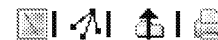


**Hotline Incident- Compliance View: CM-HTL-IN-118340970****General Information**

<b>Client Name</b>	WALGREEN COMPANY (CR)	<b>Quality Assurance?</b>	
<b>Priority</b>		<b>CIA:</b>	
<b>Call/Contact Count</b>		<b>Privacy Notified by Compliance</b>	
<b>Walgreens Callback Tracking:</b>		<b>Healthcare/Pharmacy Compliance team notified by Compliance</b>	
		<b>This Hotline is a(n):</b>	
		<b>Assign To:</b>	Store Operations
		<b>The Network - Program Name</b>	ETHICS AND COMPLIANCE EMPLOYEE HOTLINE
		<b>The Network - Report ID</b>	118340970
		<b>Date of Incident:</b>	7/23/2013
		<b>Time of Incident</b>	4:28:00 PM
		<b>Owner ID</b>	Hotline Leads (System)
		<b>Created By</b>	HOTLINE LEADS
		<b>Status</b>	-Closed
		<b>Event Type</b>	Internal
		<b>Event Sub Type</b>	Compliance
		<b>* Predication Method</b>	Hotline Report
		<b>Origin of this Contact</b>	

**Location Information**

<b>Caller Provided Location #</b>	<b>* Location</b>	05208 - Store #05208 - 25 LAKE HAVASU AVE S LAKE HAVASU CITY, AZ
<b>Caller Stated DBA</b>	<b>1 - Location Type</b>	Store
<b>Caller Provided Address1</b>	<b>2 - Department</b>	Field APM
<b>Caller Provided Address2</b>	<b>3 - Leadership</b>	Senior Director APS
<b>Caller Provided City</b>	<b>4 - Management</b>	APD TRICIA BRIENEN
<b>Caller Provided State</b>	<b>Store Phone Number</b>	9284532808
<b>Caller Provided Zip</b>	<b>Address</b>	25 LAKE HAVASU AVE S
<b>Caller Provided Country</b>	<b>City</b>	LAKE HAVASU CITY
	<b>State</b>	AZ
	<b>ZIP</b>	86403-6565
	<b>District</b>	D00269 Henderson/AZ River John Marquardt
	<b>Region</b>	R00005 Southwest David White
<b>Caller Provided Location Phone</b>		
<b>Caller Provided Location PhoneExt</b>		

**Caller Information**

<b>Caller First Name</b>	Lawrence
<b>Caller Last Name</b>	Coleman
<b>Caller's Title</b>	
<b>Caller Phone #</b>	Redacted - Confidential PII
<b>Caller Phone Ext.</b>	
<b>Best Time To Call</b>	
<b>Type of Caller</b>	

Anonymous Caller?

Caller's Email Address

Where:

store 5208

## Incident Description

### Involved Parties

Reported Type	Last Name	First Name	Title	Times Mentioned	Role	Date Notified	Ethnic Origin	Gender	Description	MgtPhone	MgtPhoneExt
Reported	COHEN	WAYNE	PHARMACY MANAGER								

### Hotline Information

A series of events occurred at store 5208 that brought into question compliance with Walgreens GFD policy as well as federal law for emergency C2 dispensing. 1. Rxmgr informed me of a customer complaint because I asked for ID as required by Walgreens GFD policy. RxMgr told me the requirements for ID do not apply to his store since he knows all the customers and prescribers in town and have dispensed GFD medications for months w/o requesting ID or completing documentation. RxMgr said requesting ID is only required for unknown customers according to policy meeting he attended. 2. Rxmgr informed me of a customer complaint because they had to wait for me to contact the prescriber before dispensing their GFD medication. I informed him there was no documentation in profile that one was ever done and contacting the prescriber and dispensing the prescription was done in 90 minutes. the customer was told it would take 2 hours. RxMgr again insisted the GFD policy does not apply to his store. I asked why did we have a notice posted informing customers of the time requirements of the new policy. RxMgr responded that Walgreens does not want me to follow that policy in practice. Dispensing medications ASAP was the companies priority and I was to dispense the medications immediately and contact the prescriber for verification and complete GFD form later at a more convenient time. RxMgr said that our GFD files would never be audited by the company, so it was OK to do so in apparent violation of policy. . 3. RxMgr partial filled a C2 prescription for a two week supply and the patient returned after 7 days for the balance. RxMgr was contacted and asked I dispense a partial. I informed RxMgr that the partial fill was no longer in the patients profile. RxMgr requested I retrieve the original hard copy and rescan into the system as a new Rx and dispense the balance. When I told RxMgr I was not comfortable with this request. RxMgr replied that Walgreens does not expect pharmacists to follow the letter of the law. RPh are paid to dispense medications and as long as we are not contributing to diversion, we do not have to follow the laws. 4. RxMgr informed me that after GFD meeting on 7/22/13 the policy no longer applies to any prescription regardless of medication written for less than 121 units. Nor are we required to contact the prescriber for any medication. I am to just run the medication dispensing report for prescriptions over 120 units and deny only if there is recent poly-pharmacy. I questioned if we do not contact the prescriber every 90 days, how do we confirm an actual patient-prescriber relationship exists. RxMgr said according to Walgreens policy, that is not my job. RxMgr explained that Walgreen implemented GFD in response to a few Florida stores that dispensed large quantities. RxMgr explained that since we keep of file of prescription from Dr Kahn that we deny, we are in compliance. I asked if Walgreen would send a memo or e-mail updating policy or PPL and was told No. Coincidentally, later the same day we had a forged prescription incident that was caught by another local pharmacy who contacted the prescriber I was not aware that pharmacists could summarily dismiss the legal standard of shared responsibility with physicians for ensuring prescriptions are dispensed according to law. I was not aware Walgreen's wants pharmacist to suspend federal law whenever it conflicts with patient convenience. I have worked at other Walgreens stores during my employments and the expectations and execution of the GFD policy were very different from store 5208. The other stores seemed to be following the policy as presented in the PPL training. I am reporting these incidents in order for the pharmacy employees of store 05208 can receive clarification and guidance on Walgreens GFD policy and stance on federal law.

### SUPPORTING DOCUMENTATION:

patient profiles GFD audits employee interviews

### Allegation(s)

Subject of Allegation	Allegation	Specific Type	Method	Allegation Status
How does the caller know about the incident?		Involved		
Will it happen within the next 24 hours?				
If so, when?				
If so, where?				

## Supplemental Information

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  
occured?

Please Explain:

Are you a member of the  
Union?

#### Analyst Comments

No record found

#### Callbacks

No record found

#### Forms and Letters (0)

Letter type	Related person	Printed date	Printed by	Printed
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#### 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
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#### Related Events

##### Related incident

Related investigation • IC10002796190

Incident Imported From Legacy Yes

Case Management?

Lead Type Violation of Co Policy

Synopsis of Issues No SubProduct Coding

Reported/Alleged

Lead History HotLine Lead Received from The  
Network Inc. on: 07/24/2013

HotLine Lead Updated by: Alpna  
Yousfi on: 07/24/2013  
HotLine Lead Updated by: Chrissy  
Schneider on: 07/24/2013 and  
EMail was sent to  
cindy.schultz@walgreens.com with  
copy/s to  
patty.zagami@walgreens.com,  
sanjay.bhana@walgreens.com,  
sherry.malusa@walgreens.com .  
Case Report 1257916 approved by:  
Gordon Couffer on: 08/02/2013

When Location # is S999999,  
This is the location number that  
was entered into legacy CM