

**DEPARTMENT OF HEALTH SERVICES
COUNTY OF LOS ANGELES**



SUBJECT: DESIGN/CONSTRUCTION AND MAINTENANCE RISK ASSESSMENT:
POLICIES AND PROCEDURES
PHARMACY AND MEDICATION SECURITY POLICY
POLICY NO: 918.3

PURPOSE: To establish a policy for the security of pharmacy departments, medications, and related activities during construction at Department of Health Services (DHS) facilities.

POLICY: To maximize pharmacy and medication security during construction.

PROCEDURE:

I. ACCESS TO PHARMACY AREAS

A. The following defines the individuals that are authorized to enter the pharmacy areas:

1. Pharmacy employees assigned to work in the area.
2. Facility authorized employees with pharmaceutical business to conduct in the area.
3. Upon approval from the immediate area supervisor, visitors and unauthorized personnel, including and not limited to architects, engineers, designers, contractors, subcontractors and construction or maintenance workers, etc. may be allowed to enter a pharmacy area escorted. In the absence of the area supervisor, permission must be obtained from the Director or Associate Director of Pharmacy Services.

B. The following defines the procedures for visitors to the pharmacy areas:

1. Representatives of local, state, and federal regulatory agencies (OSHPD, JCAHO, Board of Pharmacy, DEA, etc.) must be referred to the area supervisor and/or the Director or Associate Director of Pharmacy Services for admittance.
2. Notify the Pharmacy Administration Office upon the arrival of the representatives of local, state, and federal regulatory agencies (OSHPD, JCAHO, Board of Pharmacy, DEA, etc.).

APPROVED BY:

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II. DESIGN/CONSTRUCTION/MAINTENANCE ACCESS TO PHARMACY AREAS

- A. The following defines the procedures for architects, engineers, designers, contractors, subcontractors and construction or maintenance workers to access or work in the pharmacy areas:
1. The facility manager and the project manager shall:
 - a. notify the Pharmacy Administration of the need to enter the pharmacy;
 - b. identify the location of the work to be completed;
 - c. identify the scope of work to be completed;
 - d. identify the scheduled duration of the work to be performed;
 - e. coordinate the date and time the work will need to be completed to insure that either a Pharmacist is available for escort or all drugs will be properly removed from or properly secured within the work location;
 - f. clarify all other pertinent information associated with the task.
- B. The project manager will provide the Director or Associate Director of Pharmacy a list of the project personnel (architects, engineers, designers, contractors, sub contractors and construction or maintenance workers, etc.) prior to the start of the project and will update the list as needed.
- C. All project personnel (architects, engineers, designers, contractors, sub contractors and construction or maintenance workers, etc.) must wear identification badges at all times while in the pharmacy area.

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III. MEDICATION SECURITY

A. The following security measures shall remain in effect at all times within a pharmacy:

1. Pharmacy shall remain locked at all times.
2. All drugs stored within the medical center drug storage areas shall be accessible to authorized personnel only.
3. Controlled drugs shall remain double locked at all times prior to use.
4. All drugs, except those in the crash carts, shall be stored in secured locked containers or areas at all times.

B. The following security measures shall be enforced at all times:

1. All medications stored at nursing stations shall be in a lockable storage at all times.
2. All medications shall be stored in either lockable medication carts or in authorized medication rooms.
3. Crash carts shall be sealed with tamper-evident seals provided by the Pharmacy Department.
4. Crash cart drugs shall be stored in sealed containers, allowing the pharmacist or nurse to identify if the package has been opened or tampered with.
5. Medication stored in ancillary departments (such as Cath. Lab, Imaging, GI Lab, or other diagnostic labs) shall be in locked cabinets, drawers, or rooms. Responsibility for security rests with the department director or designee.
6. Authorized personnel include physicians, medical students, registered nurses (RN), licensed vocational/practical nurses (LVN/LPN), respiratory therapists (RT), pharmacists, pharmacy technicians, pharmacist interns and pharmacy helpers.

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7. A licensed pharmacist or designee (i.e. Pharmacy Technician) must be present at all times to provide oversight of all activities during construction/maintenance within the pharmacy.
- C. All areas that store medications shall be inspected for drug security at least every 30 days by a pharmacist.
- D. It is the responsibility of the “pharmacist in charge” to ensure medication security measures are implemented during the pharmacy design, construction and maintenance and that the Board of Pharmacy be notified of any serious breach in security during the design, construction and maintenance process.

IV. CONTROLLED SUBSTANCE ACCOUNTABILITY WHEN NURSING UNIT CLOSED

- A. Compliance with the following items shall be completed by a licensed nurse when a nursing unit is consolidated and temporarily closed:
 1. Prepare on a “U” form (Universal Drug Action Form) a list of all drugs presently within the nursing unit;
 2. Prepare a “Proof of Use Records” form;
 3. With the prepared “U” form and “Proof of Use Records”, relocate, within a locked container, all drugs presently within the nursing unit;
 4. Transfer the responsibility of all the drugs to the controlled drug pharmacist.
- B. The controlled drugs shall be stored in the facility pharmacy until the unit is reopened.
- C. When a nursing unit relocates, the controlled drug pharmacist shall be notified by the Nurse Manager to insure the drugs can be reissued to the new nursing unit.

V. PHARMACEUTICAL CODES AND REGULATIONS

- A. Reference the Business and Profession Code, Chapter 9, Division 2, Article 7, Section 4116 and 4117.
 1. Chapter 9 Section 4116. Security of Dangerous Drugs and Devices in Pharmacy Pharmacist Responsibility for Individuals on Premises; Regulations:

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- (a) No person other than a pharmacist, an intern pharmacist, an authorized officer of the law, or a person authorized to prescribe shall be permitted in that area, place, or premises described in the license issued by the board wherein controlled substances or dangerous drugs or dangerous devices are stored, possessed, prepared, manufactured, derived, compounded, dispensed, or repackaged. However, a pharmacist shall be responsible for any individual who enters the pharmacy for the purposes of receiving consultation from the pharmacist or performing clerical, inventory control, housekeeping, delivery maintenance, or similar functions relating to the pharmacy if the pharmacist remains present in the pharmacy during all times as the authorized individual is present.
- (b) (1) The board may, by regulation, establish reasonable security measures consistent with this section in order to prevent unauthorized persons from gaining access to the area, place, or premises or to the controlled substances or dangerous drugs or dangerous devices therein.
2. Chapter 9 Section 4117. Admission to Area Where Narcotics are Stored, etc., Who May Enter:

No person other than a pharmacist, an intern pharmacist, a pharmacy technician, an authorized officer of the law, a person authorized to prescribe, a registered nurse, a licensed vocational nurse, a person who enters the pharmacy for purposes of receiving consultation from a pharmacist, or a person authorized by the pharmacist in charge to perform clerical, inventory control, housekeeping, delivery maintenance, or similar functions relating to the pharmacy shall be permitted in that area, place, or premises described in the license issued by the board to a licensed hospital wherein controlled substances, dangerous drugs, or dangerous devices are stored, possessed, prepared, manufactured, derived, compounded, dispensed, or repackaged. (*Amended stats. 1997, Chapter 549*)

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B. Reference "California Code of Regulations", Division 17, Title 16, Article 2, Section 1714(d)

Section 1714(d). Operational Standards and Security

Each pharmacist while on duty shall be responsible for the security of the prescription department, including provisions for effective control against theft or diversion of dangerous drugs and devices, and records for such drugs and devices. Possession of a key to the pharmacy where dangerous drugs and controlled substances are stored shall be restricted to a pharmacist.

VI. SECURITY SURVEILLANCE

Video surveillance cameras and access keypads are recommended to be designated at all entrances to the pharmacy and for areas in which controlled drugs are stored. Central alarm systems are recommended for pharmacies that are not 24/7. It is also recommended that the video cameras be connected to a video recording system that is capable of recording color images of the areas under surveillance for a 24-72 hour period of time. Videotapes are to be maintained by the Pharmacy for a two-week period and reviewed as needed to assess compliance with security measures.

Temporary video cameras are also recommended in areas where construction activity may compromise drug security. Temporary cameras are recommended when construction may continue for an extended period of time. An extended period of time is defined here as any work that takes more than one week.

VII. RELOCATION OF MEDICATIONS

Medications stored in the Pharmacy shall be secured from access to construction/maintenance workers. During construction/maintenance within the Pharmacy, medications shall be removed from the immediate area of construction/maintenance and relocated to a secure area under lock and key. Temporary shelving and lockable storage areas shall be made available by the contractor prior to the start of construction/maintenance if required. A licensed pharmacist or designee (i.e. Pharmacy Technician) must be present at all times to provide oversight of all activities during construction/maintenance within the pharmacy.

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