



HEALTH AND HUMAN SERVICES POLICY

Department: Pharmacy

Policy Number: 1801

Policy Title: Acquisition and Handling of Schedule II Drugs

Revision History: 12/2012

Revised by/Date: Jesse Godding, PharmD /
01/27/2025

Commissioner Initials: *JD* **Director Initials:** *JD*

Approved by: *Jan Manary*
Jan Manary, Executive Director of Health Services

Date:

POLICY: The Ne-Ia-Shing Clinic Pharmacy will ensure all Schedule II medications carried by the pharmacy are strictly controlled and accounted for at all times in accordance with all applicable federal and state pharmacy regulations.

AUTHORITY: DEA Pharmacist's Manual

POLICY DETAILS:

Ordering

All Schedule II medications must be ordered by a licensed pharmacist who:

1. Is employed by the Mille Lacs Band
2. Has an active pharmacist license
3. Has been granted power of attorney to obtain and execute DEA 222 Forms by an officer of Health and Human Services

Schedule II orders will utilize DEA paper Form 222 or online ordering via CSOS.

Receipt

Upon receipt of Schedule II medications delivered to the pharmacy the pharmacist on site will verify each medication received and document its receipt either on a copy of the submitted 222 form or CSOS order form. Receipt of Schedule II medications will also be documented in the perpetual inventory log as well as received into the electronic inventory record of the electronic pharmacy management system.

Storage

Schedule II medications will be stored separately from all other medications in a secure location which shall be kept locked when not in use.

When the pharmacy is not open a security system must be in use to detect unlawful entry into the pharmacy.

Filling

All prescriptions for Schedule II medications must be double counted by the filling pharmacist or technician. They must also be recorded in the corresponding perpetual logbook.

The verifying pharmacist will check each Schedule II prescription for red flags that may indicate fraud or forgery and will resolve any red flags identified before dispensing the medication. The pharmacist must also



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verify the quantity dispensed in the prescription bottle is correct and must verify the quantity remaining in inventory.

Dispensing

Schedule II medications will only be dispensed to the patient of record unless prior arrangement have been made with the pharmacy by the patient.

Photo ID must be shown at pick up unless the patient is known to pharmacy staff.

Inventory

Once a month all Schedule II medications will be counted, and the count recorded in the perpetual inventory log as well as on the monthly controlled substance audit form. This count will be conducted by a pharmacist and will be conducted either at the beginning or close of business. Reconciliation of the physical count against inventory records will occur as soon as possible after the count and any discrepancies found must be resolved or properly reported in a timely fashion in accordance with DEA regulations.

Returning/Destroying Inventory

In-date Schedule II medications may be returned to Mckesson for credit in accordance with their returns policy for returning controlled medications.

Outdated or damaged Schedule II medications not eligible for credit from Mckesson must be separated from other Schedule II inventory and then sent to Inmar for destruction.

Removal of Schedule II medications from inventory must be marked in the perpetual inventory log and electronic pharmacy management system.

Records Keeping

All records created and maintained regarding the ordering, receipt, inventory, distribution, and destruction of Schedule II medications will be stored in accordance with federal regulations and will be readily retrievable for inspection upon request of a duly authorized DEA agent.

Replaces Policy Number	
Compliance - Posting Date	
Next Review - Due Date	

Signature: 

Email: administration@hhs.millelacsband-nsn.gov

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Final Audit Report

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