Controlled Substances Safety Checklist:

Inventory Management Guidelines for Veterinary Practices

Changing prescription management regulations at both state and federal levels are addressing the growing opioid crisis and the necessity for veterinary practices to more heavily manage their controlled substances and narcotics inventory. But the complexity of these regulations, paired with the busy day-to-day functions of a veterinary clinic, cause many practices to overlook compliance.

Help your clinic create a more efficient and compliant process by identifying current gaps using the checklist.

Common Inventory Management Challenges and Gaps

Regulations vary state to state and the DEA has its own set of compliance standards, but there are common challenges that many veterinary practices face. Some of the most frequent gaps include:

1 | Effectively securing controlled substances.

2 | Unlocked safes or secure areas during practice hours.

3 | Keeping a single drug log for Schedules I and II and Schedules III, IV and V.

4 | Failing to reconcile drug logs with inventory.

5 | Misinterpretation of DEA regulations.

6 | Failing to review state laws in addition to federal standards.

Controlled Substances Inventory Management Checklist

Use the following checklist to ensure best practices in the storage and reporting of your clinic's controlled substances. Managing controlled substances requires more than establishing the right protocol, the daily adherence and periodic audit are necessary.

Getting Started	Daily	Periodically
1. Check your state and federal regulations (see page 3 for links)	1. Accurately record each drug transaction as it occurs	1. Retrain your staff on the guidelines for compliant narcotics management
2. Consult with regulatory boards, professional groups or other experts	2. Check logbooks at close of business for completeness and accuracy (if using manual books)	2. Re-evaluate your process for efficiencies
3. Implement a process that is compliant and efficient	3. Address lapses in process adherence as soon as they occur	3. Revisit state and federal regulations to make sure you're still compliant
4. Ensure double-lock security in your storage solution	4. Establish a morning inventory check in your routine	4. Evaluate the age and efficiency of the tools/ equipment you use, budget for upgrades if needed
5. Establish logs per class of drug separate from other clinic records	5. Develop an efficient rhythm for ordering and restocking to prevent shortage or unused inventory	5. Examine and reconcile logbooks to keep records up to date
6. Update hiring and onboarding processes	6. Streamline the management process by delegating duties to one individual	
7. Identify personnel authorized to access drugs		

For the complete list of DEA guidelines your clinic should be following and a complete compliance manual, visit: https://www.deadiversion.usdoj.gov/pubs/manuals/pract/index.html. Inventory management solutions like CUBEX can automate many of the required processes for compliance.

Learn more about emerging legislature in your state*:

State	URL	State	URL
Alabama	alabamapublichealth.gov/pdmp/index.html	Montana	boards.bsd.dli.mt.gov/pha/pha-mpdr
Alaska	commerce.alaska.gov/web/cbpl/ProfessionalLicensing/BoardofVeterinaryExaminers.aspx	Nebraska	dhhs.ne.gov/publichealth/PDMP/Pages/Vets.aspx
Arizona	pharmacypmp.az.gov	Nevada	bop.nv.gov/links/PMP
Arkansas	arkansaspmp.com/veterinarian	New Hampshire	newhampshirepdmp.com/veterinarian.html
California	pharmacy.ca.gov/licensees/cures	New Jersey	njafp.org/content/prescription-drug-monitoring-program
Colorado	colorado.gov/pacific/dora/Veterinary_News	New Mexico	nmpmp.org
Connecticut	portal.ct.gov/DCP/Prescription-Monitoring-Program/Prescription-Monitoring-Program	New York	ealth.ny.gov/professionals/narcotic/prescription_monitoring
Delaware	dpr.delaware.gov/boards/pmp	North Carolina	nccsrsph.rxsentry.net/ncmoved.html
Florida	floridahealth.gov/statistics-and-data/e-forcse	North Dakota	nodakpharmacy.com/PDMP-index.asp
Georgia	dph.georgia.gov/pdmp	Ohio	ohiopmp.gov
Hawaii	dps.hawaii.gov/wp-content/uploads/2016/12/HI-PDMP-AWARxE-Requestor-USER-Guide.pdf	Oklahoma	okvetboard.com/controlled-drug-information
Idaho	bop.idaho.gov/pmp	Oregon	orpdmp.com
Illinois	ilpmp.org	Pennsylvania	health.pa.gov/topics/programs/PDMP/Pages/PDMP.aspx
Indiana	in.gov/pla/inspect/2442.htm	Rhode Island	health.ri.gov/healthcare/medicine/about/prescriptiondrugmonitoringprogram
Iowa	pharmacy.iowa.gov/prescription-monitoring-program	South Carolina	scdhec.gov/Health/HealthProfessionals/drug-control-register-verify/prescription-monitoring-veterinarians
Kansas	khi.org/assets/uploads/news/13344/k-tracs_frequently_asked_questions.pdf	South Dakota	doh.sd.gov/boards/pharmacy/PDMP
Kentucky	ekasperupload.chfs.ky.gov/KASPER_Controlled_Substance_Reporting_Guide.pdf	Tennessee	tn.gov/health/health-program-areas/health-professional-boards/csmd-board/csmd-board/faq.html
Louisiana	pharmacy.la.gov/index.cfm?md=pagebuilder&tmp=home&pid=5	Texas	pharmacy.texas.gov/PMP
Maine	maine.gov/dhhs/samhs/osa/data/pmp/veterinarians.htm	Utah	dopl.utah.gov/programs/csdb
Maryland	crisphealth.org/services/prescription-drug-monitoring-program-pdmp/pdmp-registration	Vermont	healthvermont.gov/alcohol-drugs/professionals/vermont-prescription-monitoring-system-vpms
Massachusetts	mass.gov/prescription-monitoring-program-pmp	Virginia	dhp.virginia.gov/vet
Michigan	michigan.gov/lara/0,4601,7-154-72600_72603_55478---,00.html	Washington	doh.wa.gov/ForPublicHealthandHealthcareProviders/HealthcareProfessionsandFacilities/PrescriptionMonitoringProgramPMP
Minnesota	mn.gov/boards/veterinary-medicine/prescribing	West Virginia	wvbop.com/article.asp?id=13
Mississippi	pmp.mbp.ms.gov/frequently-asked-questions	Wisconsin	pdmp.wi.gov
Missouri	stlouisco.com/healthandwellness/pdmp	Wyoming	pharmacyboard.wyo.gov/pdmp

*Current as of October 2018. Subject to change.

Want to speak with a regulator about the changes in your state? Visit www.aavsb.org/DLR/ for the Board and agency directory.

While narcotics regulations are rapidly increasing in complexity and rigor, many resources are available to support the changes required in your practice. Most practices require more than single-faceted change: hardware, software and process improvements are needed for compliance and workability.

To explore how you can automate the necessary controls in a way that supports your workflow, schedule a consultation with our inventory management experts.

Ensure compliance.
Schedule a consult.

cubex.com/consult
480.470.7382