



College of Pharmacists of Manitoba

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NARCOTIC & CONTROLLED DRUG ACCOUNTABILITY GUIDELINES

Goal: To establish self-monitoring procedures for pharmacy managers, which will provide accountability for narcotic and controlled drug transactions, detect drug diversion, and deter pilferage.

Required Procedures:

The specific drugs included shall be all products covered under the Manitoba Prescribing Practices Program (M3P) previously known as the triplicate prescription program, and other such drugs as determined by Council and the College of Physicians and Surgeons.

Perpetual Inventory Records

Either manual count sheets or the equivalent in computer software may be used. Each pharmacy will establish a start count by completing a full physical count.

Received quantities (including medication dispensed, but not picked-up and returns from personal care home to the contract provider for re-dispensing) will be added to the start count, and dispensed drug will be subtracted from the total.

Physical Inventory Counts

Each pharmacy manager will be responsible for completing and recording a physical count of these drugs at least once every three months.

The records of stock on hand will be compared with the net count from the perpetual inventory sheets, and, any discrepancies are to be investigated by the pharmacy manager where it would be deemed prudent to do so.

Expired Narcotics and Patient Returns for destruction

As there is often a time lag between when the drug expired or is returned for disposal, and the actual destruction, each pharmacy must maintain an inventory count of these drugs until the time of destruction.

The pharmacy manager will be responsible for completing and recording a physical count of these drugs at least once every three months. The inventory records of expired and returned narcotics and controlled drugs stock shall include the date of entry into the expired narcotic inventory and quantity of the drug. A physical inventory count will compare the stock on hand with the count from the expired and returned narcotics and controlled drugs inventory sheet. Any discrepancies are to be investigated by the pharmacy manager.

By tracking expired and returned narcotic and controlled drugs inventory, diversion of these medications by pharmacy staff can be prevented.

Change of Manager Inventory Count

Every change of pharmacy manager, resulting in the re-issuing of a pharmacy license, will require an additional physical count of these drugs by both the departing manager and the new manager. The signature of each manager shall be recorded on the count documents, which shall be retained for five years.

Reporting Discrepancies

Should discrepancies be identified during inventory counts, the manager shall record the incident on an “incident report” and keep a record at the pharmacy.

The manager shall initiate the necessary steps to identify the cause of the shortage, the responsible staff person and the initiate corrective actions. Significant shortages or diversion incidents must be reported to the CPhM and Health Canada.

Other Policies:

Patient reports of shortages on individual prescriptions.

Where a patient reports a shortage in their prescription, the inventory control system would verify or refute the shortage.

If the prescription is redispensed, documentation of the date, time and reason for redispensing shall be noted on the prescription and

cosigned by the manager and, except in sole practice situations, one other pharmacist.

Breakage of “Controlled Substance”

When a breakage occurs, a report shall be filed on the pharmacy records of perpetual inventory, as a negative quantity.

Documentation of the date, time and place of breakage could be co-signed by the manager and, except in sole practice situations, one other pharmacist.

Disposal

Health Canada does not require the pharmacy to obtain permission from the Office of Controlled Substances to destroy narcotic and controlled drugs. The pharmacist can proceed with destruction of expired and returned narcotic and controlled drugs without contacting Health Canada for approval. The pharmacy must keep a record of the narcotic and controlled drugs that are destroyed and the records must be kept for a period of 5 years.

There are two options for the destruction of the narcotic and controlled drugs. The first option is to destroy the drugs by altering or denaturing the drug such that consumption becomes impossible or improbable. The destruction of the narcotic and controlled drugs must be carried out in the presence of two health professionals. Health care professionals include: pharmacists, practitioners, nurses, pharmacy interns and regulated pharmacy technicians. The following information must be recorded:

1. Name, strength and quantity of the drug.
2. Date of destruction.
3. Name of the two health care professionals witnessing the destruction

Another option for the destruction of narcotic and controlled drugs is to return them to a dealer who is licensed to destroy them. With this option, the pharmacist must request authorization from a licensed dealer to return the narcotic and controlled drugs to them. The pharmacist must then receive a written, signed order from the licensed dealer authorizing the return. The information must include the drug name, strength, and quantity of the drug to be returned. It must also indicate that the drug being provided to the licensed dealer is for the sole purpose of destruction.

Once the letter is received from the licensed dealer, the pharmacist can send the drugs to be destroyed to the licensed dealer for destruction. It is very important that the pharmacy keep a record of this authorization to return. The following information must be recorded:

1. Name, strength and quantity of drug
2. Name and address of the licensed dealer to whom the narcotic and/or controlled drugs were provided
3. The date it was provided
4. The name of the pharmacist requesting destruction
5. A copy of the authorization to return the narcotic or controlled drug

*Please see next page for Narcotics and Controlled Drugs
Perpetual Inventory Form*

NARCOTIC & CONTROLLED DRUG ACCOUNTABILITY GUIDELINES

NARCOTICS AND CONTROLLED DRUGS PERPETUAL INVENTORY FORM

DRUG NAME & STRENGTH: _____ DOSAGE FORM: _____ DATE: _____

| PURCHASES | | | PRESCRIPTIONS | | | STARTING INVENTORY OR BALANCE FORWARD | PHARMACIST'S SIGNATURE | |
|-----------|------------------|----------------------|---------------|----------------|---------------------------|---|---------------------------|--|
| Invoice # | Date Received | Quantity Received | Rx Number | Date Filled | Quantity Dispense d | Current Inventory | | |
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