



# Department of Pharmacy POLICY AND PROCEDURE

POLICY NUMBER: 915  
VERSION: 2

## SUBJECT: Purchase Records

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### PURPOSE:

Records of all pharmaceuticals purchased will be maintained in accordance with legal requirements.

### PROCEDURE:

- A. The pharmacy department will utilize the prime vendor according to agreement terms.
  1. Exceptions to this agreement include:
    - a. Lack of availability
    - b. Emergency situations
    - c. Direct manufacturer single source
    - d. IV solutions (separate contract)
- B. Monthly prime vendor reports will be maintained to audit pharmaceuticals ordered electronically.
- C. All purchases will be assigned a purchase order number which are tracked by log.
- D. The Pharmacy Director or designee will review and approve all purchase invoices before forwarding to Accounts Payable for processing.
- E. Copies of all purchase invoices will be maintained by the pharmacy department for at least three years. Invoices for DEA Schedule II medications will be filed separately from all other invoices.
- F. Drugs shall not be loaned or borrowed unless of an emergency and failure to borrow may result in treatment delay and failure for a specific patient.
  1. Drugs borrowed from a DHS LA County Pharmacy shall be documented on a U form (see HDRHC Pharmacy Policy and Procedure regarding Procurement of Medication)
  2. Drugs loaned or borrowed shall be recorded on a Loan/Borrow record.
  3. The drug loaned or borrowed will need to be replaced by the borrowing pharmacy as soon as possible and the record shall be completed to reflect the return.
    - a. If the identical product cannot be replaced, then another drug of equal value can be substituted if both parties agree.
  4. All product tracing information shall be submitted to the pharmacy who is borrowing or accepting a drug from the other pharmacy.

**Transaction records received by HDRHC Pharmacy shall be filed with purchase records.** Exception is for drugs borrowed for a specific patient need- see below. Product tracing information shall include:

    - a. Transaction Information
      - i. Name of product

- ii. Strength and dosage form
  - iii. NDC
  - iv. Container size
  - v. Number of Containers
  - vi. Lot number of the product
  - vii. Date of the transaction
  - viii. Date of the shipment
  - ix. Business name and address of the person from whom and to whom ownership is being transferred.
- b. Transaction History
    - i. Transaction information for each prior transaction going back to the manufacturer of the product
  - c. Transaction statement
    - i. A statement that the entity transferring has complied with each applicable subsection of FDCA Sec. 581(27)(A)-(G)
5. Product Tracing information is **not required** for transfers to fulfill a specific patient need. However a product transfer from one pharmacy to another for the purpose of increasing or replenishing stock in anticipation of a potential need is required. (i.e. when replenishing a borrowed drug, product tracing information is still required)

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Supersedes:	