

February 1, 2022

The Honorable Senator Holland
State Capitol Room 115
Juneau AK, 99801-1185

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

Dear Senator Holland,

I am one of your constituents and have been practicing veterinary medicine for 37 years. I have been practicing in Alaska since 1986. In that time, I have been an associate veterinarian at 2 locally owned practices, a staff veterinarian and administrator at Pet Emergency Treatment, and worked at Anchorage Animal Care and Control as well as operated a house call practice which provided services to Girdwood for many years. I volunteered on the Iditarod for several years in the late 1980's and early 1990's and returned to it in 2021 and again this year. I have also done veterinary mission work in the Kingdom of Tonga. I have served on various veterinary boards for most of my years in Alaska, most recently the Alaska State Veterinary Medical Board until 2020. I thank you for sponsoring SB 132.

I maintain a DEA license which regulates the use and dispensing of controlled substances. In the last few years, we are also required to adhere to a Prescription drug Monitoring Program (PDMP). This PDMP is not working. It is unusable in our situation.

- **The PDMP database was established for human medicine.** We cannot inquire about prescriptions for an animal patient. If we go into the system, we get information on the person who's name we are putting in. It may or may not be the same person who brought that pet in previously. Pet's do not have unique identifiers. They may be listed under several owners, roommates, spouses, or friend bringing it in. They may be called different names by different people. The next time someone brings that pet in for a refill, it doesn't show up under the pet's name. That is not visible. But we can get a lot of confidential health information on the person's name we input. I have never taken a HIPPA class and am certain my clients do not want me knowing about their confidential health information. **This is an invasion of privacy.**
- **I already am licensed through Drug Enforcement Agency (DEA).** This carries a significant level of accountability, record keeping, and medication storage requirements. 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. This oversight is to control/prevent diversion from licensed professionals to drug dealers and users.
- **Veterinarians have not been shown to be a significant source of diversion for drugs.** Veterinarians in Alaska from 2015-2018 prescribed .3% to 1% of total Morphine Milligram Equivalents (source: Board of Pharmacy). 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.**

- **The cost of obtaining a professional license to practice veterinary medicine in Alaska is the highest in the nation.** Add to that the cost of our DEA license, it is significantly detracting veterinarians from coming to Alaska to practice. There is a significant shortage of veterinarians in Alaska. Call around and see how many places are taking new clients and you will need to make many calls to find someone. With the current requirement that the Board of Veterinary Examiners investigate veterinarians that fail to use a non-usable database correctly, and the costs associated with forcing use of an unusable database, our licensing fees are expected to escalate. This is a waste of resources in an already overburdened sector. It has become a vicious cycle of lack of veterinarians practicing medicine and making it difficult to find veterinarians willing to volunteer to be on the Board of Veterinary Examiners. We simply cannot attract new veterinarians.

As a medical provider it is important to me that the PDMP is used correctly to track trends of human's opioid shopping. **I thank you for your sponsorship and urge you to promote and support SB 132 and join thirty-four 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 veterinarians to continue to provide appropriate care and medical management for our 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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