

From: Eva Dudek
To: [Kathy Holscher](#); [Richard Proehl](#)
Subject: Veterinarians in K-TRACS
Date: Monday, March 19, 2018 4:31:16 PM

Mr. Chairman and members of the Committee, thank you for the opportunity to provide testimony opposing HB 2759 today. My name is DR. Eva Dudek. I am a small animal veterinarian from Parsons, Kansas. Today I would like to share with you the concerns I have regarding the inclusion of veterinarians in K-TRACS reporting.

As a veterinary practitioner, I support the desire to reduce human prescription opioid abuse and certainly want to help with a solution to the problem. However, there are no incidences on record that this is a problem in veterinary medicine to constitute a hasty decision to strip veterinarians of our reporting exemption.

I am currently registered with the Drug Enforcement Agency (DEA) and Kansas Board of Veterinary Examiners (KBVE) to provide controlled substances to my patients, when medically necessary. This registration requires me to log every controlled substance used in my practice, as well as those dispensed. Both the DEA and KBVE review the logs for accuracy and any increase in substance usage. I feel having the KBVE at my premise, providing an inspection which includes drug log reviews is more oversight than intering controlled substance information into an electronic database that no one is required to query.

We shouldn't be applying a "one size fits all" approach to Prescription Drug Monitoring Programs (PDMP). Contrary to human medicine, if a client brings an animal into my clinic I am required by law to perform a full physical examination. The evaluation may indicate a need for radiographs or other additional testing. This must all be completed before dispensing or scripting any controlled substance. While pet insurance is available, it is not widely used by our clients. Therefore, any cost associated with implementing the mandatory reporting will ultimately be passed down to my clients compromising the health and welfare of these pets.

As a veterinarian, I am not comfortable with a PDMP which is designed for human medical information, not animal information. I have several clients with multiple pets in their household. Often it isn't the same person bringing those animals in each time. For the purposes of reporting to K-TRACS, how am I supposed to positively verify that the brown dachshund brought in today was "Sammie" and not "Sadie"? Your are asking me to put information into a government system that I cannot, with complete certainty, guarantee is accurate. To me that presents a problem and shows how unreliable reporting animals to K-TRACS really is.

Again, I am concerned about the human opioid drug crisis, and am acutely aware of and educated as to the risks involved with dispensing opioids and other controlled substances. However, I adhere to very stringent regulations set forth by the DEA and KBVE and believe additional reporting to K-TRACS is extremely unnecessary. I thank you for your time today and encourage the committee to fail HB 2759. I'd be happy to stand for questions at the appropriate time.