

Appointment

From: Bratton, Edward [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=WALGREENS.ONMICROSOFT.COM-54052-BRATTON, EDWARD J. (EJB4E7BB377)]
Sent: 11/1/2013 8:35:12 AM
To: Stahmann, Eric [eric.stahmann@walgreens.com]
Subject: FW: Rx Integrity - Southern Division Conference Call/Webinar
Attachments: Pharmacist GFD Coaching Opportunities.pdf.pdf
Location: Open for Details

Start: 11/1/2013 1:00:00 PM
End: 11/1/2013 2:00:00 PM
Show Time As: Tentative

Importance: High

-----Original Appointment-----

From: Tisdell, Lorinda
Sent: Monday, October 07, 2013 2:33 PM
To: Tisdell, Lorinda; Kot, Alexandra; Market1LP; Market3LP; Market6LP; Market9LP; Market18LP; Market19LP; Market23LP; Market24LP; Market28LP; Dymon, Christopher; Hoang, Bobby
Cc: SouthDivVPs; Bernard, Charles; Cannon, LaVonnia; McGowan, Richard; Hutchens, Marlin; Kirshner, Elliott; Saenz, Jaime; Hesly-Brown, Deborah; Hardin-Oliver, Carole; Raval, Sujit; Healy, Douglas; Chang, Young; Rohn, Wesley; Espinosa, Bobby; Palmer, Charles; Vazquez, Sandra; Lopez, Elia; Barnett, Jennifer; Lehoczky, Georgia; Cedeno, Cesar; Farmer-Driscoll, Michelle farmer driscoll; Perez, Hector; Muscato, Matthew; Cibiras, John; Garcia, Ralph; England, James; Perez, Marisol; Lucas, Michael; Keimach, Brian; Carralero, Michael; Schkade, Chris; Chowdhury, Junaid; Tran, Tuan; Dunmiles, Michelle; Reagor, Tommy; Christopoulos, Chris; Newman, Cliff; Gurreri, Anthony; Chhadua, Raj; Morrow, Hugh; Malloy, Matt; Bustelo, Joan; Colon, Ada; McLaurin, Chris; Jones, Lazar; Patel, Aj; Vallejo, Carlos; Cummings II, William; Forbes, Edward; Lanzetti, Ed; Van Hoose, Bill; Weisser, James; Wheeldon, Bryon; Robinson, Krishwin; Macaulay, Roger; Marshburn, Brad; Glisson, Haley; Catalina, Brian; Palyok, Tarra; pihaley@aol.com; Isbon, Thomas; Markovich, Vily; Mitchell, Julie; Marakas, Tony; Aldrich, Anne-Marie; Hawkins III, Ben; Hernandez, Joy; Bratton, Edward; Polster, Tasha; Belton, Connie; Szymczak, Lori; Berger, Brent; Vo, Anthony; Wilkinson, Vince; Gray, Stacey; Santiago, Dennis; Pappos-Elledge, Niki; Lutchman, Brian; Wedekind, Shannon; Treece, Kimberley; Gaude, Jeff; Muller, Christina; Lemoine, Jon; Parisi, Irene; Castro, Sylvia; McCollum, Kevin; Donovan, Jackie; Rowland, Jeff; Vander Jeugdt, Dave; Le, Anthony; Fredericksen, Paul; Littlefield, Manuel; Kratofil, Keri; Robinette Sr, Gerard; Siemoneit, Erv; Cuccia, Mike; Axem, Lakeisha; Lemke, Roger; Moore, James; Ward, James; Edwards, Gale; Elkareh, Nabil; Myers, Greg; McInaney, Mark; Simonetti, Tracy; Ortega, Eileen; Ramirez, Cecilia; Matos, Jose; Delgado, Ivette; Koelz, Tammie; Rakauskas, Melissa; Hernandez, Mario; Satterfield, James; Braley, Rob; Puckett Beasley, Jessica; Moothedan, Augustine; Ghanem, Ziad; Pickos, Mick; Fox, Kurt; Rook, Jayme; Harris, Anthony; Thakkar, Minal; Primuth, Greg; Gaitan, Rick; Philip, Jeenu; Gonzalez, Carlos; Davis, Jason; Mehler, Julie; Robinson, Brian; Grisham, Andrew; Meyers, Mark; Teal, Ryan; Sayler, Debbie; Swiencicki-Reinert, Lora; Quirindongo, Jaime; Nickols, James; Indovina, Ricky; Parra, Fermin; Ortiz, Roberto; Douville, Lynn; Lyall, Matt; Banks, Robin; Johnson, Stephen; Davis, Chris; Smith, Brian; Gubbins, Terry; Avila, Fernando; Ortiz, Oscar; Peterson, Shauna; Sieminski, Royetta; Kucera, Monique; Reddick, Randy; Jacob, Lince; Allen, Debbie; Bialczak, Jeff; Viteri, Johanna; Anglade, Eric; Wilkerson, Micah; Cash, Natasha; Rengering, Paul; Diaz, Jose; Nikolich, Tony; Collins, Terence; Ashlock, Susan; Johnson Jr, Jay; Sanchez, Jaime; Joiner, Mollie; Velez, Edwin; Fesler, Craig; Sheppard, Dave; Gwyn, Billie Jo; Collier, Jonathan; Montgomery, Adana; Smith, Marie; Sendejo, Ted; Thompson, Stephanie; Felsen, Meryl; Wilson, Jerry; Ripak, Roy; Espino, Raymond; Stockman, Sharon; Jenkins, Robert; Rodriguez, Melvin; Drake, Bill; Market28RXSupv; Market28DM; Alexander, Ross
Subject: Rx Integrity - Southern Division Conference Call/Webinar
When: Friday, November 01, 2013 1:00 PM-2:00 PM (GMT-06:00) Central Time (US & Canada).
Where: Open for Details
Importance: High

PLAINTIFFS TRIAL
EXHIBIT
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Southern Operation and District Leaders:

Please note, the Genesys Web Meeting is in place of the videoconference that was cancelled.

The **Pharmacist GFD Tool** located on the **Rx Integrity Web Portal** is designed as a coaching tool that provides insight into the GFD process. The Pharmacist GFD tool is primarily used by the RxS, as a coaching tool to address GFD opportunities. The tool can be used during a store visit and will allow the RxS to talk specifics about GFD instead of having a vague conversation with the pharmacist.

Please join us for a **Genesys Web Meeting** to discuss the Pharmacist GFD Tool. A copy of the presentation has been attached to this communication. The Pharmacist GFD Tool is located at: **StoreNet > RxOps > Pharmacy Policy and Procedures > Rx Integrity > Rx Integrity Operations > Rx Integrity Web Portal > GFD Opportunities > Pharmacist GFD.**

Genesys Web Meeting:

Date: November 1st

Time: 1pm CST

Dial-in number: 1-866-855-1224 (Toll Free) OR 1-334-323-1813 (International)

Meeting number: *3888349967* (Enter the * star key before and after the Meeting Number)

To JOIN the meeting [click here](#) and enter in the meeting number

Important Notes:

- Once dialed in, **do not** place your phone on hold. If you need to take a call, please hang up and dial in again.
- Please place your phone on **mute** unless you have a question.

Thank you!

Rx Integrity



Pharmacist GFD
Coaching Opport...



Pharmacist GFD Review *Coaching Opportunities*

Pharmaceutical Integrity Team

October 2013

Walgreens
AT THE CORNER OF HAPPY & HEALTHY™

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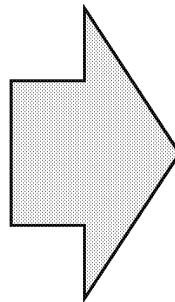
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Agenda

Topics:

- Review select Pharmacists specific to district/market with GFD opportunities
- Review controlled substances validation procedures
- Case Studies
- Review controlled substance prescription examples with the pharmacist



Intended Outcomes:

- Identify opportunities for improvement specific to a pharmacist by reviewing potential issues in controlled substance dispensing
- Reiterate the GFD and TD GFD Validation Procedure



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Why are we doing this?

- To better assist supervision in evaluating overall GFD and controlled substance dispensing by reviewing prescriptions filled by select pharmacists.
- To provide a framework for the RXS to review controlled substance dispensing in our stores.
- This process is intended to assist pharmacists and assess, as well as support, their exercise of professional judgment while carrying out their corresponding responsibility under the law.



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Pharmacist GFD Overview

- Pharmacist GFD Tool:
 - RxS can view pharmacists that have been selected in their district
 - Prescription data is refreshed monthly
 - Pharmacist data is refreshed quarterly
- Pharmacists were selected based on dispensing patterns in 5 or more categories:
 - Alprazolam, Carisoprodol, Hydrocodone, Hydromorphone, Methadone, Oxycodone, all CII, and all CIII - CV
- The report contains prescriptions that can be used as GFD coaching opportunities



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Pharmacist GFD RxS View

Pharmacist Summary:

Employee Name	Job Title	Store	Reasons	Scripts
[REDACTED]	MANAGER PHARMACY DEPARTMENT	[REDACTED]	Details	Examples
[REDACTED]	MANAGER PHARMACY DEPARTMENT	[REDACTED]	Details	Examples
[REDACTED]	PHARMACIST SALARIED DRUG STORE	[REDACTED]	Details	Examples
[REDACTED]	PHARMACIST SALARIED DRUG STORE	[REDACTED]	Details	Examples
[REDACTED]	REGIS PHARMACIST MULTIPLE LOCATIONS-NON SPEC	[REDACTED]	Details	Examples
[REDACTED]	MANAGER PHARMACY DEPARTMENT	[REDACTED]	Details	Examples
[REDACTED]	MANAGER PHARMACY DEPARTMENT	[REDACTED]	Details	Examples
[REDACTED]	REGIS PHARMACIST MULTIPLE LOCATIONS-NON SPEC	[REDACTED]	Details	Examples

The selected pharmacist has a higher than average metric for the following:

High rate of Controls
 High percent of 15/30 Oxycodone
 High cash psc percent of Hydromorphone
 High rate of Hydrocodone
 High quantity of C2 Drugs

[Close](#)

Rx Nbr	str nbr	drug name	sig	fill sold dt	qty	days supply	reason
		HYDROCODONE /ACETAMINOPHEN 10-500 T	TK 1 T PO Q 4 H AROUND THE CLOCK. MAY TAKE UP TO 5 TS D FOR KNEE PAIN	9/26/2013	150 30		Combination with GABAPENTIN 300MG CAPSULES - 2013-09-19 , ALPRAZOLAM 2MG TABLETS - 2013-09-28
		HYDROCODONE /ACETAMINOPHEN 10-650 T	TK 1 T PO Q 6-8 H PRN	9/26/2013	100 25		Combination with CARISOPRODOL 350MG TABLETS - 2013-09-26 , ALPRAZOLAM 2MG TABLETS - 2013-09-26
		METHADONE 10MG TABLETS	TK 4 TS QAM AND 2 TS AT NOON THEN TK 4 TS QHS FOR PAIN	9/24/2013	300 30		Methadone - High QTY
		HYDROCODONE/ACETAMINOPHEN 7.5-500 T	TK 1 T PO Q 8 H	9/20/2013	90 30		Combination with CYCLOBENZAPRINE 10MG TABLETS - 2013-09-20 , ALPRAZOLAM 0.25MG TABLETS - 2013-09-15
		HYDROCODONE /ACETAMINOPHEN 10-325 T	TK 1 T PO Q 24 H	9/17/2013	30 30		Combination with GABAPENTIN 300MG CAPSULES - 2013-09-17 , ALPRAZOLAM 1MG TABLETS - 2013-09-17
		OXYCODONE 15MG* IMMEDIATE REL TABS	TK ONE T PO BID	9/17/2013	150 30		New Patient Paying Cash High Qty - Patient Registered on 2013-09- 17
		OXYCODONE 30MG IMMEDIATE REL TABS	TK 1 T PO TID	9/17/2013	90 30		Combination with GABAPENTIN 300MG CAPSULES - 2013-09-17 , ALPRAZOLAM 1MG TABLETS - 2013-09-17
		HYDROCODONE /ACETAMINOPHEN 5-325 TB	TK 1 T PO TID FOR 30 DAYS	9/12/2013	90 30		Combination with CYCLOBENZAPRINE 10MG TABLETS - 2013-09-12 , ALPRAZOLAM 0.5MG TABLETS - 2013-09-12



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Coaching Opportunities

Review: Validation Process for Controlled Substances

Pharmacists should consider all available resources that can assist them in determining the appropriateness of filling a controlled substance prescription. This may include:

- Referencing the state Prescription Drug Monitoring Program website (in states where this is available)
- Reviewing the patient's profile
- Conversation with patient or caregiver
- Considering information from other pharmacists in the community (if indicated).
- Identifying prescriber trends
- Conversation with prescriber or clinical staff as needed

There are 3 key lenses through which a prescription should be evaluated when a pharmacist is presented with a controlled substance prescription.

1. Prescriber
2. Individual/Patient
3. Prescription



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Prescriber Considerations

1. Prescription is written by a prescriber located outside of the pharmacy's trade area.
2. Prescriber routinely prescribes large number (or percentage) of prescriptions for controlled substances relative to prescriptions for non-controlled substances.
3. Prescriber prescribes the same medication, with the same directions, for the same quantity for a large number of individuals.
4. Prescriber provides the same diagnosis for the majority of individuals.
5. Prescriber commonly writes narcotic prescriptions for individuals between 18-35 years old, especially chronic therapy.
6. Knowledge that prescriber operates on a "cash only" basis - does not accept insurance.



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Individual/Patient Considerations

1. Individual pays cash, or insists paying cash for controlled substances even though insurance is on file.
2. Evidence of “doctor shopping” exists.
3. Evidence of “pharmacy shopping” exists.
4. Individual resides outside of the trade area of your pharmacy (cannot be reasonably explained).
5. The individual’s statement and conduct or behavior suggest abuse of controlled substances.
6. Individual routinely attempts to obtain an early refill on controlled substances.
7. Individuals have suspicious relationships with each other.



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Prescription Considerations

1. Prescriptions presented represent a cocktail of commonly abused drugs.
2. Prescriptions presented is for an unusually large quantity or high starting dose.
3. Individual insists on the brand name, or a certain generic company's drug being dispensed.
4. Prescriptions appear to be altered or duplicated.



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Prescription Review

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Prescription Selection

Criteria:

1. High dose controlled substance
2. High quantity Oxycodone
3. High quantity Methadone
4. High quantity Hydrocodone
5. Cocktails such as an Opiate or Hydrocodone, Benzodiazepine and Carisoprodol
6. New patients with a high quantity control substance paying cash



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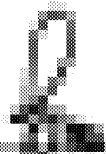
Case Studies

Case Study 1

Carisoprodol 350mg

Sig: 18 PO Q Day

Qty: 540 Refills: 3

PSYCHIATRY AND PHARMACOLOGY	
PATIENT [Redacted Patient Information]	PROVIDER [Redacted Provider Information]
<div><div></div><div>Prescription Date: 05/22/2013</div></div>	
Soma (carisoprodol) oral tablet 350 mg	
Brand:	
Strength: 350 mg	
SIG: 18 PO Q DAY (high dose consent in place)	
Max daily dose:	
Quantity: 540 Tablet	
Refills: 3	
Note to pharmacy: Adjustment for pain mgmt failure... <u>HIGH DOSE CONSENT IN PLACE!</u>	
	
Substitution permitted	Dispense as written



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Case Studies

Case Study 2

Hydrocodone 10/500mg
Sig: 1 PO QID PRN Qty: 120

Carisoprodol 350mg
Sig: 1 PO Q 6hrs Qty: 100

Alprazolam 0.5mg
Sig: 1 PO BID PRN for anxiety
Qty: 30

Elberta Clinic, P.C.

Date: 08/06/2013

Patient: [REDACTED] DOB: [REDACTED]

Address: [REDACTED]

Lorabid 10 mg-500 mg tablet

Qty: **120** Tablet(s) Refills: **3**

Directions: 1 PO QID PRN

Soma 350 mg tablet

Qty: **100** Tablet(s) Refills: **3**

Directions: 1 PO Q 6 HRS

Xanax 0.5 mg tablet

Qty: **30** Tablet(s) Refills: **3**

Directions: TAKE 1 TABLET (0.5 MG) BY ORAL ROUTE 2 TIMES PER DAY AS NEEDED FOR ANXIETY.

Product Selection Forbidden

Dispense as Written



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Case Studies

Case Study 4

Oxycodone/Acetaminophen 10/325mg

Sig:1-2 PO Q 4 hours prn pain, not to exceed 10 tablets per day Qty:300

KCIM - Menorah	
Name _____ MRN _____	
Address _____ DOB _____	
Oxycodone-Acetaminophen 10-325 MG Oral Tablet (**300** Tablet)	
Quantity: (three hundred tablet)	
TAKE 1 OR 2 TABLET EVERY 4 HOURS PRN PAIN, NOT TO EXCEED 10 TABLETS PER DAY	
Dispense as Written	Brand Exchange Permissible
Written 08/08/2013	Refills Authorized **0** Times Rx: 108363163

Case Studies

Case Study 5

Cocktail with multiple prescribers

MONDELLO FAMILY CLINIC
 10000 W. 10th Ave., Suite 100
 Denver, CO 80231
 (303) 755-1234
 Fax: (303) 755-1235

Name: Tracy Myers Age: _____
 Address: _____
 Date: June 10 2013

SECURITY FEATURES ON BACK
 R _____
 Date: June 10 2013

Percocet 10/325 mg
 T tab PO TID PRN
 # 90 (Ninety)

Refill: NR 1 2 3 4 5
 MO DO/ARNP
 To ensure that a brand name product be dispensed, the prescriber must
 handwrite "Brand Medically Necessary" on the prescription form.

MONDELLO FAMILY CLINIC
 10000 W. 10th Ave., Suite 100
 Denver, CO 80231
 (303) 755-1234
 Fax: (303) 755-1235

Name: Tracy Myers Age: _____
 Address: _____
 Date: June 10 2013

SECURITY FEATURES ON BACK
 R _____
 Date: June 10 2013

Xanax 0.25 mg +
 tab PO BID PRN
 # 60 (Sixty)

Refill: NR 1 2 3 4 5
 MO DO/ARNP
 To ensure that a brand name product be dispensed, the prescriber must
 handwrite "Brand Medically Necessary" on the prescription form.

MONDELLO FAMILY CLINIC
 10000 W. 10th Ave., Suite 100
 Denver, CO 80231
 (303) 755-1234
 Fax: (303) 755-1235

Name: Tracy Myers Age: _____
 Address: _____
 Date: 06/10/2013

SECURITY FEATURES ON BACK
 R _____
 Date: June 10 2013

Pharmacy: Walgreens

For: Soma (carisoprodol) tablet 350 mg orally
 Disp: ***90*** (NINETY)
 Sig: 1 tab(s) TID PRN 30 day(s)

To ensure brand name dispensing, prescriber must
 write "Dispense as Written" or "D.A.W." on the
 prescription.
 *Valid only if transmitted by electronic means.

Electronically Generated Signature



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Talking Points

- Not all prescription examples are necessarily bad prescriptions.
- The decision whether to dispense or refuse may vary by pharmacist but should be reasonably explained.
- It's important to look for documentation that the pharmacist used the tools available as appropriate in the decision making process, such as the PDMP, reviewing the patient profile, or speaking with the patient or caregiver.



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What if a prescription example I review with my pharmacist fits within the guidelines of Good Faith Dispensing?

- District and market leadership store visits reinforce GFD. The Pharmacist GFD Tool was designed to assist leadership in having discussions with pharmacists around good faith dispensing.
- Certain prescription examples may appear to fit within the confines of GFD practice. Look for documentation to support the pharmacist's TD/GFD decision.
- The decision to dispense a prescription is ultimately up to the pharmacist, however, proper documentation to support the decision is needed. It is important that pharmacists document all actions taken during GFD process.



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Supporting Documents

- GFD and TD GFD Policy posted on StoreNet
- RX Integrity website, web portal, and CE's located at:
 - StoreNet > Rx Ops > Pharmacy Policies and Procedures > Rx Integrity



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Next Steps

- Review and familiarize yourselves with:
 - Resources available on the RX Integrity website
 - Pharmacists identified in your area
 - Prescription examples specific to your pharmacists
 - Patient, prescriber and prescription considerations
- Incorporate pharmacist coaching on controlled substances in your store visits
- Ensure all stores have a “refused” folder for controlled substances
- Communicate with your pharmacists



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Questions?

- Pharmacy Supervisors can direct questions to the Divisional Rx Integrity

Managers:

- Christopher (Chris) Dymon - East
- Patricia (Patty) Daugherty - Midwest
- Edward (Ed) Bratton - South
- Eric Stahmann - West

OR

- Rx Integrity E-mail: (rxintegrity@walgreens.com)



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Thank You