

Controlled Substance Standard Operating Procedure

Controlled Substance Certificates

The controlled substance registration certificates used in this veterinary practice are as follows: (list all held certificates).

At XYZ Animal Hospital, the controlled substance registration certificate is issued to Dr. XYZ and Dr. ABC and will be used for the purpose of purchasing, administering and dispensing of the controlled substances within this veterinary practice.

Individual veterinarians are responsible for ensuring their controlled substance registration certificate is:

1. Current and not expired
2. Contains the correct name and address on the certificate
3. Contains the correct schedules of the registration

Individual practitioner's controlled substance registration certificates will be safely kept in locked in the controlled substance lock box located in the main office.

When a new controlled substance registration certificate is received from the DEA, it will be attached to the old certificate and retained until the next renewal date, at which time the old certificate and corrected certificate may be destroyed.

If a new Veterinarian joins the team, and controlled substances will be ordered under their registration number, the Inventory Manager will contact all necessary distributors and obtain the paperwork to make the change.

Controlled Substance Security

All controlled substances will be stored in the double locked cabinet located in the main office. All team members are responsible for the security of controlled substances. The following basic guidelines will be followed:

- Controlled substances will not be left unattended at any time.
- Controlled substances will be removed from the double lock box, administered or dispensed, and immediately returned to the lock box after use.
- The controlled substance lock box will be double locked when not in use.



The Technician Shift Manager or the Practice Manager will be responsible for checking controlled substances at the end of the day to ensure that they are properly secured (box is locked) and that no controlled substances were left outside of the box. The Veterinarian on shift will be responsible for the end-of-day check if the Shift Manager or Practice Manager are unavailable.

Access to Controlled Substances

At XYZ Animal Hospital, the following team members will have access to the locking device for controlled substances:

- Dr. XYZ
- Dr. ABC
- Jane Smith - Practice Manager

Reporting Misuse, Abuse, or Theft

Any team member that becomes aware of misuse, abuse, or theft of controlled substances is required to report the infraction to the Medical Director, Practice Manager, Hospital Administrator or the CEO. If an employee has a “reason to believe” that controlled substances are being misused, abused, or stolen they are still required to share the information with the team members mentioned above.

Any team member that reports the possibility of misuse, abuse, or theft will not be retaliated against because of their actions. All information received will be treated as confidential information, and an investigation will take place.

If it is discovered during an investigation that a team member had the knowledge of an infraction of this policy and did not alert the proper member of the leadership team, the status of their continued employment will be reviewed.

If an employee who has access to the locking device listed above tests positive during a regular drug test, their results will be sent to the state licensing board, and the employee will no longer have access to any of the controlled substances in the facility.

The Practice Manager and Chief of Staff are responsible for reporting all thefts or losses of controlled substances to the DEA. The DEA Form 106 will be used for this purpose.

LIST THE CONTACT INFORMATION OF YOUR LOCAL DEA OFFICE

All reports of theft will be reported by the Practice Manager to the local law enforcement office.

Controlled Substance Inventory

Controlled substances authorized for use in this practice are listed in the controlled drug log book for each controlled substance registration certificate in use. SDS sheets are also on file. Sufficient



inventories of controlled substances will be kept on hand to ensure the substance is available as needed. Please keep in mind that orders being submitted using a DEA-222 form may take extra time to ship.

Controlled substance purchases ordered under a different registration number will not be stored in the same locking cabinet. Separate inventories of controlled substances are required for each controlled substance registration number utilized in the veterinary practice.

Purchasing and Ordering Controlled Substances

The purchasing of all controlled substances is the responsibility of the Inventory Manager. The Inventory Manager is responsible for correctly preparing and submitting the DEA-222 Form. In the event that the Inventory Manager is unavailable, the registrant indicated on the controlled substance certificate is responsible for purchasing all controlled substances. No other employee in this practice is authorized to purchase controlled substances at any time, unless authorized by the owner of the practice.

Excessive quantities will not be ordered unless specifically discussed with the Chief of Staff.

DEA-222 Form

All DEA-222 Forms are stored under lock and key to prevent possible theft. For each form submitted, the practice keeps the blue copy for the hospital records.

When the product is received, the blue copy will be annotated to reflect the date received, quantity received and the NDC number for the product. It will then be attached to the packing slip and will be retained with the purchasing records. Unused or outdated 222 forms will be returned to the local DEA office for destruction.

Order Record Keeping

All finalized DEA-222 forms will be filed in a separate folder from any other purchase made in the practice. Additionally, records for the purchases of scheduled II controlled substances need to be kept separate from the records for schedule II, IV, and V controlled substances.

The purchasing record for any controlled substances must be kept for 2 years. The packing slip/invoice will be annotated with the handwritten date of receipt and the initials of the person who received it. This annotation indicates the date the product was physically added to the hospital's inventory.

The packing slip/invoice will contain the name and address of the distributor it was purchased from and will also have the name and quantity of the controlled substance ordered.

The owner of the controlled substance certificate will review the file of controlled substances purchased on a weekly basis to ensure that the proper purchasing practices are being followed.

Usage Record Keeping

The records for the use of all controlled substances administered or dispensed will be maintained in a computerized format within Cornerstone.

The record of controlled substances administered or dispensed must include the following:

- The name of the substance.
- The strength of the substance.
- The size of the container.
- The amount administered or dispensed.
- The name and address of the person to whom it was administered or dispensed.
- The initials of the person administering or dispensing on behalf of the registrant.

All employees that administer or dispense controlled substances will enter the information above immediately into Cornerstone. There are no exceptions to this rule.

Physical Inventory Counts

Physical inventories for all controlled substance registrations will be performed on a weekly basis. A complete physical inventory will be performed at the beginning of each year. This inventory will be for all controlled substance registrations used within the practice. This inventory will be filed with the purchasing records.

All physical inventories performed must contain the following information:

- The inventory must indicate the date it was performed.
- The inventory must indicate what time of day it was performed.
- The inventory must list the name, strength, and size of all controlled substances on hand.
- The inventory must be signed by the registrant that possesses the controlled substance registration certificate.

Additionally, records will be checked for accuracy on a quarterly basis by the Practice Manager or Inventory Manager. The records that will be checked include:

- The records for all controlled substances purchased (any addition to inventory) = A
 - The records for all controlled substances dispensed and administered (any subtraction from inventory) = B
 - The records for all controlled substances reported as lost or stolen (subtraction from inventory) = C
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- The physical inventory count = D

To determine the accuracy of controlled substance records as compared to the physical inventory, the following formula will be used: $A - B - C = D$

For products that are classified as new controlled substances, a written inventory, using the guidelines above, will all be performed on the date the product is classified as a controlled substance. The product will then be afforded the same safeguards as all other controlled substances.

The purpose and intent of the controlled substance regulations is to ensure there is no misuse or abuse of controlled substances. The balancing of controlled substance records provides a clear statement that no misuse or abuse has occurred.

Inventory control shall be the responsibility of all employees that handle controlled substances. Inventory control and accuracy can only be determined through excellent record keeping and through physical inventory.

Controlled Substance Destruction

An option for controlled substance disposal is to surrender the substances to an approved independent company (also known as reverse distributors). Companies must be licensed by the Department of Health to receive such substances and registered with the Drug Enforcement Administration. Companies that are currently approved can be seen on the following website: [Reverse Distributors](#)

The following guidelines will be utilized regardless of the manner of destruction:

- Documentation must be on file to indicate the product, size, strength and quantity.
- Documentation can be a DEA Form 41 or transfer document to another registrant for destruction (ie: reverse distributors)
- If the product is destroyed in the practice with the DEA's permission, a written letter from the DEA should be obtained that serves as authorization for the destruction.

Controlled Substance Prescription

No prescription for a controlled substance listed in Schedule II will be filled for more than a 90 day supply. Additionally, there are no refills authorized for schedule II drugs, as they will need a new prescription for each refill.

No prescription for a controlled substance listed as Schedule III or IV will be filled or refilled for more than six months after the date on which the prescription was originally issued. If there are authorized refills on the original prescription, they may not be refilled more than five times within the six months.

The prescribing practitioner must execute a new and separate prescription for additional quantities beyond the five refills, with the same 6 month window.

All patients must have a physical exam within one year of each new or refilled controlled substance drug prescription.

Approval

This written procedure for controlled substances has been approved for use at XYZ Animal Hospital.

Signature of Owner

Date

