

Standard Operating Procedure: Controlled Drugs and Narcotics

1. Purpose

Controlled drugs and narcotics pose a serious risk to the public and clinic staff. Diversion and self use pose significant risks. This SOP serves to help ensure that this veterinary practice appropriately oversees controlled drugs and narcotics in the practice and reports concerns appropriately.

2. Scope

All clinic staff.

3. Reporting Concerns

Concerns about narcotics and controlled drugs are reported to ____role____. (*consider choosing a contact that staff will be comfortable approaching, has training, Health and Safety person/committee*)

If concerns are not adequately addressed, concerns can be directed to:

- **Workplace Safety and Health**

Winnipeg: 204-957-SAFE (7233)

Toll-free: 1-855-957-SAFE (7233)

<https://www.gov.mb.ca/labour/safety/index.html>

- **MVMA**

www.mvma.ca

204-832-1276

- **Health Canada**

Office of Controlled Substances

Email: ocs-bsc@hc-sc.gc.ca

Phone: 613-952-2177

- **The police**

4. Procedure (General)

Location

The locations where the controlled substances and log are kept:

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Controlled substances and narcotics are stored ____location____.

Note: Narcotics and controlled substances must be stored on a premises under the care and control of the veterinary practice.

Note: Narcotics and controlled substances must be stored in a locked, secure area.

Note: Narcotic and controlled drugs shall be stored in a manner that protects them against loss or theft.

The Narcotics and Controlled Drug Log is located ____insert location____.

Note: The Narcotics and Controlled Drug Log must be kept separately from the locked drugs.

Reconciliation

Reconciliations are completed at least every ____insert time period____.

Note: All physical narcotics and controlled drugs in the veterinary practice must be reconciled with the Narcotics and Controlled Drug Log by a Practising Veterinarian Member or Practising Veterinary Technologist Member at least once per month.

Reconciliation will occur immediately following high risk events including break in at the practice, evidence of drug tampering, practice flooding, etc.

The following veterinarian(s) and/or veterinary technologist(s) are responsible to complete the reconciliations *and complete the Reconciliation Report (appendix A)*.

- Insert name
- Insert name

Reconciliation Reports are stored ____insert location____.

Reporting Losses

- Reportable losses of controlled substances/narcotics will be reported to Health Canada- <https://www.canada.ca/en/health-canada/services/health-concerns/controlled-substances-precursor-chemicals/controlled-substances/compliance-monitoring/loss-theft.html> . Reports will be made by ____insert person/role____. Reports to Health Canada will be made within the required timelines- <https://www.canada.ca/en/health-canada/services/publications/healthy-living/loss-theft-controlled-substances-precursors/timeframes-reporting.html> .

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- Reportable losses of controlled substances/narcotics will be reported to the MVMA by complete this form (Link). Reports will be made by ____insert person/role____. Reports to the MVMA will be made within 30 days.

Destroy/dispose of controlled substances and narcotics

See Appendix C for more guidance on options

This practice disposes of controlled substances and narcotics in the following manners:

The practice uses the following system to destroy/dispose of controlled substances and narcotics in a safe manner that meets provincial and federal requirements. This practice uses the following methods:

- *Provides expired product to third party service provider(s) that is a licenced dealer to destroy product:*
 - *Name, contact information*
 - *Name, contact information*
- *Returns product to original distributor:*
 - *Name, contact information*
 - *Name, contact information*
- *Local destruction (example: cremate product onsite)*
 - *The Veterinarian destroying the controlled substance and/or narcotic:*
 - *Uses an appropriate method to denature the controlled drug(s).*
 - *Ensures that the method of destruction is in compliance with all applicable federal, provincial and municipal environmental legislation.*
 - *Has another health professional witness the destruction (i.e., veterinarian, registered veterinary technician, nurse, pharmacist.)*
 - *Records on the inventory list/controlled drug log the date of destruction (the list should identify product destroyed from inventory and product destroyed that was returned by clients... separately)*
 - *Ensures the veterinarian and witness sign and date the list.*

Note: see Narcotic Destruction Sheet Template

5. Procedure (New Staff, Students, Volunteers)

The practice should consider how new staff, students and volunteers are onboarded. You may wish to include direction on the following, non-exhaustive list:

How are they oriented to the procedure?

How is the SOP communicated? manual log, posted on wall, staff training

Appendix A

Reconciliation Report

Current date: _____

Date of most previous reconciliation: _____

Reconciliation completed by: _____

Step 1: Determine the amount of each product that should be remaining as per a review of the Narcotics and Controlled Drug Log, including purchase history.

Drug Name	Amount at last reconciliation	Amount added to stock	Amount dispensed /used	Number of withdrawals from bottle (if applicable)	Loss Allowance*1 (if applicable)	Amount Expected
<i>Drug 1 Name</i>						
<i>Drug 2 Name</i>						
<i>Kitty Magic</i>						

*1 Loss allowance is 0.1-0.2ml per withdrawal

Step 2: Determine the amount of each product remaining, as per the physical inventory count.

Drug Name	Amount at Physical Inventory Count
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<i>Drug 1 Name</i>	
<i>Drug 2 Name</i>	
<i>Kitty Magic</i>	

Step 3: Compare Amount Expected and Amount at Physical Inventory Count and provide description of any discrepancies.

Drug Name	Amount Expected (Step 1)	Amount at Physical Inventory Count (Step 2)	Explanation of any discrepancies
<i>Drug 1 Name</i>			
<i>Drug 2 Name</i>			
<i>Kitty Magic</i>			

Step 4: Loss and/or theft reports made to the MVMA and/or Health Canada

☐	Since the last reconciliation report, there have NOT been no loss and/or theft reports made to the MVMA and/or Health Canada
☐	Since the last reconciliation report, there have been loss and/or theft reports made to the MVMA and/or Health Canada. Copies of these reports are attached.

Appendix B

Drug Audit Tips

1. Determine Expected Inventory

The amount of each drug that you expect to be on hand.

Based on the information contained in the controlled drug log and purchase invoices.

2. Determine Actual Inventory

By counting measuring the stock of both unopened and opened bottles/stock

Tamper proof seals can save time, is seal is not broken, the auditor can assume the quantity in the bottle remains the same

Injectable/liquid drugs- do not pull out of bottle and this can lead to contamination and loss.

Method 1- apply new label after each withdrawal from bottle

Example: A new 10ml bottle of Drug X is opened and 2ml are withdrawn. Attach a sticker indicating that 8.0 ml of the drug remain in the bottle.

Method 2 – have an empty bottle of the same size for comparison.

Example: if you believe there are 3 ml remaining in a 10 ml bottle, take an empty 10ml bottle and add 10ml of water. Compare the two bottles.

Example: when verifying the amount of drug in a 10 ml bottle, the practice can maintain an empty 10ml bottle with markings for each ml (measured by adding water to the bottle.)

Method 3 – have an empty bottle and full bottle to weigh for comparison.

Example: an empty bottle of 10ml drug A is 100 grams. A full bottle of 10ml drug A is 1,100 grams. 10ml of drug A therefore would weight 100 grams. If an opened bottle of 10ml drug A weighs 300 grams, we would know that there are 2ml of drug A remaining in the bottle.

Loss allowance- .1 to .2 ml per withdrawal is the normal acceptable range.

Example: If 12 withdrawals are made from a bottle a loss allowance of 1.2 to 2.4ml is expected.

Logged withdrawal + Loss allowance = Actual Amount Removed

Step 3 Compare Expected Inventory to Actual Inventory

These two numbers should be identical or very close

If there are discrepancies:

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- Check your math
- Check the records
- Recount inventory
- Ensure you have accounted for loss allowance

Appendix C

Destroying and Disposing of Controlled Drugs and Narcotics

Licensed veterinarians have a variety of options related to the destruction of controlled drugs. These options may be used as a single solution, or may be combined in a manner suitable to individual practice. Options include:

1. Sending controlled drugs off-site for destruction and disposal purposes. This may be done by:
 1. Using the services of a third-party collection service who is a licensed dealer;
 2. Returning the controlled drugs to the licensed dealer who sold or provided them as per their return policies.
2. Local Destruction: If a licensed veterinarian chooses to destroy controlled drugs by means of local destruction, they must do so in a manner that will alter or denature the drugs to such an extent as to make them non-recoverable and their consumption rendered impossible or improbable. Veterinarians are encouraged to consult WHMIS sheets to determine methodology. Bleach is not recommended as it may produce an exothermic reaction. Once the controlled drug is denatured, it is the responsibility of the veterinarian to ensure that it is placed in a suitable waste container for disposal in an appropriate manner. (i.e. in a manner compliant with all applicable federal, provincial, and municipal environmental waste legislation).

Before destroying any controlled drug, a veterinarian is expected to:

- Use an appropriate method to denature the controlled drug(s).
- Ensure that the method of destruction is in compliance with all applicable federal, provincial and municipal environmental legislation.
- Have another health professional witness the destruction (i.e., veterinarian, registered veterinary technician, nurse, pharmacist.)
- Record on the inventory list/controlled drug log the date of destruction (the list should identify product destroyed from inventory and product destroyed that was returned by clients... separately)

(Clinic Logo)

- Have the veterinarian and witness sign and date the list.

Resources

- [Handling and destruction of post-consumer returns containing controlled substances \(CS-GD-021\)](#)
- [Guidance Document for Pharmacists, Practitioners and Persons in Charge of Hospitals: Handling and Destruction of Unserviceable Stock Containing Narcotics, Controlled Drugs or Targeted Substances](#)