

## **Red Flags for Dispensing Controls**

With the recent Rochester Drug decision, and multi-million dollar fines being levied on wholesalers for sending CS to pharmacies that use a disproportionate amount of CS, this will only get worse. Wholesalers would rather cut off a questionable pharmacy than pay a big fine, or worse. The President of Rochester Drug was found guilty of illegal drug distribution and may be facing jail time. Same charges as El Chapo.

Below are the Red Flags that the DEA is looking for from your pharmacy. Make sure you are familiar with this list and stay away from Rxs that apply.

## Prescriber Red Flags:

- Prescription written by a prescriber outside of the pharmacy's trade area.
- Prescriber routinely prescribes a large number (or percentage) of prescriptions for controlled substances relative to prescriptions for non-controlled substances.
- Prescriber prescribes the same medication, with the same directions, for the same quantity for a large number of individuals.
- Prescriber routinely writes for large doses of controlled substances.
- Prescriber provides the same diagnosis for the majority of individuals.
- Prescriber engages in the unauthorized practice of medicine, including writing prescriptions outside
  the scope of practice and/or not having a proper relationship with the patient.

## Patient Red Flags:

- Individual insists on paying cash or insists on paying cash for controlled substances even though insurance is on file.
- Evidence of "doctor shopping" or "pharmacy shopping" exists.
- Individual resides outside of the pharmacy trade area.
- The individual's statements and conduct or behavior suggest abuse of controlled substances.
- Individual asks for certain drugs prone to abuse by color, trade name or markings, and/or uses "street names."
- Individual routinely attempts to obtain an early refill on controlled substances.
- Individuals have suspicious relationships with each other. For example: multiple patients filling prescriptions from one address, prescriptions being presented by someone other than the patient, or groups of patients arriving all with prescriptions for the same medication from the same doctor.

## Prescription Red Flags:

- Prescriptions presented represent a "cocktail" of commonly abused drugs or are presented in a combination that can cause medical complications.
- Prescription presented is for an unusually large quantity or high starting dose.
- Prescription appears to be altered or duplicated.
- Prescription has an electronically generated or rubber-stamped signature.