

AOAAM REVIEW OF DEA BUPRENORPHINE PRESCRIBER INSPECTIONS

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- ▣ Recent Survey
 - 17 respondents
 - Average length of time approx. 70 minutes
 - Consistencies
 - ▣ Ask to see waiver and increase to 100 patient limit when indicated.
 - ▣ Documentation of expectations
 - ▣ Log of prescription written

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- ▣ Variations of report
 - DEA Consent to be signed
 - ▣ Explanation of rights
 - Number of patients on Buprenorphine
 - ▣ List
 - ▣ Criterion for establishing treatment of these patients
 - ▣ Criterion for maintaining patient on medication

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- ▣ Documentation
 - Waiver for 100 patients
 - CDS or State CS certificate
 - DEA certificate
 - License
 - Suboxone Treatment Agreement.

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- ▣ Chart review
 - Mock Chart
 - Some ask to see actual charts
 - ▣ 1 to 10 charts reviewed
 - ▣ Electronic chart
 - Asked to be printed
 - Told should be kept in separate file with password
 - Important pieces
 - ▣ Log of prescriptions
 - ▣ Patient expectations/contact/treatment plan
 - Signed/dated

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- ▣ Variations
 - Practices of the other physicians in the office.
 - Record of other practice sites.
 - Unusual number of patients coming from any particular doctors in the area.
 - Asked which drug was most prevalent in the practice area.
 - Copies taken of the mock documents requested.

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▣ Concerns

- Clarification of rights to see actual chart without redaction of identifying information.
- What constitutes a contract/treatment plan
- Special scrutiny to the point of discontinuation of applying for indigent pharma support for medication assistance.

“I no longer help people. A great big pain in the _____. They threatened \$10,000 fine but did not impose.”