

INTERNAL PHARMACY THEFT

Tips & Practices to PROTECT
Your Pharmacy From Diversion



INTRODUCTION

Prescription drug diversion is illegal and a serious problem that has become a national concern. There are many methods and scams that enable diverters to illegitimately acquire prescription medications, for example: doctor shopping, forged/counterfeit prescriptions, and pharmacy robbery or burglary.



Notwithstanding these outside threats, another threat to pharmacies is internal theft by employees, contractors, or family members, who have access to restricted areas within the pharmacy. As with the external threats, internal theft can be mitigated, through proper controls, practices, and/or procedures.

This brochure provides information to help you protect your pharmacy from internal theft.

We will **focus** on four major topics:

- Physical Site Security
- Employee Screening
- Controlled Substance (CS) Handling Procedures
- Common Scams

Our **goal** is to reduce the opportunity for CS loss by:

- Limiting authorized access
- Establishing strong site security measures
- Screening all incumbent and future employees
- Creating CS handling procedures

PHYSICAL SITE SECURITY

Building Access

Key control is the first component of site security, therefore, it is imperative to have an appropriate key management plan.

Limit key issuance to appropriate persons:

- Establish strong key control—who issues keys?
- Develop a procedure for lost or stolen keys
- Have keys stamped **“Do not Duplicate”**
- Do not permit critical or sensitive area keys to be taken off-site
- Consider re-keying if a key is lost or an employee leaves your employment

The same points may be made for alarm access codes:

- Distribute unique alarm codes for each authorized user
- Change alarm codes routinely
- Audit entry and exit logs

Pharmacy Access

Not all employees need access to every area:

- Limit access to dispensing area based on need
- Consider separate key and alarm access codes for pharmacy area
- Escort non-pharmacy staff at all times (repairmen, etc)

Pharmacy Layout

Are your controlled substances stored in a **safe** or **secure cabinet**?

- May prevent loss during burglary
- Limits employee access

Are your controlled substances stored on the shelf?

- Place CS in areas out of customer view, but within proximity of authorized employees
- When opening a new bottle of medication, always count the entire content of the bottle, even if only filling a small amount

Cameras

CCTV cameras are a visible and highly effective deterrent against employee theft, as well as a robbery prevention measure:

- Use high resolution, color, low-light capable equipment
- Camera quality should allow for facial recognition
- Ensure a clear view of areas where CS are stored or handled
- Store recording device in a secured cabinet or at an off-site location
- Use hidden cameras as necessary
- Perform periodic audits of recording devices to ensure that equipment is working properly

EMPLOYEE SCREENING

Pre-Employment

Background checks are recommended on all employees:

- Verify licenses in all states of residency
- Conduct reference checks
- Verify previous employment
- Consider drug screening

Incumbent

- Conduct routine audits and verify license status

Work Schedule

Pharmacy should be staffed by at least two employees at all times:

- Prevents one person from unobserved access
- If possible, rotate staff to avoid collusion

Workspace

Everyday items brought in by employees may easily serve as a means to hide stolen medications. Limit what employees bring into the pharmacy area:

- Purses, backpacks, coats, lunch boxes, etc
- Inspect items leaving the pharmacy (boxes, trash, etc)
- Maintain an organized and clean workspace to reduce the opportunity for theft

CONTROLLED SUBSTANCE (CS) HANDLING PROCEDURES

Controlled Substance (CS) Ordering & Receiving

Always handle CS first when receiving orders:

- Count order before accepting from shipper (two-person count)
- Establish procedure for handling incomplete (short) orders
- Establish an order review and approval process requiring at least two employees
- Establish a process for Submission of DEA 222 form that also requires at least two employees

Waste, Disposal & Manufacturer Returns

Waste and returns present an opportunity for internal theft. Implementing strong controls may help prevent loss:

- Waste logging must be witnessed
- Customer returns (as allowed by law) must be carefully inventoried and logged
- Securely store waste, returns, and recalls until disposal

Losses

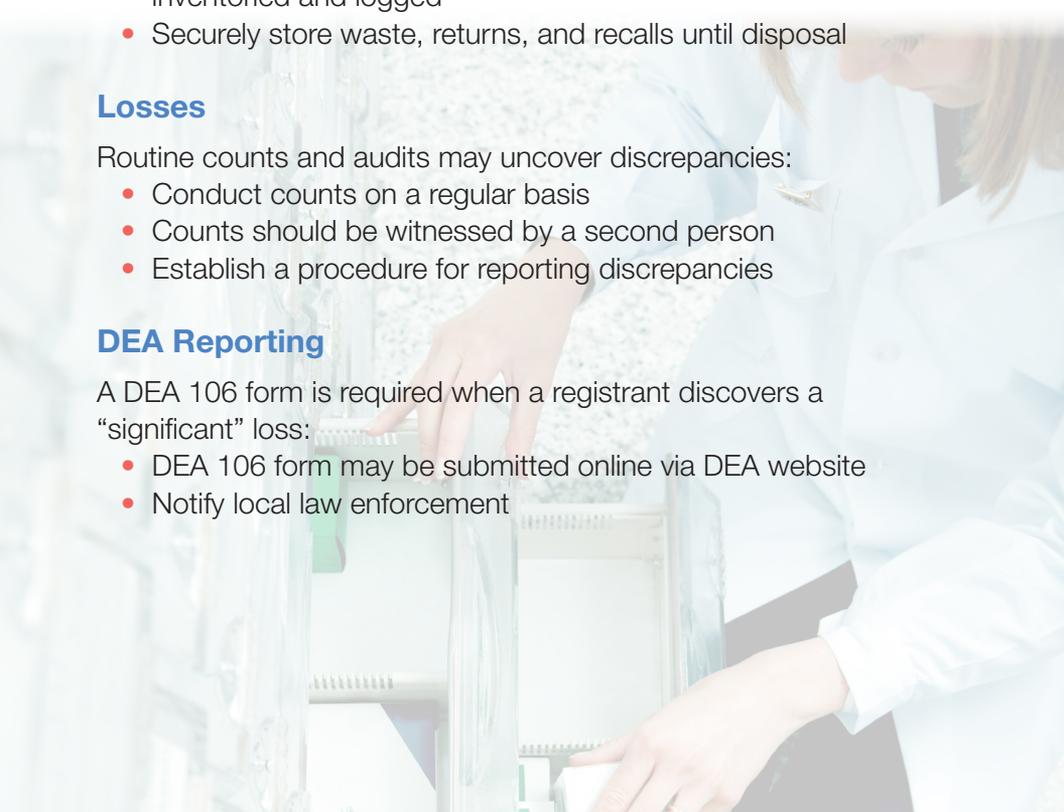
Routine counts and audits may uncover discrepancies:

- Conduct counts on a regular basis
- Counts should be witnessed by a second person
- Establish a procedure for reporting discrepancies

DEA Reporting

A DEA 106 form is required when a registrant discovers a “significant” loss:

- DEA 106 form may be submitted online via DEA website
- Notify local law enforcement



COMMON SCAMS

Below are a few common scams committed by pharmacy staff in order to conceal their theft:

- Filling prescriptions for deceased patients
- Unauthorized early refills
- Filling phony written or called-in prescriptions
- Short filling prescriptions and pocketing medication
- Taking tablets from bottle, then replacing with “look alike” tablets
- Opening bottles/packages, removing tablets, then replacing and gluing the seal





RxPATROL®

Rx **P**ATTERN **A**NALYSIS **T**RACKING **R**OBBERIES & **O**ther **L**OSSES

RxPATROL® is an online pharmacy crime tracking database designed to gather and disseminate critical information to help protect pharmacists, guard against potential robberies and burglaries, and assist law enforcement. It provides educational material and safety tips to the pharmacists on how to protect their pharmacy:

- Incidents may be reported online
- Streaming training videos are available for viewing
- Database is searchable to authorized, registered users

The RxPATROL® Crime Stoppers Program works with local Crime Stoppers chapters nationwide offering rewards leading to the arrest of those committing pharmacy robberies and burglaries:

- Reward offers up to \$2500
- Coordinated and approved by law enforcement

RESOURCES

www.rxpatrol.org

www.deadiversion.usdoj.gov

www.rxsafetymatters.org

