

*So we have*  
*Scheduled*  
*Medications*  
*Now what?*



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# Chain of Custody

- 1. In practice, a chain of custody is a chronological paper trail documenting when, how, and by whom individual items of physical or electronic evidence. \*<sup>®</sup><sub>1</sub>

# DEA Rules

- Links

- [Home](#)  
[gpo.gov](#)  
[govinfo.gov](#)

# *Scheduled Medication Basics*

- Medication Schedules Title 21 Sec II 1308.12, 1308.13, 1308.14
- Exempted Drugs -1308.21-22

# State Pharmacy Board Rules

- Applying for CSR to then apply as a DEA Registrant.
  - The cost to obtain a registration is \$100 for agency. The biannual cost to renew the registration is \$60.
    - Individual Paramedics/Adv. EMT requirement of registration are waived under [856 IAC 2-3-5-Sec 5,c6d](#)
- [856 IAC 2-1-1](#)

# Documentation examples

- There are many available low cost avenues for obtaining Chain of custody paperwork.
- Electronic
  - Inventory tracking systems
    - <https://www.operativeiq.com/controlled-substance-tracking-software>
    - [https://pharmlogs.com/key\\_strategies.aspx](https://pharmlogs.com/key_strategies.aspx)
    - <https://pstrax.com/controlled-substance-checks/>
    - <https://emslogik.com/pages/narcbox>
  - Paper trails
    - [Paperback book available](#)
    - [Hardback book available](#)

# Inventory Receivables Documentation Example

Importance of inventory intake

8/16/2021

Sugar Creek Township Fire Department - Members Only - Forms

## Narcotics Intake Log Sugar Creek Township Fire Department

To Be Submitted By: Greg Hunt  
Date/Time Saved: Aug 9, 2021 at 13:33

### Narcotics Intake Log

Date:

Members:

Select one:

### Narcotics Quantities On Hand

Label

Fentanyl

Ketamine

Versed

On Hand:

...

...

...

Medication and packaging in place:

### Member's Signature

Members:

Member Signature:

### Additional Comments

comment

comment

comment

comment

Examples

New Column:

...

...

...

Save



## Distribution accountability example

Use electronic form or Security tags.





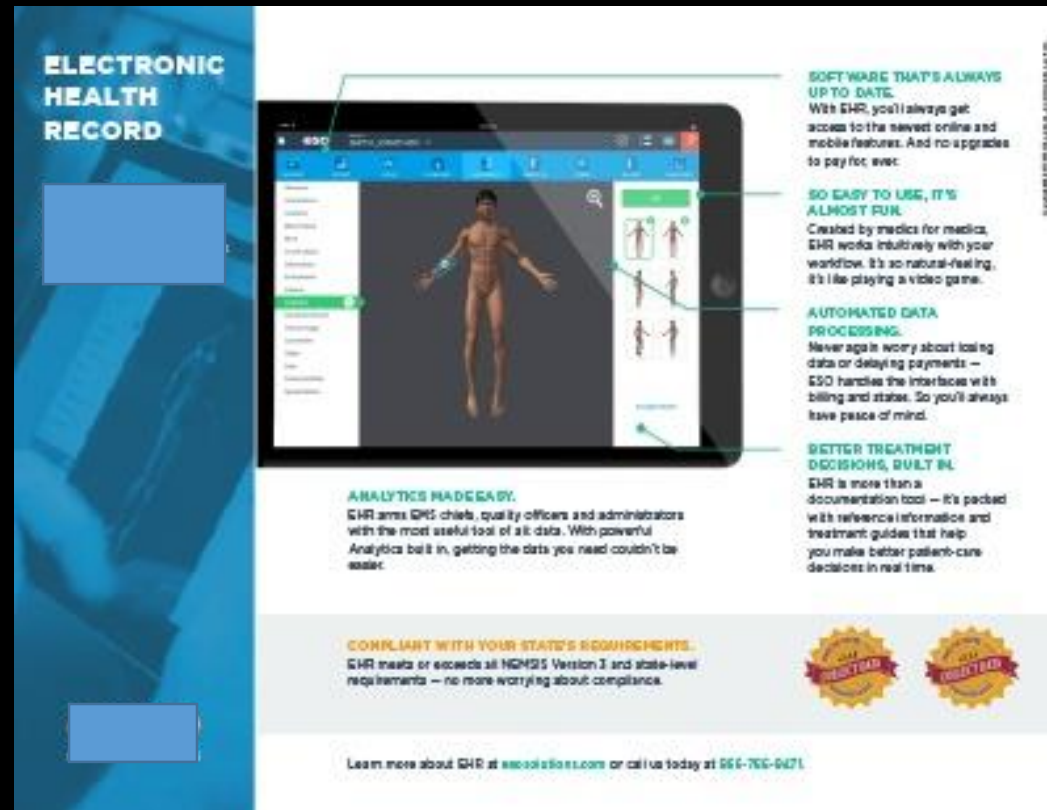
# Example document

USAGE

ACCOUNTABILITY

EXAMPLE

Comparative mechanism to match usage sheets to EHR or PCR as a mode for validation.



**ELECTRONIC HEALTH RECORD**

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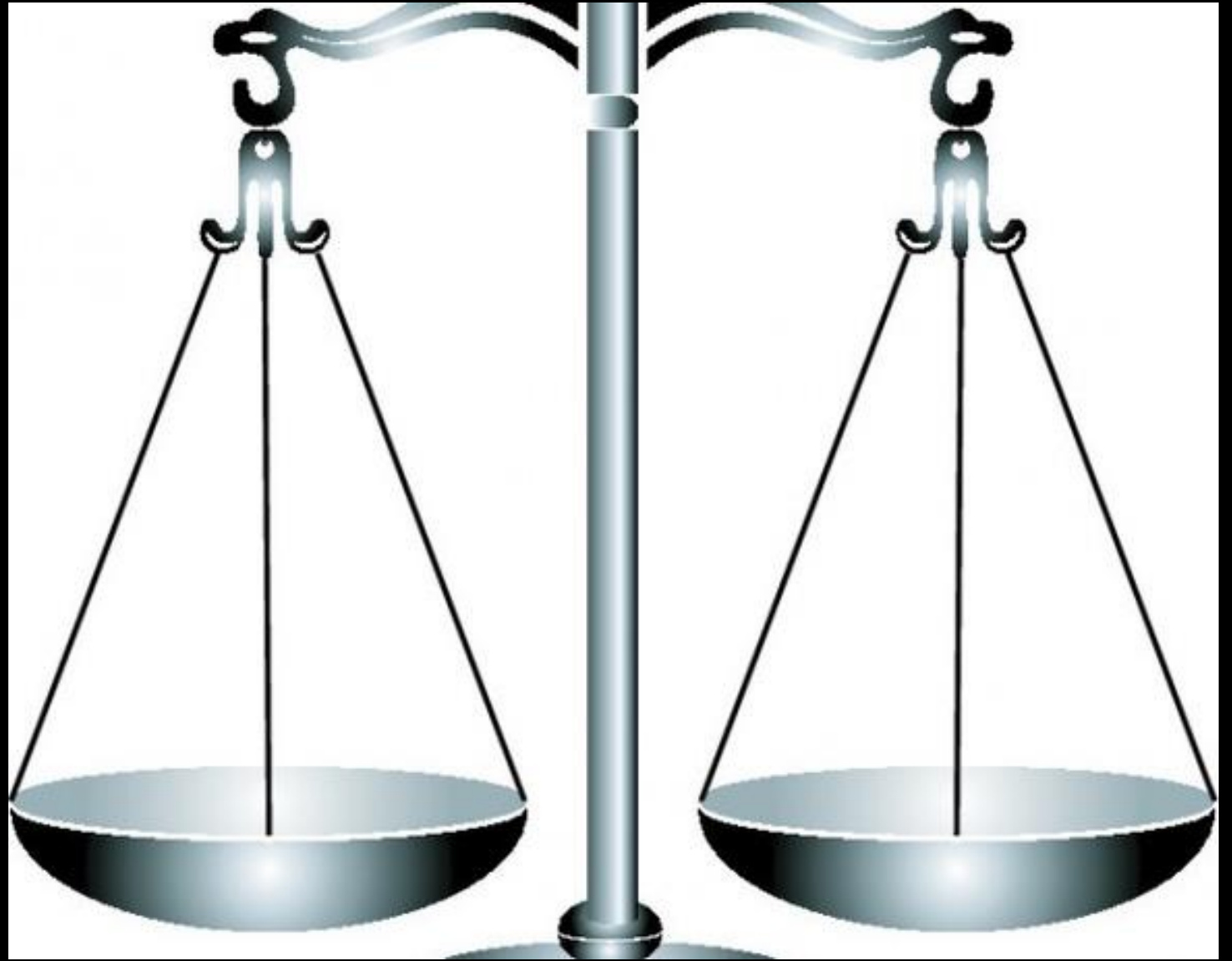
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## Accountability and Redundancy

Using a check and balance system for administrators.



# Inventory Control examples

Secured System:

1. Vaults
2. Safes
3. Lock Boxes



# Supply chain Documentation

Invoices and packing slips used to validate the order manifest from delivered/undelivered product.

**PACKING SLIP**

LOGO

Date: Jan 1, 2010

[COMPANY NAME]  
Your Company Slogan

Your Company Name	Ship To	Name	To
Primary Address		Title	
Address 2		Primary Address	
Phone: 555-555-5555		Address 2	
Fax: 555-555-5555		Phone: 555-555-5555	
E-mail: someone@example.com		Customer ID: #999	
		E-mail: someone@example.com	

Name	To
Title	
Primary Address	
Address 2	
Phone: 555-555-5555	
Customer ID: #999	
E-mail: someone@example.com	

Order Date	Order Number	Job
------------	--------------	-----

Item	Description	Quantity
------	-------------	----------

# Ordering

Form 222, completed in triplicate is mailed to the supplier.

The supplier keeps a copy

DEA gets a copy

Copy is returned in the package order

Records of transfer or disposal are kept for two years

## DEA Form 222

See Reverse of PURCHASER'S Copy for Instructions		No order form may be issued for Schedule I and II substances unless a completed application form has been received (21 CFR 1305.04)		OMB APPROVAL No. 1117-0010		
TO: (Name of Supplier)			STREET ADDRESS			
CITY and STATE		DATE	TO BE FILLED IN BY SUPPLIER			
			SUPPLIER'S DEA REGISTRATION No.			
1 2 3 4 5 6 7 8 9 10	TO BE FILLED IN BY PURCHASER					
	No. of Packages	Size of Package	Name of Item	National Drug Code	Packages Shipped	Date Shipped
LAST LINE COMPLETED		(MUST BE 10 OR LESS)		SIGNATURE OF PURCHASER OR ATTORNEY OR AGENT		
Date Issued	DEA Registration No.		Name and Address of Registrant			
Schedules						
Registered as a	No. of this Order Form					
DEA FORM-222 (Oct. 1992)		U.S. OFFICIAL ORDER FORMS - SCHEDULES I & II DRUG ENFORCEMENT ADMINISTRATION				

# Implementation using existing distribution sources

Example:

1. Using an existing pharmacy
  - a. Sponsoring Hospital(s)





# Spoilage and expiration

Transfer of medications:

1. Proper disposal
  1. Commercial Waste management system
  2. Transfer of controlled substances using 222 form. (Chain of Custody)
  3. Schedule II are 222 for transfer/disposal
  4. Schedule III-V can be by invoice.
  5. Destruction DEA form 41



# Investigating and Reporting

Theft or Significant loss

1. DEA form 106

[21 CFR 1301.76\(b\)](#)



## Source Site

- 1. thoughtco.com
- 2. Slideshare.net
- 3. uidevices.com
- 4. knox.com
- 5. PRWEB.com
- 6. Home  
gpo.gov  
govinfo.gov

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