

BUREAU OF NARCOTICS AND DANGEROUS DRUGS HOSPITAL SURVEY TIPS

- The BNDD will send a list of providers in advance. The hospital should have the Missouri license, BNDD registration/license, and the Drug Enforcement Administration certificate (will not accept primary source verification for the DEA certificate).
- They expect the sites where providers also may practice being listed as secondary sites (example, specialty providers or emergency department providers that practice at multiple locations).
- They will send a list 2-4 days prior to arrival to pull two to three files/charts of visits when a controlled substance was prescribed to ensure appropriate information is included. They will be checking for the following: patient's full name and address are in the chart/record, and also the substance prescribed, strength, form and quantity. If the provider has not written any controlled substance prescriptions, let the surveyor know. The inspection will include but may not be limited to these areas.
- The surveyor expects to see notes and prescriptions from the electronic system as well. The facility should have had both prepared, but they may only look at the prescriptions and be able to get the information needed. Indications should be listed on the prescriptions.
- If providers do emergency call-ins to pharmacies for Schedule II controlled substances, there will need to be evidence of a follow-up prescription within seven days. They also will want confirmation the prescription is issued only in emergency situations as defined by law.
- If there are controlled substances under provider licenses in the clinics (i.e., rural health regulations require antiseizure medication and providers may want a benzo) the clinic will have to show they medications are double locked; and the provider must have their license noted that they store controlled substances.
- Pulling visits can be a big task for medical informatics liaisons. Plan for this.
- If prescriptions are faxed, the prescriptions need to be kept separate from the patient file and include the appropriate information.
- The surveyor will check the security related to prescription pads or access to e-scripts.
- They will let you know if they have received any complaints on any of the providers or the hospital and whether it is a complaint or regular inspection.
- Normally providers in a hospital setting do not have controlled substances stocked under their name. If any of the providers do have controlled substances stocked under their name, make the surveyor aware as it will lengthen the process.

RESOURCES

- DEA Registration Verification [website](#)
- Missouri BNDD [website](#)
- Controlled Substance Laws and Regulations [link](#)