

Current Schemes in Healthcare Fraud: DME and Narcotics Diversion

Tamara Neiman, Director, Kaiser Permanente
Jay Loden, Assistant Director, Kaiser Permanente
Governance, Risk & Compliance – G23



The "CyberSizelT" logo is rendered in a large, stylized font with a red-to-white gradient and a drop shadow. The background of the slide features a silhouette of the San Francisco skyline, including the Golden Gate Bridge and various skyscrapers, set against a warm, yellowish-orange sky.

KAISER PERMANENTE



Trust in, and value from, information systems

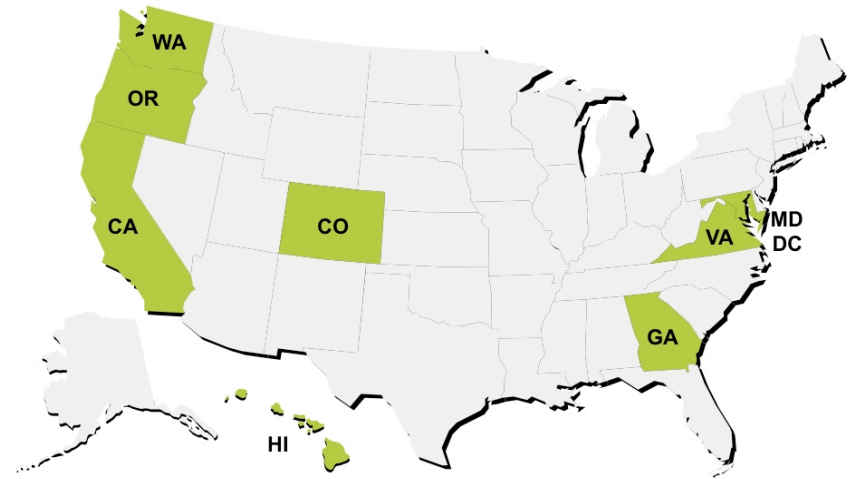
San Francisco Chapter

A stylized illustration of the San Francisco skyline in silhouette against a warm, yellow and orange background. The Golden Gate Bridge is the central focus, with other bridges and buildings visible in the background.

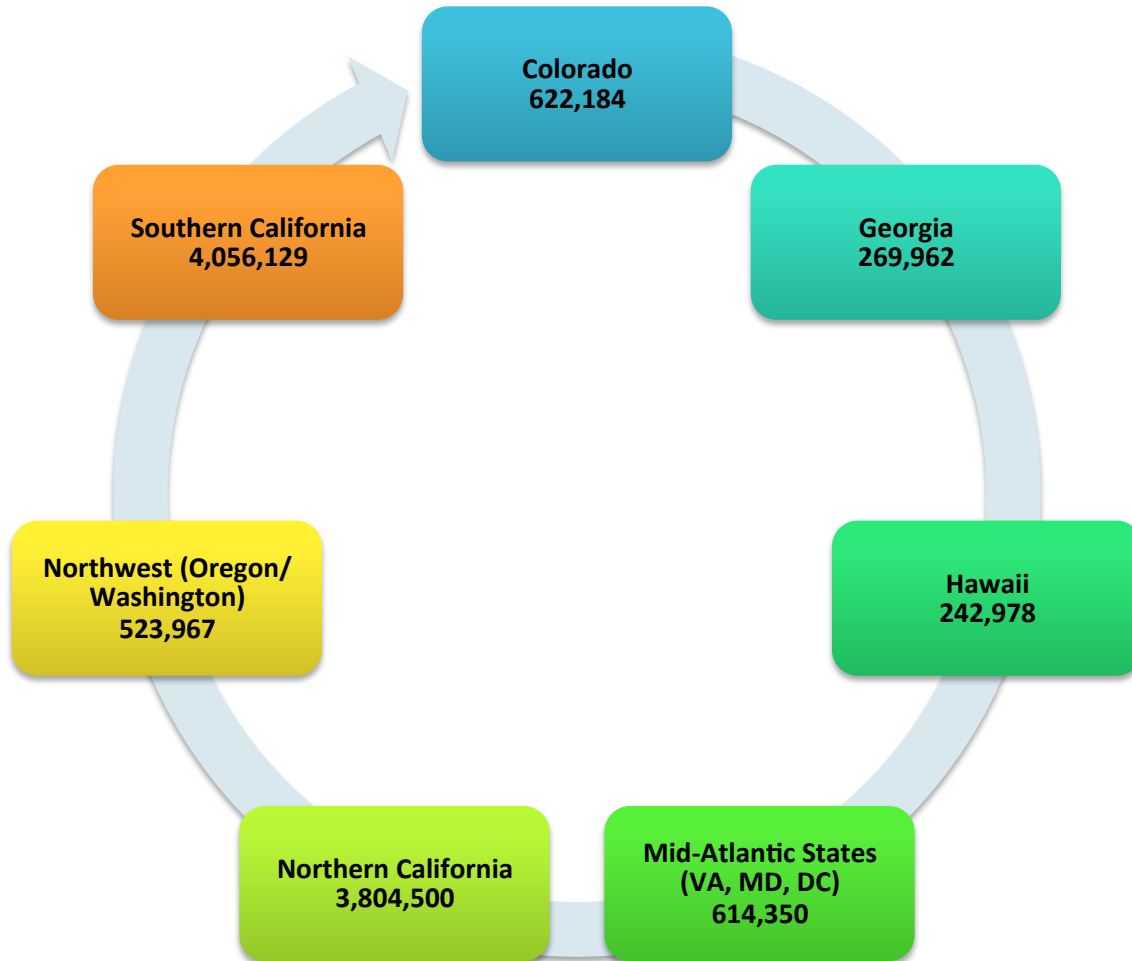
CyberSizelT

About Kaiser Permanente

- Nation's largest nonprofit health plan
 - 10.1 million members
- Integrated health care delivery model
- 38 hospitals
- 619 medical offices
- 17,791 physicians
- 177,445 employees
- 532 pharmacies enterprise wide (OP, IP, ARC, HH, and ONC)
- 5 drug distribution warehouses
- 7 pharmacy automated refill centers



Health Plan Membership



As of July 31, 2015

ANALYTICS AND CASE STUDIES PYXIS

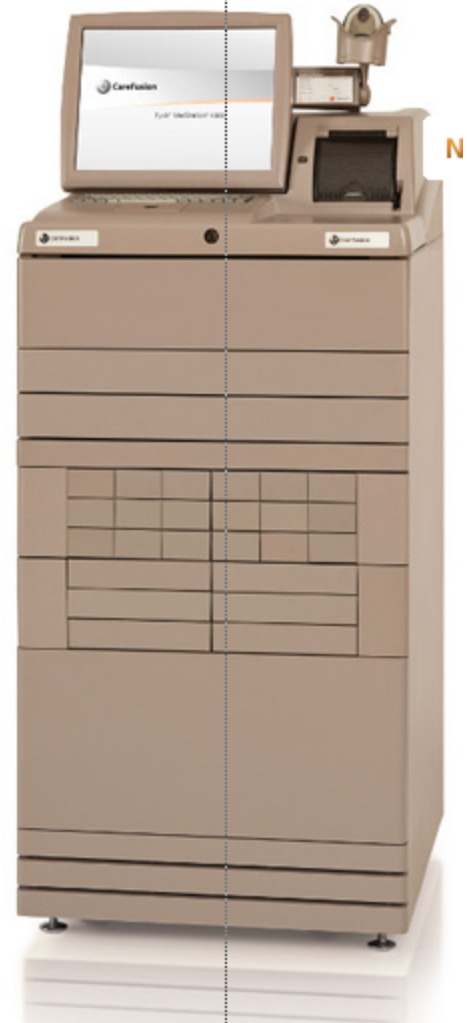
A silhouette of the San Francisco skyline is shown against a light, hazy background. The Golden Gate Bridge is prominent on the left, and other city buildings and bridges are visible. The word "CyberSizeIT" is overlaid on the skyline in a large, red, sans-serif font with a white outline.

CyberSizeIT

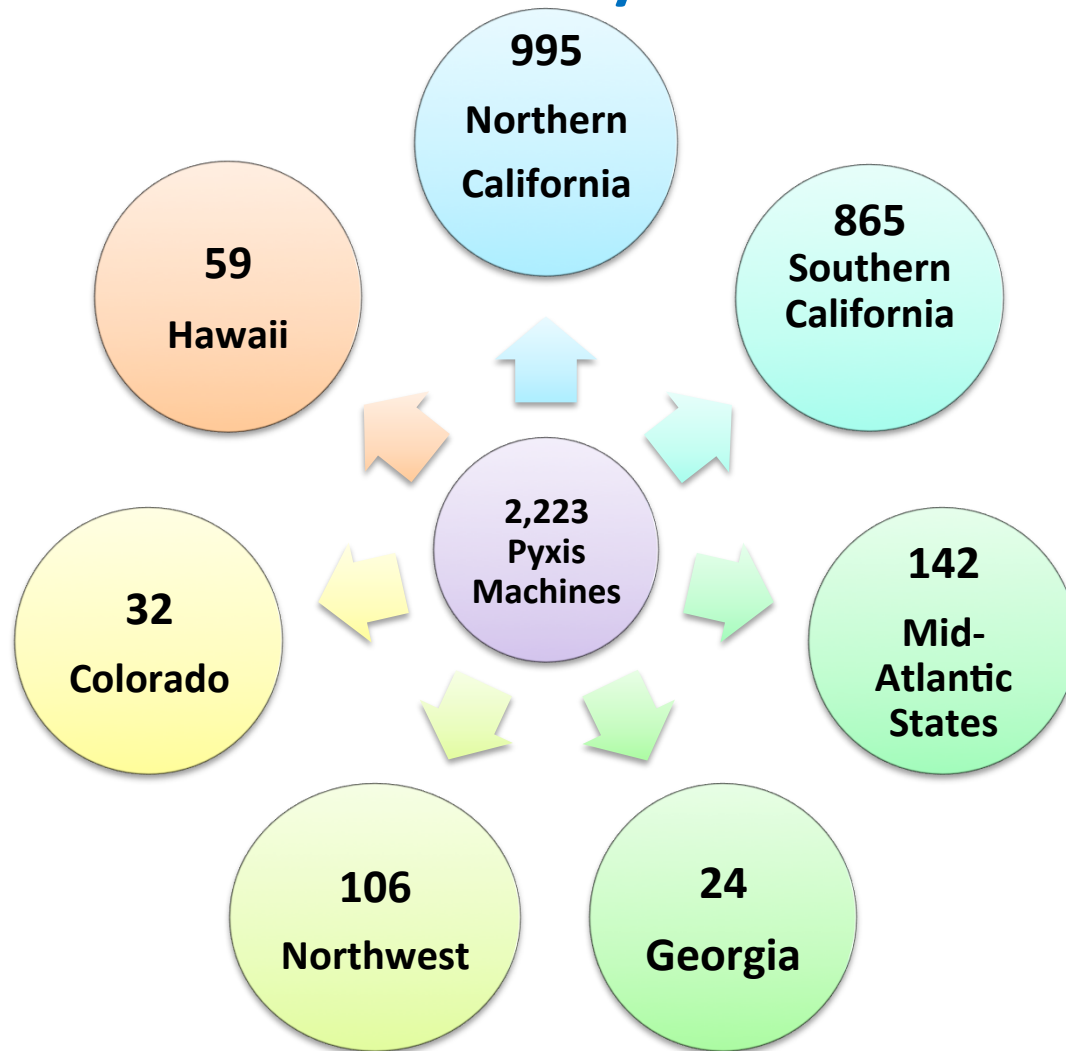
Hospital/Pyxis® Diversion

A Pyxis® is a medication dispensing machine most commonly used in hospitals.

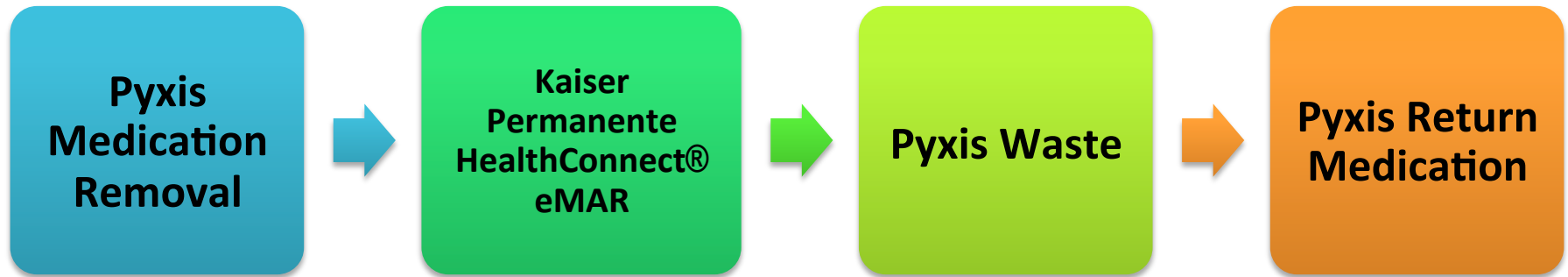
It uses bar code scanning to help ensure accurate dispensing.



Kaiser Permanente Pyxis Numbers



Medication Administration Flow



Biometrics/login passwords used to access automatic dispensing cabinet for medications.

Records who, what, where, and when.

Patients permanent medication administration record. Use barcode scanning technology for eMAR.

Common practice of disposing of excess medication not administered.

Witness required

Medication not administered or withdrawn in error and later return to Pyxis/return bin.

No witness required

iACT Pyxis Analytics: Current Reporting Under Way

Override Trending Report

- Designed for operations
 - Not intended for fraud, waste, and abuse (FWA)
- Monthly distribution to SCAL, NCAL, and NW
- Partners: Inpatient Pharmacy Directors
- **COMPLETED**

Removal With No Associated eMAR

- One version of report
- Pharmacy Ops: Version 1
- Inpatient Pharmacy Director: sponsor & champion
- Version 1: Go live with SCAL June 2014. Additional roll out TBD
- **COMPLETED**

Diversion Reports

- Additional analytics planned
 - Six reports, designed by Fraud Control, NSIU, NPCO, Pharmacy Ops
 - Identify diversion from different perspectives
 - NSIU/Pharmacy Operations partners
- **WORK IN PROGRESS**

FWA Pyxis Diversion Report

 Incorporate removal with no associate MAR report

 Missing medication = (Removal) – (MAR) – (Waste) – (Return)

 Removal after discharge/administered too close to discharge

 Removal after death

 Removal after transfer

 Pain scale link to removal

 Pain medication removed not indicated for pain scale

Pyxis Withdrawn With No Associated eMAR Report Summary

TOP USER BY TOTAL WITHDRAWN TRANSACTION			
User ID	User Name	# of Withdrawn with no associated MAR	Facility
		27	
		25	
		22	
		20	
		19	
		18	
		18	
		17	
		17	
		16	
		16	
		15	
		15	
		15	
		15	

TOP MEDSTATION BY TOTAL WITHDRAWN TRANSACTION		
MedStation	# of Withdrawn with no associated MAR	Facility
21CSU2	101	
A2SW	101	
27EAST2	99	
A2SE	97	
A2A2	96	
C4PICU	93	
IC-4W2	84	
C5SDUN2	79	
IC-5W2	75	
M4EMS4	75	
MLD	73	
C5SDUS1	73	
IC-5E2	72	
C3LDRP	71	
26WEST2	71	

TOP PATIENT BY TOTAL WITHDRAWN TRANSACTION * Where # of Withdrawn with no associate MAR >=2			
MRN	Patient Name	# of Withdrawn with no associated MAR	Facility
		41	
		40	
		16	
		13	
		12	
		11	
		10	
		10	
		10	
		9	
		9	
		8	
		8	
		8	
		8	

TOP MEDICATION BY TOTAL WITHDRAWN TRANSACTION			
Drug Name	Drug Strength (mg or mcg)	# of Withdrawn with no associated MAR	Facility
HYDROmorphone Inj *1mL*	2	300	
morphine (PF) Crtg *1mL*	2	207	
HYDROmorphone Inj *1mL*	2	196	
HYDROmorphone Inj *1mL*	2	183	
HYDROmorphone Inj *1mL*	2	181	
HYDROcodone/Acetaminophen	10	176	
HYDROcodone/Acetaminophen	5	164	
HYDROcodone/Acetaminophen	5	163	
HYDROcodone/Acetaminophen	10	150	
morphine (PF) Crtg *1mL*	2	132	
morphine (PF) Crtg *1mL*	2	130	
HYDROcodone/Acetaminophen	5	128	
fentaNYL Citrate PF *2mL*	100	116	
HYDROmorphone Inj *1mL*	2	115	
HYDROmorphone Inj *1mL*	2	114	

Missing Medication Report

Pyxis MAR Missing Medications Report

Pyxisfacility	Pyxis Station	Pyxis Userid	Pyxis Username	Pyxis Ptaltid	Patient Name	TransactionType	Pyxis Txdate	Pyxis Txtime	Drug Name	Withdrawn A	Drug Strengt	Wasteonrem	Wa Emar	Amount	Returned Am	Pyxiswasteafte	Missingmedication
	SDEFSTRK					WITHDRAWN	2/22/2015	01:31:45	HYDROmorphone Inj *1mL*	1	1			0.5			0.5
	SDPACU					WITHDRAWN	2/22/2015	07:16:55	Midazolam (PF) Inj *2mL*	1	2			1			1
	SDPACU					WITHDRAWN	2/22/2015	10:35:58	HYDROmorphone Inj *1mL*	1	2			0.4	1.200000048		0.4
	SDPACU					WITHDRAWN	2/22/2015	16:13:30	HYDROmorphone Inj *1mL*	1	2			0.4			1.6
	SDPACU					WITHDRAWN	2/22/2015	15:13:07	HYDROmorphone Inj *1mL*	1	2			0.4	1.200000048		0.4
	SDPACU					WITHDRAWN	2/22/2015	23:15:55	HYDROmorphone Inj *1mL*	1	2			0.4			1.6
	SDPACU					WITHDRAWN	2/22/2015	01:50:44	Midazolam (PF) Inj *2mL*	1	2			1			1
	SDPACU					WITHDRAWN	2/22/2015	20:28:55	Midazolam (PF) Inj *2mL*	1	2			1			1
	SDPACU					WITHDRAWN	2/22/2015	11:40:28	HYDROmorphone Inj *1mL*	1	2			0.4	1.200000048		0.4
	SDPACU					WITHDRAWN	2/22/2015	17:40:09	fentaNYL Citrate PF *2mL*	1	100			25			75
	SDPACU					WITHDRAWN	2/22/2015	09:51:30	fentaNYL Citrate PF *2mL*	1	100			50			50
	SDPACU					WITHDRAWN	2/22/2015	10:21:50	HYDROmorphone Inj *1mL*	1	2			0.4	0.200000003		1.4

NCO Fraud Control Pyxis® FWA



Reactive analysis related to internal tip (2007-2014)



Pandora/Pyxis reports generated manually to initiate analysis (2007-2014)



Weeks to months for SME to review data to confirm diversion or not for NCO investigation (2007-2014)



NCO partnered with pharmacy SME to create proactive analytics (2013)



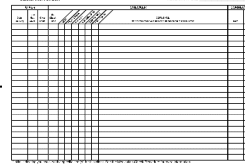
NCO identified ~ 2,300 Pyxis machines across the organization (2013)



Data normalization/structure 12 months (2013)



Trending Pyxis Override Report developed (2013)



Removal with no associated eMAR report (2014)



RN diversion case in SCAL confirmed "Removal With No Associated eMAR Report" could identify potential diversion



Missing Medication Report (March 2015)



First proactive Pyxis diversion case identified (April 2015)



Case was identified, investigated and subject interviewed within 41 hours (fewer than two days)



Continued development of Diversion report to identify additional drug diversion flags "i.e., removal after discharge" (2015-2016)



Next steps

Commonly Diverted Medication in Hospitals



Dilaudid® (Hydromorphone)



Demerol® (Meperidine)



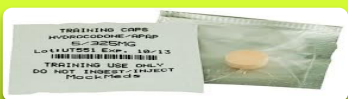
Morphine



Fentanyl



Lorazepam



Hydrocodone



Alprazolam



Valium (Diazepam)

Professionals Caught

RNs

- Travel
 - Move from facility to facility
- Employed

LVNs

Pharmacists

Physicians

- Newly hired or long-term employees
- Part D patients drugs at risk

Investigation Process

Medication Reports (Anomalous User Report)

- Generally will show outliers of employees who are excessive users

No Cameras

- Usually no cameras in patient treatment areas

Close Scrutiny of Medical Records

- Doctors orders
- Pain scale
- Medication administration record
- Patient discharged/transferred
- Multiple removals in a short time period

Patient Interviews

- Not always reliable

Case Study

Traveler Nurse Hired 12/16/2014 (IDM = 3/02/2015)

Worked 1900-0700

April 5, 2015

- Noticed 14 incidents in removal from Pyxis with no associated eMAR
- Identified 15 incidents on missing medication report for the same day

April 6, 2015

- Informed iACT and NSIU of information

April 7, 2015

- Nurse interviewed by NSIU

Daily Report: Removal With No eMAR and Med Station

TOP USER BY TOTAL WITHDRAWN TRANSACTION			
User ID	User Name	# of Withdrawn with no associated MAR	Facility
		14	
		4	
		3	
		2	
		2	
		2	
		2	
		2	
		2	
		2	
		2	
		2	
		2	
		2	
		2	

TOP MEDSTATION BY TOTAL WITHDRAWN TRANSACTION		
MedStation	# of Withdrawn with no associated MAR	Facility
RIV5E2	13	
PCM2PACU2	4	
DMC-4W2	4	
LA26EAST1	4	
LA2PICU1	4	
DMC-5E2	3	
FMC5SDUN1	3	
FMC5SDUN2	3	
HARMPP	3	
OCI2PAC1	3	
SD5SOUTH2	3	
SD5WMS2	3	
RIV5E	3	

Monthly Report: Trending

TOP USER BY TOTAL WITHDRAWN TRANSACTION			
		# of Withdrawn with no associated MAR	Facility
		68	
		42	
		28	
		20	
		17	
		16	
		13	
		12	
		12	
X		11	
Y		11	
D			
G			
2	EN, MARGARET	9	

One Month Total 111

TOP MEDICATION BY TOTAL WITHDRAWN TRANSACTION			
Drug Name	Drug Strength	# of Withdrawn with no associated MAR	Facility
HYDROmorphine Inj *1mL*	2	151	
HYDROmorphine Inj *1mL*	2	131	
Fent 2mcg/mL/Bup 0.1%	200	95	
HYDROmorphine Inj *1mL*	2	85	
HYDROmorphine Inj *1mL*	2	82	
HYDROmorphine Inj *1mL*	2	71	
HYDROmorphine Inj *1mL*	2	70	
Midazolam (PF) Inj *2mL*	2	69	
HYDROmorphine 0.2mg/mL/NS	10	65	
HYDROcodone/Acetaminophen	5	62	
LORazepam Inj *1mL*	2	59	
morphine (PF) Crtg *1mL*	2	55	
morphine (PF) Crtg *1mL*	2	55	
Midazolam (PF) Inj *2mL*	2	52	
HYDROcodone/Acetaminophen	5	48	

What We Found



Numerous incidents of missing medication



No associated pain scale



No chart notes associated with the removal



Removals too close to previous removals

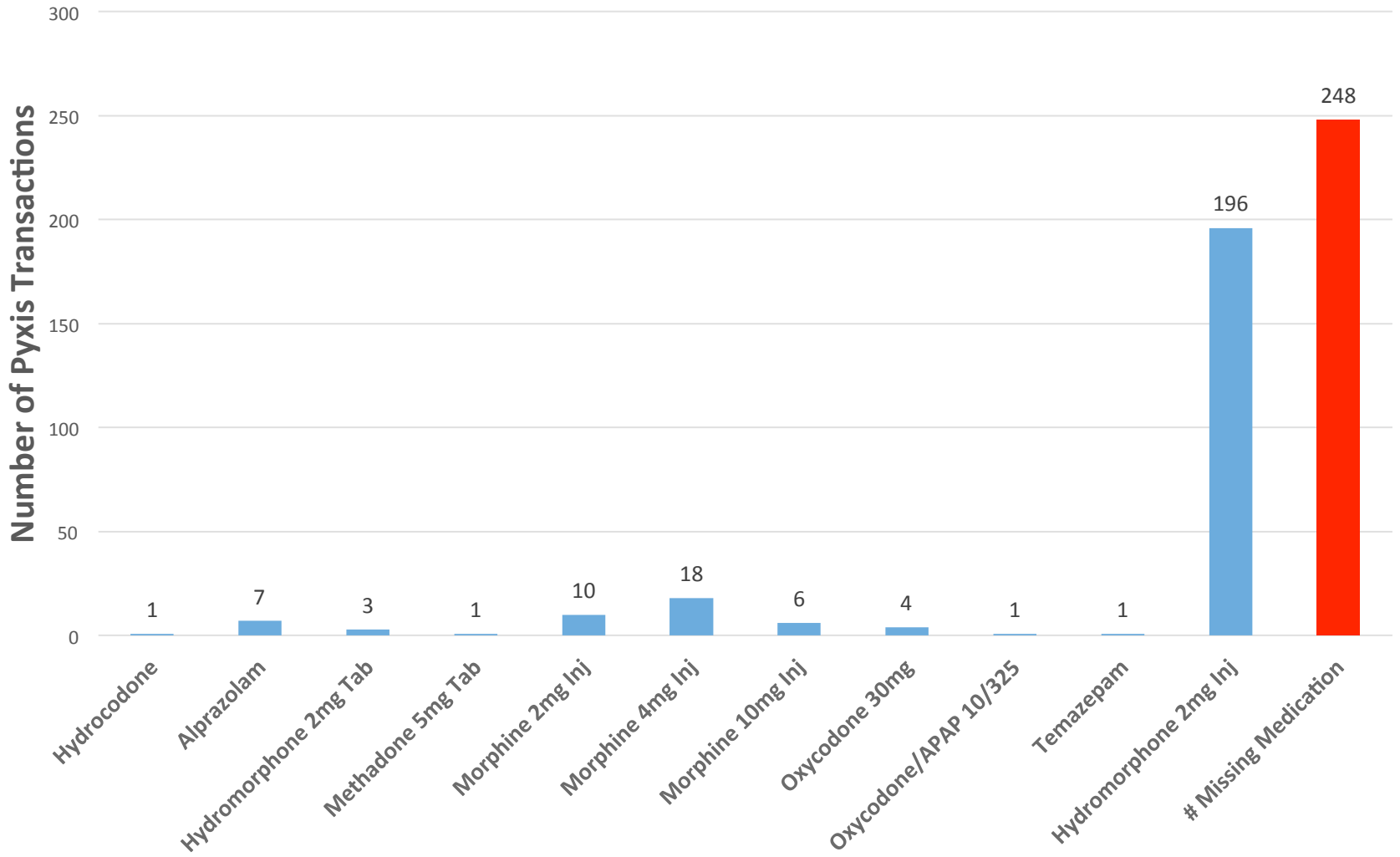


Multiple narcotics removals for same patient at same time

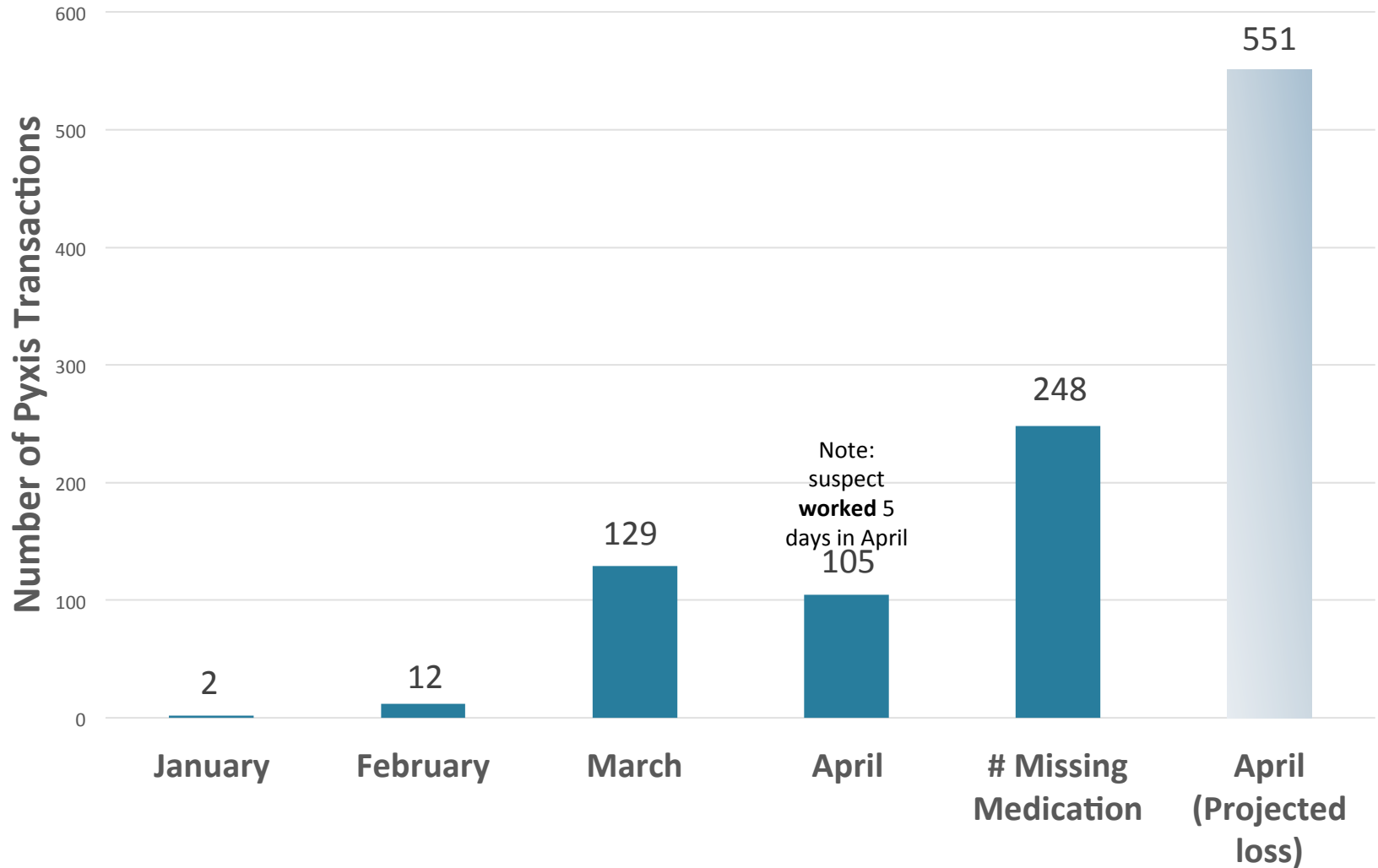


248 incidents of unaccounted for medication in the Missing Medication Report

Itemized Unaccounted Medication Withdrawal: January 1 - April 7 2015



Unaccounted Medication Withdrawal by Month: January - April 2015



Subject Interview

Subject licensed in California and Utah

- No administrative actions from either Board of Registered Nursing (BRN)

Subject admitted to stealing an unknown quantity

- Hydromorphone (Dilaudid) 2mg injectables
- Morphine Sulfate 2mg and 4mg injectables
- Hydrocodone-Acetaminophen (Norco) 10mg-325mg

Diverted medication was not documented in the patient's eMAR and no waste recorded

Subject admitted to self-administering at her residence to help her sleep due to problems in her personal life

Subject denied coming to work at Kaiser Permanente impaired and denied self-administering drugs in the workplace

Subject consented to search of her tote bag which contained two empty Dilaudid 2mg injectables, one full Morphine Sulfate 4mg injectable, and different types of sealed saline syringes

Evidence Photographs



ANALYTICS AND CASE STUDIES

IDENTITY RESOLUTION

A silhouette of the San Francisco skyline is shown against a light, hazy background. The Golden Gate Bridge is prominent on the left, and other buildings and bridges are visible in the distance.

CyberSizeIT

Medical Identity Theft



Increased 21.7 percent in 2014*



Medical identity theft occurs when someone uses an individual's name and personal identity to fraudulently receive medical services, prescription drugs and/or goods, including attempts to commit fraudulent billing

*Ponemon Institute Fifth Annual Study on Medical Identity Theft; February 2015

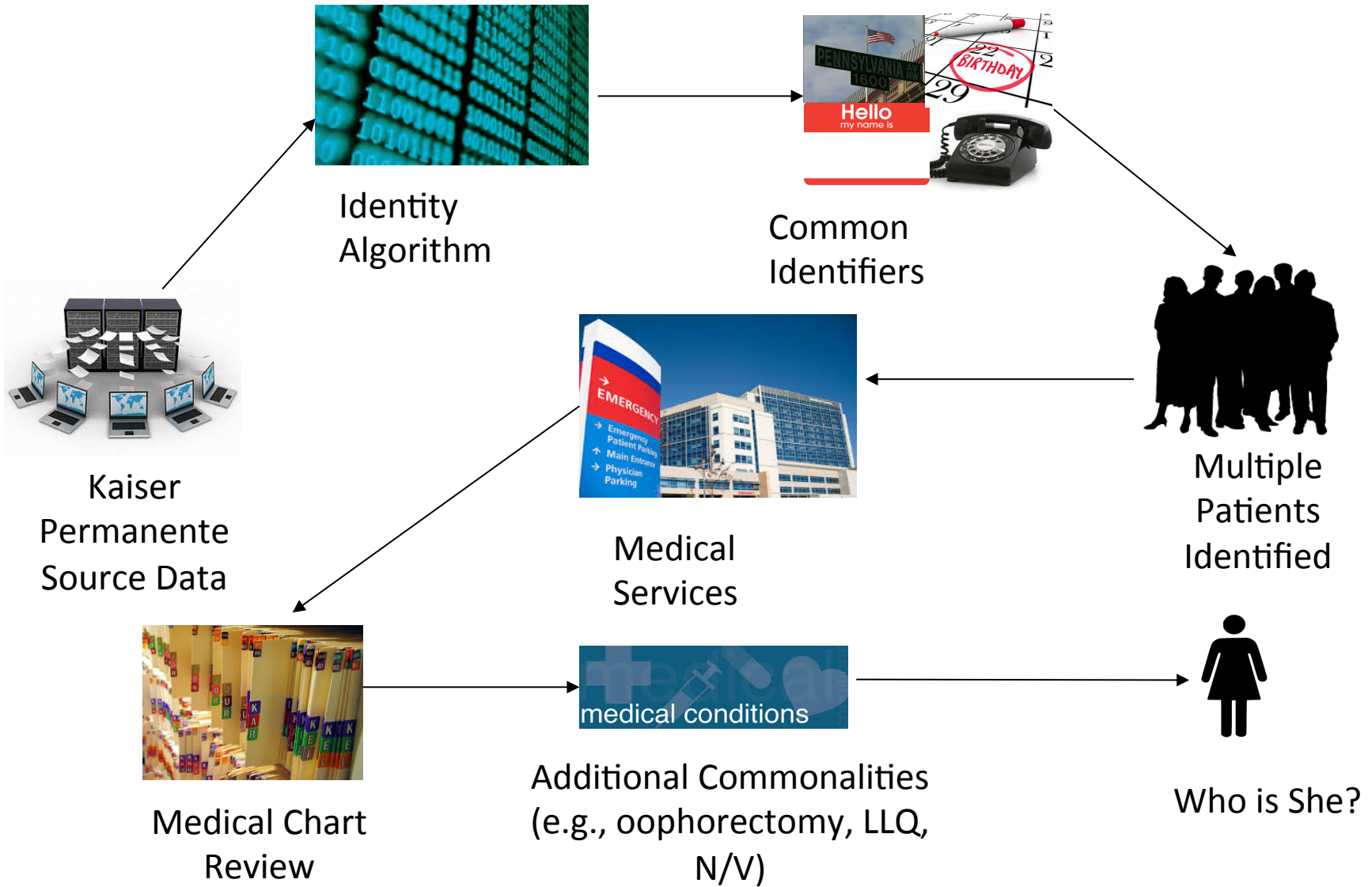
Medical Identity Link Analysis: Nonmembers - NCAL & SCAL

Names

Demographics

- **Addresses**
- **Phone Numbers**
- **Gender**
- **Relationships**

Storyboard



Name and Demographics

*Data is created PHI

Member ID	DOB	Name	Address	City	State	Create Date
1	4/15/1981	MCKINNON DEBBIE	123X SINGINGWOOD CIR	LAUREL CANYON	CA	7/17/2014
2	8/14/1981	BRENNAN TERRY	123X SINGINGWOOD CIR	LAUREL CANYON	CA	7/23/2014
3	9/12/1980	MCKINNON ANN	123X SINGINGWOOD CIR	LAUREL CANYON	CA	7/28/2014
4	9/21/1980	JORDAN LYNN	123X SINGINGWOOD CIR	LAUREL	CA	9/12/2014
5	10/24/1980	MCCLELLAN ANN	123X SINGINGWOOD CIR	LAUREL CANYON	CA	6/13/2014
6	10/13/1980	MACLENDON KAREN	123X SINGINGWOOD CIR	LAUREL CANYON	CA	10/8/2014

- ❖ Similar DOBs
- ❖ Similar Names
- ❖ Exact Address Matches
- ❖ All Different Create Dates

Name and Demographics

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6	10/13/1980	MACLENDON KAREN	123X SINGINGWOOD CIR	LAUREL CANYON	CA	10/8/2014
7	4/15/1981	MCKINNON DEBBIE	321X TRAFTON ST	SEATTLE	WA	6/14/2014

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6	10/13/1980	MACLENDON KAREN	123X SINGINGWOOD CIR	LAUREL CANYON	CA	10/8/2014
7	4/15/1981	MCKINNON DEBBIE	321X TRAFTON ST	SEATTLE	WA	6/14/2014
8	9/12/1980	MCKINNON ELAINE	1234Y CORONADO AVE	DANVILLE	CA	2/28/2014

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8	9/12/1980	MCKINNON ELAINE	1234Y CORONADO AVE	DANVILLE	CA	2/28/2014
9	10/24/1980	BRENNAN TERESA	1234Y CORONADO AVE	DANVILLE	CA	2/26/2014
10	8/14/1981	MCKINNON KAREN	1ABC POST ST	SAN DIEGO	CA	3/19/2014

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9	10/24/1980	BRENNAN TERESA	1234Y CORONADO AVE	DANVILLE	CA	2/26/2014
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11	10/24/1980	MCKINNON TERRY	1ABC POST ST	SAN DIEGO	CA	3/19/2014
12	9/21/1980	MCLENDON LYNN	12ABC CORAL ST	SANTA YNEZ	CA	10/1/2014
13	9/21/1980	MCKINNON TERESA	12ABC CORAL ST	SANTA YNEZ	CA	10/3/2014

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12	9/21/1980	MCLENDON LYNN	12ABC CORAL ST	SANTA YNEZ	CA	10/1/2014

Chart Review Analysis

Demographics

- Address
- Phone Number(s)
- Emergency Contact Information

Patient Specific Information

- Gender
- Height/Weight

Medical History

- Chief Complaint
- Allergies
- Past Surgical History
- Past Medical History

Demographics

*Data is created PHI

Member ID	DOB	Name	Phone Number	Emergency Contact	Emergency Contact Phone #
1	4/15/1981	MCKINNON DEBBIE	002-309-1905	AMBER (SISTER)	005-291-0141 006-272-9662
2	8/14/1981	BRENNAN TERRY	002-322-5210	BARBARA DENICOLA	007-291-0141
3	9/12/1980	MCKINNON ANN	002-308-1123	BRYN (SISTER)	008-291-1141
4	9/21/1980	JORDAN LYNN	002-309-1905	BARBARA DENICOLA	002-308-1123
5	10/24/1980	MCCLELLAN ANN	003-272-1662 002-309-1905	BRYNN MCKINNIN	002-309-1905
6	10/13/1980	MACLENDON KAREN	002-309-1905	BREANNA	009-308-1123
7	4/15/1981	MCKINNON DEBBIE	003-308-1123	AMBER MCKINNON	006-272-9662
8	9/12/1980	MCKINNON ELAINE	002-309-1905 004-291-0144	AMBER BRENNAN	002-309-1905 002-308-1123
9	10/24/1980	BRENNAN TERESA	004-291-0144	AMBER	008-291-1141
10	8/14/1981	MCKINNON KAREN	004—291-0141	AMBER	006-272-9662
11	10/24/1980	MCKINNON TERRY	002-309-1905	BRYNN	002-308-1123
12	9/21/1980	MCLENDON LYNN	004—291-0141	AMBER	002-308-1123

Contact Information

*Data is created PHI

Member ID	DOB	Name	Phone Number	Emergency Contact	Emergency Contact Phone #
1	4/15/1981	MCKINNON DEBBIE	002-309-1905	AMBER (SISTER)	005-291-0141 006-272-9662
2	8/14/1981	BRENNAN TERRY	002-322-5210	BARBARA DENICOLA	007-291-0141
3	9/12/1980	MCKINNON ANN	002-308-1123	BRYN (SISTER)	008-291-1141
4	9/21/1980	JORDAN LYNN	002-309-1905	BARBARA DENICOLA	002-308-1123
5	10/24/1980	MCCLELLAN ANN	003-272-1662 002-309-1905	BRYNN MCKINNIN	002-309-1905
6	10/13/1980	MACLENDON KAREN	002-309-1905	BREANNA	009-308-1123
7	4/15/1981	MCKINNON DEBBIE	003-308-1123	AMBER MCKINNON	006-272-9662
8	9/12/1980	MCKINNON ELAINE	002-309-1905 004-291-0144	AMBER BRENNAN	002-309-1905 002-308-1123
9	10/24/1980	BRENNAN TERESA	004-291-0144	AMBER	008-291-1141
10	8/14/1981	MCKINNON KAREN	004-291-0141	AMBER	006-272-9662
11	10/24/1980	MCKINNON TERRY	002-309-1905	BRYNN	002-308-1123
12	9/21/1980	MCLENDON LYNN	004-291-0141	AMBER	002-308-1123

Height and Weight

*Data is created PHI

Member ID	DOB	Name	Height	Weight
1	4/15/1981	MCKINNON DEBBIE	5'4"	115
2	8/14/1981	BRENNAN TERRY		115
3	9/12/1980	MCKINNON ANN	5'	111
4	9/21/1980	JORDAN LYNN		120
5	10/24/1980	MCCLELLAN ANN		113
6	10/13/1980	MACLENDON KAREN		115
7	4/15/1981	MCKINNON DEBBIE		119
8	9/12/1980	MCKINNON ELAINE		113
9	10/24/1980	BRENNAN TERESA		115
10	8/14/1981	MCKINNON KAREN	5'	150
11	10/24/1980	MCKINNON TERRY		119
12	9/21/1980	MCLENDON LYNN	5'	122

Patient Presents “Chief Complaint”

*Data is created PHI

Member ID	DOB	Name	Patient Presents
1	4/15/1981	MCKINNON DEBBIE	Nausea/Vomiting, LLQ
2	8/14/1981	BRENNAN TERRY	Nausea/Vomiting, Abdominal Pain
3	9/12/1980	MCKINNON ANN	LLQ, Abdominal Pain
4	9/21/1980	JORDAN LYNN	Nausea/Vomiting, LLQ, Abdominal Pain
5	10/24/1980	MCCLELLAN ANN	LLQ, Abdominal Pain, Rib pain
6	10/13/1980	MACLENDON KAREN	Nausea/Vomiting, LLQ, Abdominal Pain
7	4/15/1981	MCKINNON DEBBIE	Nausea/Vomiting, LLQ, Abdominal Pain
8	9/12/1980	MCKINNON ELAINE	Nausea/Vomiting, Abdominal Pain
9	10/24/1980	BRENNAN TERESA	LLQ, Abdominal Pain, Fell in Shower
10	8/14/1981	MCKINNON KAREN	Nausea/Vomiting, Abdominal Pain
11	10/24/1980	MCKINNON TERRY	LLQ, Abdominal Pain
12	9/21/1980	MCLENDON LYNN	Nausea/Vomiting, Abdominal Pain

Patient Presents “Existing Conditions”

*Data is created PHI

Member ID	DOB	Name	Existing Conditions
1	4/15/1981	MCKINNON DEBBIE	Oophorectomy, Epilepsy, Appendectomy
2	8/14/1981	BRENNAN TERRY	Oophorectomy, Appendectomy
3	9/12/1980	MCKINNON ANN	Oophorectomy, Epilepsy, Appendectomy
4	9/21/1980	JORDAN LYNN	Oophorectomy, Ovarian Cyst
5	10/24/1980	MCCLELLAN ANN	Oophorectomy, Ovarian Torsion
6	10/13/1980	MACLENDON KAREN	Oophorectomy, Epilepsy, Appendectomy
7	4/15/1981	MCKINNON DEBBIE	Oophorectomy, Epilepsy, Ovarian Torsion
8	9/12/1980	MCKINNON ELAINE	Oophorectomy, Ovarian Cyst
9	10/24/1980	BRENNAN TERESA	Oophorectomy, Epilepsy, Appendectomy
10	8/14/1981	MCKINNON KAREN	Oophorectomy, Ovarian Torsion
11	10/24/1980	MCKINNON TERRY	Oophorectomy, Epilepsy, Ovarian Torsion
12	9/21/1980	MCLENDON LYNN	Oophorectomy, Epilepsy, Appendectomy

Patient Presents “Allergies and Medications”

*Data is created PHI

Member ID	DOB	Name	Existing Conditions	Outpatient Medications
1	4/15/1981	MCKINNON DEBBIE	Doxycycline, Morphine, Reglan	Keppra, Trileptal, Yaz, Motrin
2	8/14/1981	BRENNAN TERRY	Doxycycline, Morphine, Reglan	Keppra, Trileptal, Yaz, Norco
3	9/12/1980	MCKINNON ANN	Doxycycline, Morphine	Keppra, Trileptal, Yaz, Motrin
4	9/21/1980	JORDAN LYNN	Doxycycline, Morphine	Keppra, Trileptal, Yaz, Norco
5	10/24/1980	MCCLELLAN ANN	Doxycycline, Morphine	Keppra, Trileptal, Yaz, Prilosec
6	10/13/1980	MACLENDON KAREN	Doxycycline, Morphine	Keppra, Trileptal
7	4/15/1981	MCKINNON DEBBIE	Morphine	Keppra, Trileptal, Yaz, Prilosec
8	9/12/1980	MCKINNON ELAINE	Doxycycline, Morphine	Keppra, Trileptal, Yaz, Motrin
9	10/24/1980	BRENNAN TERESA	Doxycycline, Morphine	Keppra, Trileptal, Yaz,
10	8/14/1981	MCKINNON KAREN	Doxycycline, Morphine	Keppra, Trileptal, Yaz
11	10/24/1980	MCKINNON TERRY	Doxycycline, Morphine	Keppra, Trileptal, Yaz, Norco

Identity Web Summary

41 Identities/MRNs

All Females With DOBs between 1980 – 1981

19 Address Variations Across 10 Cities and 2 States

Stated Allergies

- 40 of 41 – Allergic to Morphine
- 37 of 41 – Allergic to Doxycycline

Stated Medications

- 37 of 41 – Keppra
- 36 of 41 – Trileptal
- 31 of 41 – Yaz

Stated Conditions

- 40 of 41 – Oophorectomy
- 35 of 41 – Epilepsy/Seizures
- 39 of 41 – Appendectomy

Patient Presents

- 39 of 41 – Abdominal Pain
- 35 of 41 – Diarrhea, Nausea, and Vomiting
- 32 of 41 – LLQ Pain

Episodes of Care

Member ID	Episodes of Care	Service Location	Back Office Injections	Back Office Tablets	Outpatient Medications
1	2	Walnut Creek x2	18 Hydromorphone 2 Fentanyl	2 Hydromorphone 7 Percocet 1 Oxycodone	Zofran
2	1	Oakland	13 Hydromorphone	1 Norco 1 Ambien	Norco
3	1	Santa Clara	1 Hydromorphone		
4	1	Santa Clara	2 Hydromorphone		
5	2	Redwood City Sacramento	4 Hydromorphone		Norco Zofran
6	1	Fresno	2 Hydromorphone		Norco Zofran
7	1	South Sacramento	3 Hydromorphone	1 Norco	
8	3	South San Francisco x2 Oakland	2 Hydromorphone 3 Fentanyl		
9	5	South Sacramento x3 Redwood City Richmond	8 Hydromorphone 3 Morphine	2 Norco	
10	3	San Jose Oakland Santa Clara	4 Hydromorphone 1 Fentanyl		Norco
11	4	Santa Clara Walnut Creek San Francisco Vacaville	60 Hydromorphone	3 Hydromorphone 1 Percocet 1 Oxycodone 9 Norco	Norco Zofran x2 Hydromorphone
12	1	Walnut Creek	3 Hydromorphone		Norco Zofran

Care Summary

311 Episodes of Care Across 20 Locations

Back Office Injections – Opioid

- 116 Hydromorphone
- 13 Fentanyl
- 4 Morphine

Back Office Tabs

- 14 Norco
- 36 Hydromorphone
- 19 Oxycodone
- 3 Ambien

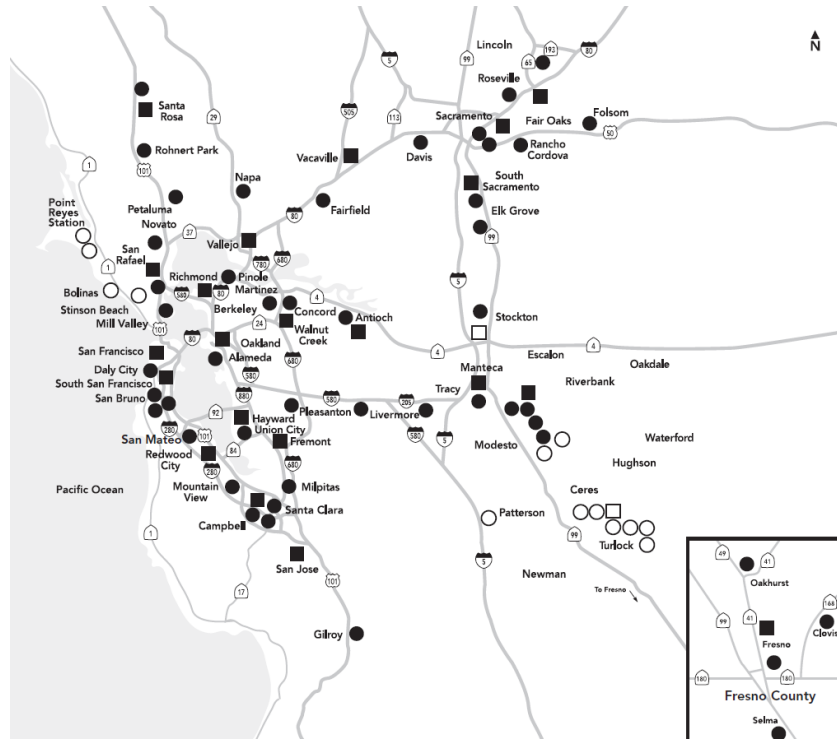
Kaiser Permanente Outpatient Pharmacy

- 22 Zofran
- 32 Norco
- 4 Oxycodone
- 2 Hydromorphone

Timeline

Member ID	Episodes of Care	Service Location
1	2/26/2014	Walnut Creek x2
2	2/26/2014-2/27/2014	Oakland
3	2/28/2014	Santa Clara
4	3/8/2014	Santa Clara
5	3/19/2014	Redwood City Sacramento
6	3/19/2014-3/24/2014	Fresno
7	5/26/2014	South Sacramento
8	6/5/2014	South San Francisco x2 Oakland
9	6/13/2014 6/14/2014-6/15/2014 6/29/2014	South Sacramento x3 Redwood City Richmond
10	7/17/2014-7/20/2014 7/23/2014-7/25/2014 7/28/2014-7/29/2014	San Jose Oakland Santa Clara
11	9/12/2014	Santa Clara
12	9/25/2014	Oakland

Treatment Information Analysis



31 Emergency Department Visits (2/26/2014 - 3/19/2015)

52 Days of Care

15 Different NCAL MSA's (Sacramento to Santa Clara)

Fraud Alert From 3/23 Santa Rosa Visit



Formal Case Creation

• TW#11111111



Assigned to:

NSIU investigator

**CONFIDENTIAL FRAUD ALERT!
NOT FOR PUBLIC VIEWING**

TW 2015-03868

The National Special Investigations Unit (NSIU) is investigating a subject making false claims for health care benefits by obtaining controlled substances through fraudulent means in violation of 11173(a) of the Health & Safety Code. Subject continuously seeks narcotics at various KP pharmacies and EDs throughout Northern California with frequent complaints of abdominal pain.

Subject has presented with numerous aliases to include the following: TARYN BRENNAN, ERIN MCKINNON, KAYELAN BRENNAN, KAYLAN MCKINNON, TAYLOR MCKINNON, DANA BRENNAN, TARYN MACLENDON, ALEXANDRA MCCLENNON, DANA MCKINNON, DANA JORDAN, TARYN MCKINNON, TAYLOR BRENNAN, KAYLAN MCKINNON, LEAH JORDAN, LEAH MCLENDON, TARYN MACLENDON, DANA MCKINNON, KAYELAN JENSEN, LEAH BRENNAN, ERIN MCCLENNON, TARYN BORDEN, DANA RYAN, LEAH BRYANT, LEAH BARRETT, LEAH KATHIR, LEAH DEACOLA, LEAH MCKINNON, LEAH WELLS, LEAH TAYLOR, LEAH MACLENNON, LEAH BARRON, LEAH HILLAD, and LEAH JOHNSON. Subject is known to dress in all black clothing; has always blonde hair; she has an allergy to Morphine and Doxycycline; has recently stated she has a loophole and has epilepsy. Subject's numerous aliases have generated multiple aliases.

SUBJECT AT SANTA ROSA HOSPITAL PHARMACY, WEST 3/23/2015 AND 3/31/2015



FOLLOW EMTALA & AREA MANAGER GUIDELINES FOR NOTIFICATION TO SECURITY AND CONTACT TO LAW ENFORCEMENT TO REPORT POSSIBLE HEALTH CARE FRAUD / DRUG SEEKING AS DESCRIBED. DO NOT PROVIDE ANY INFORMATION ABOUT SUBJECT'S MEDICAL CONDITION TO LAW ENFORCEMENT UNLESS PROVIDED WITH A SEARCH WARRANT OR COURT ORDER.

Any contacts with Subject or requests from law enforcement should be directed to:

David White

National Special Investigations Unit (NSIU) Senior Investigator
415-850-6950 (Mobile Phone)

**CONFIDENTIAL FRAUD ALERT!
PLEASE POST IN AREA INACCESSIBLE TO PUBLIC VIEWING**

NOVEMBER 9 - 11, 2015

Santa Clara ED IDs Person on May 22, 2015

ANALYTICS AND CASE STUDIES GLUCOSE TEST STRIPS (GTS)



The background of the bottom section is a stylized, high-contrast illustration of the San Francisco skyline. It features the Golden Gate Bridge, the Transamerica Pyramid, and other city buildings. Overlaid on this background is the "CyberSizeIT" logo in a large, bold, red font with a white outline. The "C" and "I" in "Cyber" are significantly larger than the other letters.

Kaiser Permanente Strips on eBay

The screenshot shows an eBay product listing for "100 ONE TOUCH VERIO Diabetic Test Strips 08/2015". The product image on the left features the text "ONE TOUCH® Verio®" and "100 Test Strips Accuracy you can trust". The listing details include a price of "US \$60.00", a "Buy It Now" button, and an "Add to cart" button. Shipping is listed as "FREE Standard Shipping". The seller is "gonefishing1951" with a "Top Rated Plus" badge and "100% Positive feedback". A "Temptations" advertisement is visible in the bottom right corner of the listing area.

ebay Shop by category Search... All Categories Search Advanced

Back to search results | Listed in category: Health & Beauty > Medical, Mobility & Disability > Diabetic Aids > Test Strips

100 ONE TOUCH VERIO Diabetic Test Strips 08/2015

1 watched in last 24 hours

Item condition: **New**

Time left: 24m 54s Today 12:31PM

Price: **US \$60.00**

Buy It Now

Add to cart

2 watching

- Add to watch list
- Add to collection

Free shipping New condition 100% positive feedback

Shipping: **FREE** Standard Shipping | See details
Item location: Surprise, Arizona, United States
Ships to: United States

Delivery: On or before **Sat. May. 23** to 94601
Estimated by eBay **FAST 'N FREE**

Payments: **PayPal** VISA MASTERCARD DISCOVER

Seller information
gonefishing1951 (4938 ★)
100% Positive feedback

Follow this seller
See other items

Temptations
treats for cats
LEARN MORE >



Virtual Meeting – 6/18/2013

Concerns Regarding Resale of Diabetic Test Strips: Overutilization

- Medicare utilization guidelines allow for coverage:
 - 100 test strips and lancets every month for insulin-dependent beneficiaries.
 - 100 test strips and lancets every 3 months for non-insulin dependent beneficiaries.
 - Larger quantities are covered if medically necessary.
 - If ordered quantities of test strips and lancets exceed the quantities specified in policy, there must be justification for testing frequency and evidence in the patient's medical record of use of the testing supplies.

Diabetic Test Strips



QUICKCASH4TESTSTRIPS.com
Quick cash for a great cause

Got questions?
Call (800) 760-9100



Sell your diabetic test strips
and get **QUICK CASH**

3 DAY
QUICK CASH
GUARANTEE

Why wait weeks to get paid? Take advantage of our 3-Day Quick Cash Guarantee. Once your order is verified, you'll get your payment in 3 business days. Guaranteed.

How does it work?

1. **Easy Registration.** Send us the details of your order and choose how you want to get paid.
2. **Fast Processing.** Mail us your test strips or request a free postage-paid mailing kit.
3. **Quick Cash.** Get your payment in 3 business days once we've received and verified your order.

Some terms and conditions apply. Please read our [FAQ](#).

Ready to send in your order?

Find out what hundreds of customers already know - QuickCash4TestStrips is the quickest way to get cash for your unused diabetic test strips.

Sell test strips today!

QUICK CASH CALCULATOR

What brand of test strips do you have?

Accu-check Avia

How many test strips are in each box?

50

How many boxes do you have?

1

Calculate

- A very active secondary market exists for the sale of diabetic test strips.

Glucose Test Strip FWA Analytics Storyboard



August 2009
Federal law enforcement
inquiry regarding GTS



Reactive Analysis related
to Federal Inquiry



Data proved Pharmacy manager
Diverted GTS for profit
2001-2009



iACT Developed Proactive
GTS In-Out Analysis for All
KP Outpatient Pharmacies
2010



Two Substantiated
Outpatient Pharmacy
Diversion Cases Identified
(2012)



First NCAL GTS FWA
Member Case
Identified from iACT
Analytics 2014



2014 NCAL
Compliance
Goal iACT GTS
Analytics for all
Medical Centers



First SCAL GTS
FWA Member
Case Identified
from iACT
Analytics 2014



Lifescan agreed to print
"For Kaiser Permanente
Members Only" on
packaging 2013



2013: iACT Develops
GTS member
utilization analytics



iACT GTS FWA
Member Analytics
shared with ROC
Regions 2014



2015 Follow CMS
Guidelines:

- Diabetes diagnosis
- Defined directions

Proactive
analytics run
twice per year
per region
Goal: Mitigate
overprescribing
and conform to
CMS regs

Case Study

iACT Data Mining Study indicated excessive use of glucose test strips (GTS)

Patient obtained 18,800 test strips between 8/5/2013 and 5/7/2014

Daily use comes to 67 strips

iACT GTS Analytics



Utilization by total quantity



Utilization by average GTS Per Day



GTS utilization with no lancets



GTS utilization with no diabetes diagnosis



Number of days since last HGA1C



Number of days since last doctor's office visit

Glucose Test Strips Analytics Top 10

TOP PATIENT BY TOTAL QUANTITY

MRN	PATIENT NAME	PART D	TOTAL GTS	AVG GTS PER DAY	AVG LANCETS PER DAY	LAST LANCET	QTY LAST LANCET	LAST HGAIC DATE	LAST HGAIC RESULTS	TYPE 1 DM	INS. PUMP	PCP NAME	PCP MCA
N		N	18,800	62	13	12/23/2014	400	10/22/2013	10.0	N	N		
N		N	12,300	32	15	5/22/2014	400	3/12/2014	8.2	Y	N		
N		N	10,400	33	10	3/24/2014	800	5/22/2013	11.7	N	N		
N		N	9,100	25	6	2/26/2014	600	6/22/2010	9.9	Y	N		
N		N	8,250	22	-	-	-	3/17/2014	8.9	Y	Y		
N		N	8,200	23	13	2/8/2014	400	4/14/2014	7.5	Y	Y		
N		N	7,800	23	22	4/30/2014	400	3/10/2014	8.8	N	N		
N		N	7,800	22	4	1/22/2014	200	5/8/2014	10.1	N	N		
N		N	7,700	21	13	10/7/2013	400	3/13/2014	6.0	Y	N		
N		N	7,600	27	11	5/20/2014	700	1/24/2014	6.5	N	Y		
N		N	7,600	20	-	2/11/2013	600	4/26/2014	10.0	Y	Y		
N		N	7,500	25	-	9/26/2012	100	3/3/2014	7.3	Y	N		
N		N	7,400	19	-	-	-	5/20/2014	15.2	N	N		
N		N	7,300	19	-	-	-	2/10/2014	5.8	Y	N		
N		N	7,200	28	-	-	-	2/11/2014	5.7	Y	Y		

DAYS SINCE LAST HGAIC

MRN	PATIENT NAME	PART D	LAST HGAIC DATE	# DAYS SINCE LAST HGAIC	LAST HGAIC RESULTS	TOTAL GTS	AVG GTS PER DAY	AVG LANCETS PER DAY	TOTAL INSULIN (ml)	TOTAL TABS	TYPE 1 DM	INS. PUMP	PCP NAME	PCP MCA	LTC #/H /HSP
N		N	2/21/2008	2,292	7.9	3,200	11	2	160	-	Y	Y			N
N		N	3/12/2008	2,272	7.8	2,400	7	-	150	-	Y	Y			N
N		N	3/15/2008	2,269	8.3	2,400	8	7	165	-	Y	N			N
N		Y	3/22/2008	2,262	9.1	2,400	8	-	90	-	N	N			Y
N		N	4/30/2008	2,223	10.7	2,200	7	1	180	-	Y	N			N
N		N	5/21/2008	2,202	8.7	2,000	8	7	285	-	Y	N			N
N		N	6/28/2008	2,164	7.3	1,500	5	-	400	-	Y	N			N
N		N	6/30/2008	2,162	7.3	3,600	13	-	320	-	Y	Y			N
N		N	7/22/2008	2,160	7.5	4,500	14	20	200	-	Y	Y			N
N		N	7/16/2008	2,146	7.6	1,700	6	-	315	-	Y	N			N
N		N	8/2/2008	2,129	7.8	3,700	13	-	250	-	Y	N			N
N		N	8/21/2008	2,110	7.3	1,900	6	-	195	-	Y	N			N
N		N	9/3/2008	2,097	8.0	1,600	8	7	290	-	Y	N			N
N		N	9/11/2008	2,089	6.8	2,700	9	4	210	-	Y	Y			N
N		N	9/18/2008	2,082	6.0	2,500	9	7	420	1200	Y	Y			N

TOP PATIENT BY AVERAGE GTS PER DAY

MRN	PATIENT NAME	PART D	AVG GTS PER DAY	TOTAL GTS	AVG LANCETS PER DAY	LAST LANCET	QTY LAST LANCET	LAST HGAIC DATE	LAST HGAIC RESULTS	TYPE 1 DM	INS. PUMP	PCP NAME	PCP MCA
N		N	62	18,800	13	12/23/2014	400	10/22/2013	10.0	N	N		
N		N	33	10,400	10	3/24/2014	800	5/22/2013	11.7	N	N		
N		N	32	12,300	15	5/22/2014	400	3/12/2014	8.2	Y	N		
N		N	30	2,700	-	-	-	4/15/2013	9.9	Y	Y		
N		N	29	5,000	15	12/16/2013	700	1/13/2013	5.2	N	N		
N		N	28	7,200	-	-	-	2/11/2014	5.7	Y	Y		
N		N	28	5,500	14	5/12/2014	1,000	1/13/2012	11.2	Y	Y		
N		N	27	7,600	11	5/20/2014	700	1/24/2014	6.5	N	Y		
N		N	25	9,100	6	2/26/2014	600	6/22/2010	9.9	Y	N		
N		N	25	7,500	-	9/26/2012	100	3/3/2014	7.3	Y	N		
N		N	25	7,200	-	-	-	1/8/2014	6.0	Y	Y		
N		N	25	2,600	15	3/2/2014	200	2/13/2014	15.7	Y	N		
N		N	24	7,200	4	4/20/2014	400	10/23/2010	7.1	Y	Y		
N		N	24	4,600	8	2/17/2014	400	10/29/2013	11.3	Y	N		
Y		Y	24	2,400	-	-	-	5/23/2014	5.8	Y	N		

DAYS SINCE LAST MD VISIT

MRN	PATIENT NAME	PART D	LAST MD VISIT	# DAYS SINCE LAST MD	AVG GTS PER DAY	AVG LANCETS PER DAY	TOTAL INSULIN (ml)	TOTAL TABS	LAST HGAIC DATE	LAST HGAIC RESULTS	TYPE 1 DM	INS. PUMP	PCP NAME	PCP MCA	LTC #/H /HSP
N		N	5/19/2006	2,935	8	-	210	-	5/22/2014	6.9	Y	N			N
N		N	10/21/2006	2,739	6	-	110	-	-	-	N	N			N
N		N	12/9/2006	2,731	4	-	120	-	12/9/2011	9.6	Y	N			N
N		N	3/19/2007	2,631	4	10	225	-	6/15/2013	8.4	Y	N			N
N		N	5/15/2007	2,574	4	4	-	2,000	-	-	N	N			N
N		N	12/11/2007	2,364	9	-	300	-	-	-	Y	N			N
N		N	2/14/2008	2,299	4	-	700	-	-	-	Y	N			N
N		N	2/29/2008	2,294	9	20	330	-	-	-	N	N			N
N		N	5/19/2008	2,204	5	7	30	-	3/11/2011	9.4	Y	N			N
N		N	9/26/2008	2,074	5	-	195	-	4/21/2014	6.7	Y	N			N
N		N	10/31/2008	2,039	9	-	120	2,200	12/19/2013	11.4	N	N			N
N		N	2/26/2009	1,921	7	-	-	-	2/20/2009	6.2	Y	N			N
Y		Y	3/30/2009	1,869	4	3	-	-	3/13/2009	8.3	N	N			N
N		N	6/9/2009	1,816	4	-	80	2,500	2/18/2014	8.1	N	N			N
N		N	7/19/2009	1,788	6	-	900	-	6/11/2013	8.8	Y	Y			N

PATIENTS WITH GTS RECEIVED WITH NO LANCET

MRN	PATIENT NAME	PART D	TOTAL GTS	AVG GTS PER DAY	AVG LANCETS PER DAY	LAST LANCET	QTY LAST LANCET	LAST HGAIC DATE	LAST HGAIC RESULTS	TYPE 1 DM	INS. PUMP	PCP NAME	PCP MCA
N		N	8,250	22	-	-	-	3/17/2014	8.9	Y	Y		
N		N	7,600	20	-	2/11/2013	600	4/26/2014	10.0	Y	Y		
N		N	7,500	25	-	9/26/2012	100	3/3/2014	7.3	Y	N		
N		N	7,400	19	-	-	-	5/20/2014	15.2	N	N		
N		N	7,300	19	-	-	-	2/10/2014	5.8	Y	N		
N		N	7,200	28	-	-	-	2/11/2014	5.7	Y	Y		
N		N	7,200	25	-	-	-	1/8/2014	6.0	Y	Y		
N		N	7,100	18	-	-	-	12/12/2013	8.2	Y	N		
N		N	7,000	21	-	3/23/2011	400	9/18/2013	7.8	Y	Y		
N		N	6,500	17	-	-	-	4/9/2014	8.1	Y	N		
N		N	6,400	18	-	1/18/2011	200	4/23/2014	13.1	N	N		
N		N	6,400	18	-	-	-	1/12/2013	7.1	Y	Y		
N		N	6,400	17	-	4/1/2011	200	5/20/2014	8.0	Y	N		
N		N	6,300	20	-	1/7/2011	400	12/18/2013	6.0	Y	Y		
N		N	6,300	16	-	4/10/2012	100	5/12/2014	11.0	Y	N		

PATIENTS WITHOUT A DIABETES DIAGNOSIS

MRN	PATIENT NAME	PART D	TOTAL GTS	AVG GTS PER DAY	AVG LANCETS PER DAY	LAST LANCET	QTY LAST LANCET	LAST HGAIC DATE	LAST HGAIC RESULTS	TYPE 1 DM	INS. PUMP	PCP NAME	PCP MCA
N		Y	2,400	9	-	-	-	2/7/2014	7.5	N	Y		
N		N	2,400	8	-	-	-	7/12/2013	5.9	N	N		
N		N	2,400	7	-	-	-	1/9/2014	7.1	N	N		
Y		Y	1,800	5	2	4/2/2014	400	6/12/2013	6.0	N	N		
Y		Y	1,600	5	-	-	-	1/4/2014	7.5	N	N		
Y		Y	1,500	4	3	8/4/2013	100	2/6/2014	7.6	N	N		
N		N	1,400	8	4	5/2/2014	100	5/8/2012	7.1	N	N		
Y		Y	1,400	4	4	9/2/2013	200	1/3/2013	6.3	N	N		
Y		Y	1,000	4	4	1/24/2014	200	5/14/2014	5.6	N	N		
N		N	900	6	7	1/30/2014	100	1/12/2013	6.9	N	N		
N		N	600	5	7	7/12/2013	200	7/17/2013	5.4	N	N		
N		N	600	4	7	1/29/2014	200	4/19/2014	7.8	N	N		
N		N	500	4	2	3/17/2014	200	1/9/2014	5.7	N	N		
N		N	500	4	-	-	-	-	-	N	N		
Y		Y	300	4	10	3/25/2014	400	7/11/2010	5.8	N	N		

Trust in, and value from, information systems

Glucose Test Strip Utilization

TOP PATIENT BY TOTAL QUANTITY

MRN	PATIENT NAME	PART D	TOTAL GTS	AVG GTS PER DAY	AVG LANCETS PER DAY	LAST LANCET	QTY LAST LANCET	LAST HGA1C DATE	LAST HGA1C RESULTS	TYPE 1 DM	INS. PUMP	PCP NAME	PCP MCA
	Person of Interest	N	18,800	62	13	1/23/2014	400	10/2/2013	10.0	N	N		
		N	12,300	32	15	5/22/2014	400	3/12/2014	8.2	Y	N		
		N	10,400	33	10	3/24/2014	800	5/22/2013	11.7	N	N		
		N	9,100	25	6	2/26/2014	600	6/22/2010	9.9	Y	N		
						-	-	3/17/2014	8.9	Y	Y		
						2/9/2014	400	4/14/2014	7.5	Y	Y		
						4/30/2014	400	3/10/2014	8.8	N	N		
						1/22/2014	200	5/8/2014	10.1	N	N		
		N	7,700	21	13	10/7/2013	400	3/13/2014	6.0	Y	N		
		N	7,600	27	11	5/20/2014	700	1/24/2014	6.5	N	Y		
		N	7,600	20	-	2/1/2013	600	4/26/2014	10.0	Y	Y		
		N	7,500	25	-	9/26/2012	100	3/3/2014	7.3	Y	N		
		N	7,400	19	-	-	-	5/20/2014	15.2	N	N		
		N	7,300	19	-	-	-	2/10/2014	5.8	Y	N		
		N	7,200	28	-	-	-	2/11/2014	5.7	Y	Y		

- 188 boxes in 12 Months
 - Roughly 15.5 boxes a month

Average Glucose Test Strip Per Day

TOP PATIENT BY AVERAGE GTS PER DAY

MRN	PATIENT NAME	PART D	AVG GTS PER DAY	TOTAL GTS	AVG LANCETS PER DAY	LAST LANCET	QTY LAST LANCET	LAST HGA1C DATE	LAST HGA1C RESULTS	TYPE 1 DM	INS. PUMP	PCP NAME	PCP MCA
	Person of Interest	N	62	18,800	13	1/23/2014	400	10/2/2013	10.0	N	N		
		N	33	10,400	10	3/24/2014	800	5/22/2013	11.7	N	N		
		N	32	12,300	15	5/22/2014	400	3/12/2014	8.2	Y	N		
									9.9	Y	Y		
									5.2	N	N		
									5.7	Y	Y		
		N	28	5,500	14	5/12/2014	1,000	11/13/2012	11.2	Y	Y		
		N	27	7,600	11	5/20/2014	700	1/24/2014	6.5	N	Y		
		N	25	9,100	6	2/26/2014	600	6/22/2010	9.9	Y	N		
		N	25	7,500	-	9/26/2012	100	3/3/2014	7.3	Y	N		
		N	25	7,200	-	-	-	1/8/2014	6.0	Y	Y		
		N	25	2,600	15	3/2/2014	200	2/13/2014	15.7	Y	N		
		N	24	7,200	4	4/20/2014	400	10/23/2010	7.1	Y	Y		
		N	24	4,600	8	2/17/2014	400	10/28/2013	11.3	Y	N		
		Y	24	2,400	-	-	-	3/28/2014	5.8	Y	N		

-Patient Test their blood sugar 62 times a day on average
 - 2.5 times per hour (never sleeping)

The Investigation

Interviewed primary care physician (PCP)

Recommendation was to test three times per day

Filled prescription monthly for 400 strips with 3-4 refills

When interviewed and told how many strips patient received, PCP stated that patient must be selling them

Patient Interview



Patient checks kp.org account for when refills are available

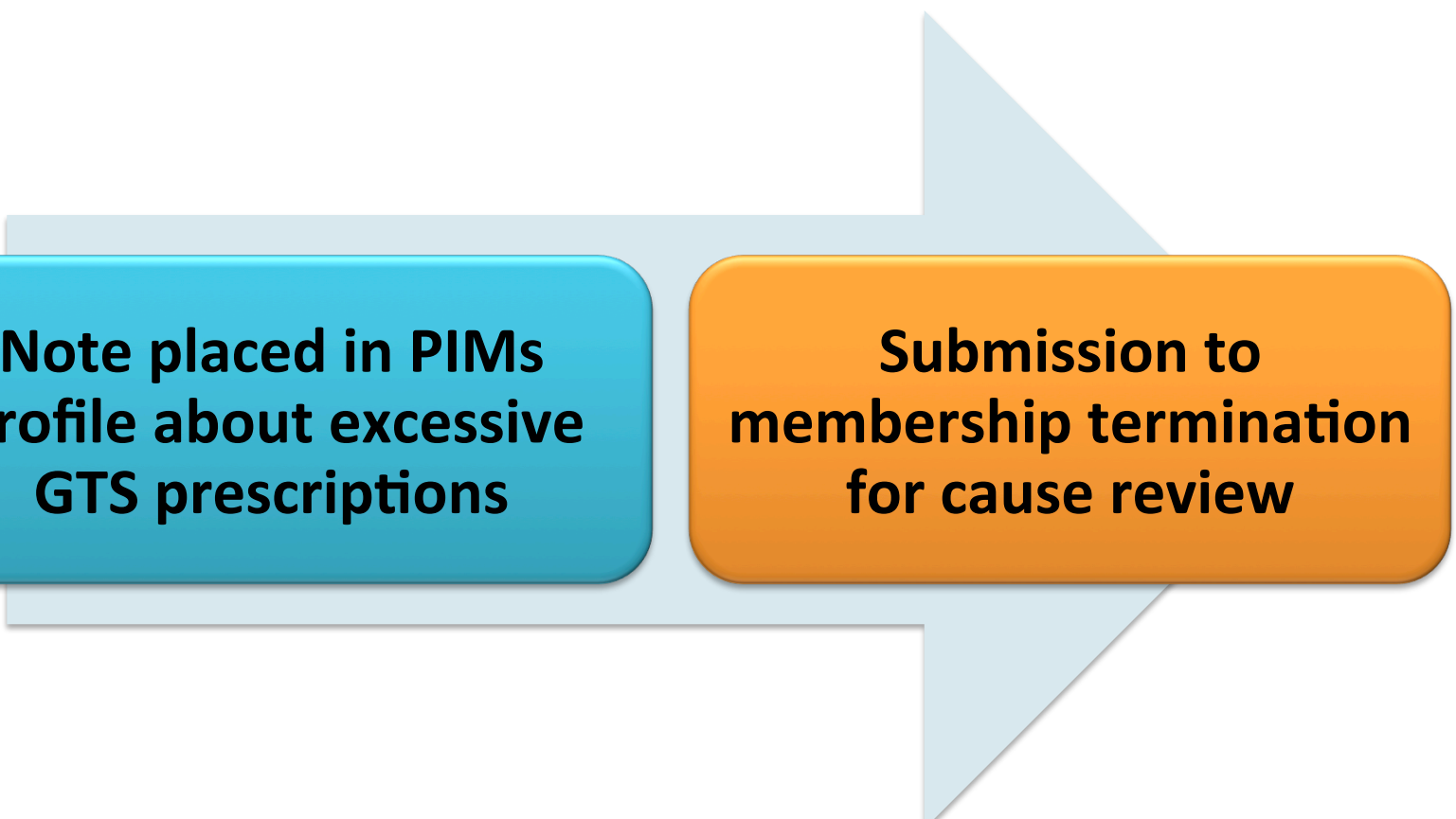


Admitted to filling prescriptions every couple of days



Patient admitted to selling 14,000 strips on eBay with proceeds of about \$10,000

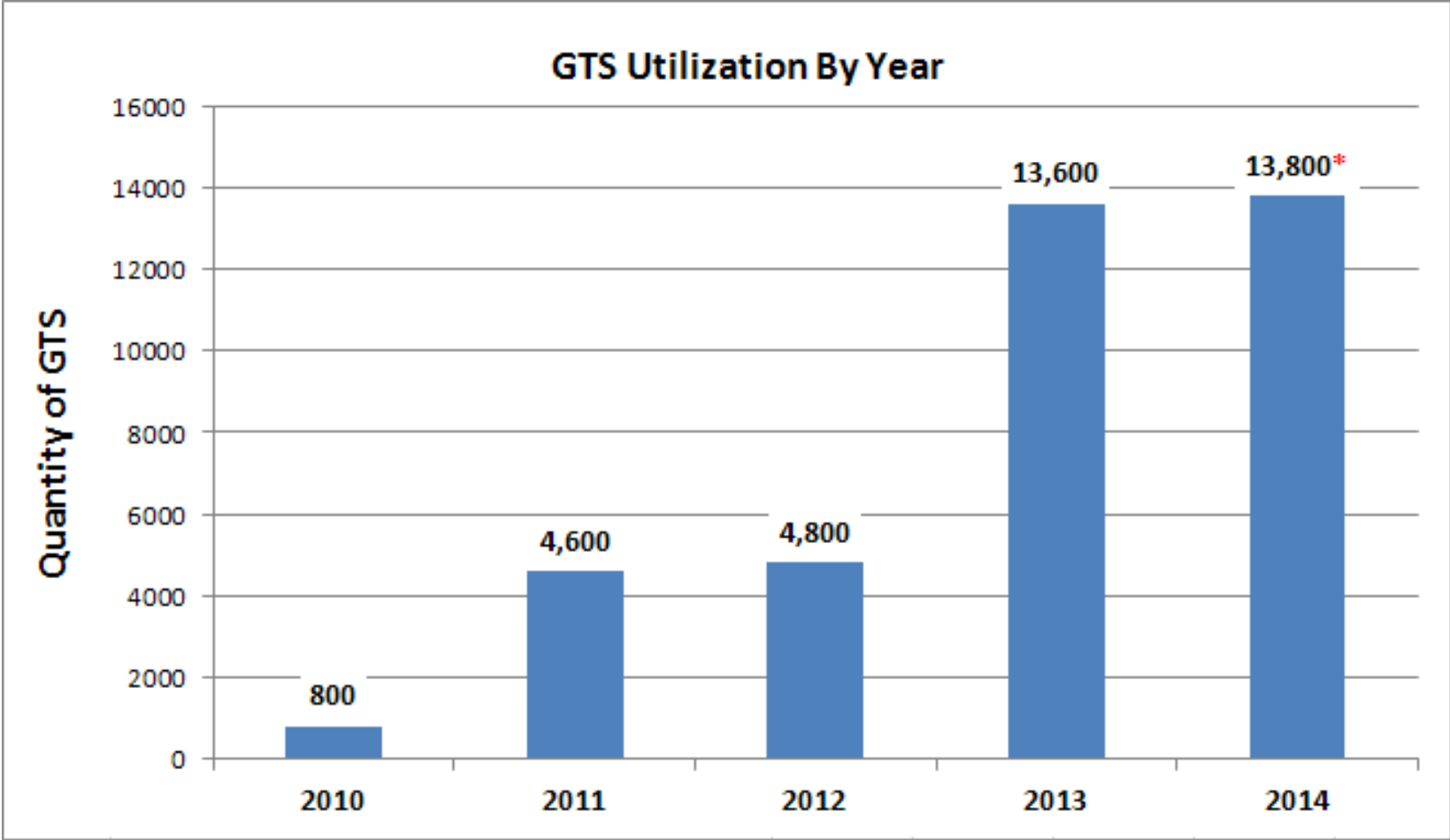
Corrective Action Plan



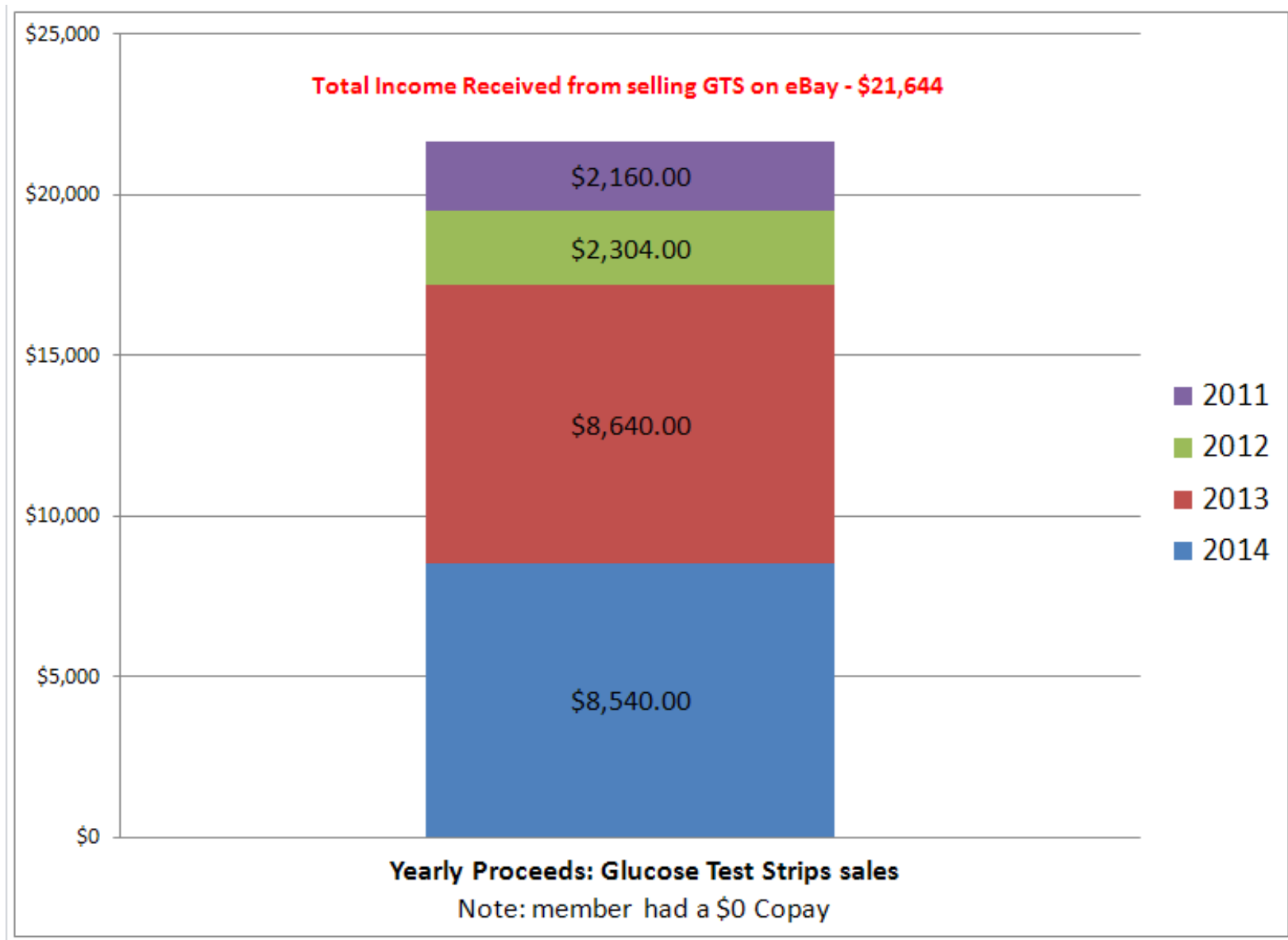
**Note placed in PIMs
profile about excessive
GTS prescriptions**

**Submission to
membership termination
for cause review**

Glucose Test Strip Utilization



Income Received from GTS Sales



Contacts:

- Jay.M.Loden@kp.org (661) 251-1102
- Tamara.L.Neiman@kp.org (408) 366-4554

Questions?

