Actavis

Suspicious Order Monitoring Program
Overview

As required by 21 CFR 1301.74 (b), Actavis Pharmaceuticals, Inc. operates an order monitoring system that discloses suspicious orders of controlled substances. Additionally, Actavis employs a "total SOM Program" that consists of customer vetting, order monitoring, and order investigation and disposition.

Actavis vets all prospective customers and requires the completion of a detailed questionnaire. Potential customers provide information relative to their business type, customer base (e.g. nursing homes, retail pharmacy locations, etc.), industry membership (e.g. HDMA), registrations (i.e. DEA and State Boards) and purchasing commitment. Actavis customers must order multiple product lines and cannot exclusively order controlled substances. Actavis's customers are primarily wholesalers, chains, distributors and mail order companies. Actavis does not sell direct to pharmacy locations.

Actavis utilizes an order monitoring component of SAP (a business management software) to evaluate a variety of order characteristics to intelligently determine whether a controlled substance order should be "suspended". These characteristics include order size, ordering frequency, ordering pattern, and similar attributes that assist in evaluating the likely "suspiciousness" of an order. Actavis's Customer Relations Department performs an initial review of the suspended order, at this point considered an "order of interest," and contacts the customer to request additional information/order justification.

Actavis's DEA Affairs Department is responsible for the investigation and disposition of controlled substance "orders of interest". These orders are thoroughly investigated and if substantiated by the customer, they are released within the SAP System and filled by Actavis's Gurnee, IL Distribution Center. If an order is deemed suspicious, the customer's order is cancelled and an investigation report is completed. All suspicious orders are reported to the DEA Chicago Field Office.