or any permanent identifiers making it impossible to accurately track their prescriptions. While serving on the Alaska State Veterinary Board this point was brought up many times to the Pharmacy board. All the Boroughs’ do not have an animal database or mandated registration programs, let alone keeping track of rehomed animals, animals presented to veterinary clinics by the friends or family members this just compounds the problem. Look at the mandated requirement for Veterinarians to query personal information, medical history for the individual presenting the patient in need of care. This is something that Veterinarian community is not qualified, or trained to evaluate a human’s medical history in relation to a medication we are dispensing for the animal we are treating, let alone running the risk for HIPPA violations.

I have spent countless hours on the phone with other boards like Illinois to find out how they can make these human based databases work..... they couldn’t and the state of Illinois passed the same type of bill that is before you making Veterinarian exempt from reporting. California has tried a hybrid human database for animals, I have talked to the company that designed it..... but it is funded by 11 million dollars and they have a huge veterinary licensee base unlike Alaska. What do they do with the data? Nothing, because Veterinarians DO NOT DISPENSE LARGE QUANTIES OF CONTROLLED SUBSTANCES (0.3-1 % total morphine equivalents) data from 2015-2018.

I have spent time talking to local drug enforcement as well as the new DEA task force Alaska Special Agent Tarentino in regards to “Operation Engage”. Recent statistics released by

the Centers for Disease Control show an alarming rise in drug overdose deaths, with synthetic opioids driving record-high fatalities. The vast majority of deaths involve illicitly manufactured fentanyl, including fentanyl analogs. These drugs are not coming from Veterinary clinics they are coming in from outside sources (mail, airports and smuggling from the Mexican US border).

I have been practicing for almost 20 years. The bulk of my controlled drug dispensing is for phenobarbital, an anticonvulsant medication than has low abuse potential. I do a lot of orthopedic procedures and extensive soft tissue procedures, the bulk of controlled substances are used during anesthesia as well as for 48-72 hrs post op which is when patients are under hospitalized care. If I do dispense controlled substances for pain control, patients have severe trauma like fractured legs, thermal burns (frost bite included) or terminal illness. This program has deterred my ability to provide the best possible care for our patients especially after hours which is when the bulk of emergencies occur and pharmacies are closed. Please be mindful how big Alaska is (Not everyone lives in Anchorage) and the extreme weather conditions (freezing rain, snow, extreme cold temperatures). The caregiver or owner of the animal has to get necessary medications for their pet and they can get only get a limited supply. This program puts owner at risk for travel and can prevent the timely access for pain relief for their pet. Another misconception is that people "doctor shop" for drugs or break their pets leg to seek out drugs..... not true in Veterinary medicine. Veterinary care costs money... Lastly the economic burden on the state's privately owned small veterinary practices. The hours of PDMP reporting requirements for Veterinary practioners costs money as well as PDMP investigative costs of the Board of Veterinary Examiners. Alaska already pays this highest Veterinary license fees in the United States.

Please support HB91 this will increase the efficiency for the intended purpose for accurate, purposeful data for a human medicine.

Respectfully,

Dr. Scott Flamme DVM.