From: Nancy Baran [/O=ONETEAM/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=NBARAN]
Sent: 8/17/2009 4:53:08 PM
To: Pat Corridon [/O=ONETEAM/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=PCORRIDON]
CC: Umesh Solanki [/O=ONETEAM/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=USOLANKI]
BCC: Nancy Baran [/O=ONETEAM/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=NBARAN]
Subject: Re: HELP please...Fw: Suspicious Orders

Tx Pat -

Interesting- a few aspects I had not heard of...such as increases to 40 percent if abuse type drug. I can't help but wonder how the products were classified so the report would know this and if the report was hard coded to what were abuse type drugs that were known back when written or if there was room for additions.

Tx for pulling all of this out. One thing I can say for sure - I am not going to stick my neck out there and speak to how tight of a process we have because we really don't (ex: no one at SSL any longer, etc...)

Nancy

----- Original Message -----
From: Pat Corridon
To: Nancy Baran
Cc: Umesh Solanki
Sent: Mon Aug 17 17:55:55 2009
Subject: RE: HELP please...Fw: Suspicious Orders

Here are some scrambled facts....

Noemi is only reviewing Elizabeth products - there was a man named Earl Jones who would monitor SSL products, but once the plant closed, he was done.
CS is supposed to contact customers if they have DEA items that look suspicious, and contact them - usual result is to document the conversation.
I have to look for some other stuff, but here's something to start.
You are correct to go with UPS monitoring for licenses, which eliminates the need for us to do that - and you could speak to not shipping to an unknown -especially DEA items.

Suspicious Order Report
Report 7.17.5
?   Per IT, an order appears on the suspicious order report if it meets the following criteria:
?   If the amount ordered by the customer is 25% over the customer's rolling average of total quantity ordered By customer, a rolling average total of quantities ordered and number of lines
?   The 25% threshold will increase to 40% for abuse type drugs.
?   The suspicious order report is printed several times/day. There is a separate suspicious order report for SSL and SOD.
?   The report is printed automatically at the time that the EDI orders are received. The report does not include manually entered orders.
?   Customer Service reviews (eyeballs) the suspicious order report throughout the day (when a new report is created).
?   Any order that looks unusual is investigated and any unusual items are cleared before the order is released.

-----Original Message-----
From: Nancy Baran
Sent: Saturday, August 15, 2009 3:06 AM
To: Pat Corridon; Umesh Solanki
Subject: HELP please...Fw: Suspicious Orders

Big question from legal.....where I get hung up answering starts with the in writing part....
First part of this could be answered by the use of our DEA suspicious report- I would just need to ask Umesh to look at the specs of the report because I don't have my notes with me. In other words, orders are flagged as suspicious if they are -
A) first time purchases
B) exceed normal usage (would just need to see what the threshhold is - ex: what percent over and based on what are orders considered suspicious) Umesh- can you tell this easily by looking at the code? Given the audience...I'd like to get it right.
Last part of the first question-

I know that Noemi's group has a role in monitoring DEA aspects, but can't speak to exactly what they do. Pat- how would you briefly describe what she or her group does?

Second part of this - I guess I could respond by saying something along the lines of how are system is set up to prevent shipping a controlled product without a valid DEA license.....which is a document governed by the DEA who determines the customers eligibility. Our customer master database is updated monthly by means of a download of their eligibility data. Without a valid DEA license, an order will fail at point of entry. Our system (MFG PRO) will generate a failure report for any order rejected for DEA purposes/lack of current license in our system. Our 3rd party logistic provider (UPS-SCS) has a level of security equally as secure as our systems acting as a secondary cKeckpoint. This makes it virtually impossible to sell to a customer that is not authorized to distribute controlled products.

Any input or suggestions you have to make my response more accurate/complete, would be much appreciated.

Thanks,
Nancy

----- Original Message -----
From: John LaRocca
To: Nancy Baran; Michael Perfetto
Cc: Doug Boothe
Sent: Fri Aug 14 18:58:18 2009
Subject: Suspicious Orders

Nancy, Mike – do we have a written procedure in place to govern the handling of orders for Class II drugs that are out of line with previous experience from customers, from unknown customers, or are for unprecedented amounts? Also what is the procedure by which we get comfortable that our customers are registered and permitted to handle Class II's?

        John LaRocca
        Vice President/Chief Legal Officer

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