



# IMPROVEMENTS FOR TRACKING THE WHOLESALE DRUG DISTRIBUTION OF CONTROLLED SUBSTANCES

**RECOMMENDED BY THE TEXAS MEDICAL ASSOCIATION**

Drug overdose is the leading cause of accidental death in the United States, with 47,055 lethal drug overdoses in 2014; and

Opioid addiction is driving this epidemic, with 18,893 overdose deaths related to prescription pain relievers and 10,574 overdose deaths related to heroin in 2014; and

In an effort to improve the Texas Prescription Monitoring Program (PMP), the program moved from the Texas Department of Public Safety to the Texas State Board of Pharmacy (TSBP) on Sept. 1, 2016; and

TSBP posts 16 reports in accordance with government code 2052.0021, but no reports are posted on the amount of controlled substances sold by wholesale drug distributors; and

Manufacturers sell to wholesale drug distributors and report their sales to the U.S. Drug Enforcement Agency's Automation of Research and Coordinated Orders System (ARCOS), then the wholesale drug distributors sell to pharmacies and report their sales to ARCOS; and

Pharmacies then report their sales to the PMP, and the TSBP can request the ARCOS data, but it is not always received and often takes six to 12 months to receive; and

Pharmacies have up to seven days to report their sales to the PMP, which makes it difficult for physicians to keep up with the medications that patients are getting from other physicians; and

Texas is second only to California in terms of the number of wholesale drug distributors; and pharmacies can use multiple wholesale drug distributors, even out of state, which makes it difficult for the TSBP to track their purchases, and pharmacies often do not keep records of wholesale drug deliveries; and

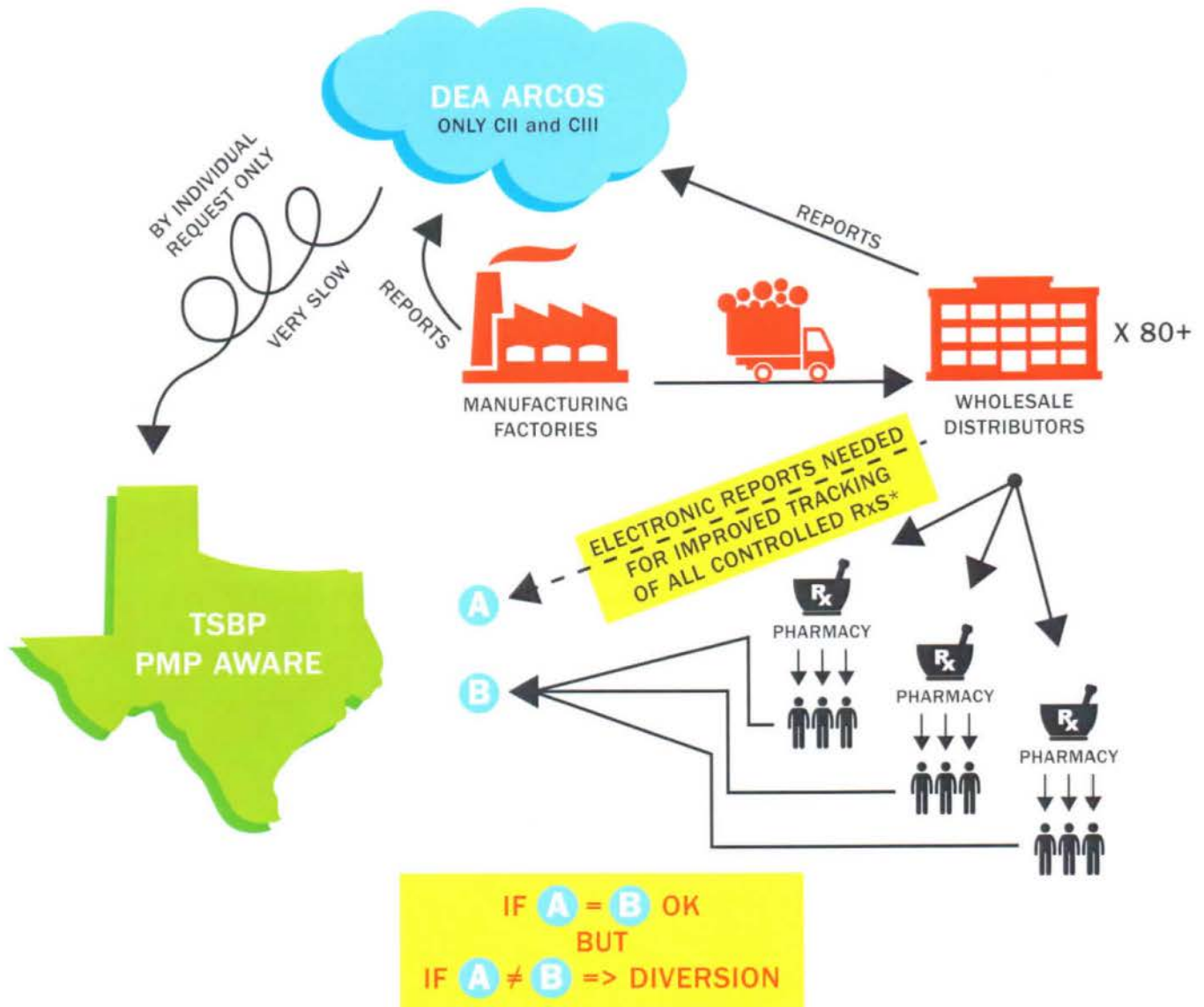
TSBP needs to match purchases to sales, ensuring that the number of units delivered to the pharmacy according to the ARCOS database matches the number of units that the pharmacy dispensed according to the PMP database, so that the TSBP enforcement division can stop the illegal diversion of controlled substances; and

The federally mandated wholesale drug oversight program does not always work, evidenced by its inability to stop illegal wholesale drug distribution in Florida (Florida now requires that the ARCOS data be reported to them) and West Virginia; and

The thefts and loss of controlled substances in Texas pharmacies due to employee pilferage has increased by 28 percent from FY2013 (584,344 dosage units) to FY2014 (749,704 dosage units).



# IMPROVEMENTS FOR TRACKING THE WHOLESALE DRUG DISTRIBUTION OF CONTROLLED SUBSTANCES



The Texas Medical Association will work with the Texas Legislature to require wholesale drug distributors to report their ARCOS data directly to the Texas Prescription Monitoring Program.

The Texas Medical Association will work with the legislature to require pharmacies to report their sales daily to the Texas Prescription Monitoring Program.

The Texas Medical Association will work with the Texas Legislature to require: the Texas State Board of Pharmacy to generate public reports (de-identified) of the top 10 wholesaled controlled substances by ZIP code, monthly, or more frequently as indicated.

\*Currently used in Florida, Ohio, Michigan, and Washington