

appointments are necessary, and they usually have poor to no medical records. Physical examinations may not be performed, and they typically dispense large prescription doses of controlled substances that exceed the boundaries of acceptable medical care.²¹

In my opinion, the Drug Quality and Security Act and its track and trace regulations will help reduce the number of pill mills. Through the use of product identifiers and the reporting of the transaction history and transaction statements, the FDA, with the state law enforcement agencies, can track large dispensers of controlled substances and shut them down when violations are discovered.

LOCAL PHARMACIES AND PILL MILLS

According to one pharmacist who manages a major retail chain pharmacy, some of the oversight of pill mills may come back on pharmacists' shoulders. As the new track and trace regulations are implemented, it is expected that pill mills will do less dispensing but more prescribing of controlled substances. These prescriptions will have to be filled by a state-licensed pharmacist. Some of this oversight is already taking place. A few of the large pharmacy chains are monitoring the levels of controlled substances dispensed by pharmacy stores in order to detect spikes in volume. This puts pressure on the pharmacists to detect spikes in prescriptions by doctor, by pain clinics, or by medical facility. According to this pharmacy manager, since pharmacies will be the "customer touchpoint" and filling the prescriptions, they will be called upon by the appropriate law enforcement personnel to produce any and all abuse details.

CVS PHARMACY IN SANFORD, FLORIDA

The pharmacy manager was referring specifically to the two CVS pharmacies in Sanford, Florida. According to articles in the *Orlando Sentinel*, the pharmacist-in-charge at one of the pharmacies told federal drug agents that customers would ask for "the Ms" or "the blues"—street slang for the painkiller oxycodone. He also said he didn't think such a request was suspicious, despite the reported facts that customers lived in Kentucky,