

Prescription drug diversion

Security checklist – are you prepared?

We have all heard the old saying, ***“An ounce of prevention is worth a pound of cure.”*** Few would argue that preventing something bad from happening in the first place is far better than trying to clean it up once it has happened. That said, when was the last time you conducted a “security checklist” of your pharmacy? This is one area where the best medicine for the health of the pharmacy and the public may be that ***“ounce of prevention”***!

Prescription drug diversion and abuse is a significant national problem. Criminal entrepreneurs utilize a variety of schemes to divert controlled substances, as these substances can and do command a very high street value. Burglaries and robberies continue to occur all too often and plague pharmacies all across the United States. These events, in particular robberies, threaten the safety and welfare of patrons and employees. During the first half of 2016, RxPatrol reported more than 3,900 pharmacy robberies and more than 2,100 pharmacy burglaries. Criminals usually size up a pharmacy and its defenses, and then prey upon those with little or no security at all. Data reveals that a very high percentage of pharmacies that were burglarized had no video security camera and no safe to secure controlled substances after hours.

Another area of concern is internal theft. It is always difficult to believe that a trusted employee would divert prescription medications illegally, but unfortunately it does happen. Also, such activity can be difficult to detect. These situations may be orchestrated by exploiting technology such as electronic ordering then deleting the order after it is diverted. Other methods used by pharmacy staff to conceal internal theft may be less sophisticated and include any of the following:

- **Unauthorized early refills**
- **Filling phony called-in prescriptions**
- **Short-filling prescriptions and pocketing the balance**
- **Filling prescriptions for deceased individuals**
- **Pilfering drugs from bottles and resealing the bottles**
- **Stealing drugs from inventory meant for return or destruction**
- **Hiding bottles in the trash and retrieving the bottles from the dumpster outside at a later time**

Regardless of what scheme is used, there is generally a common denominator — vulnerability or weakness in the security employed at the pharmacy. As such, it is very important to regularly review policies, procedures and security measures with staff. Conduct “what if” scenarios with staff. Good pharmacy security should be a combination of physical security, technology, policy and auditing. Below are suggestions that might help better prepare you or even help prevent a burglary, a robbery or internal theft.



RxPatrol is a “collaborative effort between industry and law enforcement designed to collect, collate, analyze and disseminate pharmacy theft information.” www.rxpatrol.org. (Accessed July 6, 2016).

Tips and best practices

Install security cameras

- Make sure the cameras cover the interior and exterior of the pharmacy. Ensure cameras cover the pharmacy area and cash registers and are positioned at optimal angles. (Those placed too high might only record a suspect's head, making future identification difficult or impossible.)
- Regularly check that cameras are working correctly and storing recorded data for sufficient periods of time, rather than recording over the previous day's recording.

Install an alarm system

- An alarm system should provide complete coverage of windows, doors, safes and security cabinets.
- Once installed, conduct a security checkup of your alarm systems to ensure they are up to date and fully functioning.
- Change codes frequently, especially when employees are no longer employed at the pharmacy, even if you think they never had the codes.

Conduct a building inspection

- Survey your store for weaknesses in security, e.g., no cameras, no alarms, filling area easily accessible.
- Change locks when employees are no longer employed at the pharmacy.
- Limit access via keys and have "Do Not Duplicate" stamped on the keys.
- Keep lights on after closing, especially in the pharmacy area.
- Change safe combinations after employees are no longer employed at the pharmacy.
- Develop a relationship with local law enforcement for sharing of information and trends in the area. Also ask if they will conduct a security assessment of your pharmacy.

General security procedures

- Perform a risk assessment of your policies and procedures for preventing internal theft including procedures for securing returns and out-of-dates.

- Make sure employees are trained and educated on appropriate steps to take during and after a robbery or burglary and how best to handle any potential evidence.
- Limit access to controlled substances, especially CIIIs, to essential employees.
- Limit personal belongings in the pharmacy area such as purses, backpacks or lunch boxes that might provide a means to hide stolen medications.
- Conduct background checks on employees with access to controlled substances.
- Protect passwords, do not share them, and change them regularly.
- If your pharmacy utilizes DEA's Controlled Substance Ordering System (CSOS), protect your CSOS certificate. Only the individual(s) to whom the certificate was issued is authorized to order controlled substances.
- Secure all used and unused DEA 222 order forms and immediately report any lost or stolen forms to the local DEA office.
- Have the PIC maintain a log listing the Form 222 sequential numbers with the ultimate disposition for each form.
- Consider implementing a procedure when submitting an order for controlled substances that requires two employees to review prior to submitting the order.
- Consider a separation of duties as a means of checks and balances. For example, the person who orders the controlled substances should not be the same person who receives the shipments or conducts inventories.
- Consider having a technician check incoming orders with a pharmacist signing off on the receipt prior to shelving products.
- Establish procedures to conduct biennial inventories that require at least two employees, or schedule them more frequently if there are any issues.
- Conduct unannounced inventories of selected drugs, documenting and retaining the results.

- Make it a practice to randomly back-count bottles to ensure counts are correct.
- Train and encourage employees to report any unusual behavior to management.
- The PIC should be aware of any theft or loss. And as a reminder, all thefts and significant losses must be reported to the DEA via DEA Form 106. (The form may be submitted online at www.deadiversion.usdoj.gov/online_forms_apps.html.)

Conclusion

Safety for patrons and employees is always paramount. There are a number of security measures and actions a pharmacy owner can take to help ensure the safety of customers and staff while also minimizing the potential for theft and diversion. These measures range from inexpensive physical security measures to more advanced technology measures such as high-resolution cameras and e-prescribing. Pharmacy owners must determine what security measures and procedures are best for their business and ultimately whether that ***"ounce of prevention is worth a pound of cure."***



Resources

- A security checklist can be found at www.rxpatrol.com/pdf/A7957-draft.pdf
- U.S. Drug Enforcement Administration Diversion Control Division "Pharmacy Robbery & Burglary" brochure: www.deadiversion.usdoj.gov/pubs/brochures/pharmtheft.pdf
- U.S. Drug Enforcement Administration, Office of Diversion Control Pharmacist's Manual: www.deadiversion.usdoj.gov/pubs/manuals/pharm2/index.html