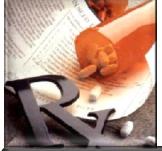


# Texas Pill Mills The Prescription Opioid Epidemic



October 30, 2016





The United States Department of Justice

**Drug Enforcement Administration** 

Lisa Sullivan, DPM DEA Dallas Division



# Lisa Sullivan

Ms. Lisa Sullivan is an alumnus of New Mexico State University where she graduated with a Bachelor of Criminal Justice degree in 1989. She began her career with the DEA in 1990 as a Diversion Investigator in the San Antonio District Office. In 2000 she became the Diversion Group Supervisor in the San Antonio Office. The group was responsible for the dismantling and successful prosecution of one of the first internet pharmaceutical cases in the country. In 2005 Ms. Sullivan was transferred to the E-Commerce Section of the Office of Diversion Control DEA in Washington DC. There she worked on the CSOS program (the newly established controlled substance electronic ordering system), the SearchPoint prescription database, and the electronic prescriptions initiative (EPCS). She helped present and establish protocols for the Distributor Initiative which addresses the excessive or unusual sales of legitimate pharmaceuticals by distributors. In 2007 she was assigned to the office of Enforcement Pharmaceutical Section DEA HQ where she continued to establish targets for future deployments with regards to internet pharmacy investigations. In November 2007 Ms. Sullivan was transferred to the position of Diversion Program Manager for the Dallas Division where she establishes priorities and direction for the Diversion Groups in Dallas, Ft. Worth, and Tyler, Texas, as well as Oklahoma City, and Tulsa, Oklahoma.

Ms. Sullivan has no relevant financial relationships to disclose.

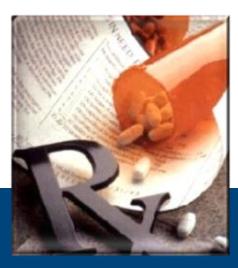




# **Learning Objectives**

- Identify and Understand the Scope of the Prescription Drug Abuse Problem in America
- Understand the Various Schemes Utilized to Divert Pharmaceutical Controlled Substances
- Understand the Role Practitioners Play in Preventing Diversion

## **Public Health Epidemic**





# **Mayo Clinic Study on Prescription Drugs**

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#### Study: 70 Percent Of Americans On Prescription Drugs

June 19, 2013 12:59 PM

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Research finds that nearly 70 percent of Americans are on at least one prescription drug, and more than half receive at least two prescriptions. (Getty Images) Rochester, Minn. (CBS ATLANTA) – Researchers find that nearly 70 percent of Americans are on at least one prescription drug, and more than half receive at least two prescriptions.

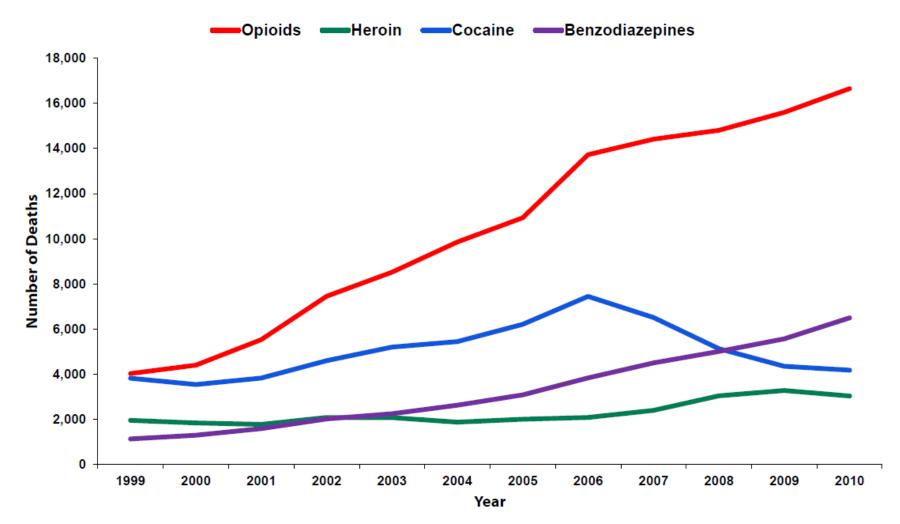
Mayo Clinic researchers report that antibiotics, antidepressants and painkiller opioids are the most common prescriptions given to Americans. Twenty percent of U.S. patients were also found to be on five or more prescription medications.

The study of is uncovering valuable information

- The three most common types of prescriptions are antibiotics, antidepressants, and painkiller opioids
- 70% of Americans are taking at least one prescription drug
- More than 50% are on at least two prescriptions



# **Public Health Epidemic**



CDC National Center for Health Statistics/Morbidity and Morality Weekly Report (MMWR); January 1, 2016

U.S. Drug Enforcement Administration Office of Diversion Control



# **Public Health Epidemic**

#### 2000-2014:

Unintentional drug overdose deaths in the US increased <u>137%</u>, which was a <u>200%</u> increase in overdose deaths involving opioids.

#### 2015:

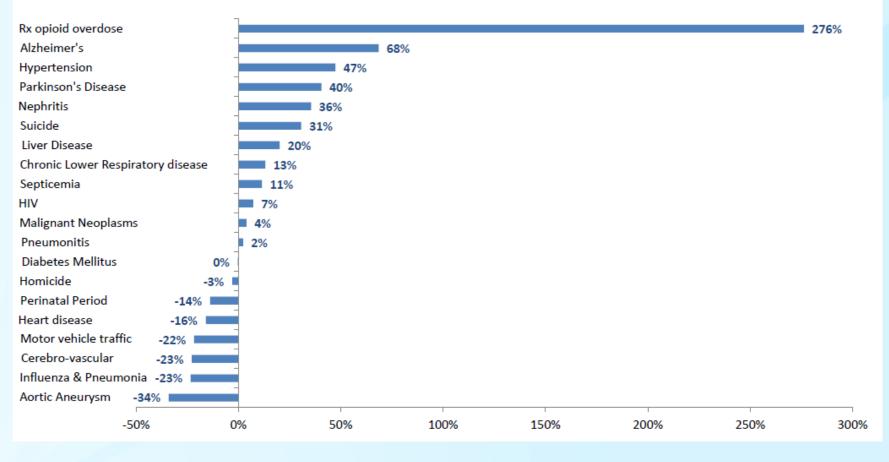
Over **47,000** drug-related overdose deaths

28,647 deaths involved opioids, including heroin
19,000 deaths involved prescription opioid
1 death every 11.16 minutes
46 deaths by end of a normal work day(8 ½ hours)
129 deaths every 24 hours

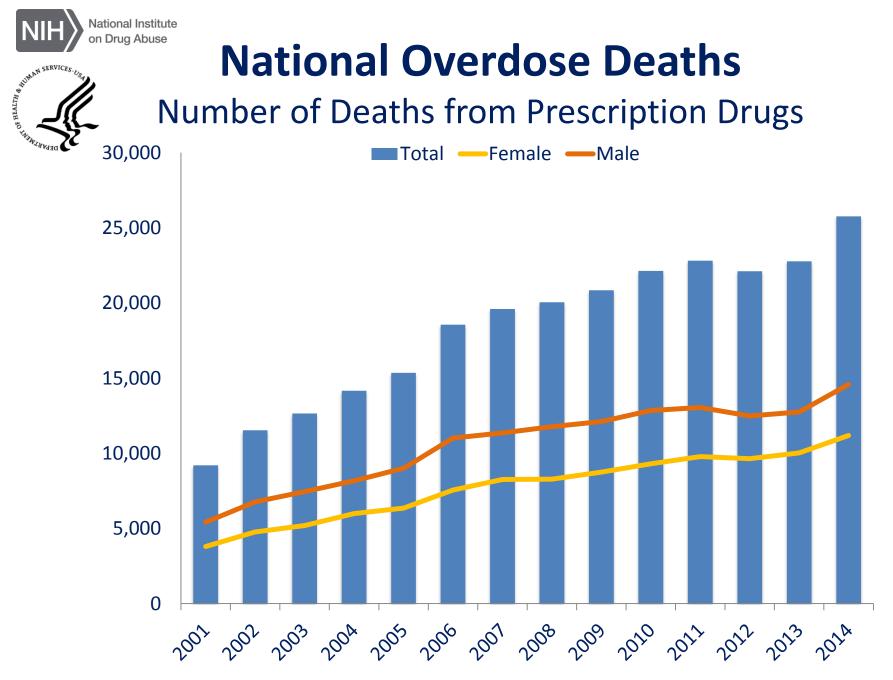
CDC National Center for Health Statistics/Morbidity and Morality Weekly Report (MMWR); January 1, 2016

# Opioid pain reliever-related overdose deaths increasing at a faster rate than deaths from any major cause

#### % change in number of deaths, United States, 2000-2010



WISQARS, 2000 and 2010; CDC/NCHS, National Vital Statistics System



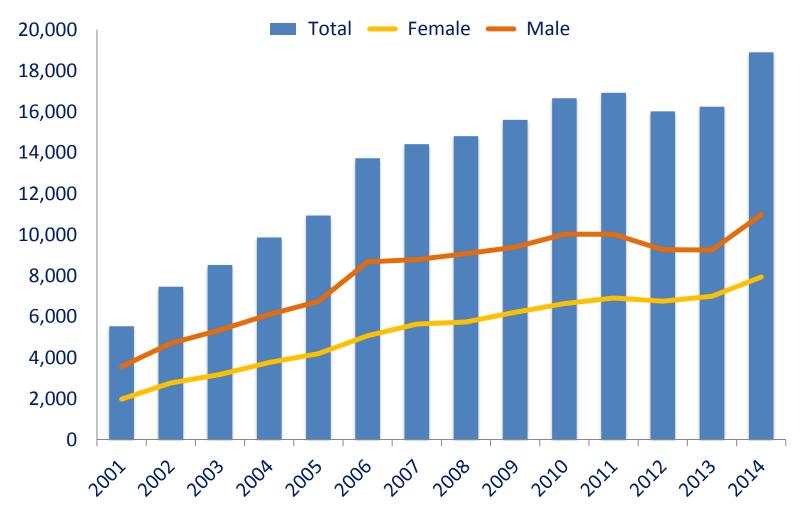
Source: National Center for Health Statistics, CDC Wonder

### **National Overdose Deaths**

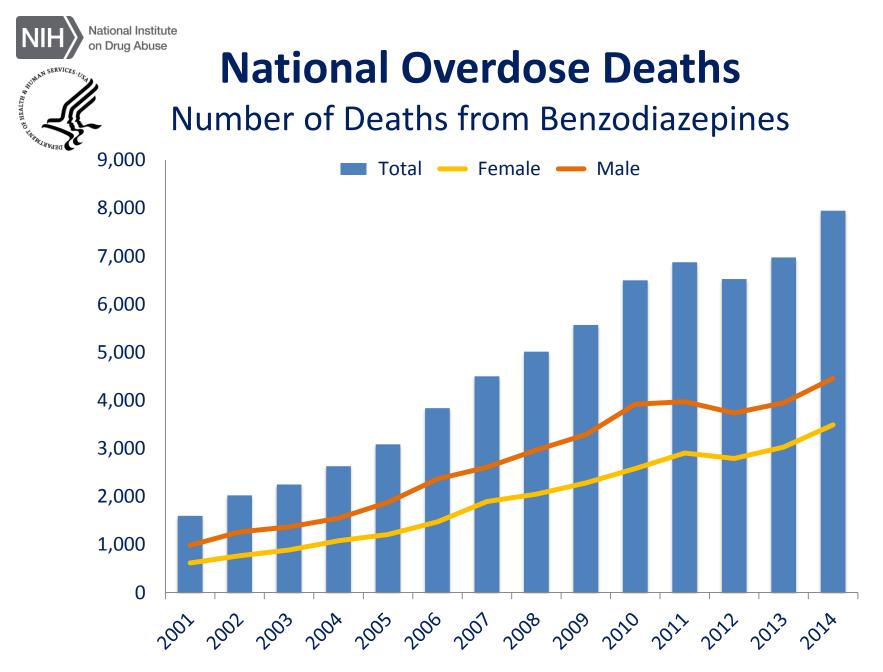
National Institute on Drug Abuse

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Number of Deaths from Prescription Opioid Pain Relievers

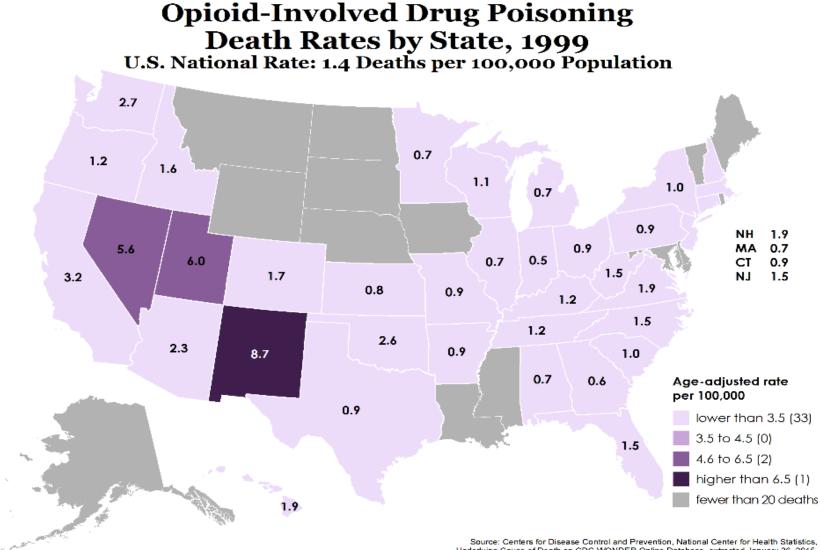


Source: National Center for Health Statistics, CDC Wonder



Source: National Center for Health Statistics, CDC Wonder

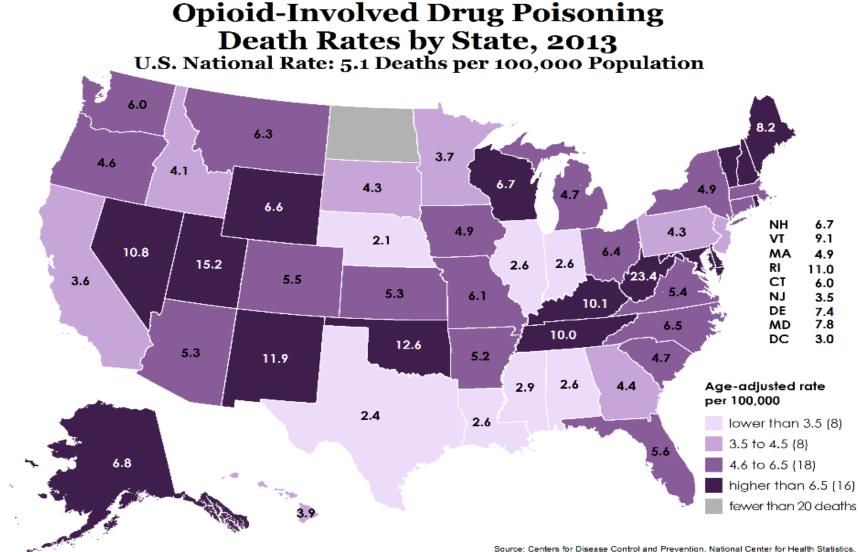
### **Prescription Opioid Analgesics Poisoning Deaths**



ONDOP003590

Underlying Cause of Death on CDC WONDER Online Database, extracted January 26, 2015.

### **Prescription Opioid Analgesics Poisoning Deaths**



OKDCP003583

Source: Centers for Disease Control and Prevention, National Center for Health Statistics, Underlying Cause of Death on CDC WONDER Online Database, extracted January 26, 2015.



Prescription Drug Abuse is driven by **False Information** AND **Indiscriminate Prescribing Criminal Activity** 

> U.S. Drug Enforcement Administration Office of Diversion Control



### PAIN "THE 5<sup>TH</sup> VITAL SIGN"

- -In 1996 The American Pain Society introduced the phrase "pain as the 5<sup>th</sup> vital sign"
- -In the mid 1990s Purdue Pharma developed Oxycontin and launched an aggressive fradulant marketing campaign
- -In 2007 Purdue Pharma paid a 600 million dollar fine for misleading doctors and patients about the drugs risks and addiction potential
- -In 2016 the CDC issues guidelines for prescribing Opioids for Chronic Pain



# CDC GUIDELINES

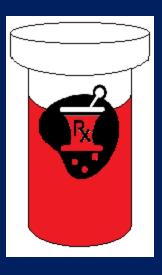
- Opioids are not first-line or routine therapy for chronic pain
- Establish and measure goals for pain and function
- Discuss benefits and risks and availability of nonopioid therapies with patient.....
- When opioids are needed for acute pain prescribe no more than needed.....



## Prescription Drug Abuse

#### United States 5.5% of World's Population

# United States Consumes 75% of World's Prescription Medication!





Source: United Nations Office on Drugs and Crime, 2011.

# America's Love Affair with Hydrocodone

- THE UNITED STATES MAKES UP 5 PERCENT OF THE WORLDS POPULATION
- WHAT PERCENTAGE OF THE WORLD'S HYDROCODONE USAGE DOES THE UNITED STATES MAKE UP?

# Hydrodocone Top 10 List

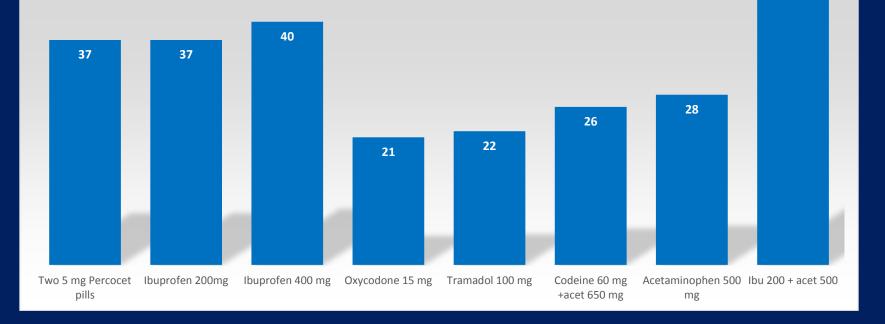
- Guatemala
- Mexico
- Vietnam
- China
- Denmark
- Syrian Republic
- Germany
- Canada 100
- United States 79,700 Kilograms (99.5%)

Source: UN International Narcotics Control Board Website. Estimated World Requirements of Narcotic Drugs in grams for 2015 www.incb.org 10 Kilograms

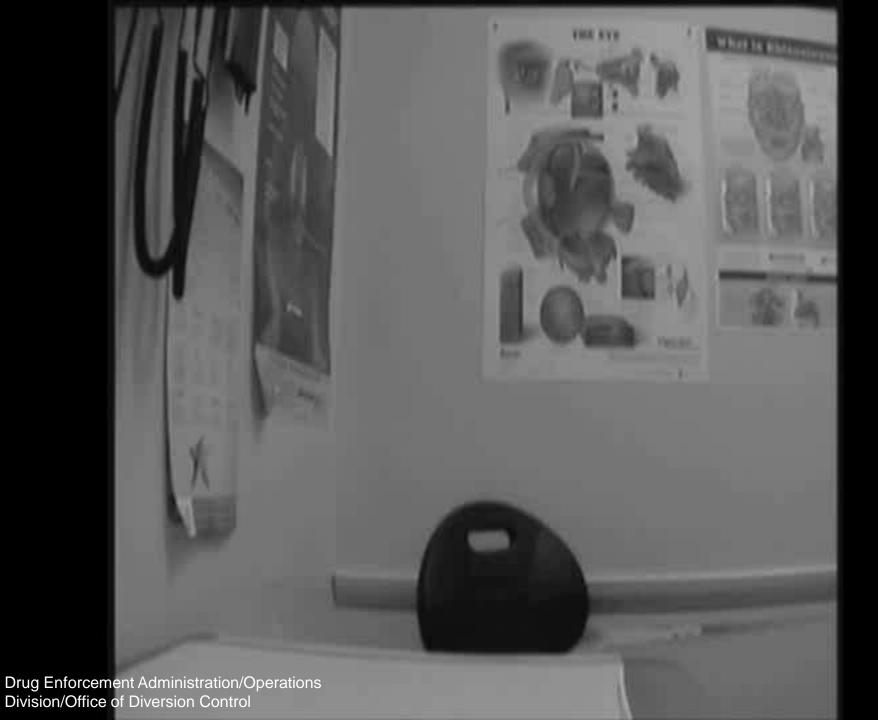
- 10 Kilograms
- 20 Kilograms
- 20 Kilograms
- 25 Kilograms
- 50 Kilograms
  - 60 Kilograms
- 100 Kilograms

Percent of people getting 50% pain relief (from acute postop pain) 1/NNT From Cochrane Reviews

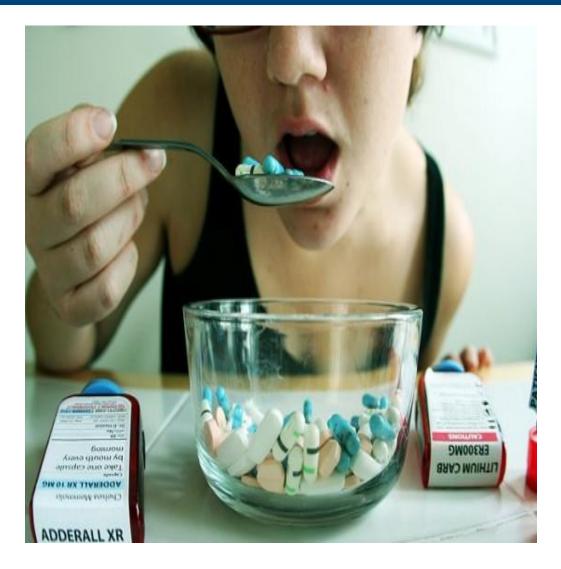
62.5

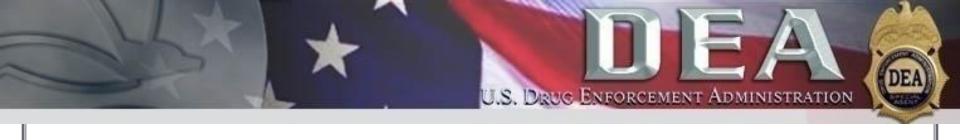


Drug Enforcement Administration/Operations Division/Office of Diversion Control

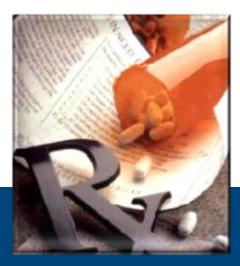


### **Impact on Our Society**





# **Drugs of Abuse**





# Most commonly prescribed prescription medicine?

# Hydrocodone/acetaminophen

### Hydrocodone

Hydrocodone / Acetaminophen (toxicity)

- Similarities:
  - o Structurally related to codeine
  - Equal to morphine in producing opiate-like effects
- Brand Names: Vicodin<sup>®</sup>, Lortab<sup>®</sup>, Lorcet<sup>®</sup>

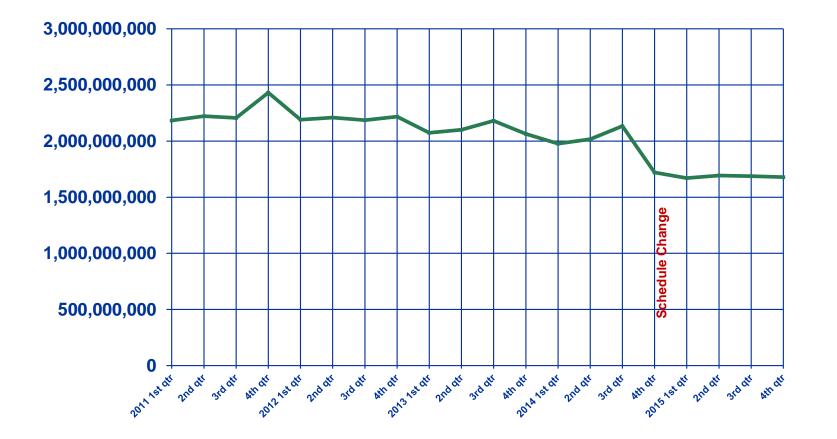
#### > October 6, 2014 moved to SCHEDULE II

- "Cocktail" or "Trinity"
  - Hydrocodone
  - Soma ® / carisoprodol
  - Alprazolam / Xanax®



Street prices: \$2 to \$10+ per tablet depending on strength & region

# Hydrocodone Distribution 2011-2015 U.S. Average



Drug Enforcement Administration, Office of Diversion Control, Pharmaceutical Investigations Section, Targeting and Analysis Unit

Source: ARCOS Date Prepared: 03/15/2016

# **The Trinity**

#### Hydrocodone





**Muscle Relaxant** 

Benzodiazepine



# Promethazine with Codeine







"Patient" drinking "syrup" in the parking lot outside doctor's office in Dallas, Texas



#### C-II CEPHALON, INC. 100 mcg 200 mcg 100 mcg 400 mcg 300 mcg 400 mcg 600 mcg 800 mcg Fentora® (fentanyl buccal tablet)

ACTIO400mcg

**ACTIQ**®

# Fentanyl

ACTIO<sup>®</sup>

400 mcg

- Fentanyl Patches
- Fentanyl Citrate dispensed in a berry flavored lollipop-type unit
- Fentanyl is 100 times more potent than morphine
- Intended to be used for chronic cancer pain & only for people who are tolerant to prescription opioid (narcotic) pain medicines
- Abused for its intense euphoric effects



- Mixing into the Heroin
- Mixing Fentanyl into Oxycodone or Hydrocodone powders and pressing pills
- In September of 2016 three members of the same family accidently overdoses on what they thought were Oxycodone pills...the pills were laced with Fentanyl.



- Glorified purple drank, jolly rancher, special k
- Then Macklemore took on the pharmaceutical industry
  - The following slides are from:
    - Macklemore & Ryan Lewis "Kevin"
    - Macklemore & Ariana DeBoo "Drug Dealer"



### I seen pain, I felt the losses Attended funerals and seen coffins 21 years old, an angel was lost here Wings clipped by the grip of 80 milligram sniffs of oxycontin Everyday through the nostrils



### And now my little brother is in the sky From a pill that a doctor prescribed That a drug dealing billion dollar industry supplied And the cops never go and profile at night



### Because a doctor with a license played God and said it's cool Played God and said it's cool But me? I don't blame Kev or his mom freebasing while pregnant with him I blame the pharmacy companies



Now he's wrapped in plastic First dealer was his mom's medicine cabinet Got anxiety, better go and give him a Xanax Focus, give him Adderall, sleep, give him Ambien



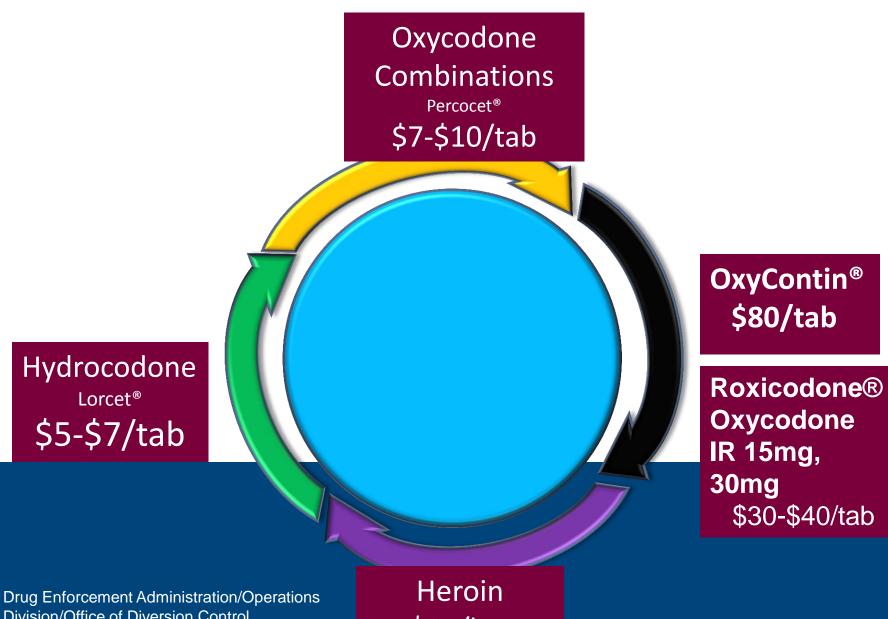
#### [Hook: Ariana DeBoo] My drug dealer was a doctor, doctor Had the plug from Big Pharma, Pharma He said he'd heal me, heal me But he only gave me problems, problems My drug dealer was a doctor, doctor Had the plug from Big Pharma, Pharma I think he tryin' kill me, kill me He tried to kill me for a dollar, for a dollar



# **Prescription Opiates v. Heroin**



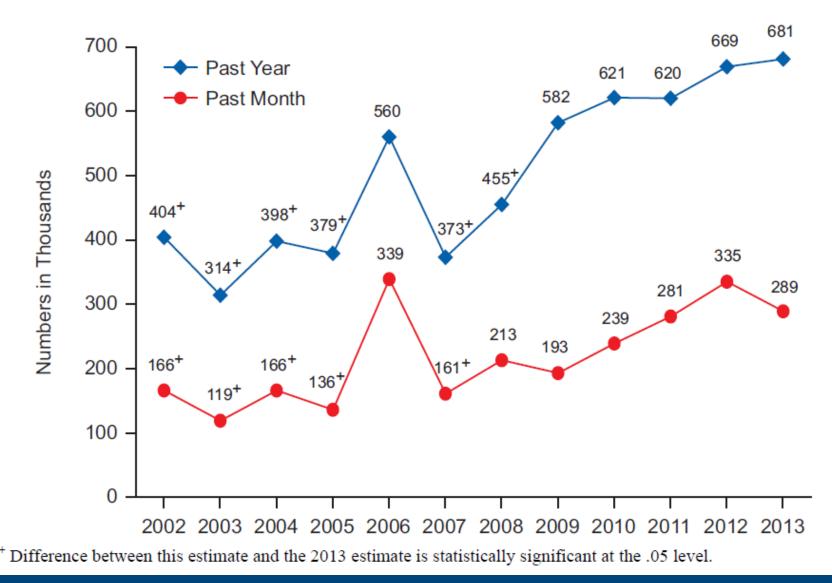
### **Circle of Addiction & the Next Generation**



**Division/Office of Diversion Control** 

\$15/bag

### Past Month and Past Year Heroin Use Among Persons Aged 12 or Older: 2002-2013



Date Prepared/ Source: 2013 National Survey on Drug Use and Health, published September 2014. Figure 2.4.

#### HEROIN: NO LONGER CONFINED TO URBAN AREAS





# Non-medical Prescription Opioid Users Who Try Heroin

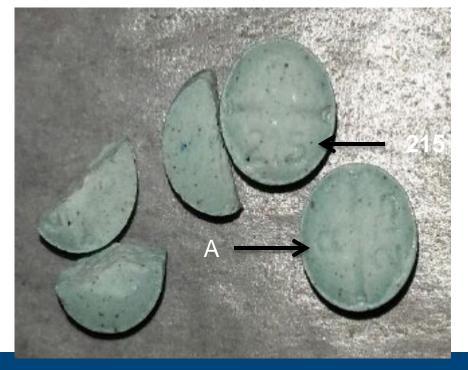
- Prescription opioid use is a risk factor for heroin use. Approximately 4 out of 5 recent heroin initiates ages 12-49 used prescription opioids non-medically before heroin initiation.<sup>1</sup>
- Transition from prescription opioid abuse to heroin use is relatively rare; approximately 4 percent of prescription opioid abuse initiates begin using heroin within five years of their initiation of prescription opioid abuse.<sup>2</sup>
- Injection-drug users report that tolerance motivates them to try heroin.<sup>3</sup>
- New research shows that heroin's effects, price, availability, and ease of use motivate heroin users who formerly used prescription opioids.<sup>4</sup>



4. Cicero TJ, Ellis MS, Surratt HL, Kurtz SP. The Changing Face of Heroin Use in the United States

Muhuri, P.K. Gfroerer, J., Davies, C. (2013). Associations of Nonmedical Pain Reliever Use and Initiation of Heroin Use in the United States. SAMHSA CBHSQ Data Review (August).

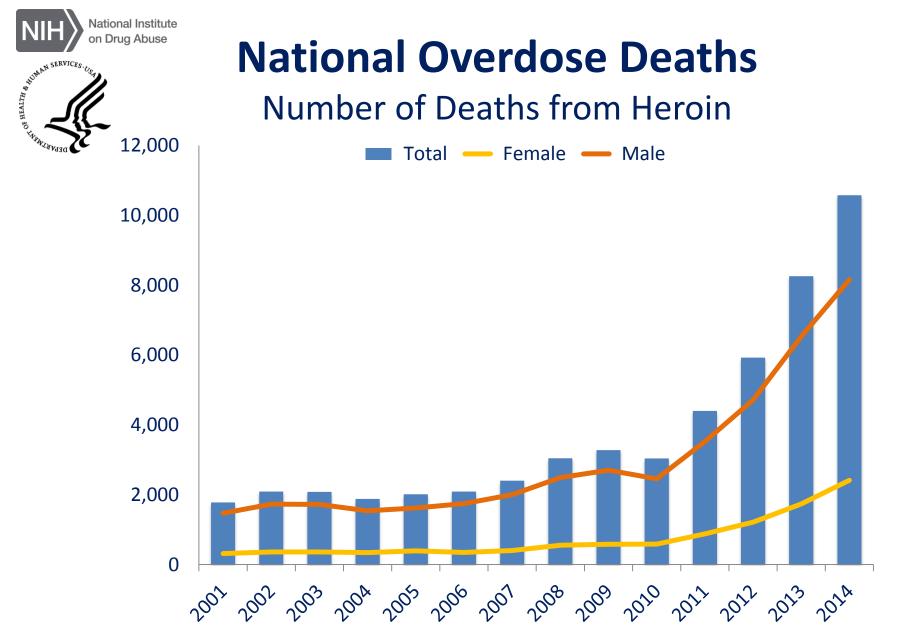
Lankenau SE, et al. (2012). Initiation into prescription opioid misuse amongst young injection drug users. Int J Drug Policy. 2012 Jan;23(1):37-44. Epub 2011 Jun 20.





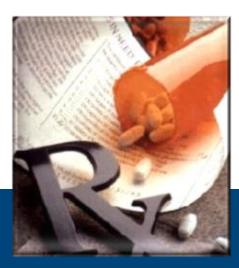
#### Heroin Seizure

#### Pharmaceutical Oxycodone 30mg



Source: National Center for Health Statistics, CDC Wonder

### The Controlled Substances Act: Checks & Balances





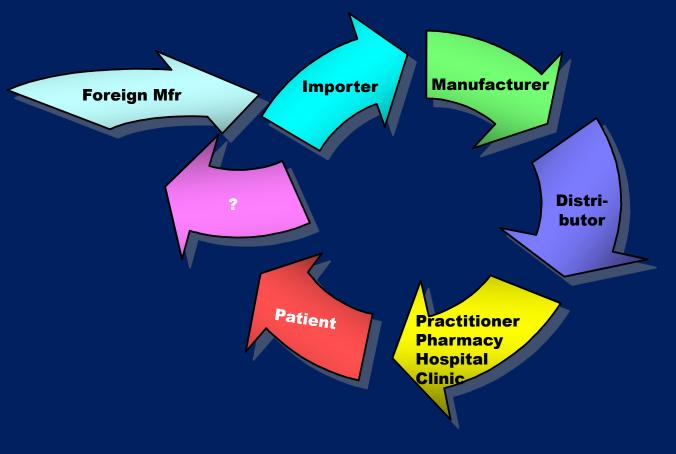
# Mission

The mission of the Office of Diversion Control is to <u>prevent</u>, <u>detect</u>, and <u>investigate</u> the diversion of pharmaceutical controlled substances and listed chemicals from legitimate channels of distribution

while ...

ensuring an adequate and uninterrupted supply of controlled substances to meet <u>legitimate medical</u>, <u>commercial</u>, and <u>scientific</u> <u>needs</u>

# **Closed System of Distribution**



#### 1,604,158 (09/04/2015)

DEA

- Practitioners:
- Retail Pharmacies:
- Hospital/Clinics:

1,221,972 71,439 16,500

U.S. Drug Enforcement Administration Office of Diversion Control



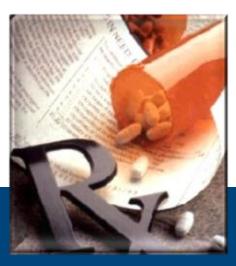
# **Closed System of Distribution**

### The DEA is responsible for:

- the <u>oversight</u> of the system
- the *integrity* of the system
- the <u>protection</u> of the public health and safety



### Legal Obligations: DEA Registrant





# Privilege NOT a Right

- The DEA registration may be denied if it would be inconsistent with the public interest. Factors considered are:
  - State Board recommendation
  - Applicant's conviction record
  - OCOMPLIANCE with State/Federal laws
  - Other conduct that threatens public health and safety.



# Prescriptions

A prescription for a controlled substance to be effective must be issued for a <u>legitimate medical purpose</u> by an individual practitioner <u>acting in the usual course of</u> <u>his professional practice</u>.





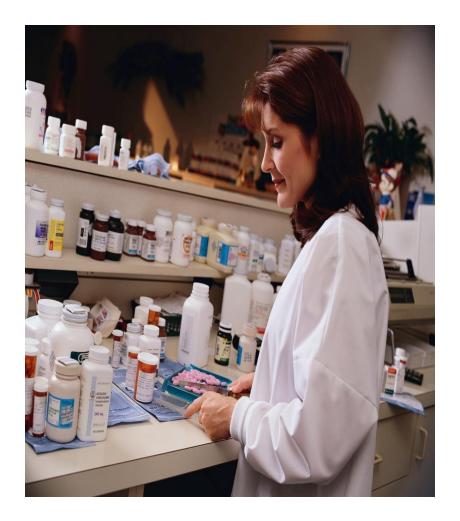
21 CFR § 1306.04(a) United States v Moore 423 US 122 (1975)



# **Corresponding Responsibility**

The responsibility for the proper prescribing and dispensing of controlled substances is upon the prescribing practitioner, but a corresponding responsibility rests with the pharmacist who fills the prescription.

21 CFR § 1306.04(a)



Drug Enforcement Administration/Operations Division/Office of Diversion Control



# **Corresponding Responsibility**

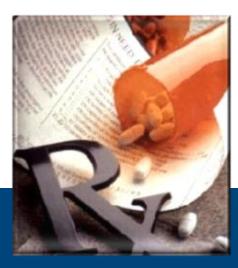
- A pharmacist, by law, has a corresponding responsibility to <u>ensure</u> that prescriptions are legitimate.
- When a prescription is presented by a patient or demanded to be filled for a patient by a doctor's office, a pharmacist is <u>not</u> obligated to fill the prescription!!!



# The Last Line of Defense



## The DEA Response







### Vigilant Enforcement and Regulation

- Identify the Threat
  - DEA Registrants Operating Outside the Law
- Address the Threat
  - Tactical Diversion Squads (TDSs): 66 Nationally
    - Agents, Diversion Investigations, Intel Analysts
  - Diversion Investigators (DIs): 600+ Nationally
  - Mobile/Regional TDSs
    - Fluid Enforcement Capability
    - Agents/DIs/Analysts
  - Exploring Funding for AUSA / SAUSA Positions



# **Diversion Partnership**

- Develop Data to Identify and Track Problems
  - Prescription Drug Monitoring Program (PDMP)
    - Connecting Registrants Nationwide
      - 49 Participant States / 30 States Interconnected
      - Working with NABP to get 40 states connected
  - Medical Examiners (ME's)
    - Support funding/resources to have ME's do toxicology screens
  - Work to Improve Technology and Improve Access to Data
    - Support Proactive Alerts and Report Cards



 Constructive Engagement with the Industry, Practitioners and Government Health Groups

Office of National Drug Control Policy (ONDCP) State and Local Health Authorities National Association of Boards of Pharmacy (NABP) Health and Human Service (HHS) American Medical Association (AMA) National Association of Chain Drug Stores (NACDS) National Institute of Drug Abuse (NIDA) Substance Abuse Mental Health Services Administration (SAMHSA) Food and Drug Administration (FDA) CDC Office of Noncommunicable Diseases, Injury & Environmental Health (ONDIEH) CDC National Center for Injury, Prevention & Control (NCIPC)



# **Diversion Partnership**

### Education and Outreach

- National Strategy Sustained & Consistent Messaging
  - Pharmacist Drug Awareness Conferences (PDAC)
  - Industry: Manufacturers, Distributors, Healthcare Executives
  - Law Enforcement, Medical Practitioners, Anti-Drug Organizations
- Local Strategy in 360 Degree Target Areas
  - Heroin Enforcement Ops Create the "Time and Space"
    - Proactive and Robust Community Engagement
    - Local Practitioners/Community Groups
    - Local Field Divisions with HQ Support



#### Drug Enforcement Administration

# **Community Partnerships**



- DEA recognizes we cannot arrest our way out of the drug problem – our goal is lasting success in the communities we serve.
- Education and Prevention are key elements for a true 360 Strategy.
- Law enforcement operations provide an opportunity for community empowerment and a jumping off point for education and prevention efforts.



# We will not arrest our way out of this problem!!!!!

### > Enforcement is just as important as....

Prevention/Education







### Most Frequent Method of Obtaining a Pharmaceutical Controlled Substance for Non Medical Use

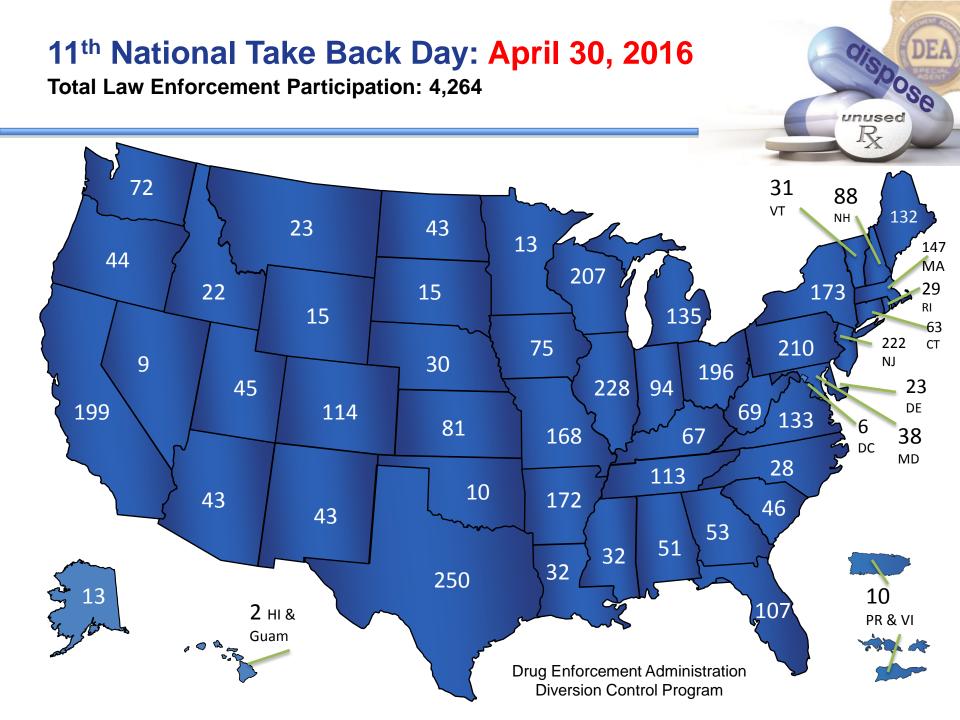




- More than half of teens (73%) indicate that it's easy to get prescription drugs from their parent's medicine cabinet
- Half of parents (55%) say anyone can access their medicine cabinet
- Almost four in 10 teens (38%) who have misused or abused a prescription drug obtained it from their parent's medicine cabinet

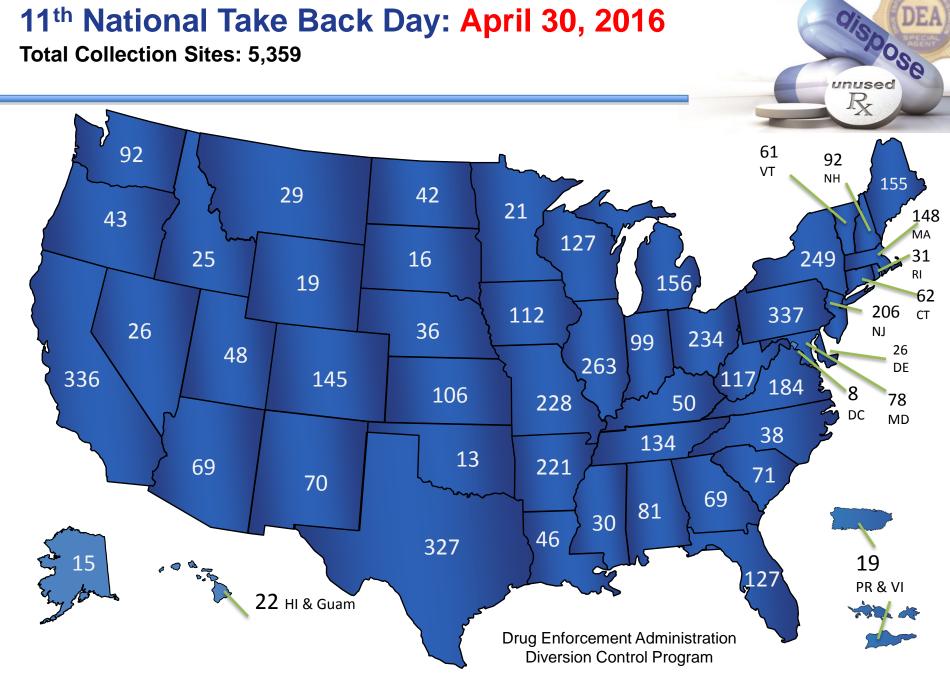
## National Take Back Initiative April 30, 2016

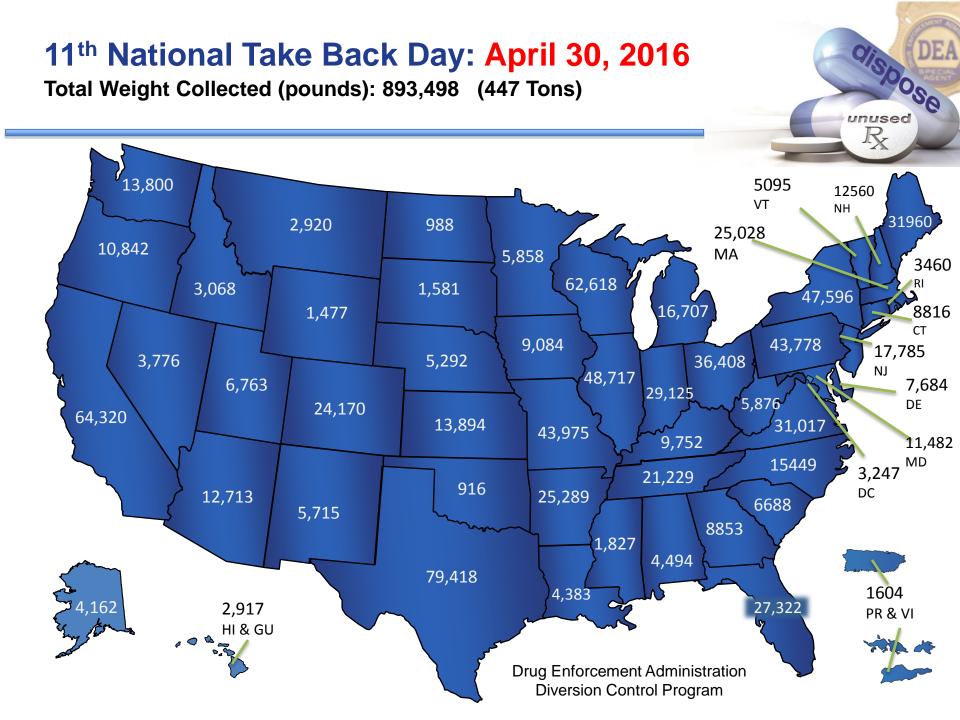




### 11<sup>th</sup> National Take Back Day: April 30, 2016

**Total Collection Sites: 5,359** 







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214-366-6936