

Dispensing Report Data Frequently Asked Questions (FAQ):

FAQ 1: Why does IPD need patient and doctor information as part of the pharmacies Dispensing Report Data?

Case precedent established during the Multistate Jurisdiction lawsuit against the pharmaceutical division of Janssen, Johnson & Johnson, McKesson, Cardinal Health and AmerisourceBergen.

The details of the settlement are publicly available at the link below.

Red flags were established as part of this settlement. These Red Flags are publicly available at the link below.

The Red Flags established in the Multistate Jurisdiction lawsuit settlement establish precedence for legal liability for wholesalers that do not evaluate pharmacies using this data.

FAQ 2: Is the information requested by IPD considered a HIPAA disclosure?

Yes, the data requested in the Extended Data Dispensing Report is considered HIPAA.

Patient Name, Patient Address, Patient Zip Code, Patient RX Number, Patient Medication, Patient Quantity

FAQ 3: How can my pharmacy disclose my patient's individual's protected health information?

Information Source: <https://www.hhs.gov/hipaa/>

HIPAA information can be disclosed to business associates based on:

"Covered entities (Pharmacy) must have contracts in place with their business associates, ensuring that they use and disclose your health information properly and safeguard it appropriately. Business associates must also have similar contracts with subcontractors. Business associates (including subcontractors) must follow the use and disclosure provisions of their contracts and the Privacy Rule, and the safeguard requirements of the Security Rule."

Disclosure Requirements:

IPD - Business Association Agreement (BAA)

IPD - HIPAA Privacy Notice

A copy of IPD's disclosure requirements can be found at the link below.

Settlement Link: [Final Distributor Settlement Agreement](#)

IPD Disclosure Requirements: [HIPAA Privacy Agreement and BAA](#)