

This policy sets out requirements for pharmacy managers on complying with their obligations for narcotic counts and reconciliation under the *Pharmacy Operations and Drug Scheduling Act* ("PODSA") Bylaws sections 18(2)(s), 18(2)(t), 23.1(1), and if applicable, section 31(6).

POLICY STATEMENTS:

~~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) ~~A~~ Pharmacy manager must ~~maintain~~ ensure that a separate perpetual inventory log for each narcotic drug is maintained for the pharmacy, telepharmacy, pharmacy satellites and all areas of a facility where narcotics are stored.
- b) ~~The~~ A perpetual inventory log may be manual¹ or automated, and 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) Each entry in the perpetual inventory log must have an associated record, including but not limited to the following
 - i. purchase record,
 - ii. prescription,
 - iii. loss and theft reports, and
 - iv. record for purchase returned, expired, transferred, or destroyed.
- d) ~~Any~~ manual adjustments to ~~the~~ an entry in a perpetual inventory log 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, and
 - iv. the identity of a full pharmacist authorizing 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).~~

¹ See sample Perpetual Inventory Form: http://library.bcpharmacists.org/7_Forms/7-7_Others/9060-Narcotics_Inventory_Form_Sample.pdf

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

2. Physical Inventory Counts and Reconciliations

- a) ~~A physical inventory count must be done at a minimum of every 3 months.~~
a) The A pharmacy manager must ensure that narcotic physical inventory counts and reconciliations for each narcotic drug are completed for the pharmacy, telepharmacy², pharmacy satellites and all areas of a facility where narcotics are stored:
- i. at a minimum of every 3 months,
 - ii. after a change of pharmacy manager,
 - iii. after a break and enter or robbery,
 - iv. after an identified drug diversion,
 - v. when a pharmacy closes and ceases to operate its business, and
 - vi. after any event where the security of the narcotic drugs may have been compromised.
- b) A physical inventory count for each narcotic drug must be conducted prior to each inventory reconciliation in accordance to the following requirements: done at a minimum of every 3 months:
- i. All narcotics inventory must be counted, including:
 - active inventory,
 - compounded mixtures, and
 - non-usable and expired inventory;
 - e)ii. When completing the a narcotic physical inventory count, the following information must be documented:
 - the name, strength, quantity, and DIN/brand of the drug counted,
 - the date and signature of the person(s) who completed the count, and
 - the date and signature of the responsible pharmacist, and
 - e)iii. The count must not be conducted by the same person who enters narcotic purchases into the records.

3. Reconciliation²

- c) An inventory reconciliation must include the following components:
a) ~~Perpetual inventory, physical inventory counts, and purchase invoices must be reconciled and documented.~~
i. b) the physical inventory count is compared with the perpetual inventory count for accuracy and discrepancies;
ii. associated records of the perpetual inventory log are audited for completeness, accuracy and discrepancies; and

² Please note that as per section 31.4(6) of the PODSA Bylaws, a telepharmacy located at an address listed in Schedule "G" to those bylaws must perform a monthly count of narcotics at the telepharmacy and retain a record of each monthly count signed by the supervising pharmacist for three years at both the central pharmacy and the telepharmacy location, and provide the signed record to the registrar immediately upon request.

~~iii. d) Discrepancies must be investigated, addressed, and documented on a narcotic incident report together with relevant supporting information and maintained at the pharmacy for a period of not less than 3 years.~~

~~d) The completion of each physical inventory 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.~~

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

4.3. Documentation Requirements

- a) ~~The perpetual inventory record must be retained for a period of not less than 3 years.~~
- b) ~~The physical inventory counts and reconciliation documentation must be kept maintained and retained in chronological order in a separate and dedicated record that is retained for a period of not less than 3 years.~~
- ~~cb) Within 10 days of the discovery of a loss or theft of a narcotic is discovered, the pharmacy manager must:~~
- ~~i. notify the College within 24 hours of the incident in accordance with PPP-74 Community Pharmacy Security.~~
 - ~~ii. report the loss or theft within 10 days in accordance with ~~to the local police and to the appropriate office at Health Canada's requirements. (Note: Shortages which cannot be accounted for must also be reported to the appropriate office at Health Canada.); and~~~~
 - ~~iii. forward to the College a copy of any report sent to the appropriate office at Health Canada in accordance with ~~.(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~~