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Sent: 4/16/2013 4:24:19 PM
To: "RXSs."@walgreens.com
CC: "MPDs, EPDs."@walgreens.com
Subject: Walgreens National TD-GFD Policy (Updated FAQs)
Attachments: national td gfd faq.pdf

Pharmacy Supervisors,

Effective this month, the Walgreens National Target Drug Good Faith Dispensing Policy (TD GFD) became effective. The RxIntegrity team has received many questions from store and district leaders regarding the requirements of this policy. To address these questions, we have updated the National TD GFD policy FAQs (See Attachment).

In addition, your assistance is requested to ensure team members are aware that this policy is a Walgreens policy. It has been developed to provide pharmacists a tool to further aid them in determining if a prescription was written in good faith in addition to utilizing their professional judgment.

The following COMPASS project will be sent to all locations on Wednesday, April 17.

Thank you.

COMPASS Project
Pharmacy Managers,

As of early April, the **Walgreens National Target Drug Good Faith Dispensing Policy (TD GFD)** became effective at your location. This policy was developed to help guide pharmacists through their corresponding responsibility in determining that the prescription was written for a legitimate medical purpose before dispensing in good faith.

What do I need to know?

The National Target Drug Good Faith Dispensing Policy is a **Walgreens Policy** created to assist and support pharmacists in their professional judgment to fill or refuse a target drug.

- When following the Walgreens TD GFD policy, if a pharmacist feels in their professional judgment that a call to the prescriber is warranted, the pharmacist may utilize the points in the 'call to the prescriber' section of the checklist as a guide during the discussion. The prescriber talking points are not mandated but are provided as a talking track to facilitate a conversation with the prescriber. This discussion will help the pharmacist determine if the prescription was written in good faith.
- Note: A diagnosis code is not required in the process of determining whether to fill or refuse a target drug prescription. This is one of several tools within the Walgreens TD GFD policy guidelines, a pharmacist may use to determine the validity of the prescription in good faith.

What do I need to do?

If the patient is **waiting or needs to come back**, please inform team members to refer to the following script when notifying the patient:

- *"I'm sorry, but Walgreens is working hard to ensure our patients get the medications they need, but also that we do everything we can to help reduce the abuse of controlled pain medications. As a result, we have to take a bit more time with each prescription. I apologize for the inconvenience, but the time we take to review each prescription is a necessary to ensure we are meeting our commitment for the safe dispensing of medications to our patients."*

If the prescription has **failed the Walgreens TD-GFD checklist and the prescription cannot be filled**, please inform team members to refer to the following script when notifying the patient:

- *"Walgreens is working hard to ensure the safe dispensing of controlled pain medications. Based on my clinical review and professional judgment, this prescription does not meet the requirements Walgreens has put in place for dispensing these medications. Therefore, we cannot fill this prescription in good faith at this or any Walgreens. I apologize for any inconvenience."*

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For additional reference regarding the requirements of the Walgreens TD-GFD policy, print and review the updated Walgreens **National TD-GFD FAQs (See Attachment)** with all team members. The **National TD GFD FAQs** have been developed to address the most commonly asked questions and reiterate the requirements of this new policy.

Note: This document is also available on StoreNet > Rx Ops > Pharmacy Policy and Procedures > Filling Prescriptions > National Target Drug Good Faith Dispensing.

For any further questions or concerns, email RxIntegrity@walgreens.com or contact your pharmacy supervisor.

By marking this project complete, you have confirmed that you read the above information regarding the TD-GFD policy, printed the attached FAQs, and shared this with your team members as appropriate.

Thank you

NATIONAL TARGET DRUG (TD) GOOD FAITH DISPENSING (GFD) FAQs

PMP FAQs

How many months of data do I have to review from the PMP website?

Review at least 3 months of data or follow your state's regulations.

How many months of data do I have to print from the PMP website?

Print 1 month of data and attach it to the prescription hardcopy. If your state prohibits this practice, follow your state's regulations.

What drug classes are covered within the PMP reports?

Most PMP state databases include data for either C2-C4 drugs or C2-C5 drug classes (RI = C2-C3 only; PA = C2 only).

How current is state PMP data?

Most states require data to be reported weekly. Exceptions include CO, CT, NJ, NY, PA, RI, and SC.

Do I need an individual account, or can we use a common username for the pharmacy?

Most state systems require pharmacists to access data using individual accounts. In these cases, do not share your username or password with any other pharmacy team members.

If my store is on a state border, or if the patient is from another state, can I have the pharmacist in the other state fax over the patient's PMP report?

No, the PMP regulations do not allow this practice. However, many states now share PMP data and or will allow pharmacists from other states to register for their PMP.

What information should I consider in my review of a PMP report?

Look for underlying trends that indicate patterns of misuse such as early fill dates, multiple doctors, multiple pharmacies, and "cocktail" prescriptions.

What do I do if a Walgreens prescription record is displaying incorrect information on a report?

Please submit a PMP Data Change Request form, found on StoreNet >> 3rd Party >> Third Party Reference >> State Specific Information >> *[Your State]* >> Prescription Monitoring Program, or use the following link:

http://walnet.walgreens.com/QF/quickform/prodpublisher/third_party_state_specific/allstates/pmpdatachange.wform

Who can I contact if I have additional questions about PMP?

Please e-mail: PMP@walgreens.com

ID FAQs**What are the official forms of government photo identification that we accept?**

State Driver's License, State ID, Passport, Passport Card, U.S. Military ID, Green Card, and Native American Tribal Photo ID.

What if state regulations prohibit me from scanning and copying a government issued photo ID?

The pharmacy staff must verify that the information on the ID matches the information in IC+ (name, address, date of birth) which shows that the person is who they say they are.

Can I scan and save the image of a government issued photo ID into IC+?

No, please do not save the image of a government issued photo ID in the patient's profile in IC+, this needlessly clutters up memory space with images that are not clear. Print the image of the ID and attach it to the hard copy per the National TD GFD Policy.

What do we do when a government issued photo ID is scanned and it comes out black or blurry?

This is a known issue. A copy of a valid government photo ID aids us in our documentation process as part of the "know your customer". The pharmacy staff must verify that the information on the ID matches the information in IC+ (name, address, date of birth) which shows that the person is who they say they are.

The passport will not fit into the scanner, what do we do?

Ask the patient if they have a government issued photo ID. If the patient does not have one, enter the following in the notes section of the TD GFD Checklist "passport verified dd-mm-yy, RPh: ABC".

How do we handle ID for delivery patients or bedside delivery patients?

An ID is not required for delivery or bedside delivery. Enter the following in the notes section of the TD GFD Checklist "delivery or bedside delivery, RPh: ABC."

If a patient presents an expired government issued photo ID, can we fill a TD prescription?

No, technically the ID is expired and therefore not valid. However professional judgment must always be used. One suggestion would be the patient may drop off their prescription and come back with a valid ID for it.

Some patients may not have a government issued photo ID, is there any flexibility with these patients if they are not able to provide a photo ID?

This would be a small occurrence as the majority of people have some form of government photo identification. In any case, you must use your professional judgment in filling any controlled substance prescription in good faith.

Will there be a CAP block at the registers for TD GFD prescriptions informing the staff to make a copy of the person's ID at pickup?

At this time there is no CAP block in place.

TD GFD CHECKLIST FAQs

Should the store fax the TD GFD Checklist to the DEA with the refused prescription?

No, only a copy of the prescription should be faxed.

When we fax the refused prescriptions to the DEA, do we need to also complete a HIPAA disclosure form on StoreNet?

Yes.

If the rx is just too soon to fill but would pass on all other points, do we refuse the rx and document in the comment field or just give the rx back and tell the patient to bring back on a certain day?

The rx too early to fill alone may not be considered a true refusal. If you determine this is not a true refusal, comments are not needed in the patient profile and you will not need to notify the DEA. You can give the patient an opportunity to come back and fill when it's not too soon to fill.

Is a pharmacist required to speak directly to the prescriber to verify the prescription and ask questions or can they speak to any staff member?

The pharmacist can speak to the prescriber or any clinical staff member. The pharmacist must feel that their questions have been sufficiently answered and must use their professional judgment in filling a TD prescription. The pharmacist must document the name of the person that they spoke to.

How can I attach the TD GFD Checklist and the PMP if the prescription was sent over as an E-Rx?

After the prescription is filled, go into the patient's profile and print an image of the E-Rx that can be used for documentation purposes.

What is our policy on dispensing emergency prescriptions for TD narcotics will be from here on out?

Please follow the emergency C-II policy and procedures in your state. The prescription still needs to go through the TD GFD process.

If a patient decides to take back a prescription while we are verifying the information with the prescriber, do we need to send the DEA the fax?

No, because the pharmacist has not finished their investigation of the prescription.

What if one pharmacist refuses to fill a prescription based on TD GFD and places a comment in the patients profile; however another pharmacist feels that the prescription passes TD GFD?

The pharmacist that refuses the prescription refuses it for the life of that prescription for all stores.

Will there be a Spanish version of the TD GFD Sign and the TD GFD Checklist?

Yes.

MISCELLANEOUS FAQs

Now that we have the TD GFD Policy, are those the only drugs I should be focusing my good faith dispensing efforts on?

No, the good faith dispensing policy is still in effect for all controlled substances. The TD GFD Policy was put together as an added tool for pharmacy staffs to use to aid in making a decision as to whether the prescription was written for a legitimate medical purpose.

What should I do when a customer calls to check the stock status of a TD drug or a controlled substance?

When answering a call for TD drugs or other controlled substances, verify that the customer is in IC+ and ask the customer for the exact quantity needed. Only disclose that you can or cannot fill the prescription based on the quantity that they customer has provided you.

Why have select controlled substances been removed from the inventory on hand tool?

These drugs have been removed to help protect the safety of the pharmacy and store staff from burglaries and robberies.

Has it been considered to use the procedures for PSE sales in requesting photo ID for picking up any controlled substance prescription at the pickup/drop off window or at drive-thru?

Yes this has been discussed. It will be addressed at a future time.