**Purpose:**

The purpose of the Pharmacist Due Diligence “Know the Prescriber” policy and procedure is to provide reasonable guidance for the Dispensing Pharmacist to notice and resolve red flags related to prescribers under the Dispensing Pharmacist’s corresponding responsibility as it relates to controlled substance prescription dispensing.

**Scope:**

This policy and procedure applies to {List all pharmacies under common ownership} and to the pharmacist dispensing controlled substances in those facilities.

**Responsibility:**

It is the responsibility of the Dispensing Pharmacist to remain aware and current of laws and regulations affecting the controlled substance prescription dispensing. The Dispensing Pharmacist can not delegate the corresponding responsibility to any person or entity.

**DEFINITIONS:**

**Controlled Substances:**

**PROCEDURE:**

Identification of potential problems

**Red Flags**

* Distance- Patient and or prescriber not being located within the stores geographic area.
	+ Patients traveling distance to pharmacy and or the doctor
* Cash- Cash payments for prescriptions, if the patient has insurance but is paying cash.
* Early Fills- Patients attempting to refill early or consistently showing up at the first available moment when a refill can be obtained.
* Patients has scripts for multiple medications but is only wanting the control substance filled.
* Prescriptions from emergency room for a large supply. For example, a ninety-day supply of medication would typically not come from an emergency room.
* The same diagnosis codes for many patients
* Same combinations of drugs prescribed for multiple patients.

**Presentations of the Prescription:**

* A handwritten prescription is presented at the pharmacy, it looks altered or flawlessly thorough (contains patient address. Quantity spelled out, patients date of birth, and multiple provider identifiers, etc.)
* Irregularities on the face of the prescription itself
* The pharmacist becomes aware that the prescribers Drug Enforcement Agency (DEA) registration has been previously suspended or revoked.
* Pharmacist becomes aware through “Know your Prescriber” Policy and Procedure.
* The prescriptions for controlled substances contain nonspecific or no diagnoses
* The prescriptions are commonly for the highest strength of the drug and/or for large quantities
* Patients are traveling in groups, groups of patient’s present prescriptions for the same controlled substance from the same prescriber or multiple family members or patients living at the same address present similar controlled substance prescriptions to the pharmacy on the same day.
* Prescriptions that are missing information- DEA, Prescribers Phone Number, Prescribers Address, Prescribers Signature.
* Prescribing of combinations, the DEA has identified as having a high potential for abuse (example: Oxycodone/Hydrocodone, alprazolam and carisoprodol)

**Due Diligence and verification:**

**Prescriber:**

* Pharmacist notice a large number of control prescriptions coming from the same prescriber.
* Pharmacist notice a medication is prescribed to a patient but the prescriber is an ophthalmologist etc.
* Patient remains on long-term high dose opioid long after an injury has healed.
* Prescriber routinely prescribers the same combination of pain drugs for most or all of their patients. Prescribes combinations the DEA has identified as having a high potential for abuse.
* Prescriber is overprescribing large doses of controlled substances to patients.
	+ Pharmacist will contact the prescriber’s office and verify the prescriber’s information and speak with the prescriber themselves.
	+ Pharmacist will look up the prescriber’s NPI, DEA, and license.

**Facility Verification:**

* Pharmacist are encouraged to visit all control substance providers in their immediate area or providers that they are filling for.
* Pharmacist should make an unannounced visit of the facility. This visit is to validate the legitimacy of the practice.
	+ Reception area
	+ Receptionist
	+ Nursing Staff
	+ Patient Rooms
	+ Lab collection and evaluation rooms
* Pharmacist should do a google earth search of the facility and ensure that it is a true location.
* Does the facility conduct drug testing?
	+ Random
	+ Announced
	+ What is their policy if patient is positive?

No matter whom you work for or work with you do NOT have to fill every prescription that comes across the counter. While it is true nobody wants to turn away business or disappoint a patient, the pharmacist must use professional judgement.

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