



Guidance for Community-Based Pharmacists: Developing a Patient Opioid Pledge

With pharmacists and pharmacies susceptible to investigations and corresponding liability, it is important that pharmacies establish due diligence policies, which include checking state prescription drug monitoring programs, identification of **Red Flags (Exhibit A)**, communicating with the prescribing provider when concerned and appropriately documenting patient interactions. Red flags are warning signs that may indicate a controlled substance prescription is not being obtained for legitimate medical purpose but rather for diversion or abuse. It is the pharmacist's job to evaluate and interpret the seriousness of these warning signs. Pharmacists are required to exercise sound professional judgment with determining the legitimacy of a controlled substance prescription.

When a pharmacist is presented with a doubtful, questionable or suspicious prescription, ***the law does not require a pharmacist to dispense the prescription.*** On the contrary, a pharmacist who deliberately ignores a questionable prescription when there is reason to believe the prescription was not issued for a legitimate medical purpose may be prosecuted along with the prescribing physician for knowing and intentionally distributing controlled substances.

In an effort to improve health care delivery and have better results for your patients, CPESN USA suggests adopting and implementing a Safe Opioid Dispensing Policy/Pledge to be shared with patients. Such policy/pledge should be conspicuously posted or provided to each applicable patient. An example policy/pledge is provided as **Exhibit B**.

Please Note, Before Refusing to Fill a Prescription:

- *Use caution. Keep in mind that a patient who suddenly discontinues a long-term medication, particularly an opioid medication, may experience negative health consequences, including withdrawal and even death.*
- *Contact the prescriber. If a pharmacist has any concern regarding a prescription, he or she should attempt to have a professional conversation with the prescriber to resolve those concerns and not simply refuse the prescription. A short conversation with the prescriber will either alleviate the pharmacist's concerns or substantiate them—in either case, this is important information to have. You are invaluable as a healthcare professional in terms of your medication expertise, and you should feel empowered to utilize this expertise as part of any dialogue with a prescriber regarding potential alternatives, changes in the prescription strength, and directions to the patient.*
- *Be part of the solution. If Red Flags consistently involve the same prescribing provider do not hesitate to contact the appropriate licensing board or authority.*



Exhibit A: Red Flags

Signs that patients might be struggling with opioid use disorder or diverting medications include:

- Forged prescriptions (e.g. lack of common abbreviations or overly legible handwriting)
- Prescriptions originating from outside the immediate geographic area
- Altered prescriptions (e.g. multiple ink colors or handwriting styles)
- Cash payments
- Inconsistent or early fills
- Multiple prescribers

RESOURCES:

A detailed examination of the pharmacist's role and **Red Flags** can be found in the *Pharmacy Times* article [*Don't Ignore These Opioid Abuse Red Flags.*](#)

A coalition of medical, pharmacist, and supply chain stakeholder organizations released a consensus document highlighting challenges and "red flag" warning signs related to prescribing and dispensing controlled substance prescriptions. The goal is to provide health care practitioners with an understanding of their shared responsibility to ensure that all controlled substances are prescribed and dispensed for a legitimate medical purpose, as well as to provide guidance on which red flag warning signs warrant further scrutiny. See [*Stakeholders' Challenges and Red Flag Warning Signs Related to Prescribing and Dispensing Controlled Substances.*](#)



Exhibit B: Patient Opioid Pledge

[Insert Pharmacy Name] Patient Rights and Obligations regarding receiving Opioid Medications

PURPOSE: The purpose of this pledge is to highlight the pharmacists' and patient's responsibilities when a patient is prescribed certain controlled substances. The pharmacy has legal and ethical responsibilities to patients prescribed and receiving certain controlled substances.

Our Pharmacists are responsible to use professional judgment to assess the appropriateness of the service we provide to all patients. *[Insert Pharmacy Name]* commits to helping you understand the risks associated with your treatment plan and the appropriate, storage, use, and disposal of the controlled substance prior to receiving the medication.

As your trusted pharmacy, we commit to:

- Counsel you on the safe and appropriate use, benefits, and risks of your medications.
- Help safely manage your medications and medical conditions.
- Communicate with your prescriber on your progress with treatment and help with any unmet treatment needs.
- If the pharmacist has any concerns, he/she will work with you as the patient and your provider to resolve these concerns.
- The pharmacist will document your conversations and treatment plan to build your complete health record
- Review State Controlled Substance Reporting Systems to verify your medication history to ensure it is safe and appropriate to fill the controlled substance and avoid any duplications of medications.
- Help you keep your medications secure and disposing of unwanted medications properly.
- The pharmacist will assess your risk based on current dose of opioid(s) and make the offer for a prescription for naloxone, the opioid overdose reversal medication if appropriate to protect you and other individuals [BASED ON STATE LAW].

Patient by accepting the dispensed controlled substance AGREES that:

- There are risks of dependence, addiction, and overdose associated with the use of opioid medications and other controlled substance medications and will discuss any concerns with the pharmacist.
- I will discuss any changes in dosage or how often I take my medication with my doctor and pharmacists.
- I will not request my medication to be refilled before the date I am scheduled to run out of my medication. If I need to refill my medication earlier than this date, I understand the pharmacy will not fill the medication more than 1-2 days early depending on the last day supply received.
- I will safeguard my medications from loss, theft, or unintentional use by others by keeping my medications in a locked box or away from others, including children.
- I will dispose of any unused medications properly as discussed with the pharmacy staff.
- I understand that my prescription is for me only and will not share my medication with anyone.

I agree to abide by this policy to ensure my safety.

I understand the pharmacy may refuse to fill further controlled substance prescriptions for me if I cannot abide by this Policy.