



## **Order Monitoring Program and Diversion Control**

AmerisourceBergen® is committed, along with our supply chain partners, to preventing the diversion of controlled substances. We have taken a leadership role in developing and implementing programs that help identify instances of diversion

### **Current Regulations**

One of the DEA's highest priorities nationwide is to eliminate the diversion and abuse of controlled substances. All individuals and firms who handle controlled substances must be registered with the DEA. DEA registered pharmacies are required to "provide effective controls and procedures to guard against theft and diversion of controlled substances." Title 21, Code of Federal Regulations (21 CFR), parts 1300 to 1316.

Furthermore, the DEA requires wholesalers to "design and operate a system to disclose to the registrant suspicious orders of controlled substances". (21 CFR 1301.74(b)) In response, AmerisourceBergen continues to modify and enhance its Order Monitoring Program to provide effective controls to prevent diversion.

### **About our Order Monitoring Program**

- The Order Monitoring Program is the cornerstone of our diversion control effort. The program helps to alert customers of significant changes in order quantities and can assist in resolving variances.
- Monthly controlled substance thresholds are established for each customer and are based on three factors:
  - DEA registrant type (hospital, retail, clinic, physician, etc)
  - Customer size by sales volume
  - Item family (particular classes of drugs or chemicals)
- Threshold levels for controlled substances can be adjusted depending upon your business practices and/ or treatment specialty.

### **How AmerisourceBergen helps customers**

- AmerisourceBergen has developed "Pharmacy Guidelines for DEA Compliance" which are suggested Best Practices for our customers — to help customers gain confidence in compliance with DEA regulations.
- A team of dedicated investigators, analysts and support personnel will assist our customers to help prevent diversion and remain compliant with federal regulations.
- AmerisourceBergen's Corporate Security and Regulatory Affairs staff will work closely with customers to minimize impact on compliant customers' orders.

Prescription drug diversion and abuse will continue to be a serious problem with far-reaching implications for public safety and the pharmaceutical industry. AmerisourceBergen remains an industry leader in addressing those concerns

— And we will continually enhance our program — for our pharmacy partners.