



Good Faith Dispensing

Preventing the Inappropriate Use of
Controlled Substances

Your Responsibilities

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

WAG-MDL-03189

Admitted: 6/02/2022

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Prescription drug abuse is a serious social and health problem.

Controlled substances may **only** be dispensed to patients who have a prescription for a legitimate medical purpose issued by a practitioner acting in the usual course of professional practice.

As a pharmacist, you have a **corresponding responsibility** to ensure that controlled substance prescriptions are issued and dispensed appropriately.



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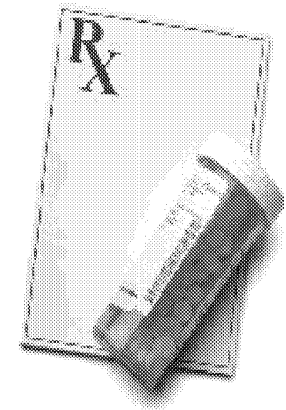
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Pharmacists have legal, professional and personal responsibilities when dispensing controlled substances.

- Pharmacists must be familiar with and adhere to state and federal requirements for dispensing controlled substances.
- Pharmacists may be held civilly and criminally liable for knowingly dispensing a prescription that was issued outside the usual course of professional practice.
- As a team member, you need to protect the company from becoming an easy target for drug diversion.



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Upon completing this course, you will be able to:

- **Identify** the elements of Good Faith Dispensing which should alert a pharmacist to questionable circumstances
- **Validate** the legitimacy of controlled substance prescriptions
- **Report** questionable prescriptions to law enforcement when appropriate

Let's begin by reviewing some common characteristics of individuals trying to obtain a controlled substance for an inappropriate purpose.

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Identify



Any of these individuals could be trying to obtain a controlled substance for an inappropriate purpose.

According to the DEA, there are some common characteristics associated with potential drug abusers.

- Unusual or suspicious behavior while waiting for the prescription to be filled
- May be exceptionally knowledgeable of controlled substances and/or give a medical history with textbook symptoms
- Will be reluctant to receive an alternative drug
- Demanding immediate action for the prescription to be filled
- Usually has no regular doctor and often no health insurance

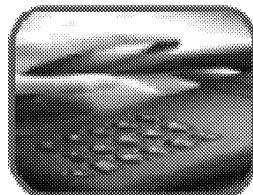
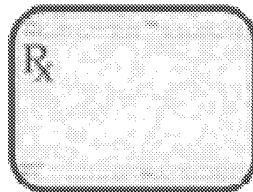
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Identify

Pharmacists and pharmacy staff need to be aware of the common sources of fraudulent prescriptions they may receive for dispensing. These prescriptions may be presented in many different ways.

Click on the picture to reveal more.



- Prescriptions written on legitimate prescription pads stolen from physicians' offices. These are often written for fictitious persons.
- Altered prescriptions in which the quantities of legitimately prescribed drugs have been increased by the person presenting the prescription.
- Prescriptions written on prescription pads from a legitimate doctor printed with a different call back number that is answered by an accomplice who verifies the prescription.

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Identify

So, what are some signs that you may have a questionable prescription? Here are some questions to ask yourself.

?

Does this prescription look “too good?” Is the prescriber’s handwriting too legible?

?

Does the quantity, directions or dosage differ from usual medical usage?

?

Does the prescription appear to be a textbook presentation or does it not contain acceptable standard abbreviations?

?

Does the prescription appear to be photocopied?

?

Are the directions written in full with no abbreviations?

?

Is the prescription written in different colored inks or in different handwriting?

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Identify

If you suspect a fraudulent prescription, **do not:**

- Take the patient's word for it when you are suspicious
- Dispense drugs just to get drug-seeking patients out of the store
- Dispense controlled substances in the absence of a valid practitioner-patient relationship
- Misrepresent that you are out of stock

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Dispensing a prescription that the pharmacist knows is fraudulent is a violation of state and federal law.

If asked by law enforcement to dispense a fraudulent prescription, **do not** dispense and inform law enforcement that this is a violation of state and federal law.

Knowingly dispensing a prescription with anything other than what is written on the prescription (i.e., candy, OTC medication, etc.) is a violation of company policy.

Violation of state and federal law and/or company policy will result in disciplinary action, up to and including termination of employment.



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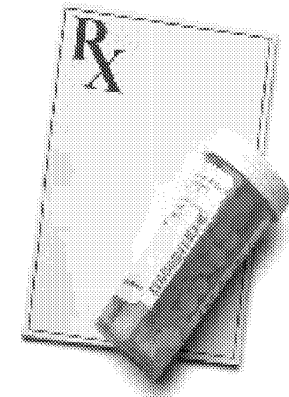
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We have reviewed how to identify a potential fraudulent prescription. Now we will look at the procedure for validating prescriptions.



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Validate

When presented with a controlled substance prescription, follow your state requirements such as requesting and documenting information from a government issued ID, if appropriate.

If the controlled substance prescription appears questionable, always:

1. Ask for government issued identification to confirm the identity of the patient or patient's agent.
2. Confirm that the prescriber has authority to prescribe controlled substances and verify the validity of the practitioner's information including the DEA number. The DEA website is available for your reference on StoreNet.
RXOps > Company Policies > DEA Home Page > Diversion Control and Prescription Drugs > Registration Validation
3. Contact the prescriber for verification or to clarify the prescription. If the prescriber cannot be reached, **do not** dispense the prescription.
4. If the prescriber confirms the validity of the prescription, document the date, name of the individual spoken to and any other pertinent information (i.e. diagnosis) on the hard copy or annotate the image and then process the prescription as normal.

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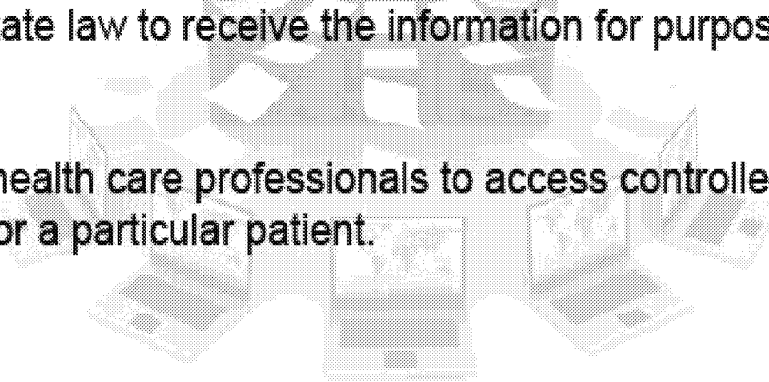
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Prescription Drug Monitoring Program (PDMP) Guidelines

A PDMP is a **statewide** electronic database that collects certain data on controlled substances dispensed in the state. The PDMP is housed by a state regulatory, administrative or law enforcement agency. The agency allows access to the database to individuals who are authorized under state law to receive the information for purposes of their profession.

Many states allow health care professionals to access controlled substance history for a particular patient.



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Validate

Q: Does my state have a PDMP program that I can access?

A: The majority of states have operational PDMPs that have the capacity to receive and distribute controlled substance prescription information to authorized users.

You can locate specific information and instructions on accessing your state PDMP on StoreNet at:

StoreNet>RX>3rd Party>State Specific Information

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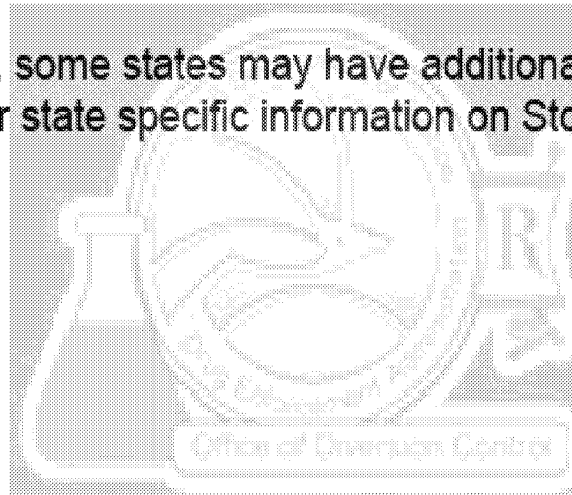
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Q: When should I contact the local DEA office, law enforcement or the State Board of Pharmacy?

A: If you determine that a prescription is forged, altered and/or issued for other than a legitimate medical purpose, you should refuse to dispense the prescription and **notify the DEA within two business days.**

In addition, some states may have additional requirements. Check your state specific information on StoreNet.



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Report

If you need to contact DEA, you can use this fax template which is located on StoreNet at the bottom of the Controlled Substance and Good Faith Dispensing page.

StoreNet > Rx > RxOps > Policy and Procedures: Filling Prescriptions > Controlled Substance and Good Faith Dispensing.

Walgreens
There's a way

Date:

Pages: 2

To:

Drug Enforcement Administration

Fax:

Phone:

From:

Walgreens #

Fax:

Phone:

A Walgreens pharmacist at this location has determined that the enclosed prescription is forged, altered and/or not issued for a legitimate medical purpose.

UNIVERSAL HEALTH INFORMATION

Healthcare information is personal information related to a person's healthcare. It is being shared to you after appropriate authorization or under circumstances that continue authorization. You are required to maintain it in a safe, secure and confidential manner. No disclosure without the appropriate authorization or consent or as permitted by law is prohibited. Unauthorized re-disclosure or failure to maintain confidentiality could subject you to penalties described in federal and state laws.

IMPORTANT WARNING:

This message is intended for the use of the person or entity to whom it is addressed and may contain information that is privileged and confidential, the disclosure of which is governed by applicable law. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering it to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this information is STRICTLY PROHIBITED. If you have received this message in error, please notify me immediately.

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Best Practices

Click on the stars below to reveal best practices to prevent dispensing fraudulent prescriptions.



Know the prescriber and his/her signature. Understanding their prescribing habits, may help in determining if the prescription is appropriate.



Know your patients. Be aware of your patients' health conditions to help you determine if the prescription is appropriate.



Know how to validate the prescriber's DEA registration number.



Check the date of issue on the prescription order. Has the prescription been presented in a reasonable length of time since it was written?



If you question any aspect of the prescription contact the prescriber for verification or clarification and document the relevant information on the hardcopy or annotate the image.



If you determine that you have a forged, altered or counterfeit prescription - do not dispense the prescription. Notify DEA. Contact law enforcement and/or state board of pharmacy if required by your state.

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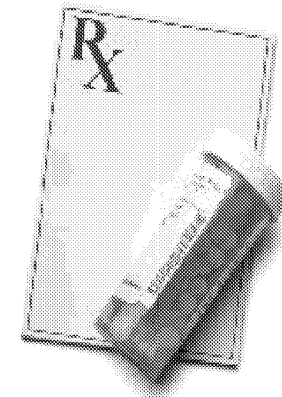
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Next we will take you through some practice scenarios.

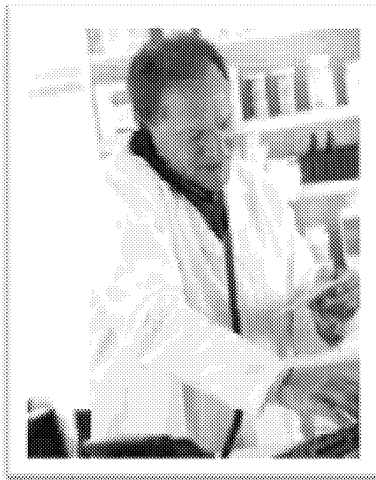
For each situation, read the information and pick the best course of action.



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Scenario 1



You must answer the question before continuing.

Vicky, a relatively new patient, calls and asks if you could dispense an early refill for a controlled substance prescription. Vicky has never asked you to do anything like this before. You should:

- ☐ A) Dispense the medication.
- ☒ B) Ask further questions before dispensing the medication.
- ☐ C) Refuse to fill the medication.

Incorrect - Ask further questions before dispensing the medication and/or contact the prescriber and document the reason for the early refill.

Click anywhere to continue.

SUBMIT

Scenario 2



You must answer the question before continuing.

Joe, a long-time customer, comes in with a prescription he's filled before. This prescription seems to be altered and the quantity is more than what is usually prescribed. You should:

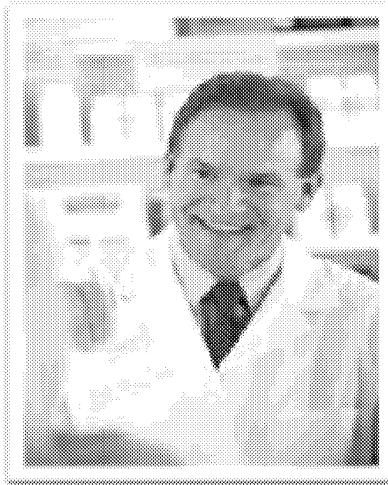
- ☐ A) Assume it is correct and fill the medication.
- ☒ B) Verify the prescription with the prescriber.
- ☐ C) Call the police.

Incorrect - You should verify the prescription with the prescriber. There may be a valid reason why the prescriber changed the prescription, but there is also a possibility it was improperly changed or a mistake was made.

Click anywhere to continue.

SUBMIT

Scenario 3



You must answer the question before continuing.

Sally comes in with a refill for a controlled substance prescription. It is within the proper amount of time, you know the doctor, and the prescription seems to be in order. You should:

- ☒ A) Dispense the medication.
- ☐ B) Verify the prescription with the prescriber.
- ☐ C) Refuse to fill the medication.

Incorrect - Since everything is in order, you should feel comfortable filling the prescription.

Click anywhere to continue.

SUBMIT

Scenario 4



You must answer the question before continuing.

You suspect that you've received a fraudulent prescription. You check with the prescriber and learn that her prescription pads were stolen and that she did not write that prescription. You should:

- ☐ A) Fill the prescription to get the customer out of the store.
- ☐ B) Fill the prescription with aspirin and call the police.
- ☒ C) Refuse to fill the medication and contact the DEA within two business days.

Incorrect - You must notify the DEA within two business days. You should not fill the prescription.

Click anywhere to continue.

SUBMIT

Key Takeaways

➔ Identify

Be aware of the characteristics of potentially fraudulent prescriptions such as:

- Unusual dosages or directions in conflict with approved labeling.
- Unusual presentation - prescriber's handwriting too legible.

➔ Validate

- Any time you are in doubt, ask to see proper identification.
- Contact the prescriber for verification or to clarify the prescription.

➔ Report

- If you determine that a prescription is forged, altered and/or issued for other than a legitimate medical purpose, you should refuse to dispense and **notify the DEA within two business days**.
- Contact law enforcement and/or state board of pharmacy if required by your state.

➔ Click Done to complete this module

DONE