

**Title 16. Board of Pharmacy  
Proposed Text**

**Adopt section 1715.65 in Article 2 of Division 17 of Title 16 of the California Code of Regulations to read as follows:**

**1715.65. Inventory Reconciliation Report of Controlled Substances**

- a) Every pharmacy, and every clinic licensed under sections 4180 or 4190, shall perform periodic inventory and inventory reconciliation functions to detect and prevent the loss of controlled substances.
- b) The pharmacist-in-charge of a pharmacy or consultant pharmacist for a clinic shall review all inventory and inventory reconciliation reports taken, and establish and maintain secure methods to prevent losses of controlled drugs. Written policies and procedures shall be developed for performing the inventory reconciliation reports required by this section.
- c) A pharmacy or clinic shall compile an Inventory Reconciliation Report of all Schedule II controlled substances at least every three months. This compilation shall require:
  - 1) A physical count, not an estimate, of all quantities of Schedule II controlled substances. The biennial inventory of controlled substances required by federal law may serve as one of the mandated inventories under this section in the year where the federal biennial inventory is performed, provided the biennial inventory was taken no more than three months from the last inventory required by this section;
  - 2) A review of all acquisitions and dispositions of Schedule II controlled substances since the last Inventory Reconciliation Report;
  - 3) A comparison of (1) and (2) to determine if there are any variances; and
  - 4) All records used to compile each Inventory Reconciliation Report shall be maintained in the pharmacy or clinic for at least three years in a readily retrievable form.
- d) Losses shall be identified in writing and reported to the board and, when appropriate, to the Drug Enforcement Administration. Likely causes of overages shall be identified in writing and incorporated into the Inventory Reconciliation Report.
- e) The Inventory Reconciliation Report shall be dated and signed by the individual(s) performing the inventory, and countersigned by the pharmacist-in-charge, and be readily retrievable in the pharmacy or clinic for three years.
- f) A new pharmacist-in-charge of a pharmacy shall complete an inventory within 30 days of becoming pharmacist-in-charge as identified in subdivision (c). Whenever possible an outgoing pharmacist-in-charge should complete an inventory as required in subdivision (c).
- g) For inpatient hospital pharmacies, a separate Inventory Reconciliation Report shall be required for Schedule II controlled substances stored within the pharmacy and for each pharmacy satellite location.
- h) The pharmacist-in-charge of an inpatient hospital pharmacy or of a pharmacy servicing onsite or offsite automated drug delivery systems shall ensure that:
  - 1) All controlled substances added to an automated drug delivery system are accounted for;
  - 2) Access to automated drug delivery systems is limited to authorized facility personnel;

- 3) An ongoing evaluation of discrepancies or unusual access associated with controlled substances is performed;
- 4) Confirmed losses of controlled substances are reported to the board; and
- 5) A pharmacy or clinic identifying losses of controlled drugs but unable to identify the cause within 30 days shall take additional steps to identify the origin of the losses and improve security of controlled substance access to prevent losses.

Authority cited: Section 4005, Business and Professions Code. Reference: Sections 4081, 4104 and 4332, Business and Professions Code.