

Department: Distribution Operations	SOP #:064
Title: Suspicious Account Reporting	

1.0 SCOPE

The directives contained in this SOP apply to all Anda DEA Compliance Analysts who are involved in the review of initial applications for controlled substances purchasing abilities, requests for limit increases and/or requests for new control families.

2.0 PURPOSE

To document the procedures involved in identifying and reporting suspicious accounts deemed to likely be of interest to applicable regulatory agencies.

3.0 PROCEDURE

I. Designation/Duties of Reporting Analyst

- An analyst will be designated as the reporting analyst and will be responsible for transferring all reportable accounts to the appropriate administrative and/or governmental agencies in accordance with the procedures set forth herein.

II. Review of Accounts

- In accordance with all existing SOPs, analysts will conduct due diligence on accounts provided for review by analyzing all documents included in initial applications for controlled substances purchasing abilities, requests for limit increases and/or requests for new control families.

III. Identification of Suspicious Accounts

- After conducting due diligence, should the analyst determine that an account exhibits: (a) an abnormally high ratio of controls to non-controls dispensed; (b) unusual dispensing patterns that may reflect diversion or an increased

potential for diversion (e.g. high pill count per opioid prescription); (c) myriad suspicious orders (i.e. orders of abnormal size, pattern, frequency, or volume); (d) a history of diversion; or (e) any other activity or characteristic which the analyst determines may be of interest to the department or administrative agencies, the analyst will, immediately upon concluding the account review, provide a summary of his or her findings ("Summary") via email to the other analysts within the department.

IV. Review of Suspicious Accounts

- The analyst that deems an account suspicious will immediately upon discovery send the account to the reporting analyst to be reported to the appropriate administrative and/or governmental agencies.

V. Reporting Procedures for Suspicious Accounts

- The reporting analyst will complete the following actions prior to close of business of the same day.
- Enter the relevant account information in the departmental log of accounts to be reported.
- Note the event in TPS 2.2.4.1.
- Change the "(P)erm/(T)emp Control Flag" status to "P" and enter the appropriate date in TPS 2.2.4.1
- Report the account via email, to all appropriate regulatory agencies.

VI. Reporting Procedures for Reinstated Accounts

- For reinstatement of accounts previously reported, immediately upon conclusion of the review, the analyst will provide email notification to the reporting analyst that the account will be reinstated.
- Prior to close of business of the day on which the account is reinstated, the reporting analyst will enter the relevant account information in the departmental log of accounts to be reinstated.
- The reporting analyst will note the event in TPS 2.2.4.1.
- The reporting analyst will change the "(P)erm/(T)emp Control Flag" status to "N" in TPS 2.2.4.1.
- The reporting analyst will report the account in the preferred manner to all appropriate regulatory agencies.



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STANDARD OPERATING PROCEDURE

4.0 REVISION HISTORY

SOP will be reviewed annually, each February, by management

Effective Date	Version	Author	Change Description
October 2017	064	John Kincaide	Original Issue