

## **CONTROLLED SUBSTANCES**

### **PAPERWORK BASICS**

Please do not view this as an end all for information on handling your controlled substances. I am simply presenting to you how I handle our controlled substance logging and tracking. It is as good a place as any to start.

I am under the impression that the DEA has a lot of freedom/leeway when they audit you.

Butler Pharmaceuticals has had a controlled substance class. Lasts about two hours and covers the basics.

The system components:

- Internal Audits
- Invoices
- Transfers
- Background check forms
- Copies of veterinary licenses
- Disposition Logs
- Usage logs
- Filing system
- Numbering System

Filing System

- The DEA requires that your controlled substance records be kept for two years. **SOME STATES REQUIRE THEY BE HELD FOR THREE YEARS (CALIFORNIA FOR EXAMPLE). CHECK YOUR STATE LAWS.**
- Our filing system consists of binders. Every year has its own binder(s).
- If you are using Class 2 controlled substances, you must maintain a separate system for these. **DO NOT INCLUDE THEM IN A FILE OR BINDER THAT CONTAINS ANY NON-CLASS 2 CONTROLLED SUBSTANCES.**

Numbering System

- Your clinic must have some way of tracking the controlled substances that it uses. Numbering the bottles helps you keep on top of this.
- For large clinics processing lots of controlled substances color coding can make things easier. This is probably a waste of effort in small clinics. I print all disposition and usage logs on colored paper, and bottle numbers on color coded stickers (when possible). It makes them really easy to find and hard to confuse.
  - Buprenorphine = Blue
  - Euthanasia = Red
  - Valium =Violet
  - Ketamine = Yellow
  - Telazol = Teal
  - Torbugesic = Fluorescent Green

Numbering System

There are three components to our numbering system

A letter that represents the drug

B=Buprenorphine

D=Diazepam

E=Euthanasia

K=Ketamine

T=Torbugesic

TZ=Telazol

A number that represents the year in which it was purchased

- 10 = 2010
- 11 = 2011
- 12 = 2012

The number assigned to the individual bottle. I start with

- 001 if I am likely to use more than 100 bottles
- 01 if I am likely to use more than 10 but less than 99 bottles
- 1 if I am likely to use 9 bottles or less

So:

D10-075 is the 75<sup>th</sup> bottle of diazepam purchased/numbered in 2010  
K09-150 is the 150<sup>th</sup> bottle of ketamine purchased/numbered in 2009

I use stickers to number my bottles.

- If processing large orders it is easy to start writing numbers more than once or to skip them. The stickers eliminate this.
- I place two stickers on each bottle, one on the cap and one on the body.
- The sticker system doesn't save me any time overall, but it saves me time on the day that the order is received, as I prepare them in advance.
- My stickers are color coded (as are my disposition logs and usage logs).
- You can pull the stickers off the cap or the bottle and place them on your log if you choose to.
- Care must be taken once the bottle is in use to not remove all numbers from it.

#### Processing Your Order/Invoices

- Your controlled substance order must be processed the day you receive it.
- Your order will come with an invoice. On the invoice you will record:
  - The date the shipment was received.
  - For each type of controlled substance you received you will record the:
    - Number of bottles
    - Lot number
    - Expiration date
    - Number assigned to the bottles
    - "20 bottles diazepam, D10-001 to D10-020, Lot 71-215-01-EV Exp 11-2010"
- The invoice is then filed, I have a section in my binder marked "invoices."
- The bottles are recorded in order on a disposition log.
- Your first Biennial audit is performed if this is your first order.
- The controlled substances are locked in your safe/lock box.

#### Disposition Logs

DISPOSITION LOG 2010 PAGE 1												
Bottle Number	Drug	Volume ml	Date Received	Supplier	Lot Number	Expiration Date	Date 2010 MONTH/ DAY	BY	Disposition	Date 2010 MONTH/ DAY	BY	Disposition
							/			/		
							/			/		
							/			/		
							/			/		
							/			/		

The disposition log tells you where all bottles of controlled substances in your practice are located at any time. It includes the following information:

- When they were received
- Who they were received from (we don't use that many suppliers, so I just use initials)
- Volume in each bottle
- Lot number
- Expiration date
- When a bottle is moved from the safe to a room in the clinic or to a clinician's bag the date and new location are recorded.
- The person responsible for the movement of the bottle initials the "by" column.
- All subsequent moves, if any, are recorded.
- When the bottle is finished a final entry is made in the disposition log stating the date the bottle was emptied.
- If more space is needed for a given bottle it is carried to the back page. This page does not contain the drug, volume, supplier, lot number, or expiration date as it is all recorded on the front page.

DISPOSITION LOG 2010 PAGE 1a									
Bottle Number	Date MONTH/ DAY	BY	Disposition	Date MONTH/ DAY	BY	Disposition	Date MONTH/ DAY	BY	Disposition
	/			/			/		
	/			/			/		
	/			/			/		
	/			/			/		
	/			/			/		

**Internal Audits**

- You are required to do an audit of your stock:
  - On the first day that you receive controlled substances.
  - Biennially after that (once every two years).
- The audit must be performed during hours when no one will access the practices controlled substances, (on a day when the clinic is closed, or during off hours.)
- This is easier if you allow your stock to run down a little before you do it. (Don't place a big order and then decide to audit your stock).

NOTE: There are companies that employ retired DEA officers to consult with veterinary clinics. According to one such company (2<sup>nd</sup> hand information) if the DEA audits you they tend to only go back as far as your last internal audit. For this reason I do an audit every year. I do it on the first of the year and keep my records for each year completely separate. I do a balance forward on a new usage log for any open bottles from the previous year. I make a balance forward entry on my disposition log, and have a new disposition log that covers exactly a one year period.

**Controlled Substance Inventory Audit Form**

Veterinarian of Record: Name: \_\_\_\_\_  
 DEA License Number \_\_\_\_\_ Expiration Date \_\_\_\_\_  
 Address: \_\_\_\_\_  
 Date \_\_\_\_\_ Time \_\_\_\_\_ Location \_\_\_\_\_  
 Performed By \_\_\_\_\_ Performed By \_\_\_\_\_  
 Biennial Inventory Audit  Spot Check Audit      Print Name \_\_\_\_\_ Page \_\_\_\_\_ of \_\_\_\_\_ Signature \_\_\_\_\_

Controlled Substance	Bottle Number/s	Location	Lot Number	Expiration Date	Bottle Volume	# of bottles	Total Volume

- Under bottle numbers you can list a series, as long as the lot numbers and expiration dates are all the same for the entire series.

- D10-001 to D10-020, Lot 71-215-01-EV, Exp 11-2010

### Background Check Forms and Veterinary License Copies

- Any person who will be handling controlled substances in your clinic must sign a background check form. (There is no requirement that you complete the background check unless you have an Institutional license for your facility), but you must have the form signed. There are specific requirements for what must be included in this form. They must include the following points:

Within the past five years, have you been convicted of a felony, or within the past two years, of any misdemeanor or are you presently formally charged with committing a criminal offense? (Do not include any traffic violations, juvenile offenses or military convictions, except by general court-martial.)  YES  NO

If the answer is yes, furnish details of conviction, offense, location, date and sentence on the back of this form.

In the past three years, have you ever knowingly used any narcotics, amphetamines or barbiturates, other than those prescribed to you by a physician?  YES  NO

If the answer is yes, furnish details on the back of this form.

I hereby authorize inquiries to be made of courts and law enforcement agencies for possible pending charges or convictions

I understand that any false information or omission of information will jeopardize my position with respect to employment/volunteer opportunities.

I understand that information furnished or recovered as a result of any inquiry will not necessarily preclude employment/volunteer opportunities, but will be considered as part of an overall evaluation of my qualifications.

I understand that the results of such inquiries will be treated as confidential by the employer/volunteer organization and will in no way compromise the maintenance of fair employment practices, or the protection of my right of privacy.

I have read, understand, and agree to the terms of this document.

SIGNATURE \_\_\_\_\_  
DATE \_\_\_\_\_

PRINT NAME \_\_\_\_\_

- All Veterinarians working under your license/with your controlled substances must supply you with a copy of their current veterinary license.

### Transfers

- All controlled substance transfers (DVM to DVM) must have an accompanying signed transfer form.
- Both DVMs need to sign the form and file a copy in their records.
- This form must include the following information from both parties
  - DEA license number
  - Expiration date
  - Address of record
  - Date
  - Signature
- The form must also include all pertinent information regarding the controlled substances being transferred.
  - Drug
  - Bottle Number (if applicable)
  - Lot number
  - Expiration date
  - Total volume of each drug being transferred





