



April 13, 2017

The Honorable Vern Buchanan  
U.S. House of Representatives  
Washington, DC 20515

Dear Congressman Buchanan:

Thank you for your March 2, 2017, letter to the Department of Veterans Affairs (VA) regarding your concerns about prescription drug thefts at VA facilities. I appreciate the opportunity to provide the enclosed answers to your questions.

VA's Veterans Health Administration is the Nation's largest integrated health care system, and pharmacy services are a vital part of delivering the high-quality health care our Veterans deserve. Our pharmacy program is widely regarded as the professional benchmark for clinical pharmacy practice, drug formulary management, prescription fulfillment services, and medication safety.

Oversight of controlled substances is multi-faceted and involves: 1) ensuring VA lists controlled substances on its National Formulary that have evidence of safety and effectiveness; 2) providing evidence-based prescribing criteria for controlled substances; 3) developing internal controls for physical drug security; 4) using electronic prescribing to prevent forgery; 5) monitoring suspected cases of theft or diversion and taking appropriate follow-up action; 6) addressing any controlled substances prescribing that does not align with evidence-based criteria; 7) implementing patient-focused initiatives such as medication take-back programs; 8) providing overdose education and naloxone distribution; and 9) ensuring the availability of complementary and integrative medicine therapies in place of controlled substances.

When a controlled substance prescription is lost or stolen, VA facilities have processes in place to ensure a Veteran's treatment is not impacted by circumstances outside his or her control. Over 80 percent of prescriptions are mailed to Veterans by a VA Pharmacy. When documented prescription losses occur, the overwhelming number of such losses occurs after leaving the VA medical center in the mailing system.

In most cases where such documented losses occur, the Veteran will first contact the VA facility Pharmacy Department and report the controlled substance prescription as not delivered. Procedures in the case of reported loss of mailed controlled substances are governed by local facility policy. Typically, when a Veteran reports a loss, the VA Pharmacy staff will review the mail carrier tracking documentation to confirm non-delivery of the missing controlled substance prescription, as well as the Veteran's medication refill request history, and then contact the Veteran's VA provider to discuss the reported lost prescription. After the VA provider reviews the Veteran's



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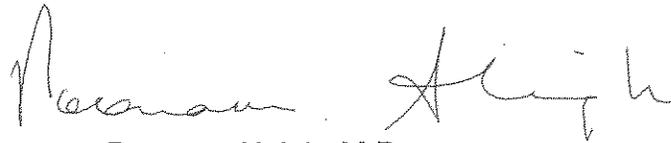
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electronic health record, the VA provider may authorize the VA pharmacy department to reissue the controlled substance prescription. In these situations, the VA pharmacy reports the mailed controlled substance prescription loss to the Drug Enforcement Administration (DEA) as required by DEA's regulations, and also reports the loss to the mail carrier. Finally, VA collaborates with the United States Postal Service and United Parcel Service investigators on mail thefts to assist in the identification and arrest of those involved with the criminal activity of stealing controlled substance prescriptions.

Should you have any questions, please have a member of your staff contact Mr. Alex Ware, Congressional Relations Officer, at (202) 461-7372 or by email at [Alex.Ware@va.gov](mailto:Alex.Ware@va.gov).

Thank you for your continued support of our Nation's Veterans.

Sincerely,

A handwritten signature in cursive script, appearing to read "Poonam Alaigh".

Poonam Alaigh, M.D.  
Acting

Enclosure



**Response to Rep. Vern Buchanan regarding Concerns with Drug Thefts at  
Department of Veterans Affairs (VA) Facilities**

**Question 1: How many facilities were affected by these losses?**

**VA Response:** As of calendar year (CY) 2016, five VA facilities within the State of Florida were affected by prescription drug losses. Please note that the majority of documented controlled substance prescription losses occur in the mailing system during shipping to the Veteran, after leaving the VAMC. In these cases, losses are reported to the Drug Enforcement Administration (DEA) for further investigation.

**Question 2: Where in Florida were they?**

**VA Response:** The Florida-affected facilities are as follows: (1) C.W. Bill Young VA Medical Center (VAMC) (Bay Pines, FL); (2) the Orlando VAMC; (3) the West Palm Beach VAMC; (4) the James A. Haley Veterans' Hospital (Tampa, FL); and (5) the Bruce W. Carter VAMC (Miami, FL).

**Questions 3 and 4: What types of drugs are missing, and in what amount? What was the street value of the missing drugs?**

**VA Response:**

Type of Drug (Date Range CY 2016 – Present)	Strength	Quantity	Street Value/ Range of Cost Per Tablet or Unit	Source	Internal or External Drug Loss  (i.e., drugs lost at VA facility vs. drugs lost in mail)
Codeine/APAP	30mg/300mg	17 tablets	\$2	Internet blog	Internal
Dextroamphetamine (1)	15mg	90 tablets	\$2-\$5	Streetrx.com*	Internal
Dextroamphetamine (2)	5mg	90 tablets	\$3	Streetrx.com*	External
Fentanyl	100mcg/2ml	See footnote #1.	\$10 per ampule	Internet Blog	Internal
Hydrocodone/ Acetaminophen	5mg/325mg	See footnote #2.	\$2-\$10	Streetrx.com*	External
Hydrocodone/APAP	10mg/325mg	90 tablets	\$4-\$10	Streetrx.com*	External
Ledipasvir/Sofosbuvir	90mg/400mg	28 tablets	Not a controlled substance; search did not return a street value		External
Methylphenidate SA	18mg	90 tablets	\$4 for 40mg tablet (no information found on 18mg)	Streetrx.com*	External



Midazolam	2mg/2ml	22.5	Controlled Substance; however, search did not return a street value.		Internal
Morphine SA	15mg	90 tablets	\$5-10	Internet blog	Internal and External
Morphine SR Tabs	15mg	60 tablets	\$5-\$10	Internet Blog	External
Oxycodone	10mg	120	\$5-\$10	Streetrx.com*	External
Oxycodone/APAP tablets	5mg/325mg	168 tablets	\$1-\$30	Streetrx.com*	External
Oxycodone ER	10mg	30 tablets	\$1-\$20	Streetrx.com*	External
Oxycodone IR Tabs	5mg	180 tablets	\$5-\$27	Streetrx.com*	External
Pirfenidone tablets	267mg	270 tablets	Not a Controlled Substance; search did not return a street value.		External

Footnote #1. There were multiple suspected diversions of this drug; therefore, the quantity/amount varies.

Footnote #2. There were multiple suspected diversions of this drug. As a result, the quantity ranges from 30-90 tablets.

\*Streetrx.com is a site that relies mainly on anonymous public postings of what was paid for off-the-street prescription drugs; it also receives some input from DEA. The information can be searched by state, and the prices are unit prices, but not all product strengths or formulations are posted. For example, morphine street pricing is available only for the 200mg, 100mg, and 60mg ER formulations; however nothing posted for the 15mg formulation.

#### Question 5: How many VA employees were involved in Florida?

**VA Response:** As of CY 2016 there were five internal incidents of reported drug loss. Of these five cases, only two of the cases directly involved known Florida VA employees. In two of the cases, the missing drugs were eventually located. In the fifth case, it was not possible to identify a responsible individual; therefore, all vault employees were advised in writing of appropriate procedures and were again advised regarding this issue during a staff meeting.

As part of its long-standing focus on medication safety, VHA implemented robust controlled substance security measures in the early 1980s. In many cases, these security measures far exceed the requirements of the Controlled Substances Act. For example, a DEA regulation requires that an actual count of Schedule I and II controlled substances and an estimated count of most of Schedule III through V controlled substances be performed every 2 years. However, VA performs an actual count of all schedules of controlled substances every 72 hours. In addition, a DEA regulation allows Schedule III through V controlled substances to be dispersed among non-controlled substances in the pharmacy. However, VA requires all schedules of controlled substances to be stored under lock and key, with electronic access controls requiring two-factor authentication.



Individuals who are determined to divert controlled substances may find a way to do so despite the existence of robust controls. This is true within and outside of VA. Data from January 2, 2014, through March 11, 2016, show that VA (overall) had 2,405 reports of internal and external losses, some of which were due to diversion. The data also show that approximately 92 percent of controlled substances losses occur in the mailing system during shipping to the Veteran, 1.5 percent of losses are due to diversion by VA staff, 1.2 percent are due to external theft outside of the mailing system, 0.3 percent are due to dispensing errors and 5.6 percent are unknown but likely due to manufacturer shortages in stock bottles, miscounts, or similar issues.

During this same time period, VA dispensed approximately 29 million prescriptions for controlled substances, as well as a very large number of individual doses of controlled substances for hospitalized patients. Using only the number of controlled substance prescriptions, which overestimates reports of loss by not including inpatient doses, the 2,405 reports filed indicate a controlled substance loss rate of 0.008 percent.

**Question 6: What actions to date have been taken to hold them responsible?**

**VA Response:** In all cases where drug diversion was founded after investigation, serious disciplinary action was taken. An employee of the Miami VA Healthcare Center received a proposed removal. The employee resigned in lieu of the removal, and Miami is pursuing reporting the nurse to her State Licensing Board. An employee of the Bay Pines VA Healthcare System received a 14-day suspension for a single instance of the loss of a narcotic.

**Question 7: How many Veterans were affected? How so?**

**VA Response:** Since CY 2016, approximately 30 Veterans were affected by prescription drug losses in the State of Florida. However, please note that the overwhelming number of documented controlled substance prescription losses occurs in the mailing system during shipping to the Veteran, after leaving the VAMC. In these cases, losses are reported to the DEA for further investigation.

