AmerisourceBergen

U.S. Opioid Settlement Injunctive Relief

Changes to AB's Controlled Substance Monitoring Program (CSMP)

July 2022

AmerisourceBergen

What is Injunctive Relief?

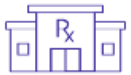
- In March 2022, AmerisourceBergen, Cardinal and McKesson agreed to a nationwide settlement that resolves most of the thousands of opioid-related lawsuits filed by state and local government entities across the country.
- As part of the agreement, court-ordered injunctive relief will apply to each distributor's Controlled Substance Monitoring Program (CSMP) to ensure consistency across the industry.
- The injunctive relief terms will go into effect on July 1, 2022, and will impact all customer who are registered with the DEA as a retail pharmacy including independents, chains and mail order pharmacies.
- For the latest information and details about injunctive relief, visit: **amerisourcebergen.com/injunctiverelief**

What's changing?

AB will be making changes to our **Controlled Substance Monitoring Program (CSMP)**. These changes will ensure consistency in our approach to Controlled Substance distribution across the industry and will impact how we conduct diligence reviews, data collection and analysis, monthly limits on controlled substance ordering, and suspicious order reporting.

A higher quantity of order lines will be flagged – flagged order lines will be automatically cancelled and reported.

- Our new algorithm is designed to automatically flag order lines of unusual size, frequency or pattern
- Order lines that are flagged by the algorithm will be automatically cancelled and reported
- Only the lines of your order that are flagged will be cancelled, the rest will ship.
- If you're routinely having items cancelled and are unable to meet legitimate medical needs of your patients, there's a process to request a threshold review



AB will make unannounced pharmacy visits to observe and speak with the responsible pharmacist.

- Historically, we've notified you in advance if we needed to do an on-site visit for due diligence.
- As part of the settlement agreement, we are required to make unannounced visits.
- These may be performed by our third-party partner, Pharma Compliance Group (PCG) – they will provide identification credentials
- You may contact your AB representative to validate that it is a legitimate visit

We will be required to collect 90 days of de-identified dispensing data from you more frequently

- Please ensure you have processes in place to efficiently turn over this data to AB or our HIPPAA-compliant technology vendor, when requested
- If you request a threshold review, you will also be required to submit this information in support of your request.

thank you