



Dear Valued Prescriber,

Walgreens wants to ensure that our patients continue to have access to the medications they need while fulfilling our role in reducing the potential abuse of controlled substances. Our intent is to partner with you to ensure that patients receive their appropriate therapy and that the necessary information to confirm the appropriateness of the prescription is documented to satisfy DEA requirements. This process is designed to protect both you and the pharmacist.

According to Title 21 of the Code of Federal Regulations, section 1306.04, pharmacists are required by the DEA regulations to ensure that prescriptions for controlled substances are issued for a legitimate medical purpose. The regulation states the following:

A prescription for a controlled substance to be effective must be issued for a legitimate medical purpose by an individual practitioner acting in the usual course of his professional practice. The responsibility for the proper prescribing and dispensing of controlled substances is upon the prescribing practitioner, but a corresponding responsibility rests with the pharmacist who fills the prescription. An order purporting to be a prescription issued not in the usual course of professional treatment or in legitimate and authorized research is not a prescription within the meaning and intent of section 309 of the Act (21 U.S.C. 829) and the person knowingly filling such a purported prescription, as well as the person issuing it, shall be subject to the penalties provided for violations of the provisions of law relating to controlled substances.

Our pharmacists are required to take additional steps when verifying certain prescriptions for controlled substances. This verification process may, at times, require the pharmacist to contact you for additional information necessary to fill the prescription. While the information requested may vary, potential questions could include information about the diagnosis, ICD-9 code, expected length of therapy and previous medications/therapies tried and failed. Privacy laws allow you to share this information with another healthcare professional who is providing care to the patient.

We realize that this process may generate questions and concerns from both you and the patient and we will do our best to respond in a professional and courteous manner. We recognize that sharing appropriate information with our pharmacists may require additional time from you or your office staff and we want to thank you in advance for partnering with us to provide the best care to our patients.

Be well,

Your Walgreens Pharmacist



Dear Valued Prescriber,

As you know, Walgreens recently amended its policy on good faith dispensing of controlled substances, specifically opioid narcotics. We want to thank you for your patience as we implement this new policy. We also want to address some of the concerns that many of you have raised.

Many of you have voiced concerns about the confidential or private nature of your patients' health information. Please be assured that Walgreen's is a HIPAA compliant health care provider. [45 CFR 160.103 par (3)]. By law, pharmacists are granted access to private health information necessary for them to perform their responsibilities. Any information obtained is treated as private health information, which is held as confidential, and protected under Federal Law (HIPAA).

Under Federal regulation, pharmacists have a responsibility to ensure that each prescription for a controlled substance is "issued for a legitimate medical purpose." (21 U.S.C. 829). To make that determination, pharmacists may need to gather additional information, including patient diagnosis and expected length of therapy. This will be necessary on some, but not most, prescriptions. We understand this diligence takes extra time, for our patients, and for you, our partnering physicians. We want to thank you for taking this time, and we promise that we will be mindful of it. Our pharmacists will not be calling you on every prescription for a controlled substance.

Our policy is new, and we know it has been difficult to implement. We are listening to your concerns and we will continue to modify the policy so that it better meets the needs of our patients, and of you, our physician partners. We believe we can make this policy work, and we believe it is absolutely essential for all of us. Our country is experiencing a serious and rapid increase in the abuse of prescription controlled substances. The safety of our patients and the general public requires that all health care professionals increase vigilance to stem the abuse of these drugs and prevent death and injury. Federal authorities are looking carefully at every step of the prescription drug dispensing process, scrutinizing physicians, pharmacists, distributors and manufacturers. Our distributors, regulators and our prescribers have encouraged us to work with them to enhance our good faith dispensing practices.

This is the goal of our new policy. While we know it hasn't been easy, in today's climate, we felt it was the right thing to do. We welcome further discussion, and we thank you for your efforts to improve understanding of our good faith efforts to better serve our patients.

Sincerely,

Walgreen Co.