Executive Summary Controlled Substance Accountability Practice Direction

Controlled Substance Accountability Practice Direction

Section	Overview
Access, Accountability, and Supervision	Limits controlled substance access to only when a pharmacist is physically present. Sets supervision and accountability requirements.
Security and Storage	Establishes minimum security requirements set out by the Pharmacy Facilities Practice Direction. Identifies where controlled substances must be stored.
Ordering Controlled Substances	Sets ordering requirements.
Receiving Controlled Substances	Sets requirements for receiving and acquisition documentation.
Perpetual Inventory	Clearly requires a perpetual inventory for all controlled substances (currently the Drug Distribution and Storage Practice Direction only applies to M3P drugs, which does not align federal requirements). Applies to patient returns and expired drugs, which strengthens federal requirements, as this is an area at risk for diversion. Sets new requirements for manual inventory adjustments, as this is an area that is at risk for diversion.
Physical Inventory and Reconciliation	Establishes quarterly counts and reconciliation to all controlled substances including patient returns and expired pharmacy inventory (currently the requirement in the Drug Distribution and Storage Practice Direction only applies to M3P drugs and patient returned or expired CDSA drugs which does not align with federal expectations).
Investigating and Responding to Inventory Discrepancies	Establishes requirements for responding to an inventory discrepancy.
Reporting Loss or Theft	Establishes minimum reporting requirements when loss or theft is identified.
Controlled Substance Sales	Establishes a required review of controlled substance sales. This helps to detect internal diversion.

Disposal of Controlled Substances, disposal by local destruction and sending to a licenced dealer for disposal.	Establishes minimum disposal requirements. This applies to patient returns as well as pharmacy inventory, which strengths federal legislation, as this is an area at risk for diversion.

Executive Summary Amendments to Existing Practice Directions

Practice Direction/Guideline	**Overview**
Narcotic and Controlled Drugs Accountability Guideline	This guideline will be retired and replaced by the Controlled Substance Accountability Practice Direction.
Drug Distribution and Storage Practice Direction	Sections 2.1.1 and 2.3.2 is repealed. Section 2.6.6 (delivery) is amended to comply with federal requirements and clarify expectations for maintaining security and cold chain.
Pharmacy Facilities Practice Direction	Section 2.2.8 is amended to outlined specific minimum physical security measures. Section 2.2.15 is amended to remove duplication with the Controlled Substance Accountability Practice Direction.
Practice Direction: Permanent and Temporary Pharmacy Closures	Section 2.2 is amended to remove the clause that prohibits the transfer of controlled substance prescriptions when a pharmacy is closing. References to narcotic and controlled drugs in section 2.3 are amended to controlled substances so narcotics, controlled drugs and targeted substances are included.
Practice Direction: Refill History Recording System	Section 1.1 is amended to exclude targeted substances from the practice direction. With the new Controlled Substances Regulations targeted substance prescriptions must be filled separately with narcotic and controlled drugs. Section 2.1.1.2 is repealed to remove the one-year expiry for targeted substance refills.
Practice Direction: Exempted Codeine Preparations	Terminology and regulatory references have been updated to reflect the Controlled Substances Regulations.

	A definition for low dose codeine products has been added. The practice direction title has been updated.
Transfer of Patient Care	Section 2.3 has been amended to add prescription number to the required prescription transfer information. Section 2.4 was added to reference the controlled substances regulation requirements for controlled substance transfers.