

Narcotic and Controlled Substances Reconciliation

In the late 1990's onsite pharmacy inspections by Health Canada regarding narcotic and controlled drug record keeping and compliance with the *Controlled Drugs and Substances Act* (CDSA) were discontinued. Due to this lack of direct oversight by Health Canada inspectors, the Saskatchewan College of Pharmacists is requiring pharmacy managers to ensure that narcotic and controlled drug are reconciled.

From the Webster's online dictionary:

Reconciling:

4 a : to check (a financial account) against another for accuracy b : to account for

As provided for in the *"Responsibilities of the Pharmacy Manager"*

B. Narcotic and Controlled Drugs

The pharmacy manager:

- a) is ultimately accountable for record keeping, the acquisition, storage and distribution of Narcotic and Controlled Drugs, according to the pertinent governing legislation.
- b) retains the right to designate which pharmacists may have signing authority for purchasing Narcotic and Controlled Drugs in a specific pharmacy.

The record keeping requirements regarding receipt, sales and destruction of narcotic and controlled drugs are outlined in *The Controlled Drugs and Substances Act* (CDSA), *Narcotic Control Regulations*, the *Benzodiazepines and Targeted Substances Regulations* and Part G of the *Food and Drug Regulations*. Along with specific prescription requirements, accurate purchase and sales records, as well as secure storage of products are required within the pharmacy. Any loss or theft is to be reported to the Minister (Federal Minister of Health) within ten (10) days of its discovery.

An inventory count of the narcotic and controlled drugs should be done on a routine basis but this alone is not reconciliation. It simply provides an inventory. A review of purchases, sales and inventory together using the pharmacy's records (reconciliation) will identify any losses or discrepancies.

As noted in the March 2010 *SCP Newsletter* article, [Notes from the Field](#), it is important to keep your unique personal access wholesale ordering code for controlled substances secure at all times. No one other than the person to whom the order code belongs should be using it to order CDSA products.

It is important not to rely solely on your computer system's inventory control management system for reconciliation. If there is no security for the ordering, receiving or distribution of controlled substances in the pharmacy, the pharmacy manager may be relying on inaccurate or incomplete information. One method of diversion is to use another person's ordering code and to intercept those orders (and invoices) before they are received into

stock and put into the computer. The person whose code is utilized then becomes accountable for the missing products.

Most wholesales now have online access to your account 'ordering' information and can provide you with a list of all purchases for CDSA products.

When performing a reconciliation it is best to reconcile each specific brand of a particular drug separately. Do not include expired medications or medications which are slated to be returned to the wholesale in your first reconciliation. Ensure your sources of information are accurate and up to date, including purchase records (as above) and sales reports. This is a good opportunity to review your sales records to ensure reports contain all the required information.

If your pharmacy software system is capable of generating an inventory report that details perpetual inventory, you can review this report. However, diligence will be required to ensure the accuracy of the data inputted into the computer, to make sure no information has been missed. Also take into consideration any prescriptions which have "owed" quantities still outstanding.

Decide upon the date range of your reconciliation. Your first reconciliation should review at least one year of records, subsequent reconciliation time frames will depend upon how often you wish to do inventory counts and reconciliations, but the less data you have to work through, the easier the process will be. If you intend to keep an ongoing reconciliation log, document the last controlled drug prescription filled, count your inventory before filling any more prescriptions, then proceed to examine your records. If possible, your date range should begin with the date of your last inventory. Any discrepancies should then be investigated for causes, and record keeping errors should be corrected. Future reconciliations may also need to consider products returned to the wholesale as well as those which have expired.

Reconciliation involves comparing sales and current inventory with purchases. A thorough review of any discrepancies should include a review of the records, your ordering/receiving systems, your security systems, your storage systems, and your present and previous inventory counts. Unexplained losses are to be reported to Health Canada http://napra.ca/Content_Files/Files/Saskatchewan/PFM/LossandTheft-Apr2007.pdf and the Saskatchewan College of Pharmacists office.