# Texas State Board of Pharmacy
## "Red Flags" Checklist for Pharmacies
## *YOU MIGHT BE A PILL MILL IF…*

*Check all that apply:*

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| | Your pharmacy fills prescriptions for prescribers who frequently write identical prescriptions for numerous people, indicating a lack of individual dosing. |
| | Long lines are common at your pharmacy with most people presenting prescriptions for controlled substances. |
| | Multiple people arrive at the pharmacy in the same vehicle, or one person is picking up prescriptions for multiple people. |
| | People receive the same controlled substances from multiple prescribers. |
| | Multiple people with the same address present prescriptions from the same prescriber. |
| | People often seek early refills. |
| | You rely solely on the prescriber's representation that prescriptions are legitimate. |
| | You feel compelled to hire "security" to prevent problems. |
| | People pay with cash or credit card more often than through insurance. |
| | Your pharmacy charges and people are willing to pay more for controlled substances than they would at nearby pharmacies. |
| | People comment about the price of the drugs on the street, refer to the drugs by their "street names," or ask for a specific colored pill or liquid. |
| | Multiple people, particularly those who are not regular patrons, bring in prescriptions for controlled substances from the same prescriber. |
| | Drugs prescribed are inconsistent with the prescriber's area of practice (e.g., fentanyl from a dentist). |
| | The prescriber of the drugs is located a significant distance from your pharmacy. |
| | The person's address is a significant distance from your pharmacy and/or from the prescriber's office. |
| | The PAT system indicates that persons are obtaining prescriptions for the same drugs from multiple prescribers, or that persons are filling prescriptions for the same drugs at multiple pharmacies. |
| | The prescriptions for controlled substances contain nonspecific or no diagnoses. |
| | The prescriptions brought to the pharmacy are frequently for hydrocodone, alprazolam, carisoprodol, and/or Flexeril or any combination of these drugs. |
| | Dangerous drugs or OTC products (such as multi-vitamins or laxatives) are added to controlled substance prescriptions. |
| | The prescriptions are commonly for the highest strength of the drug and/or for large quantities. |
| | If you contact the prescriber, he/she is unconcerned about your apprehensions regarding his/her prescribing practices or unwilling to provide additional information. |
| | The prescriber has been subject to disciplinary action by the licensing board, had the DEA registration removed, or been subject to criminal action. |
| | The prescriber's clinic is not registered as a pain management clinic by the Texas Medical Board. |
| | The number of controlled substances your pharmacy dispenses has significantly increased. |
| | One or more drug wholesalers have expressed concern about the number of controlled substances ordered by your pharmacy or discontinued supplying the drugs. |
| | Your pharmacy prepackages controlled substances in the same quantity and strength. |
| | Your pharmacy has been previously warned or disciplined by the Texas State Board of Pharmacy for non-therapeutic dispensing of controlled substances (i.e., corresponding responsibility) . |

If you checked any of the above items, you should immediately review the laws and rules concerning non-therapeutic dispensing, especially Board rule §291.29 (*Professional Responsibility of Pharmacists*), in the law book or on our website: **www.tsbp.state.tx.us** (click on Texas Pharmacy Rules and Laws). Or call the Pharmacy Law Hotline at (512) 305-8070.