

Message

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Sent: 6/26/2013 3:08:46 PM
To: Makris, Maria [maria.makris@walgreens.com]
Subject: DEA Timeline
Attachments: DEA Agreement Action Items v2.xlsx



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Every day I help people **get, stay and live well.**

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Project	Group	Owner	Due Date	Status	Source	Agreement requirements	Comments
Dedicated DEA Contact Point	Rx Integrity	Maria Makris	7/11/2013	In Progress	A.1	Within one month of the effective date of this agreement, Walgreens will identify a dedicated contact point (including a dedicated email address) for DEA within the Department of Pharmaceutical Integrity to facilitate Walgreen's responses to DEA requests for information and documents, specifically including responses to request for dispensing log data and pseudophedrine data.	Communication to the field required?
Department of Pharmaceutical Integrity	Rx Integrity	Tasha Polster	7/11/2013	Complete	A.1	Walgreens will maintain a department of Pharmaceutical Integrity, composed of personnel with pharmacy-related training and managerial personnel, who shall be training in relevant diversion-related issues, to coordinate compliance efforts related to controlled substances.	
Dispensing Logs within 2 Days	Rx Integrity		7/11/2013	Complete	B.1	Upon request by DEA to Walgreens Department of Pharmaceutical Integrity within two business days Walgreens will provide to DEA, via appropriate secure means of electronic transmission, controlled substances dispensing logs.	Currently in place
Dispensing Logs SOP	Rx Integrity	Steven Mills	7/11/2013	In Progress	B.1	Internal Requirement	Jim Goodall, Al Carter and Legal may respond to some of these requests currently
Controlled Sticker	Pharmacy Affairs	Al Carter	9/11/2013	In Progress	B.2	For all Schedule II prescriptions, Walgreens currently affixes a sticker to each paper prescription containing certain dispensing information such as: Serial Number to each prescription, the prescribers name, address, telephone number and DEA registration number, the patients name, address and telephone number, the prescription issue date, the drug and quantity dispensed and the file date. Within 3 months of the effective date of this agreement, Walgreens pharmacies will affix such a sticker to all paper controlled substance prescriptions in each state, regardless of requirements of state law.	
DEA Records Requests	Rx Integrity		7/11/2013	Complete	B.3	Walgreens's pharmacies utilize a computer application for the storage and retrieval of refill information for original paper prescriptions. To the extent that DEA wishes to retrieve electronic records regarding refills, Walgreens' department of Pharmaceutical Integrity will facilitate responses to such requests, including by providing such information to DEA upon request in a manner that is sortable and retrievable by prescriber name, prescriber DEA registration number, patient name, patient address, drug dispensed, date filled and last name of dispensing pharmacist.	
GFD Policy Updates	Rx Integrity		6/11/2014	In Progress	B.4	Walgreens remains committed to properly training its pharmacy personnel to deal with evolving diversion-related issues. Walgreens will continue to enhance its Good Faith Dispensing Policy and training materials to identify "red flags" of potential diversion for pharmacists to consider in making professional judgements regarding dispensing of controlled substances.	
GFD Annual Training	Rx Integrity		6/11/2014	In Progress	B.4	Walgreens will train its pharmacy personnel at least annually on Good Faith Dispensing and will update Good Faith Dispensing Policy and training materials to respond to chaining diversion threats of which Walgreens is aware.	Include Sal Benegis and Cheryl Creek (Training)
Verify DEA of prescribers	Rx Integrity	Chris Dymon	7/11/2013	Complete	B.5	Walgreens will maintain procedures to verify that the DEA registration number for the issuing prescriber of a controlled substance is a current, valid registration number. Such verification shall be performed using information from the NTIS database or similar third party DEA database. Walgreens agrees to maintain a system integrating NTIS data with Walgreens' computer that will: (1) update NTIS registration data on a weekly basis and (2) prevent a pharmacy from filling a controlled substance prescription using a registration number not listed in such NTIS data until such prescribers valid registration number is confirmed.	Registering new prescriber requires DEA check?
Exclude controls from Bonus	Finance?	Jeremy K	1/1/2014	In Progress	B.6	Beginning in 2014, Walgreens will exclude any accounting for controlled substance prescriptions dispensed by a particular pharmacy from bonus computations for pharmacists and pharmacy technicians at that pharmacy.	
Electronic PSE Logs	Rx Integrity	Edward Bratton / Patty Daugherty	7/11/2013	In Progress	B.7	For each retail pharmacy, Walgreens will maintain, either electronically or in paper form, a log of pseudophedrine purchases that can be made available upon request to authorized DEA personnel. DEA agrees that Walgreens Department of Pharmaceutical Integrity will facilitate transmission of such information, including through transmission of electronic records to DEA.	LP Follow up and reporting?
DEA Contact for CSOM	Rx Integrity	Tasha Polster / Sue Thoss	6/18/2013	In Progress	C.1	Within one week of the effective date of this agreement, Walgreens will designate a DEA contact point in its Department of Pharmaceutical Integrity to address inquiries regarding suspicious order monitoring and reporting.	
DC DEA Training and Reporting			6/18/2013	In Progress	C.1	Atleast one existing employee at each Walgreens distribution center that distributes controlled substances will receive appropriate training on suspicious order monitoring requirements and on reporting relevant issues to the Department of Pharmaceutical Integrity.	
CSOM Ceiling, Threshold and Limits	Rx Integrity	Tasha Polster	9/11/2013	Complete	C.2	Walgreens will maintain the tolerance threshold, ceiling limits and other elements of its current suspicious order monitoring and reporting system, either for the duration of this agreement or until Walgreens distribution activities are transitioned to a third party.	
CSOM Investigation Turn around time commitment	Rx Integrity	Tasha Polster	9/11/2013	Complete	C.2	Walgreens will endeavor to conduct its evaluations of "orders of interest" identified by its tolerance thresholds and ceiling limits within 4 business days and shall inform DEA field offices of orders that Walgreens has determined are "suspicious" within two business days of making any such determination.	
Add reason to SOM Faxes sent to DEA	Business Services	Chirica, Manuela	9/11/2013	In Progress	C.2	Within 90 days of the effective date of this agreement, suspicious order reports shall identify reasons an order was determined to be suspicious, and the registration number for the specific Walgreens distribution center that would have received the order at issue.	
CSOS	Rx Integrity	Tasha Polster, Denny Murray, Sue Thoss	12/1/2014	In Progress	C.3	Within 18 months of the effective date of this agreement, Walgreens will initiate enrollment in and operationally implement DEA's controlled substance ordering system for all orders of all Schedule II controlled substances placed by its retail pharmacies to its distribution centers.	Electronic 222

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