

# THE QUARTERLY CONNECTION

Quarterly Report from Pharma-Care, Inc., Health Care Consultation Specialists

Third Quarter 2014

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## “Borrowing” of Controlled Dangerous Substances (CDS)

“Borrowing” of a controlled dangerous (drug) substance from one person to another is prohibited by federal law. Only the person whose name appears on the prescription label can utilize the medication. A borrowing policy CANNOT override this. Facilities should be able to provide all medications in a timely manner. If the pharmacy provider is unable to provide medications when needed, the back-up pharmacy should be utilized.

Surveyors have found instances of “borrowing” by reviewing the declining inventory sheets. In some cases, the nurse had written “borrowed”; other times a different resident’s name appeared in the declining inventory sheets. Surveyors can also find it if the number of doses signed on the declining inventory sheet does not match the number of doses administered in the MAR.

Again, under no circumstances can you borrow CDSs. It is ILLEGAL.

## State Survey Results of LTC Facilities: Recorded Trends

Our review of the last quarter State Surveys identifies the following areas as having frequently cited deficiencies:

### F281 Standards of Practice

- All “prn” medication should state an indication for use.
- Lidoderm and nitroglycerin patch removal; twelve hours after application; was not plotted on MAR.
- Nurse failed to flush G-tube after giving medication.
- Tube feeding volume entered ahead of time.

### F329 Unnecessary Medication

- Resident on Xanax in am prior to care. Resident kept exhibiting behaviors yet nothing was done to either increase the dose or evaluate and change the medication.
- Risperdal prescribed without behavior to justify. Resident was found to have UTI, potentially causing the behaviors.
- Targeted behaviors for psychoactives were actually a diagnosis.
- Psych notes and summaries were not in synch with care plans.

Continued on reverse

## Destruction of Controlled Dangerous Substances From Back-Up Medications

In response to recent inquiries from facilities about proper procedures for the destruction of controlled dangerous substances, please consider the letter below that was received from the NJ Office of the Attorney General, Division of Consumer Affairs, Drug Control Unit..

Dear CDS Registrant:

Enclosed please find Controlled Dangerous substances (CDS) Destruction request (DDC-51) forms. Prior to destroying any CDS drugs because (e.g. outdated, unwanted, contaminated, etc.) you must first receive explicit authorization from this office, including a designated authorization number.

Please list all CDS drugs you propose to destroy on the DDC-51 forms according to the instruction/examples specified thereon. The forms may be reproduced if more are needed. When the form is completed, (except for signature, etc. at the bottom of the reverse side), fax one copy to this office at 973-504-63326 or it can be mailed to: Office of Drug Control, PO Box 45045, Newark, NJ 07101 (for our evaluation). Be sure to include all required information including CDS registration number, contact person/persons and telephone number.

When you are granted permission to destroy indicated CDS drugs, a specific date for same will be established. The “Destroyed by,” method of destruction, witness and date destroyed signatures and entries must be completed upon conclusion of the authorized activity.

Sincerely  
Drug Control Unit

To obtain forms and for more information, visit:  
[deaddiversion.usdoj.gov](http://deaddiversion.usdoj.gov)



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**State Survey Results (continued)**

**F332 Medication Pass**

- Metoprolol not administered with or immediately following a meal.
- Miralax not completely dissolved before administration.
- Meds given outside the specified time window for administration.
- Chewable aspirin given instead of enteric coated aspirin.

**F431 Labeling & Storage of Drugs/Biologicals**

- Narcotics box not affixed to refrigerator.
- Borrowing of controlled meds and incomplete DEA 222 forms.
- Expired insulin; opened insulin with no date.
- Tubersol (PPD) opened but not dated.
- OTC stock bottles had pharmacy label with an expiration date shorter than the manufacturer's expiration date.

**Narcotics in Oral Backup/Pyxis:**

**DEA Form 222**

Instruction checklist:

1. Write in supplier name, address
2. Date the form.
3. Indicate number of packages desired.
4. Size of package refers to the available size of the medication.
5. Name of item and desired strength of medication. (Name of item must be filled out completely by writing the drug name, strength, and dosage form.)
6. The last line completed must ALWAYS be filled in.
7. Make sure the Registered Practitioner signs the DEA 222 Form.

**When the medication is received from the pharmacy:**

- A) Record "packages shipped" and "date shipped" on the right-hand side of the form for each line item.
- B) Forms should be filed in numerical order.
- C) Facility must do biennial inventory of these medications.

Blank DEA Form-222  
US Official Order Form - Schedules I & II

See Reverse of PURCHASER'S Copy of Instructions		No order form may be issued for Schedule I and II substances unless a complete application form has been received. (21 CFR 1305.04)		OMB APPROVAL No. 1117-0010	
TO: (Name of Supplier) PHARMACY PROVIDER			STREET ADDRESS 123 MAIN ST		
CITY AND STATE ANYTOWN, NJ		DATE 3/12/2015		TO BE FILLED IN BY SUPPLIER SUPPLIER'S DEA REGISTRATION	
TO BE FILLED IN BY PURCHASER					
LINE No.	No. of Packages	Size of Package	Name of Item	National Drug Code	Packages Shipped
1	10	1	Digoxin/APAP 5 / 325mg tab		
2	20	1	Hydrochlorothiazide 2mg tab		
3	2	30ml	Morphine Sulfate 20mg / ml soln.		
4	8	1	Digoxin ER 10mg tab		
5	2	1	Fentanyl 50mcg patch		
6					
7					
8					
9					
10					
6 5 LAST LINE COMPLETED (MUST BE 10 OR LESS)			SIGNATURE OR PURCHASER OR ATTORNEY OR AGENT Mary Smit 7		
Date Issued XX/XX/XX	DEA Registration No. XXXXXXX	Name and Address of Registrant HAPPY HOME NURSING FACILITY 555 MAIN STREET TOWN, NJ 00000			
Schedules XXX	No. of this Order 01988888				
Registered as a XXXXX					

DEA Form-222 (Oct. 1992) U.S. OFFICIAL ORDER FORMS - SCHEDULES I & II DRUG ENFORCEMENT ADMINISTRATION SUPPLIER'S Copy 1

**Welcome to our newest clients:**

**CareOne at Evesham  
Dialysis of Deborah  
Garden State Surgical Center  
Main Street Dialysis  
Millburn Dialysis  
Raritan Valley Surgical Center**

**NJ Long-Term Care Leaders Coalition Conference  
"Navigating the Perils of Care Transitions"**

October 2, 2014; 8am - 4pm; Crowne Plaza, Monroe Twp  
For physicians, medical directors, administrators, nurses, pharmacists, social workers, dietitians, and other LTC professionals. (Applied for 5 credits)  
Information: Maureen Ziegler (732) 574-9434 ext 105

**EPIC Corner**

ELECTRONIC PHARMACIST INFORMATION CONSULTANT  
(MEDICATION REVIEWS WITHIN 48 BUSINESS HOURS)

**EPIC Phone: 732-943-3573  
EPIC Fax: 732-574-3469**

**"Old-Fashioned is still Fashionable"**

Although EPIC serves as a valuable member of the healthcare team, it can not, and does not, replace the need for care and vigilance from the nursing staff that checks and validates medication orders on a daily basis.

Although we are in the 21st century, certain "old fashioned" rules remain valid...especially the "old fashioned" rule that the first nurse administering a medication should check the medication administration record against the physician order sheet. This procedure remains a solid way to help prevent medication errors, including omissions.

EPIC continues to grow. We are now reviewing over 3,800 residents monthly! Even though many residents are in a facility for a short time, necessary information for their safety and pharmaceutical care should not be overlooked.

We welcome Kathleen Murphy Rodgers, MS, CHES, CCP, RPH to the EPIC staff. Ms. Rodgers brings her skills as a medical writer and Certified Health Education Specialist to the division.



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