



WV BOARD OF PHARMACY

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CSMP ADMINISTRATOR

WV SUSPICIOUS ORDER REPORTING

- SUSPICIOUS ORDER REPORTS TO THE BOARD HAVE BEEN REQUIRED BY WHOLESALE DRUG DISTRIBUTORS IN WV FOR OVER 25 YEARS (MIRRORS DEA)
- 2018 WE REQUIRED ZERO REPORTING IF NO SOR'S IN A MONTH
- ALSO REQUIRES REPORTING TO THE BOARD IF A WDD CUTS OFF A PHARMACY AS A RESULT OF AN SOR

WV SOR'S

- NUMBERS OF SOR'S INCREASED DRAMATICALLY IN THE LAST 10 YEARS
- STAFF INSPECTORS BEGAN REVIEWING SOR'S IN 2017
- 100'S OF PHARMACY CONTACTS TO DETERMINE CAUSE
- ONLINE SOR PORTAL ALLOWS US TO BETTER TRACK DATA

WV SOR'S

- TO DATE, NO COMPLAINTS INITIATED AS A RESULT OF AN SOR
- 2 COMPLAINTS INITIATED AS A RESULT OF A WDD CUTTING OFF A PHARMACY FOR AN SOR ISSUE
- BOTH COMPLAINTS WERE DISMISSED
- CHIEF INSPECTOR QUOTE: "THESE SUSPICIOUS ORDER REPORTS ARE THEMSELVES SUSPICIOUS"

WV SOR'S IN THE LAST 12 MONTHS

- 3,401 TOTAL (NOT INCLUDING ZERO REPORTS)
- NUMBER OF REPORTS BY WDD
 - 1 - 1,544
 - 2 - 927
 - 3 - 355
 - 4 - 264
 - ALL OTHERS - 311

WV SOR'S IN THE LAST 12 MONTHS

- TOP DRUGS INVOLVED
 - 389 BUPRENORPHINE PRODUCTS
 - 375 ALPRAZOLAM
 - 262 HYDROCODONE
 - 250 OXYCODONE
 - 225 TRAMADOL

WV SOR'S IN THE LAST 12 MONTHS

- # OF CONTAINERS ORDERED
 - 99999
 - 42854 (PARTIAL NDC)
 - 2,028, 828, 600, 528, 504, 492, 336, 312, 216...
(34 SOR'S ON ANOTHER WDD)
 - 1418 x 3 (COUGH SYRUP ORDERS)
 - 401 (REPORTED DATA ENTRY ERROR)
 - 216,213,211,205,....64 (28 SUBOXONE ORDERS
BY SAME PHARMACY)
 - 1,750 WERE FOR ONE (1) CONTAINER (603
WERE CONTAINERS OF 100 DOSES OR LESS)

WV SOR'S IN THE LAST 12 MONTHS

- REASONS SUSPICIOUS
 - 1,008 - PRIMARY WHLSR FOR ITEM/FAMILY AND VOL EXCEEDS METHODOLOGY
 - 927 - EXCEEDS CONTROLLED SUBSTANCE MONITORING THRESHOLD
 - 347 - ITEM ORDERED AT END OF ACCRUAL PERIOD
 - 248 - NOT PRIMARY WHOLESALER FOR ITEM
 - 205 - MONTHLY VOLUME EXCEEDS METHODOLOGY BASED ON CUSTOMERS DISPENSING HISTORY
 - 203 – UNUSUAL SIZE

WV SOR RELATED ISSUES

- HOSPITAL SYSTEM CAN'T GET PREFERRED PRICING BENZO, ORDERS A DIFFERENT BRAND, BLOCKED DUE TO NO PREVIOUS ORDER HISTORY
- OF 389 BEPRENORPHINE SOR'S, 18 WERE CORRECTIONAL FACILITIES ORDERING SUBLOCADE
- PHARMACY ATTEMPTED TO INCREASE BUP THRESHOLD AS A RESULT OF LOCAL PHARMACY CLOSURE AND NEW TREATMENT CENTER IN AREA, WDD INSTEAD REDUCED THRESHOLD BASED ON PEERS

WV SOR RELATED ISSUES

- PHARMACY PRODUCT REGULAR ORDER NOT FILLED, NEXT ORDER INCLUDES BACK ORDERED PRODUCT, ORDER THEN BLOCKED DUE TO UNUSUAL SIZE
- HOSPITAL SYSTEM CAN'T GET PREFERRED STRENGTH BENZO (2MG), ORDERS 4X THE ONLY STRENGTH AVAILABLE (0.5MG) AS EQUIVALENT, BLOCKED DUE TO UNUSUAL SIZE
- PHARMACY THRESHOLD SET TO ONE DOSE FOR FAILURE TO FILL OUT A WDD QUESTIONNAIRE

WV SOR RELATED ISSUES

- MOST COMMON ISSUES WE ENCOUNTER ARE BUPENORPHINE RELATED, ESPECIALLY SINCE X-WAIVER CHANGE
- MANY SOR'S RELATED TO STOCK REPLENISHMENT FROM SHORTAGES OF CERTAIN STIMULANTS, OPIOIDS AND BENZOS
- ADAPTIVE/PREDICTIVE REPEAT SYSTEM ORDERS ARE FREQUENT
- WE RECEIVED 10 CONSECUTIVE SOR'S FOR SAME PRODUCT, ORDER FILLED AND NO LONGER SUSPICIOUS ON ORDER 11

WV SOR RELATED OBSERVATIONS

- SOR'S APPEAR TO BE USED FOR CUSTOMER ACCOUNT MAINTENANCE
- NO VISIBILITY INTO SOR ALGORITHMNS
- CUSTOMERS USUALLY AREN'T AWARE THAT THERE WAS A SOR GENERATED
- ALGORITHMNS SHOULD CONSIDER BUPRENORPHINE PRODUCTS DIFFERENTLY
- ALGORITHMNS SHOULD ACCOUNT FOR BACK-ORDERED ITEMS
- DIFFICULT TO IMAGINE A SCENARIO WHERE AN ORDER FOR ONE (1) 100 COUNT BOTTLE OF GABAPENTIN IS UNUSUAL IN ANY WAY

QUESTIONS?

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