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**From:** Stahmann, Eric [eric.stahmann@walgreens.com]  
**Sent:** 9/9/2015 11:19:04 AM  
**To:** Daugherty, Patricia [patricia.daugherty@walgreens.com]; Bratton, Edward [edward.bratton@walgreens.com]  
**Subject:** RE: Monthly DM webinars  
**Attachments:** GFD DM Webinar.pptx

Here is the deck I created for my portion.

BTW I am on vacation Sept 21<sup>st</sup> for the first session, so I can do either the 2<sup>nd</sup> or the 3<sup>rd</sup> session.

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**From:** Daugherty, Patricia  
**Sent:** Tuesday, September 08, 2015 11:27 AM  
**To:** Stahmann, Eric  
**Cc:** Bratton, Edward  
**Subject:** Re: Monthly DM webinars

Sure I can go in a pharmacy round here and take some pics.

Thanks

Patty

On Sep 8, 2015, at 11:16 AM, Stahmann, Eric <[eric.stahmann@walgreens.com](mailto:eric.stahmann@walgreens.com)> wrote:

No problem; we can meet tomorrow.

Tasha wanted photos of the stickers attached to hard copies for examples (not sure if that is an easy get for you).

I can take the TD GFD checklist related questions (#5, #6 & #7)

- Eric

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**From:** Daugherty, Patricia  
**Sent:** Tuesday, September 08, 2015 9:36 AM  
**To:** Stahmann, Eric  
**Cc:** Bratton, Edward  
**Subject:** Re: Monthly DM webinars

I'll be in later our air is out and the repair guy is here. I can take the stickering and log book section if no has a preference. Just send me an invite and we can meet to discuss.

Patty

On Sep 8, 2015, at 9:33 AM, Stahmann, Eric <[eric.stahmann@walgreens.com](mailto:eric.stahmann@walgreens.com)> wrote:

Yes we should meet. Tasha just called me and asked who is taking the lead on this.

She wants the deck to her by end of this week (Friday).

CCSF v. Purdue Pharma,  
et al. 3:18-CV-7591

**P-15085\_00001**

Admitted: 6/02/2022

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**From:** Bratton, Edward  
**Sent:** Monday, August 31, 2015 9:10 AM  
**To:** Stahmann, Eric; Daugherty, Patricia  
**Subject:** RE: Monthly DM webinars

Should we meet to come up with the outline?

**Edward Bratton**  
Manager - Pharmaceutical Integrity  
Walgreen Co.  
200 Wilmot Road  
Deerfield, IL 60015  
Office: 847-315-2689  
Cell: 224-226-9494

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**From:** Polster, Natasha  
**Sent:** Saturday, August 29, 2015 10:00 AM  
**To:** Bratton, Edward; Stahmann, Eric; Daugherty, Patricia  
**Subject:** FW: Monthly DM webinars

All-

Please see below. We have been given time on the Monthly DM webinars. I want an outline that breaks out the findings of the BCI (attached) into content enough for 3 webinars. You will have no more than 5 minutes to cover the slides (so 3-4 slides max per webinar). **The outline is due to me by Friday Sept 4.** Work together to decide what needs to be presented. If there isn't enough content for 3 webinars, then let's pick one or two more hot topics in regard to RxIntegrity and add those to the content of the meetings.

Let me know which of you is taking the first webinar, keep in mind each of you will get a turn. They are held on the third Monday of every month, so plan accordingly around your vacations, days off, etc. You will be responsible for working with the others as well as other BUs to ensure your content is accurate, going over deck with me, and getting deck to Sue Drelicharz on time.

**Deck due date: Sept 15**  
**Webinar date: Sept 21 (business dress)**

I would like pictures associated with the slides for as much as we can.  
For example: slides for issue #1, #2 ; Someone needs to go into a store and take a picture of a stickered hard copy of a CS, or a California folder full of stickered hard copies. Keeping in mind HIPAA and patient name/address will have to be blacked out on the slide deck somehow. Pictures are worth a thousand words. Plan this out so only one store visit is required for the minimum amount of disruptions to the store. Take a picture of the log book, stored hard copy files, etc. Be creative to make this interesting for the audience.

I have also attached a copy of the MOA as there could be things in there that we can use for content if we need some idea.

Let me know if you have questions. One of the analysts could help build the deck as a development opportunity for them.

Thank you,

Tasha Polster, RPh  
Walgreen Co.

Sr. Director, Pharmaceutical Integrity | Pharmacovigilance  
847 315 3379

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**From:** Drelicharz, Susan  
**Sent:** Saturday, August 29, 2015 8:49 AM  
**To:** Polster, Natasha  
**Cc:** Arnold, Brian; Bratton, Edward; Stahmann, Eric; Daugherty, Patricia  
**Subject:** Re: Monthly DM webinars

Hello

Next month's DM webcast will be 60 minutes, not 90. Since the Health Trade meeting is right before it (Sept. 18) flu and Med D will not be on the webcast agenda.

We'll hold 5 min for you. The deck is due on Sept. 15.

Thanks.

Sue

On Aug 29, 2015, at 7:48 AM, Polster, Natasha <[tasha.polster@walgreens.com](mailto:tasha.polster@walgreens.com)> wrote:

Brian/Sue-

Who owns the agenda for the pharmacy portion? RxIntegrity needs a few minutes the next few months, if possible.

We got the results of the business continuity investigation that AP did in regards to the stores following the MOA we signed with the DEA. We have some opportunities we need to address. I was thinking we would break it down into 2 or 3 of the monthly webcasts so we are not overwhelming them.

When would the deck be due. And I am assuming we would have 3-5 minutes, is that correct?

Thank you,

Tasha Polster, RPh  
Walgreen Co.  
Sr. Director, Pharmaceutical Integrity | Pharmacovigilance  
847 315 3379

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## Good Faith Dispensing DM Webinar

**Eric Stahmann**  
Rx Integrity Manager - Western Operations



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## Administrative Memorandum of Agreement (MOA)



Walgreens agreed to the following obligations:

*“Walgreens to maintain a compliance program to detect and prevent diversion of controlled substances as required under the Controlled Substances Act (CSA) and applicable DEA regulations.*

- ...includes procedures to identify the common signs associated with the diversion of controlled substances...”*
- ...implement and maintain policies and procedures to ensure that prescriptions for controlled substances are only dispensed to authorized individuals...”*



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*Including but not limited to doctor shopping and requests for early refills.*

*“Walgreens shall not knowingly fill an invalid prescription or a prescription that it reasonable believes was issued for other than a legitimate medical purpose or by a practitioner acting outside the usual course of professional practice. substances based on a prescription.”*

*“...where circumstances lead the pharmacist in her or her professional judgment to responsibly doubt the validity of the prescription, verify that a valid prescriber/patient relationship exists before filling a prescription for a controlled substance”.*

## Basic Control Initiative (BCI)

In order to check if stores are compliant with the policies/procedures put in place per the MOA, a random sample size audit was conducted in June.

- Roughly 2,400 stores were audited for compliance on various Good Faith Dispensing (GFD) and Target Drug Good Faith Dispensing (TD GFD) policies and procedures
- Results were unfavorable



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## BCI Summary

When Target Drug prescriptions are dispensed, pharmacy team members are responsible for completing the Target Drug Good Faith Dispensing (TD GFD) Checklist.

Number of stores that correctly had a completed TD GFD Checklist attached to the **filled** TD prescription hard copies:

(2,407 stores audited)

- 1,432 stores (59.5% compliance rate)



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**SAY:** Some red flags might be resolvable by checking a patient's identification, speaking with the patient or patient's caregiver or calling the prescriber, there are also circumstances in which calling the prescriber will not resolve the red flags because the red flags indicate that the prescriber is collaborating with the patient to divert drugs.

Let's review Walgreens expectations regarding the law and how they help you meet the DEA's requirements with this next exercise.

## BCI Summary

If the pharmacist determines that a TD prescription does not meet GFD requirements, a copy of the refused prescription and completed TD GFD Checklist must be in the designated refusal file folder.

Number of stores that correctly had completed TD GFD Checklist attached to the **refused** TD prescription hard copies or copies:

(2,404 stores audited)

- 1,820 stores (75.7% compliance rate)



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**SAY:** Some red flags might be resolvable by checking a patient's identification, speaking with the patient or patient's caregiver or calling the prescriber, there are also circumstances in which calling the prescriber will not resolve the red flags because the red flags indicate that the prescriber is collaborating with the patient to divert drugs.

Let's review Walgreens expectations regarding the law and how they help you meet the DEA's requirements with this next exercise.



## BCI Summary

If the pharmacist determines that a TD prescription does not meet GFD requirements, a copy of the refused prescription and completed TD GFD Checklist must be in the designated refusal file folder.

After reviewing the refusal file folder for calendar year 2015, how many refused TD prescriptions were identified?

(2,405 stores audited)

- 1,160 stores had 0 refused prescriptions
- 271 stores had 1 refused prescription
- 502 stores had 2-5 refused prescriptions
- 233 stores had 6-10 refused prescriptions
- 176 stores had 11-25 refused prescriptions
- 63 stores had 26 or more refused prescriptions

\* Most refused prescriptions = 336



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## What We Need From Leadership

Leadership should be checking for compliance on a regular basis.

The decision to dispense a prescription is ultimately up to the pharmacist, however, proper documentation to support the decision is needed.

It's important that pharmacists document all actions taken during the Good Faith Dispensing process.



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## What We Need From Leadership

### During routine pharmacy walks

- Review TD-GFD refusal folder
  - Are there any recent refusals?
  - Are all required documents attached (ID, PDMP, checklist etc.)?
- Review recent California folder of CII's
  - Review target drugs and confirm checklist was complete, PDMP and ID are attached
- Randomly check on-hand levels of target drugs



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**Thank You**