

The pharmacy manager must ensure that narcotic counts and reconciliations are completed for the pharmacy, pharmacy satellites and all areas of a facility where narcotics are stored:

- at a minimum of every 3 months,
- after a change of pharmacy manager,
- after a break and enter or robbery,
- after an identified drug diversion,
- when a pharmacy closes and ceases to operate its business, and
- after any event where the security of the narcotic drugs may have been compromised.

REQUIRED PROCEDURES:

The narcotic counts and reconciliations must consist of the following four components, and must be verified and signed off by the pharmacy manager after each completion:

1. Perpetual Inventory¹

- a) Pharmacies must maintain a separate perpetual inventory for each narcotic drug.
- b) The perpetual inventory must include entries for:
 - i. purchases,
 - ii. transfers,
 - iii. losses,
 - iv. purchases returned, expired, or destroyed,
 - v. quantities dispensed, and
 - vi. a running balance.
- c) Any manual adjustments to the perpetual inventory must be documented, including:
 - i. the reason for the adjustment,
 - ii. the date adjusted, and
 - iii. the identity of the person who made the adjustment.
- d) If a pharmacy does not have a computerized perpetual inventory, then a manual perpetual inventory must be maintained. (Note: A sample Perpetual Inventory Record can be found on the CPBC website).

2. Physical Inventory Counts

- a) A physical inventory count must be done at a minimum of every 3 months.
- b) All narcotics must be counted, including:
 - i. active inventory,
 - ii. compounded mixtures, and
 - iii. expired inventory.
- c) When completing the narcotic count, the following information must be documented:
 - i. the name, strength, quantity, and DIN/brand of the drug counted,
 - ii. the date and signature of the person(s) who completed the count, and
 - iii. the date and signature of the responsible pharmacist

¹**Perpetual Inventory:** A book record of every inventory kept continuously up to date by detailed entries for all incoming and outgoing items. (Merriam-Webster Dictionary)

- d) The count must not be conducted by the same person who enters narcotic purchases into the records.

3. Reconciliation²

- a) Perpetual inventory, physical inventory counts, and purchase invoices must be reconciled and documented.
- b) Discrepancies must be investigated, addressed, and documented on a narcotic incident report and maintained at the pharmacy for a period of not less than 3 years.

4. Documentation Requirements

- a) The inventory counts and reconciliation documentation must be kept in chronological order in a separate and dedicated record that is retained for 3 years.
- b) Within 10 days of the discovery of a loss or theft of a narcotic, the pharmacy manager must:
 - i. report the loss or theft to the local police and to the appropriate office at Health Canada. (Note: Shortages which cannot be accounted for must also be reported to the appropriate office at Health Canada.)
 - ii. forward to the College a copy of any report sent to the appropriate office at Health Canada. (Note: Please refer to PPP-74 Community Pharmacy Security)

BACKGROUND:

The above policy statement is supplemental to PODSA Bylaw 18 and 19, PPP-74 Community Pharmacy Security, and the *Narcotic Control Regulations*.

APPENDIX:

Sample – Perpetual Inventory Form

²**Reconciliation:** To check (example a financial account) against another for accuracy (Merriam Webster Dictionary)