

## Internal Investigation Form - Compliance View: CM-HTL-IV-118275612



## Investigation Form

**\* All required fields will be highlighted in RED until the entry is saved. These required fields must be completed prior to submitting for approval.**

Legal Hold? [?]

Manual Notification Was Created [?]

Investigation

Notes

All

## Incident Detail

**\*\*\* HOTLINE LEAD \*\*\*****Please Complete the Investigation within 30 Days**

|                    |   |                      |            |
|--------------------|---|----------------------|------------|
| Investigation ID   | CM-HTL-IV-118275612                               | Date Created         | 10/31/2014 |
| * Location         | 11754 - Store #11754 - 787 L ST CRESCENT CITY, CA | Date of Incident [?] | 7/9/2013   |
| 1 - Location Type  | Store   | Day Of Week          | Tuesday    |
| 2 - Department     | Field APM   | Incident Time [?]    | 4:34:00 PM |
| 3 - Leadership     | Senior Director APS                               | Event Type           | Internal   |
| 4 - Management     | APD MICHAEL HOURIGAN JR                           |                      |            |
| Store Phone Number | 7074643857  |                      |            |
| Address            | 787 L ST  |                      |            |
| City               | CRESCENT CITY                                     |                      |            |
| State              | CA  |                      |            |
| ZIP                | 95531-2822  |                      |            |
| District           | D00223 Santa Rosa CA Steve Borjas                 |                      |            |
| Region             | R00011 California Jason Cunningham                |                      |            |
| Record Status      |   |                      |            |
| Created By         | Hotline_Leads                                     |                      |            |
| Owner ID           | Hotline Leads (System)                            |                      |            |
| Status             | -Closed   |                      |            |

## Subject Information (0)

Reporting Party [?]  
Witness [?]  
Person with Knowledge [?]  
Parent or Guardian [?]  
Victim [?]

## Allegation(s)

| Subject of Allegation | Allegation | Specific Type | Method | Allegation Status |
|-----------------------|------------|---------------|--------|-------------------|
|-----------------------|------------|---------------|--------|-------------------|

**\* Have You Finalized All Allegation Statuses?**

**Was Training/Policy Reviewed with Team Members?****Should Compliance be notified?****Reviewed by Compliance:****Should Privacy be notified?****Investigation Detail****Investigative Questions****Were you assisted by any Corporate APS Personnel (Ex. Investigative Analyst)?****LP Dashboard Usage****Was AP Dashboard Used?****Administrative Section****\* Do any Prescription Billing Claims need to be Reversed?****Please contact your Healthcare Supervisor to coordinate the reversal****\* Was Cash, Merchandise or Drugs Involved?****Was Credit or Debit card, W Card, Balance Rewards, Prescription Savings Club or Checking Account information obtained?****Law Enforcement Notified?****View Narrative?**

Yes

**\* Full Narrative****LEAD CLOSING REASON:** Other**ADMISSION AMOUNT (\$):** 0**COLLECTED AMOUNT (\$):** 0

**CLOSING COMMENTS:** Per RXS E Wong: I spoke with pharmacist Conway and address his interpretation of GFD. I told him we support him with the decision and the company will stand behind him on his decision. I also address the issue of the comments our store manager made in regards to "can't afford to lose this patient". I reassure him that our company values his effort in caring the patients and will not interfere his effort in practicing GFD regardless of any financial gain. I told Conway that this will be addressed by the district manager, Dan Kidson, along with Community Leader, Troy Ingold. Conway again was very appreciated of the response. Conway has already filed a complaint to the board of pharmacy in regards to this situation (Store manager not supporting GFD). I thank him for letting me know and again, I reassure him that the company value his effort in practicing GFD.

**Evidence Attachments****(After attaching Digital Evidence, Retain a Hard Copy Only if Required by Authorities) (0)**

| Description | File Name | Attached By | Date | Evidence given to PD |
|-------------|-----------|-------------|------|----------------------|
|-------------|-----------|-------------|------|----------------------|

**Hotline Details/Information****CIA:****Quality Assurance?****Assign Hotline To:**

Store Operations

**Assigned to (Name):****District Number:****Caller First Name**

EDWARD

**Caller Last Name**

CONWAY

**Caller's Title****Caller Phone #**

(608) 334-1558

**Caller Phone Ext.****Best Time To Call**

ANYTIME BETWEEN 7AM AND 8PM

**Type of Caller****Anonymous Caller?****Caller's Email Address****When:**

7/3/13

**Where:**

PHARMACY

**How does the caller know about the incident?**

Involved

**Will it happen within the next 24 hours?****If so, when?****If so, where?****How does the caller know about the hotline?****Client Instructions:****Is this in reference to a worker's compensation fraud issue?****Did the caller ask about a reward?****Please describe the type of location where the issue occurred?****Please Explain:****Are you a member of the Union?****Hotline Information**

Caller, CONWAY, reported that on 7/3/13 Store Manager, Heather Marie JONES, violated Walgreen's National Target Drug Good Faith Dispensing Policy, when she overrode and removed his decision to not dispense a prescription to customer, name DECLINED. All Walgreen's store managers are required to have a pharmacy tech license and that on 7/3/13, JONES was working underneath him as a pharmacy tech when she received a prescription for 180 Oxycontin pills and passed the prescription on to CONWAY to dispense. CONWAY examined the customer's prescription history and noticed that within the last two months the patient had moved his/her prescription from Walgreens to Wal-Mart and then back to Walgreens. CONWAY explains that this was a red flag and that he considered this, the prescription's quantity, and other factors to make an informed decision to deem this prescription as suspicious and to not dispense it. Per Walgreen's policy, if a pharmacist does not believe that they have been given a prescription in good faith, then the pharmacist has the right to reject filling that prescription. Using the policy as a guideline, CONWAY rejected the prescription and called the customer to notify him/her that he would be unable to dispense it to him/her. The customer was angry and CONWAY notified JONES that she might be getting a complaint from the customer. JONES asked the CONWAY to leave the prescription for Pharmacy Manager, Jennifer UNKNOWN, to review thus, basically removing the decision of whether to or not to dispense the prescription out of CONWAY'S hands. JONES told him that she could not afford to lose a customer who spends \$6,000 a month in her store. JONES declaration scared CONWAY because she was bringing economics into the equation. CONWAY then requested that JONES produce the policy that gave her the right as store manager to override his decision as the pharmacist on duty, and she couldn't. JONES asked CONWAY to leave the prescription again which he did, and Jennifer later filled and dispensed the medication to the customer. CONWAY states that Jennifer's reason for dispensing the prescription was that the 180 oxycontin tablets on the prescription were above the 120 limit set by the policy and was therefore was outside of the policy's boundaries. CONWAY respects Jennifer's decision; however, he does not respect the way that this situation was handled, because it is illegal for a store manager to remove a dispensing decision from a licensed pharmacist's hands. CONWAY does not want anyone to be fired or to be yelled at. He only wants JONES to be reminded via a letter that can be sent to either him or the district, reaffirming that it is not Walgreen's policy to let store managers override the decision of the pharmacist on duty.

**SUPPORTING DOCUMENTION:**

Good faith dispensing policy and California statutes 4050,4051,4115, and 4329

**Involved Parties**

| Reported Type | Last Name   | First Name | Title            | Times Mentioned | Role | Date Notified | Ethnic Origin | Gender | Description | MgtPhone | MgtPhoneExt |
|---------------|-------------|------------|------------------|-----------------|------|---------------|---------------|--------|-------------|----------|-------------|
| Involved      | UNKNOWN     | JENNIFER   | PHARMACY MANAGER |                 |      |               |               |        |             |          |             |
| Reported      | MARIE JONES | HEATHER    | STORE MANAGER    |                 |      |               |               |        |             |          |             |

**Analyst Comments**

No record found



**Forms & Letters (0)**

| Letter Type | Investigation Related Person | Date Printed/Sent | Printed/Sent by | Printed/Sent |
|-------------|------------------------------|-------------------|-----------------|--------------|
|-------------|------------------------------|-------------------|-----------------|--------------|

**Callbacks**

No record found

**Closing Comments****Allegations found to be:****Disposition****Compliance Notes****No Retaliation Policy Reviewed?****Message submitted to caller?****Hotline Investigation Reviewed by Compliance?** Yes**Privacy Notified by Compliance****Healthcare/Pharmacy Compliance team notified by Compliance****This Hotline is a(n):****Related Events****Related incident** • [CM-HTL-IN-118275612](#)**Related investigation****Related case****Notes [?]**

No record found

**Task (0 Pending)****Follow-up with Caller**

|                  |   |
|------------------|---|
| <b>The</b>       | Dead Space Dead space dead space dead space |
| <b>Network -</b> | Dead Space Dead space dead space dead space |
| <b>Report ID</b> |   |

**If you would like to send a question or comment to the caller via The Network, follow the steps below.**

Step #1: Copy **The Network report ID** (NOT the APIS IC number) from above (highlight it with the mouse and then press CTRL-C)

Step #2: Click on the link below and then paste (CTRL-V) The Network ID number at the end of the SUBJECT line of the email.

Step #3: Type your question or comment into the body of the email.

Step #4: Send the email.

[Send Question/Comment to The Network.](#)**Confidentiality**

|  |    |
|--|----|
| <b>Mark this Investigation Confidential?</b> | No |
|--|----|