Drug Theft Prevention
DEA Detroit Diversion
May 4-5 2013

Areas of Concern
Questions

• How are drug thefts required to be reported by practitioners/licensees?
• 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.
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