



January 29, 2016

Honorable Bill Walker  
Office of the Governor  
PO Box 110001  
Juneau, Alaska 99811-0001

Dear Governor Walker:

The Controlled Substances Advisory Committee (CSAC), created under AS 11.71.100, is an advisory board made up of various subject-matter experts in the field of controlled substances, with expertise in medicine, law enforcement, and citizenry. One of the duties of the CSAC is to recommend regulatory changes to the Board of Pharmacy regarding the prevention of “excessive prescribing of controlled substances and the diversion of prescription drugs into illicit channels.” See AS 11.71.110(2). According to the Alaska Division of Public Health, 54 Alaskans died of prescription opioid overdose in 2015 and an additional 33 died of heroin overdose. A significant percentage of heroin users become dependent on opioids through the use of prescription drugs. As discussed in more detail below, the CSAC has concluded that Alaska’s Prescription Drug Monitoring Program (PDMP), as currently enacted, faces unnecessary limitations in its effort to respond to the opioid epidemic currently being seen in Alaska.

Due to the fact that the committee’s recommended modifications require a statutory change – as opposed to a regulatory change – the CSAC is advising you of its proposed modifications. The reasons and rationale for the proposed modifications are set forth in the attached white paper entitled, “*Increasing the Effectiveness of Alaska’s Prescription Drug Monitoring Program (Alaska’s PDMP)*”.

In short, Alaska’s PDMP, managed by the Board of Pharmacy, is a statutorily created electronic controlled substance database designed to enhance patient care and reduce misuse, abuse, and diversion of controlled substances. Over the past several months, the CSAC has reviewed Alaska’s PDMP and discovered several areas that limit the overall effectiveness of the PDMP. In the opinion of the committee, those limitations are easily addressed, and in so doing, would increase the effectiveness of the PDMP and reduce the recurring opioid abuse occurring in Alaska. Specifically, the CSAC recommends nine modifications to Alaska’s PDMP:

1. Require all prescribers and all pharmacists to register with the Alaska PDMP.
2. Require prescribers and pharmacists to review the PDMP database when prescribing or dispensing a controlled substance to a patient.
3. Authorize prescribers and pharmacists to delegate database access to supervised employees or clinical staff.

4. Authorize the Board of Pharmacy to forward unsolicited notifications to prescribers and dispensers database information about patients who may be obtaining controlled substances inconsistent with generally recognized standards of care.
5. Collect dispensing data and updating the PDMP database weekly.
6. Authorize PDMP database access to the State of Alaska Medicaid Pharmacy Program.
7. Authorize PDMP database access to the State of Alaska Medicaid Drug Utilization Review Committee.
8. Authorize PDMP database access to the State of Alaska Medical Examiner.
9. Authorize de-identified PDMP data access to the State of Alaska Department of Health and Social Services (Alaska DHSS) Division of Public Health.

These modifications are consistent with national recommendations of the American Medical Association's Task Force to Reduce Opioid Abuse, which urges states and providers to utilize prescription drugs monitoring programs to reduce prescription drug misuse, overdose, and death. The effects of heroin and opiate abuse in Alaska are well-documented. The CSAC recommends that action be taken to strengthen one of Alaska's most important tools in combating this epidemic – the PDMP.

Sincerely,

Robert E. Henderson  
Chief Assistant Attorney General  
Chair, Controlled Substance Advisory Committee

Enclosures as stated

cc: CSAC members (*via email*)