

DENISE P. BALANAY 5526-0
Regulated Industries Complaints Office
Department of Commerce and Consumer Affairs
State of Hawaii
Leiopapa A Kamehameha Building
235 South Beretania Street, Suite 900
Honolulu, Hawaii 96813
Telephone: (808) 586-2660

Attorney for Department of Commerce
and Consumer Affairs

BOARD OF PHARMACY
DEPARTMENT OF COMMERCE AND CONSUMER AFFAIRS
STATE OF HAWAII

In the Matter of the Miscellaneous Permit of) PHA 2012-4-L
)
AETNA SPECIALTY PHARMACY, LLC,)
)
Respondent.)
)
)
)
)
)

248042211

SETTLEMENT AGREEMENT PRIOR TO FILING OF PETITION
FOR DISCIPLINARY ACTION AND BOARD'S FINAL ORDER

Petitioner, DEPARTMENT OF COMMERCE AND CONSUMER AFFAIRS'
REGULATED INDUSTRIES COMPLAINTS OFFICE (hereinafter "RICO" or "Petitioner"),
through its undersigned attorney(s), and Respondent AETNA SPECIALTY PHARMACY, LLC
(hereinafter "Respondent"), enter into this Settlement Agreement on the terms and conditions set
forth below.

A. UNCONTESTED FACTS

1. At all relevant times herein, Respondent was permitted by the Board of Pharmacy
(hereinafter the "Board") as a pharmacy under Miscellaneous Permit Number PMP 411. The

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AND CONSUMER AFFAIRS
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REGULATED INDUSTRIES COMPLAINTS OFFICE

permit was issued on or about February 7, 2005. The permit will forfeit or expire on or about December 31, 2013.

2. Respondent's mailing address for purposes of this action is 503 Sunport Lane, Orlando, Florida 32809.

3. RICO received a complaint alleging that, on or about January 17, 2011, Respondent entered in to a Consent Agreement with the Alaska Board of Pharmacy relating to allegations that Respondent failed to disclose disciplinary actions taken against one of its pharmacists ("Alaska Order"). Pursuant to the Alaska Order, Respondent's Alaska pharmacy permit was placed on probation for three years and it was required to pay a \$10,000 fine and comply with a Corrective Plan. The Alaska Order is attached hereto as Exhibit "1."

4. RICO alleges that the Alaska Order constitutes disciplinary action taken in another jurisdiction.

5. The foregoing allegations, if proven at an administrative hearing before the Board, would constitute violations of the following statute(s) and/or rule(s): Hawaii Revised Statutes ("HRS") § 436B-19(13) (disciplinary action taken in another jurisdiction).

6. The Board has jurisdiction over the subject matter herein and over the parties hereto.

B. REPRESENTATIONS BY RESPONDENT:

1. Respondent is fully aware that Respondent has the right to be represented by an attorney and voluntarily waives that right.

2. Respondent enters into this Settlement Agreement freely, knowingly, voluntarily, and under no coercion or duress.

3. Respondent is aware of the right to have a hearing to adjudicate the issues in the case. Pursuant to HRS § 91-9(d), Respondent freely, knowingly, and voluntarily waives the right to a hearing and agrees to dispose of this case in accordance with the terms and conditions of this Settlement Agreement.

4. Respondent being at all times relevant herein permitted as a pharmacy by the Board acknowledges that Respondent is subject to penalties including but not limited to, revocation, suspension or limitation of the permit and administrative fines, if the foregoing allegations are proven at hearing.

5. Respondent does not admit to violating any law or rule, but acknowledges that RICO has sufficient cause to file a Petition for Disciplinary Action against Respondent's permit.

6. Respondent enters into this Settlement Agreement as a compromise of the claims and to conserve on the expenses of proceeding with an administrative hearing on this matter.

7. Respondent agrees that this Settlement Agreement is intended to resolve the issues raised in RICO's investigation in RICO Case No. PHA 2012-4-L.

8. Respondent understands that this Settlement Agreement may be subject to reporting requirements.

9. Respondent understands this Settlement Agreement is public record pursuant to Hawaii Revised Statutes chapter 92F.

C. TERMS OF SETTLEMENT:

1. Administrative Fine. Respondent agrees to pay a fine in the amount of ONE THOUSAND AND NO/100 DOLLARS (\$1,000.00). Payment shall be made by **cashier's check or money order made payable to "DCCA - Compliance Resolution Fund"** and mailed to the Regulated Industries Complaints Office, Attn: Denise P. Balanay Esq., 235 S. Beretania Street,

9th Floor, Honolulu, Hawaii 96813. Payment of the fine shall be due at the time this Settlement Agreement is returned to RICO.

2. Compliance with Alaska Order. Respondent shall comply with any and all terms in the Alaska Order. Respondent shall notify the Board in writing of any finding of noncompliance within ten (10) days of said finding.

3. Failure to Comply with Settlement Agreement. If Respondent fails to fully and timely comply with the terms of this Settlement Agreement as set forth in paragraph(s) C.1 and C.2 above, Respondent's permit shall be automatically revoked upon RICO's filing of an affidavit with the Board attesting to such failure. In case of such revocation, Respondent shall turn in all indicia of the permit to the Executive Officer of the Board within ten (10) days after receipt of notice of the revocation. In case of such revocation, Respondent understands Respondent cannot apply for a new permit until the expiration of at least five (5) years after the effective date of the revocation. Respondent understands that if Respondent desires to become permitted again, Respondent must apply to the Board for a new permit pursuant to and subject to HRS §§ 92-17, 436B-21, and all other applicable laws and rules in effect at the time.

4. Possible Further Sanction. The Board, at its discretion, may pursue additional disciplinary action as provided by law to include further fines and other sanctions as the Board may deem appropriate if Respondent violates any provision of the statutes or rules governing the conduct of pharmacies in the State of Hawaii, or if Respondent fails to abide by the terms of this Settlement Agreement.

5. Approval of the Board. Respondent agrees that, except for the representations, agreements and covenants contained in Paragraphs C.6, C.7, C.8 and C.9 below, this Settlement Agreement shall not be binding on any of the parties unless and until it is approved by the Board.

6. No Objection if Board Fails to Approve. If the Board does not approve this Settlement Agreement, does not issue an order pursuant thereto, or does not approve a lesser remedy, but instead an administrative hearing is conducted against Respondent in the Board's usual and customary fashion pursuant to the Administrative Procedure Act, Respondent agrees that neither Respondent nor any attorney that Respondent may retain, will raise as an objection in any administrative proceeding or in any judicial action, to the Board's proceeding against Respondent on the basis that the Board has become disqualified to consider the case because of its review and consideration of this Settlement Agreement.

7. Any Ambiguities Shall be Construed to Protect the Consuming Public. It is agreed that any ambiguity in this Settlement Agreement is to be read in the manner that most completely protects the interests of the consuming public.

8. No Reliance on Representations by RICO. Other than the matters specifically stated in this Settlement Agreement, neither RICO nor anyone acting on its behalf has made any representation of fact, opinion or promise to Respondent to induce entry into this Settlement Agreement, and Respondent is not relying upon any statement, representation or opinion or promise made by RICO or any of its agents, employees, representatives or attorneys concerning the nature, extent or duration of exposure to legal liability arising from the subject matter of this Settlement Agreement or concerning any other matter.

9. Complete Agreement. This Settlement Agreement is a complete settlement of the rights, responsibilities and liabilities of the parties hereto with respect to the subject matter hereof; contains the entire agreement of the parties; and may only be modified, changed or amended by written instrument duly executed by all parties hereto.

IN WITNESS WHEREOF, the parties have signed this Settlement Agreement on the date(s) set forth below.

DATED: Orlando, FL, July 17, 2013.
(City) (State) (Date)

AETNA SPECIALTY PHARMACY, LLC

By: Harry J. Travis
Its General Manager

DATED: Honolulu, Hawaii, JUL 26 2013

Denise P. Balanay

DENISE P. BALANAY
Attorney for Department of Commerce
and Consumer Affairs

IN THE MATTER OF THE MISCELLANEOUS PERMIT OF AETNA SPECIALTY PHARMACY, LLC; SETTLEMENT AGREEMENT PRIOR TO FILING OF PETITION FOR DISCIPLINARY ACTION AND BOARD'S FINAL ORDER; CASE NO(S). PHA 2012-4-L

APPROVED AND SO ORDERED:
BOARD OF PHARMACY
STATE OF HAWAII



JILL OLIVEIRA GRAY

8/15/13

DATE



TODD INAFUKU



MARY JO KEEFFE

LYDIA KUMASAKA

GARRET A. LAU



CAROLYN S. J. MA



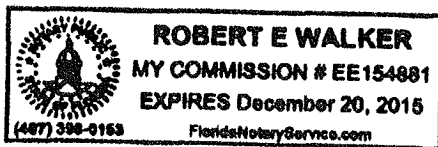
KERRI OKAMURA

PVL 06/13

STATE OF Florida)
) SS.
COUNTY OF ORANGE)

On this 17th day of July, 2013, before me personally appeared Harry J. Travis, to me known to be the person described, and who executed the foregoing instrument on behalf of AETNA SPECIALTY PHARMACY, LLC, as its General Manager, and acknowledged that he/she executed the same as his/her free act and deed.

This _____-page _____ document dated _____, 2013 was acknowledged before me by _____ this 17th day of July, 2013, in the City of Orlando, in the County of Orange, in the State of Florida.



Robert Walker
Name: Robert Walker
Notary Public, State of Florida
My Commission expires: 12/20/2015

1 STATE OF ALASKA
2 DEPARTMENT OF COMMERCE, COMMUNITY AND ECONOMIC DEVELOPMENT
3 DIVISION OF CORPORATIONS, BUSINESS AND PROFESSIONAL LICENSING
4 BEFORE THE ALASKA BOARD OF PHARMACY

5
6 In the Matter of:)
7)
8 Aetna Specialty Pharmacy, LLC)
9)
10 Respondent)
11 Case No. 2010-000673

12 CONSENT AGREEMENT

13
14 IT IS HEREBY AGREED by the Department of Commerce, Community and Economic
15 Development, Division of Corporations, Business and Professional Licensing (Division) and
16 Aetna Specialty Pharmacy, LLC (Respondent) as follows:

17 1) **Licensure.** Respondent is currently licensed as an Out-of-State Pharmacy in the
18 State of Alaska, and holds License number 653. This license was first issued on May 18, 2005
19 and lapsed on June 30, 2010. Respondent applied for license renewal on June 2, 2010.

20 2) **Admission/Jurisdiction.** Respondent admits and agrees that the Board of
21 Pharmacy (Board) has jurisdiction over the subject matter of its license in Alaska and over this
22 Consent Agreement.

23 3) **Admission/Facts.** Respondent admits to the following facts:

24 a) Until recently Aetna has held an out of state pharmacy registration (AS 08.80.158)
25 in Alaska. On their Biennial Out of State License Renewal Application for 7/1/2010-6/30/2012,
26 Aetna answered yes to the question, "since the date the facility license was last issued, has the
27 owner or any partner, corporate officer, the pharmacist in charge or any employee....had any
28 license denied, revoked, suspended, placed on probation, or been the subject of any restriction,
29 censure, reprimand or other disciplinary action in any jurisdiction?"

30 b) Aetna provided the following explanation for the "yes" answer: A pharmacist
31 employed with Aetna was disciplined by the Florida Board of Pharmacy for filling a prescription
32 with the wrong drug. Afterwards, the New Jersey Division of Medical Assistance denied Aetna
33 application to participate in the program because Aetna did not disclose on its application the
34 disciplinary action in Florida.

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CONSENT AGREEMENT
AETNA SPECIALTY PHARMACY
CASE #2010000673
Page 1

State of Alaska
Department of Commerce, Community and Economic Development
Division of Corporations, Business and Professional Licensing
550 West 7th Avenue, Suite 1200
Anchorage, Alaska 99501-3567
Telephone: 907-269-8100 Fax: 907-269-8195

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EXHIBIT 1

DEPT OF COMMERCE
& CONSUMER AFFAIRS
STATE OF ALASKA

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LICENSING DIVISION

State of Alaska
Department of Commerce, Community and Economic Development
Division of Corporations, Business and Professional Licensing
350 West 7th Avenue, Suite 1500
Anchorage, Alaska 99501-5567
Telephone 907-269-8100 Fax 907-269-8195

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1 c) Aetna answered no to the other 7 professional fitness questions, including question
2 4 that asks, "since the date the facility license was last issued, has the owner or any partner,
3 corporate officer, the pharmacist in charge or any employee: furnished false or fraudulent material
4 in an application in connection with drug or device manufacturing or distribution?"

5 d) Aetna should have answered "yes" to question 4 because between June 6, 2008
6 when Actna's out of state registration was last issued and May 27, 2010 when an Aetna
7 representative signed the renewal application, Aetna submitted a Medicaid enrollment application
8 to the New Jersey Division of Medical Assistance and Health Services on which it falsely
9 answered a question asking whether certain agents had been the subject of licensing suspension,
10 revocation or adverse licensing action, even though one of its pharmacists had been disciplined by
11 Florida. As a result, New Jersey denied Aetna the requested license on the grounds it had
12 submitted a false application.

13 e) Aetna was denied their license renewal by the Alaska Board of Pharmacy on
14 October 8, 2010. Aetna requested an administrative hearing to appeal the denial on October 19,
15 2010. The request was timely filed.

16 Respondent admits that as a result of the above facts, grounds exist for the denial of the
17 renewal of Respondent's Alaska license, or for the imposition of disciplinary sanctions,
18 pursuant to AS 08.80.157(h)(1), AS 08.80.261(a)(1) and 12 ACC 52.920(a)(13).

19 4) **Formal Hearing Process.** It is the intent of the parties to this Consent
20 Agreement to provide for the compromise and settlement of all issues that were raised by or in an
21 accusation to revoke, suspend, or impose disciplinary sanctions against Respondent's license
22 through a formal hearing process.

23 5) **Waiver of Rights.** Respondent understands it has the right to consult with an
24 attorney of its own choosing and has a right to an administrative hearing on the facts in this case.
25 Respondent understands and agrees that by signing this Consent Agreement, Respondent is
26 waiving its rights to counsel and to a hearing. Further, Respondent understands and agrees that it
27 is relieving the Division of any burden it has of proving the facts admitted above. Respondent
28 further understands and agrees that by signing this Consent Agreement it is voluntarily and
29 knowingly giving up its right to present oral and documentary evidence, to present rebuttal
30 evidence, to cross-examine witnesses against Respondent, and to appeal the Board's decision to
31 Superior Court.

CONSENT AGREEMENT
AETNA SPECIALTY PHARMACY
CASE #2010-000673
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State of Alaska
Department of Commerce, Community and Economic Development
Division of Corporations, Business and Professional Licensing
541 West 7th Avenue, Suite 1500
Anchorage, Alaska 99517-2567
Telephone 907-269-8160 Fax 907-269-8195

1 6) **Effect of Nonacceptance of Consent Agreement.** Respondent and the Division
2 agree that this Consent Agreement is subject to the approval of the Board. They agree that, if the
3 Board rejects this Consent Agreement, it will not constitute a waiver of Respondent's right to a
4 hearing and the admissions contained herein will be void and have no effect. Respondent agrees
5 that if the Board rejects this Consent Agreement, the Board may decide the matter after a hearing,
6 and its consideration of this Consent Agreement shall not alone be grounds for claiming that the
7 Board is biased against Respondent, that it cannot fairly decide the case, or that it has received *ex*
8 *parte* communication.

9 7) **Consent Agreement, Decision, and Order.** Respondent agrees that the Board
10 has the authority to enter into this Consent Agreement and to issue the following Decision and
11 Order.

12 **PROPOSED DECISION AND ORDER**

13
14 **IT IS HEREBY ORDERED** that renewal of license to the Respondent for the period from
15 7/1/2010-6/30/2012 will be deferred until May 1, 2011. This license shall be subject to the
16 following terms and conditions of license probation.

17 **A. Duration of Probation**

18 Respondent's license shall be on probation for three (3) years from May 1, 2011 to May 1,
19 2014. If Respondent fully complies with all of the terms and conditions of this license probation,
20 the probationary period will end as conditioned under this Order.

21 Respondent shall carry out the Corrective Plan, attached as exhibit "A" to this agreement,
22 and file progress reports as required by the plan.

23 Respondent must keep the Board apprised of any adverse licensure action taken against it
24 in any state or jurisdiction where it does business. A notice to the Board must be submitted
25 within 30 days of the adverse action.

26 Respondent must also comply with all laws pertaining to its license in this state or any
27 other state. To provide assurance of such compliance, Respondent must submit a correction plan
28 for approval by the Board which requires Respondent to submit quarterly reports on compliance
29 with all applicable Alaska laws and regulations concerning the transfer, procurement, dispensing,
30 compounding and distribution of drugs and controlled substances.

CONSENT AGREEMENT
AETHA SPECIALTY PHARMACY
CASE #0010-016071
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Department of Commerce, Community and Economic Development
Division of Corporations, Business and Professional Licensing
550 West 7th Avenue, Suite 1500
Anchorage, Alaska 99501-3567
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B. Civil Fine

Respondent shall pay a fine of \$10,000 in cash, certified check, or money order payable to the "State of Alaska" within ninety (90) days after this Consent Agreement is accepted by the Board.

All payments required by this Consent Agreement shall be addressed to:

Quinten D. Warren, Chief Investigator
Division of Corporations, Business and Professional Licensing
550 West 7th Avenue, Suite 1500
Anchorage, Alaska 99501-3567

C. Violation of Agreement

If Respondent fails to comply with any term or condition of this Consent Agreement, the Division may enforce this agreement by immediately suspending Respondent's license, without an additional order from the Board or without a prior hearing.

If Respondent's license is suspended under this paragraph, as provided above, Respondent will be entitled to a hearing regarding the issue of the suspension. If Respondent's license is suspended, it will continue to be responsible for all license requirements pursuant to AS 08.80.

D. Good Faith.

All parties agree to act in good faith in carrying out the stated intentions of this Consent Agreement.

E. Address of the Board

All required reports or other communication concerning compliance with this Consent Agreement shall be addressed to:

Investigator Gary Keiser
Division of Corporations, Business and Professional Licensing
550 West 7th Avenue, Suite 1500
Anchorage, Alaska 99501-3567
(907) 269-0168 Fax (907) 269-8195

IT IS HEREBY FURTHER ORDERED that this Adopted Decision and Order shall take effect immediately upon its adoption by the BOARD and is a public record of the BOARD and the State of Alaska. The state may provide a copy of it to any person or entity.

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DEPT OF COMMERCE
& CONSUMER AFFAIRS
STATE OF ALASKA

1 DATED this 13th day of JANUARY, 2010 at ANCHORAGE

2 Alaska.

3 SUSAN K. BELL, COMMISSIONER

4
5 By: [Signature]
6
7 Quintel D. Warren, Chief Investigator for
8 Don Habeger, Director
9 Division of Corporations, Business and
10 Professional Licensing

11 QDW

12 I, DAVID JESSE, a person with authority to enter into this Consent Agreement on
13 behalf of Aetna Specialty Pharmacy, LLC, have read the Consent Agreement, understand it, and
14 agree, on behalf of Aetna Specialty Pharmacy LLC to be bound by its terms and conditions.

15 DATED: 1-13-11 David Jesse

16 State of Florida
17 County of ORANGE

18 Sworn to (or affirmed) and subscribed before me this 13 day of
19 January, 2011, at 503 Sunport Lane, Orlando,

20 Florida by DAVID JESSE

21 SEAL A. Sabala
22 Notary Public -- State of Florida
23 AMERICA SABALA
24 MY COMMISSION # DD797191
25 EXPIRES June 12, 2012
26 (407) 398-0153 FloridaNotaryService.com
27 Print, Type, or Stamp Commissioned
28 Name of Notary Public

29 Personally Known X OR Produced Identification _____

30 State of Alaska
31 Department of Commerce, Community and Economic Development
32 Division of Corporations, Business and Professional Licensing
33 540 West 7th Avenue, Suite 1504
34 Anchorage, Alaska 99501-5567
35 Telephone: 907-269-8160 Fax: 907-269-8195

36 CONSENT AGREEMENT
AETNA SPECIALTY PHARMACY
CASE #2010-010473
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Division of Corporations, Business
and Professional Licensing

STATE OF ALASKA
DEPARTMENT OF COMMERCE, COMMUNITY AND ECONOMIC DEVELOPMENT
DIVISION OF CORPORATIONS, BUSINESS AND PROFESSIONAL LICENSING
BEFORE THE BOARD OF PHARMACY

In the Matter of:)
)
Actna Specialty Pharmacy, LLC.)
)
Respondent)
Case No. 2010-000673

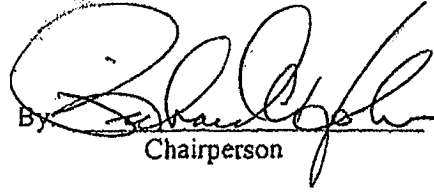
ORDER

The Board of Pharmacy for the State of Alaska, having examined the Consent Agreement and Proposed Decision and Order, hereby adopts the Consent Agreement and Decision and Order in this matter.

The Division may enforce the Consent Agreement by immediately suspending Respondent's license, without an additional order from the Board and without a prior hearing, for a violation of the Consent Agreement.

DATED this 17th day of January, 2011, at
North Pole, Alaska.

BOARD OF PHARMACY

By 
Chairperson

State of Alaska
Department of Commerce, Community and Economic Development
Division of Corporations, Business and Professional Licensing
550 West 7th Avenue, Suite 1500
Anchorage, Alaska 99501-3567
Telephone 907-269-8100 Fax 907-269-8195

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EXHIBIT A
AETNA SPECIALTY PHARMACY, LLC
Corrective Action Plan:
Reporting Pharmacist Disciplines

<i>Action</i>	<i>Resulting Activity</i>	<i>Responsible Area</i>	<i>Due Date/Frequency</i>
1. Retro active review of responses on current pharmacy license renewal for Aetna pharmacies to verify all questions are answered correctly and disciplines reported where appropriate.	Conduct survey with employed pharmacists for statements on disciplinary actions in the last 12 months	PIC	
	Send notice or correction where appropriate	P&RA Licensing Team	12/31/2010
2. Establish process for review of each new staff pharmacist at hire	a. Interview pharmacist about any disciplines	PIC	At hire
	b. Check resident state BOP website	P&RA Licensing Team	Monthly
	c. Report findings to interested Boards of Pharmacy	P&RA Licensing Team	Monthly
3. Establish process for check of all staff pharmacist on an annual basis	Conduct survey with employed pharmacists for statements on disciplinary actions in the last 12 months	PIC	Annually
	Review information on BOP website for each staff pharmacist	PIC	

12/08/2011

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 STATE OF HAWAII

EXHIBIT A
AETNA SPECIALTY PHARMACY, LLC
Corrective Action Plan:
Reporting Pharmacist Disciplines

4. Do regulatory reporting of new disciplines outside of renewal reporting	a. Develop checklist of state reporting requirements for reporting of pharmacist disciplines.	Business Compliance Manager	12/31/2010
	b. Have checklist reviewed for updates annually	Business Compliance Manager	Annually
	c. Report disciplines as required	P&RA Licensing Team	As needed
	d. Report results to interested Boards of Pharmacy	P&RA Licensing Team	Monthly
5. Demonstrate compliance with all applicable Alaska laws and regulations concerning the transfer, procurement, dispensing, compounding and distribution of drugs and controlled substances.	Provide reporting of this Corrective Action Plan to Alaska Board of Pharmacy and Division of Corporations, Business and Professional Licensing ("Division")	Business Compliance Manager with assistance from P&RA Licensing Team	Quarterly (to the attention of Investigator Gary Keiser of the Division)

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