

Drug Theft Prevention
DEA Detroit Diversion
May 4-5 2013

Areas of Concern

Questions

- How are drug thefts required to be reported by practitioners/licenseses?
- Analysis of DEA 106 reveals: Chain pharmacies experience diversion by Pharmacy Technicians.
- Same analysis: Independent pharmacies experience higher break ins.
- Advantage to distributing controlled substances.
- Prevention by Cameras. Awareness. Windows
- Pharmacist takes swig of “Syrup”

Classification

- Internal theft and diversion
- External Theft
- Varies by Type
- Chain VS Independent
- DEA Analysis

External Theft

- Burglaries
- Armed Robberies
- Lost in transit.
- Shortages from supplier.
- Less control. Planning and strategies
- Non-employees (you hope)
- Chance of physical harm or worse.

External Theft

- Personal protection course.
- Aware – always. Pay attention.
- Alert
- Who is the pharmacist?
- Suggestions.
- Anticipate.

External Theft

- Keep good records. Helps with inspections
- MI requires annual inventory. To BOP
- DEA two years. May 1st. 90 day period
- Zero based audit.
- The good robbers observe first.
- Undo attention. Pharmacy Inspector.
- Background checks for staff.

External Theft

- Keys, Codes, Employees leave.
- Cameras at or near face level.
- Keep windows free of clutter.
- Disperse or nest controlled substances.
- Good lighting. An alarm.
- Limit access.

No person is above suspicion.

- Drug Reps.
- Inventory companies and cleaning crew.
- Non-pharmacist owners/Managers.
- Enclose pharmacy.
- Policeman (YES)!!
- Flint 24 hour pharmacy.
- Used “Big Gulp”
- Loss of 16,000 Vicodin ES
- Big Round numbers? Really?
- Audit after incident: 4,000 more missing.
- Monthly audits for two years. Suspension for 30 days.

Good Witness

- Very difficult.
- Barriers.
- Signs regarding cameras.
- **DON'T ENDANGER SELF OR STAFF.**
- Don't enter building if evidence of robbery.
- Contact local law enforcement.
- Hero in West Michigan.

Reporting Requirements.

- DEA 106 Form. Rule 338.3141
- Theft within 24 hours. Significant shortage.
- Board of Pharmacy.
- DEA 106 Form within 10 days of discovery of a theft or loss of ANY controlled substance. Notice of filing.
- How many copies? Three
- Only proof of the loss or theft.

Rule 338.3141

- “Shall provide effective controls against theft and diversion of controlled substances”.
- Access is a major element.
- DEA term: “Due Diligence”
- Minimal Standards.

We actually review the 106.

- May call or inspect.
- Be clear and concise.
- Employee? Differentiate Tech or pharmacist.
- If it's looks strange to you, it will look even stranger to us.
- Created by some pharmacists to hide diversion.

Internal Theft

- More likely to experience.
- Don't assume. May be multiple employees. Three is my limit.
- Disperse or store in cabinet/gun safe.
- No excuse for absence of an alarm.

Remember That 106 Analysis?

- Keep personal belongings out of pharmacy. Why a briefcase or tote?
- Common sense will carry you far!
- Change in behavior of staff.
- Good Records!
- Going to the bathroom. Lunch.
- Store lacking a pharmacist.
- Public Health Code: MCL 333.16222 requires reporting.

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