

NSVMA Narcotics Control Policy 2024

Every veterinarian has the right to prescribe and dispense controlled drugs. This privilege comes with responsibilities, inclusive of mitigating the risk of inappropriate or illegal access to controlled drugs.

Canada's controlled substance regulations only state that prescribers must limit access to controlled substances to prevent diversion, by considering the various opportunities for diversion. The goal of controlled substance regulations is to make it sufficiently difficult for anyone to divert drugs at any point in a drug's life cycle. For veterinary facilities, the period from procurement through when the drug is administered, dispensed, or disposed of is the focus of concern.

NSVMA Annex to the By-Laws for Facilities

US-8 Pharmacy Management

Narcotic and controlled substances:

- a. **Are stored in a limited access, securely locked, substantially constructed cabinet or safe.**
- b. **A current, verifiable inventory of all products is maintained.**

Definitions:

Limited Access

For the purposes of controlling access to narcotics, and the ability to verify narcotics inventory, access the controlled drugs locked cabinet is required to be limited to licensed members of the NSVMA. This includes Veterinarians and Registered Veterinary Technicians.

Relock controlled substance storage immediately after access. Storage should not be left unlocked, or drugs left out of the storage area, for convenience.

Dispensed narcotics prescriptions awaiting pickup by a client should be stored in a limited access locked cabinet/drawer/safe, whether it is the main locked cabinet, or a separate locked cabinet that could be accessible by support staff.

Limit access to controlled substances only to those who need it. Depending on the practice, this may include veterinarians only, or a combination of veterinarians and registered veterinary technicians. Keep in mind that the more people who have access, the more likely it is that errors will occur and the more difficult it becomes to detect diversion.

Securely locked/substantially constructed cabinet or safe

If drugs are stored behind a key lock, limit access to the key to only those authorized to access the medications. A key storage box, that is accessed by a combination lock/real estate lock box would be sufficient.

If a combination lock or electronic security lock is used to secure controlled substances, give the combination only to those authorized to access the drugs and change it when any of those personnel terminate their employment. Issuance of combinations and electronic security lock codes should only be the responsibility of the Responsible Veterinarian and not that of a non-member (eg: manager)

Locked boxes/safes are required to be secured to a surface to prevent a person from easily removing and carrying out the locked box or safe.

Secure locked ambulatory boxes to the vehicle in some manner, such as with a cable lock, so that it is not possible for a passerby to break a window and remove the box. The use of a locked glove box for narcotics storage is acceptable, however, the key must not be left in an unattended vehicle.

Verifiable (please review changes)

The use of a “4 eyes” system whereby, at every step of procurement through when the drug is administered, dispensed, or disposed of is captured and logged by two people, at least one of which is a licensed member.

An example of a “4 eyes” system in action:

- The narcotics order is delivered to the facility and accepted at reception.
- The box is opened by two people, at least ONE of which is a licensed member.
- The invoice is initialed by both people and filed for reference for a length of time determined by the Facility based on inventory reconciliation frequency OR the narcotic inventory is logged into the narcotics control drug log and initialed by both people.
- When the controlled drug cabinet is accessed, two people must be present: The licensed member accessing and the person dispensing the drug. Both people sign/initial the narcotics drug log. Few exceptions to this occur: after-hours emergencies being a common one.

Every drug box should display the National Suicide Prevention phone number