

RECORD-KEEPING COMPLIANCE BASICS

Acquisition: Tracks What Comes In

Records Must Include:

- Date Received: Note when controlled substances arrive (e.g., July 2nd, 2024).
- Unique Container ID: Assign each shipment a unique identifier (e.g., 2-2024)
- Drug Information: Record drug name, strength, NDC number, and container size.
- Seller Information: Include Manufacturer and Distributor.
- Shipment Details: Log Lot Number and Invoice Number.
- Staff Initials: Record who received the inventory.
- Location/Date Transferred: Track where and when the substance is moved.
- Balance on Hand: Update total unopened inventory balance after each receipt/movement

Physical Copies

- Save packing slips and invoices for physical proof and paper trail in the event of an audit/inspection
- Make sure to properly fill out and store DEA Form 222 if dealing with Schedule II's
- Retain all acquisition records for at least 2 years. Recommended 5 years.

Storage

- If working with Schedule II substances, ensure acquisition records are stored separate from Schedule III-V.

Remember

- Always check your state specific regulations to ensure there are not any more stringent requirements.

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Dispensing: Tracking What Goes Out

Records Must Include:

- Date of Administration: Record the exact date of administration.
- Specific Container: Identify which container the drug came from.
- Quantity Dispensed: Document the exact amount given.
- Patient Information: Include the animal's name or ID number.
- Client Information: Record owner/shelter information. This includes physical address.
- Reason for Use: Specify the medical reason for administration.
- Prescribing Veterinarian: Include the authorizing veterinarian's name/initial.
- Staff Initials: The person administering the drug/logging its usage should sign.

Physical Copies

- Retain dispensing records in the event of an audit/inspection for two years (at a minimum). Best recommendation is at least 5 years. Always check your state specific regulations to ensure there are not longer requirements
- Store Schedule II records separate from III-V's

Logbook Requirements

- Include drug name, schedule, strength, container size, expiration date, manufacturer, distributor, lot number, NDC number, and date opened.
- Note: Many pre-made books/templates/software will already include sections for you to enter this information per drug.

RECORD-KEEPING COMPLIANCE BASICS

Inventory: Double Check What You Have

Records Must Include:

- Date of Count: Record the date the inventory was checked.
- Drug Information: Note drug name, schedule, and strength.
- Inventory Containers: Include both unopened and opened containers.
- Total Amount: Document the total quantity of the drug on hand.
- Location of Drugs: Specify where the drugs are stored.
- Staff Initials: The staff member conducting the count should sign off.

Physical Copies

- Maintain for at least 2 years.
- Check state requirements for more stringent regulations.

Frequency

- At a minimum on the federal level inventory counts must be performed once every 2 years (biennially).
- Some states require more frequent counts.
- Always best practice to perform more frequently.
- Most common frequency is monthly or quarterly.

Biennial Count

- Performed once every 2 years per federal requirement.
- Requires Time of Day that count was performed noted.
 - Beginning of Day vs End of Day
- Requires DEA Registrant to participate and sign off.