

**Colorado Retail Chain Pharmacies:**  
***Committed to Helping Curb  
and Prevent Opioid Abuse***

**Presentation to the Opioid and Other Substance Use Disorder Interim  
Study Committee**

*August 1<sup>st</sup> 2017*

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NATIONAL ASSOCIATION OF  
CHAIN DRUG STORES



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**The Colorado Retail Council's Chain Pharmacy Committee Members  
operate 700+ pharmacies and employ nearly 3,000 pharmacists in  
Colorado.**

## **Chain Pharmacy Supports Holistic Strategies to Prevent Prescription Drug Diversion and Abuse**

- Pharmacists take their role in helping to ensure safe use of medications very seriously—but they cannot do it alone.
- Chain pharmacy supports a collaborative approach to curb abuse while preserving patient access to medically-necessary pain medications.
- There are a variety of ways to help curb prescription drug diversion, and chain pharmacies actively work on many initiatives to reduce this problem.

# Chain Pharmacy Initiatives

- Chain pharmacies have zero tolerance for prescription drug diversion and employ strict policies and procedures to prevent this.
- Chain pharmacies have created a variety of extensive and robust loss prevention and internal security systems to ensure that prescription drugs are accounted for every step along the way (from prescription drug distribution centers down to the point of dispensing.)
- We work closely with law enforcement to see that perpetrators are brought to justice.

# **Chain Pharmacy Supports Law Enforcement Initiatives**

*Chain pharmacy interacts routinely with state and federal law enforcement bodies to protect Americans from the dangers of prescription drug diversion and abuse.*

- We support the mission and activities of DEA, and seek to work with the agency on a routine basis to stem diversion.
- We support the work of the National Association of State Controlled Substance Authorities (NASCSA) as their members develop, implement, and maintain prescription drug monitoring programs (PDMP).
- We support the mission and objectives of the National Association of Boards of Pharmacy (NABP), and have worked with them on a number of initiatives over the years, the most recent being the development of a consensus document to alert prescribers and pharmacists about potential “red flags” in the prescribing and dispensing of controlled substances.

# Opportunities to Enhance Existing Strategies to Curb Opioid Abuse

## *Patient & Provider Education*

- *For prescribers* – We support education initiatives at the federal and state level to enhance prescriber education and training that addresses appropriate pain treatment, and prevention, identification, and treatment of opioid addiction, among other issues.
- *For patients* – We encourage FDA to adopt policies to streamline the written information that patients receive with their prescriptions to provided easy to understand information on the safe and appropriate use of controlled substances.

# Opportunities to Enhance Existing Strategies to Curb Opioid Abuse

## *E-Prescribing*

*Chain pharmacy supports mandatory e-prescribing for all prescriptions*

- Especially with controlled substances prescriptions, e-prescribing practices reduce opportunities for diversion.
- The *DEA-approved e-prescribing* process for controlled substances provides much more protection from diversion than the current system of paper and oral prescriptions:
  - Electronic controlled substance **prescriptions cannot be altered, cannot be copied, and are electronically trackable.**
  - Federal DEA rules for electronic controlled substances prescriptions establish **strict security measures, such as two-factor authentication, that reduce the likelihood of fraudulent prescribing.**

# Opportunities to Enhance Existing Strategies to Curb Opioid Abuse

## *Limiting Initial Fills of Controlled Substance Prescriptions*

- Recent laws in some states limit the maximum day supply that prescribers can authorize on initial prescriptions for controlled substances
- Where such laws are enacted, standardization across the state is important to ease implementation challenges so that patient care is not adversely impacted.
- Chain pharmacy supports such laws that are standardized with respect to the day supply limit duration (7 days), the type of prescriptions subject to the limit (opioid prescriptions for acute pain), and exemptions for prescriptions for the treatment of certain medication conditions (ex. cancer care, palliative care, etc.)



# Opportunities to Enhance Existing Strategies to Curb Opioid Abuse

## ***Promoting Access to Naloxone***

- Pharmacists are accessible in local communities and are primed to work with other healthcare providers to increase access to naloxone for overdose prevention purposes.
- Chain pharmacy supports state laws like the one recently enacted in Colorado (SB 15-053) that allows pharmacists in Colorado to dispense naloxone pursuant to a standing order or protocol, as this makes naloxone more accessible to individuals at risk of opioid overdose. This law also provided important liability protections to healthcare providers who prescribe or dispense naloxone under the law.

# Opportunities to Enhance Existing Strategies to Curb Opioid Abuse

## *Take Back and Disposal of Consumers Unused Medications*

- Chain pharmacy supports the safe and effective disposal of unwanted consumer medications, including controlled substances, to stem the abuse of such drugs and to better protect the environment.
- DEA has authorized a variety of options for drug disposal programs, including but are not limited to: take-back kiosks in pharmacies, mail-back envelopes made available for sale or for free by pharmacies, community drug take-back events hosted at pharmacies, in-home disposal products, funding of take-back kiosks at law enforcement locations, and vouchers to patients to obtain mail-back envelopes from pharmacies.
- It is important for patients to have a wide variety of options for how they can dispose of their unused medications, and pharmacies need the flexibility to create programs that best serve the needs of their patients. With more options, we can expect to have higher participation in disposal programs.