

Re: HB 2128, prescription status of pseudoephedrine products

I was a Research Analyst at the Oregon Criminal Justice Commission for five years, 2000 – 20005. While working at the CJC I authored a report documenting the connection between methamphetamine and property crime rates. Until retirement, I was a Crime Analyst at the Beaverton Police Dept. for ten years, 2005 – 2015. The views expressed here are my own and I do not speak for either of those agencies. I am opposed to the adoption of this bill.

While at the Beaverton Police Dept. I fielded calls from prospective home buyers wanting to know if a particular house had ever been a clandestine drug lab (“clanlab”): in general, only very recent data is available from local police reports. Renters also wanted to know the same information about rental units. A database of homes not deemed fit for human habitation has bounced from DEQ to BOLI to the Oregon Health Authority, but once a home has been certified as safe for habitation, there is no publicly available record of that location.

Since clanlabs were largely eliminated by 2005 HB 2485, that concern has waned, but when clanlabs come back, it will become a worry once again for landlords, tenants, and home buyers. People with undiagnosed maladies will always wonder about the history of their home. If there had been a clanlab, how can they really be certain there is no residue affecting them?

Drug manufacturers may cover the operating costs of NPLeX, the leading registry database for precursor purchases, but that does not cover the personnel expenses when investigators or analysts are called away for training. Nor does it cover the high cost for law enforcement investigators to search the database and filter out people of concern, much less the cost of personal contact and whatever followup is deemed necessary. I have used similar data sources, and can tell you that it is not easy to find the needle of concern in the haystack of data, even with tools to flag incidents or people possibly of concern.

The cost of clanlab cleanup might be covered to some extent by homeowners insurance policies, but will a claim lead to higher insurance rates in the future? Will the drug manufacturers cover the cost of enforcement and cleanup if clanlabs become common once again? Unlikely!

NPLeX advertises that their data is only available to LE, but I found a sample report on the Internet that appears to contain un-redacted personal data (name, DOB, drivers license, address). Can we trust them to safeguard the information of Oregonians?

Consider that this bill provides the unique situation in which doing nothing provides the greatest benefit! Will you be willing to tell your constituents that your vote could cost them the high price of cleaning up a clan lab, commonly estimated at \$2,500 to \$25,000 depending on the type of lab and extent of contamination? Thankfully, I was never involved in a clanlab “bust,” but is it any wonder that those who have are so committed to protecting us from this scourge?

We have an excellent system that works, why trade it in for a system that costs more and works less well? NPLeX is a good tool as far as it goes, but it is far better to not need the tool at all!

Thank you for your careful consideration of this bill and the full impact that it may have. Please do not allow yourselves to be confused by presentations about how awful methamphetamine is; the intent of prescription status relates only to the deterrence of clandestine methamphetamine labs.

Yours,
Meredith L. Bliss