

Cascade Policy Institute's recent [study](#) of Oregon's 2005 prescription-only law for cold and allergy medicines containing pseudoephedrine found that the decline in Oregon's meth lab incident statistics since 2004 does not stand out in comparison with neighboring and nearby states that do not have a prescription requirement.

In a February 25th Oregonian op-ed Lincoln County District Attorney Rob Bovett challenged our study on several grounds. He pointed out, for example, that Washington state reported significantly more meth lab incidents in 2009 than reported in the federal data our authors used. To address Mr. Bovett's concern about inconsistent data, our study authors crafted the following response, which we believe reinforces their original conclusion:

Response to questions about data

Chris Stomberg and Arun Sharma March 1, 2012

Some commentators have questioned our use of data from the Drug Enforcement Administration's El Paso Intelligence Center (EPIC) in our study titled "Analyzing the Impact of Oregon's Prescription-only Pseudoephedrine Requirement."¹ We believe our analysis and conclusions are robust as discussed below.

1. Our use of EPIC data

As pointed out in our paper, EPIC data have been widely cited by public officials in Oregon, federal officials, and newspapers to evaluate the effect of Oregon's Rx-only law. For example, the Oregon Attorney General cited declining incidents in Oregon according to EPIC data as evidence of the effectiveness of Rx-only law.² The EPIC data, therefore, are a natural touchstone for evaluating these claims. In general, the EPIC data are also used at the federal level. For example, the Office of National Drug Control Policy at the White House used EPIC data in its study of trends, titled "Methamphetamine trends in the US".³ Our study similarly focuses on trends across various states and is therefore a natural resource for this purpose.

2. Alternative data support our analysis and conclusions

Some commentators have suggested that the EPIC data consistently under-report the number of incidents in some states. For example, it has been suggested that one should instead rely on the Washington Department of Ecology (DOE) for information on incidents in Washington, rather than EPIC data. The Washington data do appear to report a generally higher number of incidents than that found in the EPIC data: one example cited by commentators involves a 2009 data comparison, where DOE reports 186 incidents to EPIC's 72 incidents. However, researchers in federal agencies have also noted these types of differences between the two sources and attribute them to likely differences in data collection and reporting methodology.⁴ We are cognizant of such issues, and in our study (both in the text and in the statistical analyses) we focus on trends in incidents rather than

¹ Chris Stomberg and Arun Sharma, "Making Cold Medicine RX Only Did Not Reduce Meth Use: Analyzing the Impact of Oregon's Prescription-only Pseudoephedrine Requirement", *Cascade Policy Institute*, February 2012

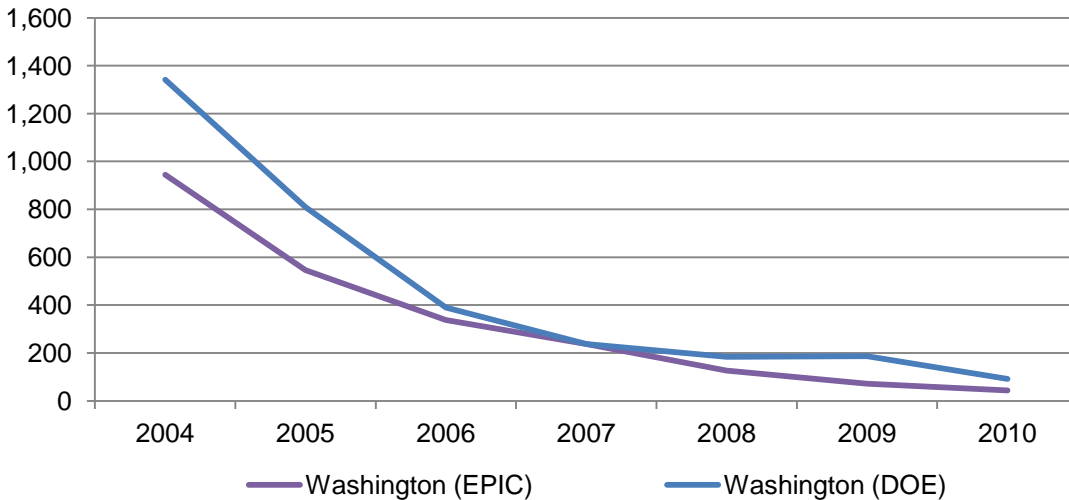
² John R. Kroger, Testimony to United States Senate Caucus on International Narcotics Control, *Oregon's Methamphetamine Control Strategy*, April 13, 2010. Available at <http://drugcaucus.senate.gov/kroger-4-13-10.pdf>, accessed February 27th, 2012

³ Office of National Drug Control Policy, "Methamphetamine Trends In the United States", July 2010, available at http://www.whitehouse.gov/sites/default/files/ondcp/Fact_Sheets/pseudoephedrine_fact_sheet_7-16-10_0.pdf

⁴ Dave Rodriguez, "Methamphetamine and Related Crime: The Impacts of Methamphetamine Abuse", Office of National Drug Control Policy, March 2006.

specific numbers of incidents. In fact, by this measure the two data sources appear to be in very good agreement. For example, in our study, we noted that EPIC data report a 95% decline in incidents in Washington from 2004 to 2010 (944 falling to 44). Meanwhile, the Washington DOE data report a very similar percentage decline in incidents in Washington – 93% over the same time period (1341 falling to 92) as shown in Figure 1 below. These two data series are very highly correlated, with a correlation coefficient of 0.96.⁵ The trend in the Washington DOE data, in other words, is very similar to the trend in the EPIC data and our conclusions are therefore the same.

Figure 1: Methamphetamine incidents in Washington



3. Our statistical analysis is robust to the choice of data source – EPIC or Washington DOE

It should be evident from the previous discussion that the statistical analysis of trends in incidents would likely be unaffected whether one used DOE data or EPIC data for Washington. We have indeed performed this check and the regression results are essentially unchanged after making this substitution. We therefore stand by our initial conclusions based on the EPIC data.

4. Mixing and matching different data sources could lead to inappropriate conclusions

Because of the likely reporting or data collection differences between the Washington DOE data and the EPIC data, it is not valid to make comparisons between these two series at different points in time and we do not do that. For example, it would not be valid to compare EPIC incident data from 2004 with Washington DOE data in 2009 as some commentators appear to be implicitly doing.

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⁵ Note that a correlation coefficient of one would occur if the two series move identically.