



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Commerce, Community, and
Economic Development

BOARD OF VETERINARY EXAMINERS

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House Health and Social Services Committee

Representative Zulkowsky, Chair
Representative Spohnholtz, Vice Chair
Representative Matt Claman
Representative Harriet Drummond
Representative Geran Tarr
Representative Sharon Jackson
Representative Lance Pruitt

Dear Esteemed Health and Social Services Committee Members,

The Board of Veterinary Examiners is writing in **OPPOSITION** to HB 242, “An Act relating to the prescription of opioids; relating to the practice of dentistry; relating to the practice of medicine; relating to the practice of podiatry; relating to the practice of osteopathy; relating to the practice of nursing; relating to the practice of optometry; relating to the practice of pharmacy; **relating to the practice of veterinary medicine**; relating to the state medical examiner; relating to the controlled substance prescription database; relating to the duties of the Board of Pharmacy; and providing for an effective date.”

If enacted into law, HB 242 requires that the Board of Veterinary Examiners create regulations to standardize opioid prescription based on Morphine Milligram Equivalents (MMEs). Due to the variety of species veterinarians treat on a daily basis, MMEs cannot be used to standardize dosing in veterinary medicine. Calculating dosing for animals in MMEs has not historically been, nor is currently recognized, as the proper method of prescribing in veterinary medicine. Changing the fundamentals of appropriate prescription methods in veterinary medicine is entirely inappropriate and could have devastating effects on animal health. The Board of Veterinary Examiners has no basis in science or technology to develop the MME standard required in HB 242. The Board is very concerned that we will end up with a statute that we cannot use to form sensible regulations. If passed as proposed, HB 242 guarantees problems for the Board of Veterinary Examiners, for the veterinary profession, and for the general public—all costs with absolutely no corresponding benefits.

The Board of Veterinary Examiners has no opinion on the appropriateness of the use of a standard MME scale for humans, as it would be outside of our scope of practice to do so. We stand in opposition of HB 242 as it is currently written and would be open to removing our opposition should the Committee amend the bill with the removal of veterinarians from the bill’s intent and language.

Respectfully,

The Board of Veterinary Examiners