

# McKesson's Controlled Substances Monitoring Program

## Program Overview

McKesson manages a Controlled Substances Monitoring Program (CSMP) as part of its regulatory obligations as a Drug Enforcement Administration (DEA) registrant. The program is designed to implement and maintain effective controls against diversion and to detect and report suspicious orders to the DEA.

Developed to support our legal responsibility as a DEA registrant and licensed controlled substances distributor, the CSMP is integral to McKesson's commitment to our customers and their patients.

The CSMP covers all controlled substance purchases by customers, with additional focus on more commonly abused drugs. The program is managed by the McKesson Regulatory Affairs team with assistance from our Sales and Operations teams.

### McKesson's Commitment

We take our role in the fight against the diversion of controlled substances for nonmedical or other illegal use very seriously.

## Program Details

The tenets of our Controlled Substances Monitoring Program are based on the requirements outlined in the U.S. federal government's Controlled Substances Act.

Our CSMP includes the following main components:

### Customer diligence

McKesson's CSMP is designed to create multiple checks throughout the relationship with our customers. Initially, McKesson reviews customers during new customer onboarding before they may begin ordering controlled substances. As part of this review, we confirm that the customer is appropriately registered, licensed and in good standing. We also obtain information about the customer's business model and operations. Once established, we routinely review the customer on an ongoing basis, monitor their purchases of controlled substances and compare their purchases against certain statistical criteria. McKesson's ongoing review process ensures that we effectively meet our regulatory obligations while also meeting the legitimate needs of our customers.

### Detailed monitoring against suspicious orders and diversion trends

McKesson monitors purchases of controlled substances to detect and report suspicious orders to the DEA and State Regulatory Boards and Agencies. We also monitor diversion trends on an ongoing basis. Our program is refreshed to address current diversion trends, while considering the legitimate business models of our customers as they evolve. We also provide our customers with access to information and resources to help them identify warning signs of prescription drug abuse and diversion.

## Resources

The following resources may support an understanding of the regulatory landscape and the role McKesson is playing in the fight against controlled substance diversion and abuse.

- Drug Enforcement Administration: [www.dea.gov](http://www.dea.gov)
- DEA Diversion: [www.deadiversion.usdoj.gov](http://www.deadiversion.usdoj.gov)
- National Association of Boards of Pharmacy: [www.nabp.net](http://www.nabp.net)
- National Institute on Drug Abuse: [www.drugabuse.gov](http://www.drugabuse.gov)