Practice Policy: Inventory Management of CDSA and Z-Drugs Frequently Asked Questions

1. Why is an update to the Narcotic and Controlled Drug Reconciliation Policy necessary?
   - The public depends on pharmacy practitioners taking reasonable steps to ensure medications are stored securely, particularly those that are prone to loss or theft.
   - There has been an evolution in the way pharmacy inventory is ordered, received, and managed which is not reflected in the current policy.
   - While most pharmacies include benzodiazepines as part of the monthly reconciliation, some do not. Given that benzodiazepines are included in the schedules of the CDSA and that they are known drugs of abuse, it is appropriate that they now be included to the requirements of this policy.
   - Z-Drugs are included in the NS Annual substance-related Fatality Rates and have been identified as drugs of concern that should be monitored.

2. What drugs are subject to the requirements of this policy?
   - The drugs included in this policy are:
     - Narcotics
     - Controlled Drugs
     - Benzodiazepines and other Targeted Substances
     - Z-Drugs (For the purposes of this policy, Z-Drugs include zopiclone and its enantiomers. Zolpidem is listed as a Schedule IV drug in the CDSA.)

3. How often do the reconciliations have to take place?
   - The requirements in this policy must be completed monthly.

4. Why does this have to be completed monthly?
   - The requirement to complete this monthly is not new. The drugs addressed in this policy are high risk drugs for misuse and their diversion has the potential to put the public at risk.

5. Managers may not have control over the pharmacy technology. How can they *"be satisfied that the pharmacy software system is kept up to date so that technology safeguards remain current"*?

- Pharmacy software programs are routinely updated. Managers should ensure that updates are implemented in a timely manner. If this process is not under the control of a manager, they should confirm with their employer that software updates are implemented when needed.

6. Can the manager delegate their responsibilities to another individual?

   - The pharmacy manager remains responsible for ensuring that all of the requirements of the policy are met. However, there is nothing to preclude them from assigning tasks to other individuals in the pharmacy. It is recommended in the policy that different people be involved (where possible).

7. The policy states that: *"Pharmacy stock (e.g., expired medication) awaiting local destruction must be included as part of this reconciliation including being reconciled with any manual adjustments."* Does this mean that I have to count my consumer returns awaiting destruction every month?

   - For the purposes of this policy, pharmacy stock does not include post-consumer returns. Post consumer returns must be managed in accordance with Health Canada requirements. Refer to resource 1.1.

8. The policy requires that a reconciliation take place when there is an unexpected change in pharmacy staff. What does *"unexpected change in pharmacy staff"* mean?

   - This requirement is based on guidance from Health Canada. Although "unexpected change" is not defined, it could include situations where an individual is fired, or quits their job abruptly.

9. Can the 10-day window to report discrepancies be increased to 30 days?

   - No, this is a Health Canada requirement. Refer to resource 1.4.

10. Can you indicate a threshold below which a discrepancy does not have to be reported?

    - The threshold for reporting is set by Health Canada. Refer to resource 1.5.

11. Why do we report Z-Drugs to the NSCP but not to Health Canada?

    - Health Canada sets out the requirements for what drugs they require to be reported. Zopiclone and its enantiomers are not included in their requirements. Refer to resource 1.4.

12. How can we ensure that the documentation of manual adjustments meets the requirements in this policy?

    - The policy does not require any specific method. However, pharmacy software systems may have forcing functions that can be enabled to ensure this takes place. Contact your software support provider for details.