



Department of Pharmacy POLICY AND PROCEDURE

POLICY NUMBER: 1405
VERSION: 1

SUBJECT: Reconciliation and Inventory Report of Controlled Substances

PURPOSE:

To establish guidelines and compliance regarding performing reconciliation and inventory functions to prevent the loss of controlled substances.

POLICY:

High Desert Regional Health Center Pharmacy shall comply with all Federal and State regulations in the management of controlled substances.

PROCEDURE:

1. PERFORM A PERIODIC INVENTORY:

- **Monthly** inventory of all controlled substances is to be performed by a pharmacist between the first and tenth day of each month.
- **Quarterly** physical inventory reconciliation report of all federal Schedule II controlled substances is to be performed by a pharmacist, dated and signed by the pharmacist performing the inventory and countersigned by the PIC or clinic professional director. All records used to complete the reconciliation must be kept in the pharmacy or clinic for three years.
- A complete inventory of all schedules II, III, IV and V drugs will be completed by the end of each fiscal year. The **annual** inventory will be kept on file for a period of at least three years.
- A new Pharmacist in charge (PIC) is to complete an inventory reconciliation of CII drugs within 30 days of becoming Pharmacist in charge, in addition the outgoing pharmacist in charge is encouraged to perform an ending control inventory before leaving.
- A **biennial** inventory of all controlled substances in the pharmacy and all nursing units will be done every even year with initials of the persons who did the inventory and countersigned by the Pharmacist in Charge (PIC). Those records will be kept for Pharmacy State Board inspection and will be retained for at least three years.

2. RECONCILIATION WITH INVENTORY REPORT:

- All acquisitions and dispositions of controlled substances will be reviewed quarterly as part of the inventory process
- Losses will be identified in writing and reported to Board of Pharmacy, and to DEA when appropriate
- Overages will be identified by the pharmacist and will be reported to PIC in writing and retained
- Records of each reconciliation will be maintained in the pharmacy for at least three years

3. ADJUSTMENTS TO THE INVENTORY REPORT:

- Once the overages and/or losses have been reported, adjustments will be made so there is a stock on hand starting point for the next inventory period
- Adjustments will be dated and initialed by a pharmacist performing the inventory reconciliation and countersigned by PIC
- The original inventory report and amended inventory report following the reconciliation will be maintained in the pharmacy for at least three years

4. AUTOMATED DRUG DELIVERY SYSTEM (PYXIS) REPORT:

- A report of all controlled substances removed from or added into PYXIS will be reviewed at least once a month
- Any discrepancy or unusual access identified will be investigated and resolved
- Controlled drugs inappropriately accessed or removed from PYXIS will reported to the Board of Pharmacy within 14 days

5. LOSSES:

- If a pharmacy or clinic identifying losses of controlled substances is unable to identify the cause within 30 days, pharmacy and/or clinic will take additional steps to identify the origin of the losses
 - Will perform daily inventory counts of the drugs at locations with repetitive/continuous shortages
 - Will consider relocation of drugs to a more secure location (installation of cameras)

POLICY NO: 1405	SUBJECT: Reconciliation and Inventory Report of Controlled Substances	Page 3 of 3
---------------------------	---	--------------------

Approved By: Romina Panoussi (PHARMACY SERVICES CHIEF II)	
Date: 06/29/2018	Original Date: Not Set
Reviewed: 06/29/2018	Next Review Date: 06/29/2019
Supersedes:	