

Suggested Questions a Distributor should ask prior to shipping controlled substances.

This list of questions is not intended to be all inclusive nor should it be interpreted that every situation or registrant activity is covered. This questionnaire is provided to assist for the distributor to formulate a better understanding of who their customers are and whether or not they should sell them controlled substances. It is incumbent upon you, the distributors, to ensure that sales to your customers are for legitimate purposes. It is further incumbent upon you to identify illicit or suspicious activities which may result in the diversion of controlled substances.

The use of this questionnaire should not be construed in any manner to be a mechanism or means that you have fully met the criteria and actions required by 21 USC 823 or other state and federal laws that are applicable.

Possible questions for a pharmacy:

- Does the pharmacy fill prescriptions via the Internet? If so, is the pharmacy registered with the DEA under the Ryan Haight Act?
- Is this a mail order pharmacy (fills prescriptions for insurance, etc.)?
Note: A pharmacist may claim to be mail order pharmacy but may actually be operating as an Internet pharmacy. Do not accept the response to this question at face value.
- Is the pharmacy licensed in all states for which it mails or fills prescriptions?
- Does the pharmacy report to all states that have prescription monitoring programs in which their customers reside and to whom they dispense?
- Does the pharmacy provide services for any specialty customers such as Long Term Health Care, Hospice Centers, Assisted Care Living Facilities, etc.?
- Does the pharmacy have staff or a private firm that solicits practitioners to get more business?
- What is the pharmacy's ratio of controlled vs. non-controlled orders?
- Does the pharmacy order a full variety of controlled substances and are they fairly evenly dispersed? If not, why the disparity?
- What are the hours of operation of the pharmacy?
- Does the pharmacy offer a full assortment of sundries to its customers (e.g., aspirin, snacks, cosmetics, etc.)?
- Does the pharmacy have security guards on the premises? If so, why?
- What methods of payment does the pharmacy accept (cash, insurance, Medicaid, and in what ratios)?
- Who is the pharmacy's primary supplier?
- Does the pharmacy order from other suppliers as well? If so, why and what controlled substances?
- If this is a new account, why does the pharmacy want you to be their supplier?

- If you are not the only supplier, what controlled substances will the pharmacy be ordering from you, in what quantities, in what time frame, and will they be ordering these same products from other suppliers?
- What ratio will you be supplying compared to other suppliers?
- Does the pharmacy fill prescriptions for out of state customers? If so, for how many out of state customers does the pharmacy fill (ratio or approximate number)?
- If the pharmacy fills prescriptions for Pain Management or other specialty practitioners (diet, oncology, etc.), is the pharmacist comfortable with the prescribing practices of the practitioner?
- Has the pharmacist questioned or been uncomfortable with, the prescribing practices of any practitioner?
- Has the pharmacy ever refused to fill prescriptions for a practitioner? If so, why and who?
- Are there particular practitioners who constitute most of the prescriptions it fills? Who are these practitioners (Name and DEA registration number)?
- Does the pharmacy have any exclusive contracts, agreements, arrangements, etc., with any particular practitioner, business group, investors, etc.? If so, explain those arrangements and/or obtain copies of those agreements.
- Is the pharmacist comfortable enough with the prescribing practices of any or all practitioners for which they fill, to stake their professional livelihood on it?
- Does the pharmacy supply, order for, or sell to any practitioners or other pharmacies?
- How does the pharmacy sell/transfer controlled substances to other pharmacies or practitioners? Via a prescription, sales invoice, or DEA Form-222? (Transfer by prescriptions is not authorized.)

Possible questions for a practitioner:

- What is the practitioner's specialty, if any (family practice, oncology, geriatrics, pain management, etc.)?
- Do the controlled substances being ordered correspond to his specialty or the treatment he provides?
- What method of payment does the practitioner accept (cash, insurance, Medicare) and what is the ratio of each?
- Has the practitioner ever been disciplined by any state or federal authority?
- How many patients does the practitioner see each day? What is his weekly average?
- Does the practitioner prescribe as well as dispense?
- Why does the practitioner prefer to dispense as opposed to prescribe?
- Who was the practitioner's previous supplier? Are they still ordering from this supplier? If not, why are they looking for a new supplier?
- Do the hours of operation and the facility accommodate the type of practice being conducted?
- Does the practitioner's office have security guards on-site? If so, why?

- Are all applicable state, federal, local licenses current and are they issued for the registered address at which the practitioner is practicing?
- Does the practitioner see out of state patients? If so,
 - From what states,
 - How many,
 - Approximate ratio of out of state compared to local, and
 - Why, specifically, they travel so far to see him?
- Can the practitioner provide a blank copy of an agreement which they enter into with a patient, specifying the course of treatment, the patient rights and responsibilities, and reasons for termination of treatment?
- Does the practitioner conduct random unannounced drug testing?
- What measures does the practitioner employ and/or monitor to prevent addiction and diversion of controlled substances?
- Is there more than one practitioner dispensing controlled substances from the registered location?
- Do you order for just yourself or for the whole clinic?
- What controlled substances are you currently dispensing? (If only one or two controlled substances are being ordered, have the practitioner fully explain why he administers or dispenses only these specific controlled substances.)
- In what dosage levels is the practitioner dispensing (2 tablets, 4 times a day, for 30 days, or 90, 120, 240 a week, month).
- Does the practitioner prescribe as well as dispense to his patients?
- Does the practitioner prescribe the same controlled substances as were dispensed to the patient?
- How many patients is the practitioner presently treating (day, week, and month)?

Should you have any additional questions, concerns or issues beyond what has been presented it is strongly recommended you contact your local DEA Office.

Office of Diversion Control