

From: Ariana Anderson <islavet@gmail.com>

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To: tracyward2413@gmail.com

Subject: PDMP letter

Dear Senator Kiehl,

I am writing to request your support for SB 132. I am a self-employed relief (substitute) veterinarian, and I travel throughout Alaska to work. I have also worked in Virginia, Arizona, and Washington. I believe requiring veterinarians to use the PDMP database results in complications to its true purpose in monitoring human patients' controlled drug prescriptions. It also results in burdensome requirements for veterinarians.

When we veterinarians want to prescribe a controlled drug to a patient, we are supposed to look up the owner's name and birthdate in a database first. The ability to see their history is inappropriate in light of HIPAA laws. If I see that they have controlled drug prescriptions, I have NO way to evaluate this. I am not aware of any guidelines on how to proceed in this scenario, and I have no knowledge of appropriate human controlled drug prescriptions. I am more alarmed to realize that when a controlled drug prescription is assigned to a particular owner under their pet, the owner may have a harder time obtaining a controlled drug if they need one. This could endanger proper medical care of humans.

After realizing how much time it took to enter a full prescription dispensed from a veterinary clinic into the PDMP, I quickly decided I could only write prescriptions, since searching the database takes far less time. I work at several different clinics as a relief veterinarian, and I am paid hourly. Dispensing a single prescription took me 10-15 minutes, as I had to enter all the client's information, my information, the clinic information, and track down the owner veterinarian's DEA number. A clinic paying me for this amount of time for each controlled drug prescription is ridiculous. I cannot delegate this duty, since I work at different clinics and have no long-term relationship with the staff. Even more appalling in terms of time is the requirement of a Zero Daily Report. I estimate this would take me about an hour per week of admin time. Since sometimes I am the only veterinarian in a clinic, substituting for the regular veterinarian, I have to be able to prescribe controlled drugs to properly care for my patients. Unfortunately, writing prescriptions still takes some time to look up an owner in the database, and human pharmacies do not carry all the controlled drug forms best used in animals. Like many veterinarians, I have chosen the option of only dispensing 72 hours of medication to avoid the reporting requirement - but some patients need more than that.

Relief veterinarians are a growing niche in the profession, and the PDMP is even harder for us to navigate. It is especially hard for Alaska clinics to find relief veterinarians; without even advertising I am booking many months out and turning down work. Many clinics look outside the state despite our expensive licensing fee (which is rising due in part to the Veterinary Board's duty of pursuing PDMP violations). Having to use the PDMP is an even greater hurdle to a relief vet providing help for clinics (and their clients and patients) suffering from a

veterinarian shortage. You may have heard about the desperate shortage of veterinarians in Juneau; our time spent on the PDMP, which provides NO benefit to pets or people, means more sick patients and worried clients we have to turn away.

I hear of vets choosing less than optimal drugs for patients due to the burden of PDMP reporting, and I am finding myself doing the same. Just a couple of examples: the drug that I think is best for cough suppression is controlled, so we often default to a non-controlled drug that I personally think is less effective and has a higher risk of side effects. In cats, we used to frequently use Buprenorphine for pain control, as it is very effective, the injectable form can be absorbed through the tissues of the mouth, and it does not carry the risk of kidney damage that non-steroidal anti-inflammatories do to sensitive cat kidneys. The requirement of reporting Buprenorphine prescriptions to the PDMP has made it much more difficult to safely manage feline pain.

I have spoken with veterinarians in multiple clinics in Alaska as I work in various locations, and all seem to be struggling with how to comply with the PDMP while still providing the best care to their patients. These complications and burdens to veterinarians attempting to use the PDMP database lead to my belief that veterinarians should be exempted, as has been decided in the majority of other states.

Thank you for reading my concerns as you consider this issue.

Sincerely,
Ariana Anderson, DVM
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