



California State Board of Pharmacy
 2720 Gateway Oaks Drive, Ste. 100
 Sacramento, CA 95833
 Phone: (916) 518-3100 Fax: (916) 574-8618
 www.pharmacy.ca.gov

Business, Consumer Services and Housing Agency
 Department of Consumer Affairs
 Gavin Newsom, Governor



AUTOMATED DRUG DELIVERY SYSTEM SELF-ASSESSMENT

Business and Professions Code (BPC) section 4427.7(a) requires the pharmacy holding an automated drug delivery system (ADDS) license complete an annual self-assessment, performed pursuant to section 1715.1 of Title 16 of the California Code of Regulations, evaluating the pharmacy’s compliance with pharmacy law relating to the use of the ADDS. The assessment shall be performed annually **before July 1 of every year** by the pharmacist-in-charge of each pharmacy under section 4029 (Hospital Pharmacy) or section 4037 (Pharmacy). The pharmacist-in-charge must also complete a self-assessment within 30 days whenever; (1) a new automated drug delivery system permit has been issued, or (2) there is a change in the pharmacist-in-charge and becomes the new pharmacist-in-charge of an automated drug delivery system, or (3) there is a change in the licensed location of an automated drug delivery system to a new address. The primary purpose of the self-assessment is to promote compliance through self-examination and education. All information regarding operation, maintenance, compliance, error, omissions, or complaints pertaining to the ADDS shall be included in this Self-Assessment.

All references to Business and Professions Code (BPC) are to Chapter 9, Division 2; California Code of Regulations (CCR) are to Title 16; and Code of Federal Regulations (21 CFR) to Title 21 unless otherwise noted.

The self-assessment must be completed and retained in the pharmacy for three (3) years after performed.

Please mark the appropriate box for each item. If “NO”, enter an explanation and timeframe when the deficiency will be completed on the “CORRECTIVE ACTION OR ACTION PLAN AND COMPLETION DATE” lines at the end of the section. If more space is needed, you may add additional sheets.

Pharmacy Name: _____
Address: _____
City: _____
Phone: _____
Fax number: _____
Website: _____
Pharmacy License #: _____
Expiration Date: _____
DEA Registration #: _____
DEA Expiration Date: _____
DEA Inventory Date: _____
Last C2 Inventory Reconciliation Date (CCR 1715.65(c)): _____

Pharmacy Hours: M-F: _____ Saturday _____ Sunday _____
 PIC: _____ RPH# _____
 ADDS License #: _____
 ADDS Expiration Date: _____
 ADDS Address: _____
 City: _____
 ADDS Hours: M-F: _____ Saturday _____ Sunday _____
 Please explain if the ADDS hours are different than the pharmacy:

FOR ALL TYPES OF ADDS: COMPLETE SECTIONS 1, 2 AND 3

SECTION 1: DEFINITIONS/TYPE OF ADDS DEVICE USED

An **ADDS** – “Automated drug delivery system,” a mechanical system that performs operations or activities other than compounding or administration, relative to storage, dispensing, or distribution of drugs. An ADDS, shall collect, control and maintain all transaction information to accurately track the movement of drugs into and out of the system for security, accuracy, and accountability. [BPC 4119.11(b)(1), 4017.3(a)]

IDENTIFY THE TYPE OF ADDS DEVICE USED

Yes No N/A

1.1. The pharmacy uses an **APDS** – “Automated **PATIENT** dispensing system,” an ADDS for storage and dispensing of prescribed drugs directly to the patients pursuant to prior authorization by a pharmacist. [BPC 4119.11(b)(2), 4017.3(c)]

1.2 The pharmacy uses an **AUDS** – “Automated **UNIT DOSE** system,” an ADDS for the storage and retrieval of unit dose drugs for administration to patient by persons authorized to perform these functions. [BPC 4119.11(b)(3), 4017.3(b)]

SECTION 2: LOCATION OF DEVICES

Yes No N/A

2.1 Provides pharmacy services to the patient of **covered entities**, as defined that are eligible for discount drug programs under federal law as specified through the use of an APDS as defined. The APDS need not be at the same location as the underlying operating pharmacy if all the specific conditions are met. “Covered entity” as defined by section 256b of Title 42 of United States Code. [BPC 4119.11(a)-(a)(11)]

2.2 Provides pharmacy services through an ADDS **adjacent to the secured pharmacy area** of the pharmacy holding the ADDS license. [BPC 4427.3(b)(1)]

2.3 Provides pharmacy services through an ADDS in **a health facility** licensed pursuant to section 1250 of the Health and Safety Code (Long Term Care (LTC)) that complies with section 1261.6 of the Health and Safety Code. [BPC 4427.3(b)(2)]

Yes No N/A

- 2.4 Provides pharmacy services through **a clinic** licensed pursuant to section 1204 or 1204.1 of the Health and Safety Code, or section 4180 or 4190 of Business and Professions Code. [BPC 4427.3(b)3]
- 2.5 Provides pharmacy services through a **correctional clinic**. [BPC 4187.1, 4427.3(b)(4)]
- 2.6 Provides pharmacy services through a **medical office**. [BPC 4427.3(b)(5), 4427.6(j)]
- 2.7 **AUDS operated by a licensed hospital pharmacy**, as defined in section 4029, and is used solely to provide doses administered to patients while in a licensed general acute care hospital facility or a licensed acute psychiatric hospital facility, as defined in subdivision (a) and (b) of section 1250 of the Health and Safety Code, shall be exempt from the requirement of obtaining an ADDS license, if the licensed hospital pharmacy owns or leases the AUDS and owns the dangerous drugs and dangerous devices in the AUDS. The AUDS shall comply with all other requirements for an ADDS in Article 25. The licensed hospital pharmacy shall maintain a list of the locations of each AUDS it operates and shall make the list available to the board upon request. [BPC4427.2(i)]

Note: An ADDS license is not required for technology, installed **within the secured licensed premises area of a pharmacy**, used in the selecting, counting, packaging, and labeling of dangerous drugs and dangerous devices. [BPC 4427.2(j)]

SECTION 3: GENERAL REQUIREMENTS FOR ALL TYPES OF ADDS

(Answer N/A if licensure not required)

Yes No N/A

- 3.1 The ADDS is installed, leased, owned, or operated in California and is licensed by the board. [BPC 4427.2(a), 4427.4(a)]
- 3.2 The ADDS license was issued to a holder of a current, valid, and active pharmacy license of a pharmacy located and licensed in California. [BPC 4427.2(b)]
- 3.3 Each ADDS has a separate license. [BPC 4427.2(c)]
- 3.4 The licensed ADDS meets the following conditions: [BPC 4427.2(d)]
- Use of the ADDS is consistent with legal requirements.
 - The proposed location for installation of the ADDS met the requirements of section 4427.3 and the ADDS is secure from access and removal by unauthorized individuals.
 - The pharmacy's policies and procedures related to the ADDS include appropriate security measures and monitoring of the inventory to prevent theft and diversion.
 - The pharmacy's policy and procedures included provisions for reporting to the board drug losses from the ADDS inventory, as required by law.

Yes No N/A

- 3.5 A precicensure inspection was conducted within 30 days of a completed application for the ADDS license at the proposed location(s). [BPC 4427.2(e)]
List date(s) of pre-license inspection(s):

- 3.6 The pharmacy is aware a relocation of an ADDS shall require a new application for licensure. [BPC 4427.2(e)]
- 3.7. The pharmacy is aware a replacement of an ADDS shall require notification to the board within 30 days. [BPC 4427.2(e)]
- 3.8 The pharmacy is aware the ADDS license will be canceled by operation of law if the underlying pharmacy license is not current, valid, and active. Upon reissuance or reinstatement of the underlying pharmacy license, a new application for an ADDS license is submitted to the board. [BPC 4427.2(f)]
- 3.9 The pharmacy is aware the holder of an ADDS license will advise the board in writing within 30 days if use of an ADDS is discontinued. [BPC 4427.2(g)]
- 3.10 The ADDS license(s) was/were renewed annually, and the renewal date is the same as the underlying pharmacy license. [BPC 4427.2(h)]
- 3.11 The ADDS is placed and operated inside an enclosed building, with a premises address, at a location approved by the board. [BPC 4427.3(a)]
- 3.12 Prior to installation, the pharmacy holding the ADDS license and the location where the ADDS is placed pursuant to subdivision (b) of Business and Professions Code section 4427.3, jointly developed and implemented written policies and procedures to ensure safety, accuracy, accountability, security, patient confidentiality, and maintenance of the ADDS, as well as quality, potency, and purity of the drugs and devices. The policies and procedures are maintained at the location of the ADDS and at the pharmacy holding the ADDS license. [BPC 4427.3(c)]
- 3.13 Each ADDS is operated under the supervision of the pharmacy holding the ADDS license. [BPC 4427.4(b)]
- 3.14 The ADDS is considered an extension and part of the pharmacy holding the ADDS license, regardless of the ADDS location, and is subject to inspection pursuant to BPC 4008. [BPC 4427.4(c)]

Yes No N/A

- 3.15 Drugs and devices stored in an ADDS will be deemed part of the inventory and the responsibility of the pharmacy holding the ADDS license, and the drugs and devices dispensed from the ADDS shall be considered to have been dispensed by the pharmacy. [BPC 4427.4(d)]

- 3.16 The stocking and restocking of an ADDS is performed by a pharmacist, or by a pharmacy technician or intern pharmacist under the supervision of a pharmacist, except for an ADDS located in a health facility pursuant to HSC 1250, where the stocking and restocking of the ADDS may be performed in compliance with HSC 1261.6. [BPC 4427.4(e)(1)]

- 3.17 Access to the ADDS is controlled and tracked using an identification or password system or biosensor. [BPC 4427.4(e)(2)]

- 3.18 The ADDS makes a complete and accurate record of all transactions including all users accessing the system and all drugs added to, or removed from, the system. [BPC 4427.4(e)(3)]

- 3.19 Are drugs or devices not immediately transferred into an ADDS upon arrival at the ADDS location, stored for no longer than 48 hours in a secured room within the ADDS location approved by the board under section 4427.3 and upon retrieval of the dangerous drugs and devices from the secured storage is an inventory taken to detect any losses or overages? [BPC 4427.4(f)]

- 3.20 Prior to installation, and annually thereafter, the pharmacy holding the ADDS license provides training on the operation and use of the ADDS to the pharmacy personnel and to personnel using the ADDS at the location where the ADDS is placed pursuant to BPC 4427.3(b). [BPC 4427.5]

- 3.21 The pharmacy complies with all recordkeeping and quality assurance requirements established in pharmacy law and regulations, and maintains records within the licensed pharmacy holding the ADDS license and separate from other pharmacy records. [BPC 4427.7(b)]

CORRECTIVE ACTION OR ACTION PLAN AND COMPLETION DATE _____

CHECK OFF THE TYPE OF ADDS USED BY THE PHARMACY AND COMPLETE THE FOLLOWING SECTION(S) AS IT APPLIES TO THE TYPE OF ADDS THE PHARMACY IS USING.

Please Note: The Pharmacist-in-Charge of the pharmacy and the owner of the ADDS shall sign the Certification Acknowledgment on page 33 after completing the assessment.

- SECTION 4 – APDS used to provide pharmacy service to covered entities and medical professionals contracted with a covered entity.
- SECTION 5 – ADDS adjacent to the secured pharmacy area and Medical Offices.
- SECTION 6 – ADDS in a health facility pursuant to HSC 1250 (LTC).
- SECTION 7 – APDS through a clinic pursuant to HSC 1204 or 1204.1 or BPC 4180 or 4190.
- SECTION 8 – ADDS operated by a correctional clinic.

SECTION 4: APDS USED TO PROVIDE PHARMACY SERVICES TO COVERED ENTITIES AND MEDICAL PROFESSIONALS CONTRACTED WITH A COVERED ENTITY

A. GENERAL REQUIREMENTS

Yes No N/A

- 4.1 A Covered Entity May Contract with Pharmacy to Provide Services- The operating pharmacy providing pharmacy services to the patients of the covered entity, including, unless prohibited by any other law, patients enrolled in the Medi-Cal program, shall be under contract with the covered entity as described in BPC section 4126 to provide those pharmacy services through the use of the APDS. [BPC 4119.11(a)(2)]
- 4.2 Contracts between the covered entities and the pharmacy shall comply with the guidelines published by the Health Resources and Services Administration and are available for inspection by Board during normal business hours. [BPC 4126(a)]
- 4.3 Drugs purchased and received pursuant to section 256b of Title 42 USC shall be segregated from the pharmacy’s other drug stock by physical or electronic means. [BPC 4126(b)]
- 4.4 All records of acquisition and disposition of these drugs shall be readily retrievable in a form separate from the pharmacy’s other records. [BPC 4126(b)]
- 4.5 The drugs shall be returned to the distributor from which the drugs were obtained if drugs to be dispensed to patient of a covered entity pursuant to section 256b of Title 42USC cannot be distributed because of a change in circumstances of the covered entity or the pharmacy. [BPC 4126(c)]
- 4.6 A licensee that participates in a contract to dispense preferentially priced drugs pursuant to this section shall not have both a pharmacy and a wholesaler license. [BPC 4126(d)]

CORRECTIVE ACTION OR ACTION PLAN AND COMPLETION DATE _____

B. UNDERLYING OPERATING PHARMACY

Yes No N/A

4.7 The operating pharmacy has obtained a license from the Board to operate the APDS which includes the address of the APDS location and the identity of the covered entity or affiliated site. [BPC 4119.11(a)(1)]

4.8 A separate license was obtained for each APDS location and has been renewed annually concurrent with the pharmacy license. (Note: The Board may issue a license for operation of an APDS at an address for which the Board has issued another site license.) [BPC 4119.11(a)(1), 4119.11(a)(8), 4107]

4.9 A precensure inspection of the proposed APDS location was conducted by the Board within 30 days after Board receipt of the APDS application before Board approval. [BPC 4119.11(a)(9)]

Date of Inspection: _____

4.10 The pharmacy will submit a new APDS licensure application for Board approval if the current APDS is relocated. [BPC 4119.11(a)(9)]

4.11 The pharmacy will notify the Board within 30 days of replacement of an APDS or discontinuing an APDS. [BPC 4119.11(a)(9), 4119.11(a)(11)]

4.12 A new APDS licensure application will be submitted if original APDS is cancelled due to the underlying operating pharmacy's permit being cancelled, not current, not valid, or inactive. (Once cancelled, a new APDS license can only be issued if the underlying pharmacy's permit is reissued or reinstated.) [BPC 4119.11(a)(10)]

4.13 The pharmacy does not have more than 15 APDS licenses for one underlying operating pharmacy under this section. [BPC 4119.11(d)(10)] List of current APDS licenses:

1. _____ 2. _____

3. _____ 4. _____

5. _____ 6. _____

7. _____ 8. _____

9. _____ 10. _____
 11. _____ 12. _____
 13. _____ 14. _____
 15. _____

Yes No N/A

4.14 The operating pharmacy will maintain the written APDS policies and procedures for 3 years after the last date of use for that APDS. [BPC 4119.11(d)(11)]

4.15 The operating pharmacy of an APDS has completed an annual Self-Assessment pursuant to CCR 1715 or BPC 4427.7(a) evaluating the pharmacy’s compliance with pharmacy law relating to the use of the APDS. [BPC 4119.11(i)]

Date of Last Self-Assessment: _____

4.16 The operating pharmacy has complied with all recordkeeping and quality assurance requirements pursuant to BPC 4119.11 and those records will be maintain within the pharmacy holding the APDS and separately from the other pharmacy records. [BPC 4119.11(j)]

4.17 The pharmacy is aware that the drugs stored in an APDS are a part of the operating pharmacy’s drug inventory and the drugs dispensed by the APDS shall be considered to have been dispensed by that pharmacy. [BPC 4119.11(a)(3)]

4.18 The underlying operating pharmacy is solely responsible for:

- The security of the APDS. [BPC 4119.11(a)(5)]
- The operation of the APDS. [BPC 4119.11(a)(5)]
- The maintenance of the APDS. [BPC 4119.11(a)(5)]
- The training regarding the operation and use of the APDS for both the pharmacy and covered entity personnel using system. [BPC 4119.11(a)(6)]

CORRECTIVE ACTION OR ACTION PLAN AND COMPLETION DATE _____

C. PHARMACIST RESPONSIBILITIES

Yes No N/A

- 4.19 The operation of the APDS is under the supervision of a licensed pharmacist acting on behalf of the operating pharmacy. [BPC 4119.11(a)(7)]. Note: The pharmacist need not be physically present at the site of the APDS and may supervise the system electronically.

- 4.20 The pharmacist performs the stocking of the APDS or if the APDS utilizes removable pockets, cards, drawers, similar technology, or unit of use or single dose containers are used, the stocking of the APDS may be done outside of the facility if the following conditions are met: [BPC 4119.11(g)]
 - 4.20.1 A pharmacist, intern pharmacist or pharmacy technician working under the supervision of the pharmacist may place drugs into the removeable pockets, cards, drawers, similar technology, or unit of use or single dose containers. [BPC 4119.11(g)(1)]
 - 4.20.2 Transportation of removeable pockets, cards, drawers or similar technology or unit of use or single dose container between the pharmacy and the facility are in a tamper-evident container. [BPC 4119.11(g)(2)]
 - 4.20.3 There are policies and procedures to ensure the removeable pockets, cards, drawers, similar technology, or unit of use or single dose containers are properly placed into the APDS. [BPC 4119.11(g)(3)]

- 4.21 The pharmacist conducts a monthly review of the APDS including a physical inspection of the drugs contained within, operation, maintenance, and cleanliness of the APDS, and a review of all transaction records in order to verify the security and accountability of the APDS. [BPC 4119.11(h)]

Date of Last Review: _____

- 4.22 The Pharmacist-in-charge of the offsite ADDS/APDS has ensured the following: [CCR 1715.65(h)]
 - All controlled substances added to the ADDS/APDS are accounted for;
 - Access to ADDS/APDS is limited to authorized facility personnel;
 - An ongoing evaluation of discrepancies or unusual access associated with controlled substance is performed; and
 - Confirmed losses of controlled substances are reported to the Board.

CORRECTIVE ACTION OR ACTION PLAN AND COMPLETION DATE _____

D. DEVICE REQUIREMENTS

Yes No N/A

- 4.23 Access to the APDS is controlled and tracked using an identification or password system or biosensor. Systems tracked via password shall include a camera that records a picture of the individual accessing the APDS and the picture must be maintained for a minimum of 180 days. [BPC 4119.11(e)]
- 4.24 The APDS makes complete and accurate records of all transactions including users accessing system and drugs added and removed from the APDS. [BPC 4119.11(f)]
- 4.25 The APDS will collect, control, and maintain all transaction information to accurately track the movement of drugs into and out of APDS. [BPC 4119.11(c)(1)]
- 4.26 The APDS will maintain transaction information in a readily available in downloadable format for review and inspection by authorized individuals for a minimum of 3 years. [BPC 4119.11(c)(2)]
- 4.27 The APDS may dispense medications **DIRECTLY** to the patient if **all** the following are met: [BPC 4119.11(d)]
- 4.27.1 The pharmacy has developed and implemented written policies and procedures with respect to all the following and the policies are reviewed annually: [BPC 4119.11(d)(1) – (d)(1)(F)]
- Maintaining the security of the APDS and dangerous drug and devices within the APDS
 - Determine and apply inclusion criteria regarding which drugs, devices are appropriate for placement in the APDS and for which patients.
 - Ensuring patients are aware that consultation with a pharmacist is available for any prescription medication including those delivered via APDS
 - Describing assignment of responsibilities and training of pharmacy personnel and other personnel using the APDS at that location regarding maintenance and filling procedures for the APDS.
 - Orienting patients on use of APDS and notifying patients when expected medications are not available in the APDS. The pharmacy must ensure the use of the APDS does not interfere with the delivery of drugs and devices.
 - Ensuring the delivery of drugs and devices to patients expecting medications from the APDS in the event the APDS is disabled or malfunctions.
- Date of Last Policy Review: _____
- 4.27.2 The APDS may only be used for patients who have signed a written consent demonstrating their informed consent to receive prescribed drug and devices from the APDS. Attach a copy of the consent form to the back of the self-assessment. [BPC 4119.11(d)(2)]

Yes No N/A

- 4.27.3 The device shall have a means to identify each patient and only release the identified patient's drugs and devices to the patient or the patient's agent. [BPC 4119.11(d)(3)]
- 4.27.4 The pharmacist has performed all clinical services as part of the dispensing process including but not limited to drug utilization review and consultation. [BPC 4119.11(d)(4)]
- 4.27.5 Drugs are dispensed from the APDS only upon authorization from the pharmacist after the pharmacist has reviewed the prescription and the patient's profile for potentials contraindication and adverse drug reactions. [BPC 4119.11(d)(5)]
- 4.27.6 The pharmacist shall consult patients for the first time on all prescribed drugs and devices dispensed from the APDS. The consultation shall be provided by a Board licensed pharmacist via telecommunication link that has two-way audio and video capabilities. [BPC 4119.11(d)(6)]
- 4.27.7 The APDS shall prominently post a notice that provides the name, address and telephone number of the pharmacy [BPC 4119.11(d)(7)]
- 4.27.8 The prescription labels on all drugs dispensed via APDS shall comply with BPC 4076 and CCR 1707.5. [BPC 4119.11(d)(8)]
- 4.27.9 Any complaint, error or omission involving the APDS shall be reviewed as a part of the pharmacy's quality assurance program pursuant to BPC 4125. [BPC 4119.11(d)(9)]
- 4.28 The federal warning label prohibiting transfer of controlled substances is on the prescription container. [21 CFR 290.5]
- 4.29 Prescriptions are dispensed in a new and child-resistant container, or senior-adult ease-of-opening tested container, or in a non-complying package only pursuant to the prescriber or when requested by the purchaser. [15 USC 1473(b), 16 CFR 1700.15, CCR 1717]
- 4.30 Patient package inserts are dispensed with all estrogen medications. [21 CFR 310.515]
- 4.31 The pharmacy provides patients with Black Box Warning Information in conformance with 21 CFR 201.57(c).
- 4.32 Medication guides are provided on required medications. (21 CFR 208.1)

CORRECTIVE ACTION OR ACTION PLAN AND COMPLETION DATE _____

E. RECORD KEEPING REQUIREMENTS

Yes No N/A

4.33 The operating pharmacy has complied with all recordkeeping and quality assurance requirements pursuant to BPC 4119.11 and those records shall be maintain within the pharmacy holding the APDS and separately from the other pharmacy records. [BPC 4119.11(j)]

4.34 The operating pharmacy will maintain records of acquisition and disposition of dangerous drugs stored in the APDS separate from other pharmacy records. [BPC 4119.11(a)(4)]

4.35 Any records maintained electronically must be maintained so that the pharmacist-in-charge, or the pharmacist on duty if the pharmacist-in-charge is not on duty, must, at all times during which the licensed premises are open for business, be able to produce a hardcopy and electronic copy of all records of acquisition and disposition or other drug or dispensing-related records maintained electronically. [BPC 4105(d)(1)]

CORRECTIVE ACTION OR ACTION PLAN AND COMPLETION DATE _____

F. POLICIES AND PROCEDURES

Yes No N/A

- 4.36 The pharmacy has developed and implemented written policies and procedures with respect to all the following and the policies are reviewed annually:
- Maintaining the security of the APDS and dangerous drug and devices within the APDS
 - Determine and apply inclusion criteria regarding which drugs, devices are appropriate for placement in the APDS and for which patients.
 - Ensuring patients are aware that consultation with a pharmacist is available for any prescription medication including those delivered via APDS
 - Describing assignment of responsibilities and training of pharmacy personnel and other personnel using the APDS at that location regarding maintenance and filling procedures for the APDS.
 - Orienting patients on use of APDS and notifying patients when expected medications are not available in the APDS. The pharmacy must ensure the use of the APDS does not interfere with the delivery of drugs and devices.
 - Ensuring the delivery of drugs and devices to patients expecting medications from the APDS in the event the APDS is disabled or malfunctions.

Date of Last Policy Review: _____

Yes No N/A

4.37 The pharmacy has policies and procedures for security measures and monitoring of the inventory to prevent theft and diversion. [BPC 4105.5(c)(2)]

4.38 The pharmacy reports drug losses as required by law. [BPC 4104, 4105.5(c), CCR 1715.6, 21 CFR 1301.76]

Last Reported Drug Loss: _____

CORRECTIVE ACTION OR ACTION PLAN AND COMPLETION DATE _____

SECTION 5: ADDS ADJACENT TO THE SECURED PHARMACY AREA AND IN MEDICAL OFFICES.

A. GENERAL REQUIREMENTS

Yes No N/A

5.1 The pharmacy maintains the APDS policies and procedures for 3 years after the last date of use for that APDS. [BPC 4427.6(l)]

- 5.2 The pharmacy developed and implemented, and reviewed annually the APDS policy and procedures pertaining to the APDS, including: [BPC 4427.6(a)]
- Maintaining the security of the APDS and the dangerous drugs and devices within the APDS.
 - Determining and applying inclusion criteria regarding which drugs and devices are appropriate for placement in the APDS and for which patients.
 - Ensuring patients are aware consultation with a pharmacist is available for any prescription medications, including those delivered via the APDS.
 - Describing assignment of responsibilities to, and training of, pharmacy personnel and other personnel using the APDS at the location where the APDS is placed, regarding maintenance and filing procedures for the APDS.
 - Orienting participating patients on the use of the APDS, notifying patients when expected prescription medications are not available in the APDS, and ensuring patient use of the APDS does not interfere with delivery of drugs and devices.
 - Ensuring delivery of drugs and devices to patients expecting to receive them from the APDS in the event the APDS is disabled or malfunctions.

Yes No N/A

5.3 The pharmacy does not have more than 15 APDS licenses for one underlying operating pharmacy under this section. [BPC 4427.6(k)] List of current APDS licenses:

- 1. _____ 2. _____
- 3. _____ 4. _____
- 5. _____ 6. _____
- 7. _____ 8. _____
- 9. _____ 10. _____
- 11. _____ 12. _____
- 13. _____ 14. _____
- 15. _____

CORRECTIVE ACTION OR ACTION PLAN AND COMPLETION DATE _____

B. PHARMACIST RESPONSIBILITIES:

Yes No N/A

5.4 A pharmacist licensed by the board performs all clinical services conducted as part of the dispensing process, including but not limited to, drug utilization review and consultation. [BPC 4427.6(d)]

5.5 Drugs are dispensed from the APDS only upon authorization from the pharmacist after the pharmacist has reviewed the prescription and the patient’s profile for potential contraindications and adverse drug reactions. [BPC 4427.6(e)]

5.6 The pharmacist shall consult patients for the first time on all prescribed drugs and devices dispensed from the APDS. The consultation shall be provided by a Board licensed pharmacist via telecommunication link that has two-way audio and video capabilities. [BPC 4427.6(f)]

Yes No N/A

5.7 The Pharmacist-in-charge of the offsite ADDS/APDS has ensured the following:
[CCR 1715.65(h)]

- All controlled substances added to the ADDS/APDS are accounted for;
- Access to ADDS/APDS is limited to authorized facility personnel;
- An ongoing evaluation of discrepancies or unusual access associated with controlled substance is performed; and
- Confirmed losses of controlled substances are reported to the Board.

5.8. The pharmacy operating the APDS has completed an annual Self-Assessment pursuant to CCR 1715 evaluating the pharmacy’s compliance with pharmacy law relating to the use of the APDS. [BPC 4427.7(a)]

Date of Last Self-Assessment: _____

CORRECTIVE ACTION OR ACTION PLAN AND COMPLETION DATE _____

C. DEVICE REQUIREMENTS:

Yes No N/A

5.9 The stocking of the APDS is performed by a pharmacist, or by a pharmacy technician or intern pharmacist under the supervision of a pharmacist, except for an APDS located in a health facility pursuant to HSC 1250, where the stocking and restocking of the APDS may be performed in compliance with HSC 1261.6. [BPC 4427.4(e)(1)]

5.10 Access to the APDS is controlled and tracked using an identification or password system or biosensor. [BPC 4427.4(e)(2)]

5.11 The ADDS makes a complete and accurate record of all transactions including all users accessing the system and all drugs added to, or removed from, the system. [BPC 4427.4(e)(3)]

5.12 Drugs and devices not immediately transferred into an APDS upon arrival at the APDS location are stored for no longer than 48 hours in a secured room within the APDS location. Upon retrieval of these drugs and devices from secured storage, an inventory is taken to detect any losses or overages. [BPC 4427.4(f)]

5.13 Drugs stored in the APDS are part of the inventory of the operating pharmacy and drugs dispensed by the APDS shall be considered to have been dispensed by the pharmacy. [BPC 4427.4(d)]

Yes No N/A

5.14 The APDS may only be used for patients who have signed a written consent demonstrating their informed consent to receive prescribed drug and devices from the APDS. Attach a copy of the consent form to the back of the self-assessment. [BPC 4427.6(b)]

5.15 The APDS has a means to identify each patient and only release the identified patient's drugs and devices to the patient or the patient's agent. [BPC 4427.6(c)]

5.16 The APDS has a notice, prominently posted on the APDS, which provides the name, address, and phone number of the pharmacy. [BPC 4427.6(g)]

5.17 Any incident involving the APDS where a complaint, error, or omission occurred is reviewed as part of the pharmacy's quality assurance program pursuant to BPC 4125. [BPC 4427.6(i)]

5.18 If the APDS is located and operated in a medical office or other location where patients are regularly seen for purposes of diagnosis and treatment, the APDS is only used to dispense dangerous drugs and dangerous devices to patients of the practice. [BPC 4427.6(j)]

5.19 The labels on all drugs and devices dispensed by the APDS comply with section 4076 and with section 1707.5 of Title 16 of the California Code of Regulations. [BPC 4427.6(h)]

5.20 The federal warning label prohibiting transfer of controlled substances is on the prescription container. [21 CFR 290.5]

5.21 Prescriptions are dispensed in a new and child-resistant container, or senior-adult ease-of-opening tested container, or in a non-complying package only pursuant to the prescriber or when requested by the purchaser. [15 USC 1473(b), 16 CFR 1700.15, CCR 1717]

5.22 Patient package inserts are dispensed with all estrogen medications. [21 CFR 310.515]

5.23 The pharmacy provides patients with Black Box Warning Information in conformance with 21 CFR 201.57(c).

5.24 Medication guides are provided on required medications. [21 CFR 208.1]

CORRECTIVE ACTION OR ACTION PLAN AND COMPLETION DATE _____

D. RECORD KEEPING REQUIREMENTS

Yes No N/A

- 5.25 The operating pharmacy has complied with all recordkeeping and quality assurance requirements pursuant to BPC 4427.6 and those records shall be maintain within the pharmacy holding the APDS and separately from the other pharmacy records. [BPC 4427.7(b)]

- 5.26 The operating pharmacy will maintain records of acquisition and disposition of dangerous drugs stored in the APDS separate from other pharmacy records. [BPC 4119.11(a)(4)]

- 5.27 Any records maintained electronically must be maintained so that the pharmacist-in-charge, or the pharmacist on duty if the pharmacist-in-charge is not on duty, must, at all times during which the licensed premises are open for business, be able to produce a hardcopy and electronic copy of all records of acquisition and disposition or other drug or dispensing-related records maintained electronically. [BPC 4105(d)(1)]

CORRECTIVE ACTION OR ACTION PLAN AND COMPLETION DATE _____

E. POLICIES AND PROCEDURES

Yes No N/A

- 5.28 The pharmacy has developed and implemented written policies and procedures with respect to all the following and the policies are reviewed annually: [4427.6(a) – 4427.6(a)(6)]
 - Maintaining the security of the APDS and dangerous drug and devices within the APDS
 - Determine and apply inclusion criteria regarding which drugs, devices are appropriate for placement in the APDS and for which patients.
 - Ensuring patients are aware that consultation with a pharmacist is available for any prescription medication including those delivered via APDS
 - Describing assignment of responsibilities and training of pharmacy personnel and other personnel using the APDS at that location regarding maintenance and filling procedures for the APDS.
 - Orienting patients on use of APDS and notifying patients when expected medications are not available in the APDS. The pharmacy must ensure the use of the APDS does not interfere with the delivery of drugs and devices.
 - Ensuring the delivery of drugs and devices to patients expecting medications from the APDS in the event the APDS is disabled or malfunctions.

Date of Last Policy Review: _____

Yes No N/A

5.29 The pharmacy reports drug losses as required by law. [BPC 4104, 4105.5(c), CCR 1715.6, 21 CFR 1301.76]

Last Reported Drug Loss: _____

CORRECTIVE ACTION OR ACTION PLAN AND COMPLETION DATE _____

SECTION 6: ADDS IN A HEALTH FACILITY PURSUANT TO HSC 1250 – LONG TERM CARE FACILITIES

A. GENERAL REQUIREMENTS

For purposes of this section, "FACILITY" means a health facility licensed pursuant to subdivision (c), (d), or (k) of section 1250 of the Health and Safety Code that has an ADDS provided by a pharmacy. [HSC 1261.6(a)(2)]

For purposes of this section, "PHARMACY SERVICES" means the provision of both routine and emergency drugs and biologicals to meet the needs of the patient, as prescribed by a physician. [HSC 1261.6 (a)(3)]

Yes No N/A

6.1 The facility and the pharmacy has developed and implemented written policies and procedures to ensure safety, accuracy, accountability, security, patient confidentiality, and maintenance of the ADDS as well as quality, potency, and purity of the stored drugs and devices. [BPC 4427.3(c), HSC 1261.6 (d)(1)]

6.2 The ADDS policies and procedures define access to the ADDS and limits to access to equipment and drugs. [HSC 1261.6 (d)(1)]

6.3 All ADDS policies and procedures are maintained at the pharmacy and the location where the ADDS is being used. [HSC 1261.6(d)(2), BPC 4427.3(c)]

6.4 The pharmacy is responsible for review of drugs contained within the ADDS and the operation and maintenance of the ADDS. [HSC 1261.6(h)]

CORRECTIVE ACTION OR ACTION PLAN AND COMPLETION DATE _____

B. PHARMACIST RESPONSIBILITIES:

Yes No N/A

- 6.5 The stocking of the ADDS is performed by a pharmacist or if the ADDS utilizes removable pockets, cards, drawers, similar technology, or unit of use or single dose containers are used, the stocking system may be done outside the facility and be delivered to the facility if the following conditions are met: [HSC 1261.6 (g)]

- 6.5.1 The task of placing drugs into the removeable pockets, cards, drawers, or unit or use or single dose containers is performed by a pharmacist, or by an intern pharmacist or a pharmacy technician under the direct supervision of a pharmacist. [HSC 1261.6 (g)(1)]

- 6.5.2 The removable pockets, cards, drawers, or unit of use or single dose containers are transported between the pharmacy and the facility in a secure tamper-evident container. [HSC 1261.6 (g)(2)]

- 6.5.3 The facility, in conjunction with the pharmacy, has developed policies and procedures to ensure that the removable pockets, cards, drawers, or unit of use or single dose containers are properly placed into the ADDS. [HSC 1261.6(g)(3)]

- 6.6 Individualized and specific access to the ADDS is limited to facility and contract personnel authorized by law to administer drugs. [HSC 1261.6 (c)]

- 6.7 A pharmacist reviews and approves all orders prior to a drug being removed from the ADDS for administration to a patient. The pharmacist reviews the prescriber's orders and the patient's profile for potential contraindications and adverse drug reactions. [HSC 1261.6 (f)(2)]

- 6.8 The review of the drugs contained within the ADDS and the operation and maintenance of the ADDS is conducted, on a monthly basis, by a pharmacist. The review includes a physical inspection of the ADDS for cleanliness, and a review of all transaction records in order to verify the security and accountability of the system. [HSC 1261.6 (h)]

Date of Last Review: _____

- 6.9 The Pharmacist-in-charge of the offsite ADDS has ensured the following: [CCR 1715.65(h)]
 - All controlled substances added to the ADDS are accounted for;
 - Access to ADDS is limited to authorized facility personnel;
 - An ongoing evaluation of discrepancies or unusual access associated with controlled substance is performed; and
 - Confirmed losses of controlled substances are reported to the Board.

Yes No N/A

- 6.10 The pharmacy operating the ADDS has completed an annual Self-Assessment pursuant to BPC4427.7(a) evaluating the pharmacy’s compliance with pharmacy law relating to the use of the APDS (BPC 4427.7(a)).

Date of Last Self-Assessment: _____

CORRECTIVE ACTION OR ACTION PLAN AND COMPLETION DATE _____

C. DEVICE REQUIREMENTS:

Yes No N/A

- 6.11 The stocking and restocking of the ADDS is performed in compliance with section 1261.6 of the Health and Safety Code. [BPC 4427.4(e)(1)]
- 6.12 Drugs and devices not immediately transferred into an ADDS upon arrival at the ADDS location are stored for no longer than 48 hours in a secured room within the ADDS location. Upon retrieval of these drugs and devices from secured storage, an inventory is taken to detect any losses or overages. [BPC 4427.4(f)]
- 6.13 Transaction information from the ADDS will be made readily available in a written format for review and inspection by individuals authorized by law and maintained in the facility for a minimum of three years. [HSC 1261.6(b)]
- 6.14 The information required by BPC section 4076 and HSC 111480 is readily available at the time of drug administration if unit dose packaging or unit of use packaging is used. Unit dose packaging, for purposes of this section, includes blister pack cards. [HSC 1261.6(i)]

When the ADDS is used as an emergency pharmaceutical supplies container, drugs removed from the ADDS are limited to the following [HSC 1261.6(e)]:

Yes No N/A

- 6.15 A new drug order given by a prescriber for a patient of the facility for administration prior to the next scheduled delivery from the pharmacy, or 72 hours, whichever is less. The drug is retrieved only upon the authorization of a pharmacist and after the pharmacist has reviewed the prescriber’s order and the patient’s profile for potential contraindications and adverse drug reactions. [HSC 1261.6(e)(1)]
- 6.16 Drugs that a prescriber has ordered for a patient on an as-needed basis, if the utilization and retrieval of those drugs are subject to ongoing review by a pharmacist. [HSC 1261.6(e)(2)]

Yes No N/A

6.17 Drugs designed by the patient care policy committee or pharmaceutical service committee of the facility as emergency drugs or acute onset drugs. These drugs are retrieved from the ADDS pursuant to the order of a prescriber for emergency or immediate administration to a patient of the facility and reviewed by a pharmacist within 48 hours. [HSC 1261.6(e)(3)]

When the ADDS is used to provide pharmacy services pursuant to BPC 4017.3, the ADDS is subject to the following requirements [HSC 1261.6 (f)]:

6.18 Drugs removed from the ADDS for administration to a patient are in properly labeled units of administration containers or packages. [HSC 1261.6(f)(1)]

6.19 A pharmacist reviews and approves all orders prior to a drug being removed from the ADDS for administration to a patient. The pharmacist reviews the prescriber’s orders and the patient’s profile for potential contraindications and adverse drug reactions. [HSC 1261.6 (f)(2)]

6.20 The pharmacy controls access to the drugs stored in the ADDS. [HSC 1261.6 (f)(3)]

6.21 Access to the ADDS is controlled and tracked using an identification or password system or biosensor. [BPC 4427.4(e)(2), HSC 1261.6(f)(4)]

6.22 The ADDS makes a complete and accurate record of all transactions that includes all users accessing the system and all drugs added to, or removed from, the system. [BPC 4427.4(e)(3), HSC 1261.6(f)(5)]

6.23 After the pharmacist reviews the prescriber’s order, access by licensed personnel to the ADDS is limited only to drugs ordered by the prescriber and reviewed by the pharmacist and that are specific to the patient. [HSC 1261.6(f)(6)]

6.24 When the prescriber’s order requires a dosage variation of the same drug, licensed personnel only have access to the drug ordered for that scheduled time of administration. [HSC 1261.6 (f)(6)]

6.25 If the ADDS allow licensed personnel to have access to multiple drugs and are not patient specific in their design, the ADDS has electronic and mechanical safeguards in place to ensure that the drugs delivered to the patient are specific to that patient (HSC 1261.6 (f)(7)).

CORRECTIVE ACTION OR ACTION PLAN AND COMPLETION DATE _____

D. RECORD KEEPING REQUIREMENTS

Yes No N/A

6.26 The pharmacy complies with all recordkeeping and quality assurance requirements, established in pharmacy law and regulation, and maintains those records within the licensed pharmacy holding the ADDS license and separate from the other pharmacy records. [BPC 4427.7 (b)]

6.27 Transaction information from the ADDS will be made readily available in a written format for review and inspection by individuals authorized by law and maintained in the facility for a minimum of three years. [HSC 1261.6(b)]

CORRECTIVE ACTION OR ACTION PLAN AND COMPLETION DATE _____

E. POLICIES AND PROCEDURES

Yes No N/A

6.28 The facility and the pharmacy has developed and implemented written policies and procedures to ensure safety, accuracy, accountability, security, patient confidentiality, and maintenance of the ADDS as well as quality, potency, and purity of the stored drugs and devices. [BPC 4427.3(c), HSC 1261.6(d)(1)]

6.29 The ADDS policies and procedures define access to the ADDS and limits to access to equipment and drugs. [HSC 1261.6(d)(1)]

6.30 All ADDS policies and procedures are maintained at the pharmacy and the location where the ADDS is being used. [HSC 1261.6(d)(2), BPC 4427.3(c)]

6.31 The facility, in conjunction with the pharmacy, has developed policies and procedures to ensure that the removable pockets, cards, drawers, or unit of use or single dose containers are properly placed into the ADDS. [HSC 1261.6(g)(3)]

6.32 The pharmacy has policies and procedures that include appropriate security measures and monitoring of the inventory to prevent theft and diversion. [BPC 4427.2(d)(3)]

6.33 The pharmacy’s policies and procedures include provisions for reporting to the board drug losses from the ADDS inventory, as required by law. [BPC 4104, 4427.2(d)(4), CCR 1715.6, 21 CFR 1301.76]

Last Reported Drug Loss: _____

CORRECTIVE ACTION OR ACTION PLAN AND COMPLETION DATE _____

SECTION 7: APDS THROUGH A CLINIC PURSUANT TO HSC 1204 OR 1204.1 OR BPC 4180 OR 4190

A. GENERAL REQUIREMENTS

Yes No N/A

7.1 The ADDS is located inside an enclosed building with a premises address, at a location approved by the Board [BPC 4427.3 (a)]. The clinic has a current Board of Pharmacy Clinic license pursuant to BPC 4180 or BPC 4190? or the clinic is licensed pursuant to HSC 1204 or 1204.1. [BPC 4427.3(b)(3)]

License number: _____ Expiration Date: _____

7.2 The clinic has developed and implemented written policies and procedures that ensure the safety, accuracy, accountability, security and patient confidentiality. Additionally, the policies and procedures shall ensure the maintenance of the quality, potency and purity of the drugs. **The policies and procedures shall be maintained at the location where the ADDS is being used.** [BPC 4186(a)]

7.3 Drugs removed from the ADDS shall be provided to the patient by a health professional licensed pursuant to BPC 4186(b).

7.4 The clinic is responsible for the review of the drugs contained within, and the operation and maintenance of, the ADDS. [BPC 4186(d)]

7.5 Drugs dispensed from the clinic ADDS shall comply with labeling requirements in BPC 4076 with CCR 1707.5. [BPC 4186(g), 4426.7(h)]

7.6 The clinic shall keep records of the kind and amounts of drugs purchased, administered, and dispensed and the records shall be available and maintained for a minimum of three years for inspection by all authorized personnel. [BPC 4180(a)(2)]

7.7 The proposed ADDS installation location meets the requirement of BPC 4427.3 and the ADDS is secure from access and removal by unauthorized individuals. [BPC 4427.2(d)(2)]

7.8 The clinics licensed under BPC 4180 or BPC 4190 perform periodic inventory and inventory reconciliation functions to detect and prevent the loss of controlled substances. [CCR 1715.65(a)]

Yes No N/A

- 7.9 The clinic shall compile an inventory reconciliation report of all **federal Schedule II controlled substance** at least every three months. [CCR 1715.65(c)] The compilation requires:
- A physical count (not estimate) of all quantities of all **federal Schedule II controlled substances**.
 - A review of all acquisition and disposition records of **federal Schedule II controlled substances** since that last inventory reconciliation report:
Date of last inventory _____
 - A comparison of (1) and (2) to determine if there are any variances.
 - All records used to compile each inventory reconciliation report shall be maintained at clinic for 3 years in a readily retrievable form.
 - Possible causes of overages shall be identified in writing and incorporated into the inventory reconciliation report.
- 7.10 The clinic shall report in writing identified drug losses and known cause to the Board within 30 days of discovery. Cases of the loss is due to theft, diversion or self-use shall be reported to the Board within 14 days of discovery. If the clinic is unable to identify the cause of loss, further investigation shall be undertaken to identify the cause and actions necessary to prevent additional losses of controlled substances. [CCR 1715.65(d)]
- 7.11 The individuals performing the inventory AND the clinic professional director shall date and sign the inventory reconciliation reports. The reports shall be readily retrievable at the clinic for 3 years. [CCR 1715.65(e)]
- 7.12 Any incident involving the APDS where a complaint, error, or omission has occurred is reviewed as part of the pharmacy's quality assurance program pursuant to BPC 4125. [BPC 4427.6(i)]
- 7.13 The federal warning label prohibiting transfer of controlled substances is on the prescription container. [21 CFR 290.5]
- 7.14 Prescriptions are dispensed in a new and child-resistant container, or senior-adult ease-of-opening tested container, or in a non-complying package only pursuant to the prescriber or when requested by the purchaser. [15 USC 1473(b), 16 CFR 1700.15, CCR 1717]
- 7.15 Patient package inserts are dispensed with all estrogen medications. [21 CFR 310.515]
- 7.16 The pharmacy provides patients with Black Box Warning Information in conformance with 21 CFR 201.57(c).
- 7.17 Medication guides are provided on required medications. [21 CFR 208.1]

Yes No N/A

7.18 Is the APDS located and operated only used to dispense dangerous drugs and dangerous devices to patients of the clinic? [BPC 4427.6j]

7.19 Does the pharmacy have no more than 15 ADDS licensed as APDS units? [BPC 4427.6(k)]
List of current APDS licenses:

1. _____ 2. _____

3. _____ 4. _____

5. _____ 6. _____

7. _____ 8. _____

9. _____ 10. _____

11. _____ 12. _____

13. _____ 14. _____

15. _____

CORRECTIVE ACTION OR ACTION PLAN AND COMPLETION DATE _____

B. PHARMACIST RESPONSIBILITY

Yes No N/A

7.20 The pharmacist performs the stocking of the ADDS. [BPC 4186(c)]

7.21 Drugs are removed from the ADDS system only upon the authorization of the pharmacist after the pharmacist has reviewed the prescription and patient profile for potential contraindications and adverse drug reactions. [BPC 4186(b)]

7.22 The pharmacist shall conduct a review on a monthly basis including a physical inspection of the drugs in the ADDS for cleanliness and a review of all transaction records in order to verify the security and accountability of the ADDS. [BPC 4186(d)]

Date of Last Review: _____

Yes No N/A

- 7.23 The pharmacist licensed by the board performs all clinical services conducted as part of the dispensing process, including, but not limited to, drug utilization review and consultation. [BPC 4427.6(d)]
- 7.24 Drugs are dispensed from the APDS after the pharmacist has reviewed the prescription and the patient’s profile for potential contraindications and adverse drug reactions. [BPC 4427.6(e)]
- 7.25 All prescribed drugs and devices dispensed to the patient from an APDS for the first time shall be accompanied by a consultation conducted by a pharmacist licensed by the board via telecommunication link with a two-way audio and video. [BPC 4427.6(f)]
- 7.26 The APDS has a notice, prominently posted on the APDS, with the name, address, and phone number of the pharmacy holding the ADDS license for the APDS. [BPC 4427.6(g)]
- 7.27 The pharmacist shall provide patient consultation pursuant to CCR 1707.2 via a two-way audio and video telecommunication link for drugs dispensed by the clinic ADDS. [BPC 4186(e)]
- 7.28 The pharmacist operating the ADDS shall be located in California. [BPC 4186(f)]
- 7.29 The clinic consultant pharmacist shall review all inventory and inventory reconciliation reports taken and establish and maintain secure methods to prevent losses of controlled substances. The clinic shall develop written policies and procedures for performing the inventory reconciliation reports. (CCR 1715.65(b))

CORRECTIVE ACTION OR ACTION PLAN AND COMPLETION DATE _____

C. POLICIES AND PROCEDURES

Yes No N/A

- 7.32 The pharmacy has developed and implemented, and reviewed annually, written policies and procedures pertaining to the APDS, including all the following: [BPC 4427.6(a)]
 - Maintaining the security of the APDS and dangerous drugs and dangerous devices within the APDS.
 - Determining and applying inclusion criteria regarding which drugs and devices are appropriate for placement in the APDS and for which patients.
 - Ensuring patients are aware consultation with a pharmacist is available for any prescription medication, including those delivered via the APDS.

- Describing assignments of responsibilities to, and training of, pharmacy personnel, and other personnel using the APDS at the location where the APDS is placed pursuant to subdivision (b) of section 4427.3, regarding maintenance and filing procedures for the APDS.
- Orienting participating patients on the use of the APDS, notifying patient when expected prescription medications are not available in the APDS, and ensuring the patient use of the APDS does not interfere with delivery of drugs and devices.
- Ensuring delivery of drugs and devices to patients expecting to receive them from the APDS in the event the APDS is disabled or malfunctions.

Date of Last Policy Review: _____

Yes No N/A

- 7.33 Is the APDS only used for patients who have signed a written consent form demonstrating their informed consent to receive prescribed drugs and devices from an APDS, and whose use of the APDS meets inclusion criteria established by policies and procedures. [BPC 4427.6(b)]
- 7.34 The APDS shall have a means of identifying each patient and only release the identified patient's drugs and devices to the patient or patient's agent. [BPC 4427.6(c)]
- 7.35 The pharmacy holding the ADDS license for an APDS maintains its policies and procedures for three (3) years after the last date of use of an APDS. [BPC 4427.6(l)]
- 7.36 Does the pharmacy maintain all recordkeeping and quality assurance requirements established in pharmacy law and regulations, and maintain these records within the licensed pharmacy holding the ADDS license and separate from other pharmacy records. [BPC 4427.7(b)]

SECTION 8: ADDS OPERATED BY A CORRECTIONAL CLINIC

A. GENERAL REQUIREMENTS

Yes No N/A

- 8.1 The pharmacy uses an "automated drug delivery system" used in a correctional clinic, meaning a mechanical system controlled remotely by a pharmacist that performs operations or activities, other than compounding or administration, relative to the storage, dispensing, or distribution of prepackaged dangerous drugs or dangerous devices. An automated drug delivery system shall collect, control, and maintain all transaction information to accurately track the movement of drugs into and out of the system for security, accuracy, and accountability. [BPC 4187.5(h)]
- 8.2 The ADDS is located in a "correctional clinic," a primary care clinic, as referred to in subdivision (b) of section 1206 of the Health and Safety Code, conducted, maintained, or operated by the state to provide health care eligible patients of the Department of Corrections and Rehabilitation (BPC 4187).

Yes No N/A

8.3 The correctional clinic licensed by the board obtains the drugs from a licensed correctional pharmacy, the Department of Correction and Rehabilitation’s Central Fill Pharmacy, or from another correctional clinic licensed by the board within the same institution for the administration or dispensing of drugs or devices to patients eligible for care at the correctional facility if under either: [BPC 4187.1(a)]

- The directions of a physician and surgeon, dentist, or other person lawfully authorized to prescribe.
- An approved protocol as identified within the statewide Inmate Medical Services Policies and Procedures.

8.4 The dispensing or administering of drugs in the correctional clinic is performed pursuant to a chart order, as defined in section 4019, a valid prescription consistent with chapter 9 division 2 of the Business and Professions Code, or pursuant to an approved protocol as identified within the statewide Inmate Medical Services Policies and Procedures. [BPC 4187.1(b)]

8.5 Medications dispensed to patients that are kept on the patient’s person for use shall meet the labeling requirements of section 4076 and all record keeping requirements of chapter 9 division 2 of the Business and Professions Code. [BPC 4187.1(b)]

8.6 The correctional clinic keeps records of the kind and amounts of drugs acquired, administered, transferred, and dispensed. The records must be readily available and maintained for a minimum of three years for inspection by all properly authorized personnel. [BPC 4187.1(c)]

8.7 The correctional clinic has obtained a license from the board. [BPC 4187.1(d)(1)]

8.8 A separate license was obtained for each correctional clinic location where an APDS is located and is not to be transferrable. [BPC 4187.1(d)(2)]

8.9 The correctional clinic’s location and address is identified by the correctional institution and building within the correctional institution. [BPC 4187.1(d)(3)]

8.10 The correctional clinic will notify the board in advance of any change in the clinic’s address on a form furnished by the board. [BPC 4187.1(d)(4)]

8.11 The ADDS is secured from access and removal by unauthorized individuals. [BPC 4427.2(d)(2)]

CORRECTIVE ACTION OR ACTION PLAN AND COMPLETION DATE _____

B. POLICIES AND PROCEDURES

Yes No N/A

8.12 The policies and procedures to implement the laws and regulations of this article within the correctional clinic was developed and approved by the statewide Correctional Pharmacy and Therapeutics Committee referenced in section 5024.2 of the Penal Code. [BPC 4187.2(a)]

8.13 Prior to the issuance of the correctional clinic license by the board, an acknowledgment of the policies and procedures was signed by the correctional facility pharmacist-in-charge servicing the institution, the pharmacist-in-charge for the California Department of Correction and Rehabilitation’s Central Fill Pharmacy, and the correctional clinic’s chief medical executive, supervising dentist, chief nurse executive, and chief executive officer. [BPC 4187.2(a)]

8.14 The chief executive officer is responsible for the safe, orderly and lawful provision of pharmacy services. [BPC 4187.2(b)(1)]

8.15 The pharmacist-in-charge of the correctional facility shall implement the policies and procedures developed and approved by the statewide Correctional Pharmacy and Therapeutics Committee referenced in section 5042.2 of the Penal Code and the statewide Inmate Medical Services Policies and Procedures in conjunction with the chief executive officer, the chief medical executive, the supervising dentist, and the chief nurse executive. [BPC 4187.2(b)(1)]

8.16 The licensed correctional clinic will notify the board within 30 days of any change in the chief executive officer on a form furnished by the board. [BPC 4187.2(b)(2)]

8.17 Schedule II, III, IV or V controlled substances may be administered by health care staff of the licensed correctional clinic lawfully authorized to administer pursuant to a chart order, as defined in section 4019, a valid prescription consistent with chapter 9 division 2 of the Business and Professions Code, or pursuant to an approved protocol as identified within the statewide Inmate Medical Services Policies and Procedures. [BPC 4187.3]

8.18 The ADDS located in a licensed correctional clinic has implemented the statewide Correctional Pharmacy and Therapeutics Committee’s policies and procedures and the statewide Inmate Medical Services Policies and Procedures to ensure safety, accuracy, accountability, security, patient confidentiality, and maintenance of the quality, potency, and purity of drugs. [BPC 4187.5(a)]

8.19 All policies and procedures are maintained either in an electronic form or paper form at the location where the automated drug system is being used. [BPC 4187.5(a)]

CORRECTIVE ACTION OR ACTION PLAN AND COMPLETION DATE _____

C. PHARMACIST RESPONSIBILITIES

Yes No N/A

8.20 A correctional facility pharmacist inspects the clinic at least quarterly. [BPC 4187.2(c)]

8.21 Drugs removed from the automated drug delivery system is removed upon authorization by a pharmacist after the pharmacist has reviewed the prescription and the patient profile for potential contraindications and adverse drug reactions. If the correctional pharmacy is closed, and if, the prescriber’s professional judgment, a delay in therapy may cause patient harm, the medication may be removed from the automated drug delivery system and administered or furnished to the patient under the direction of the prescriber. Where the drug is otherwise unavailable, a medication may be removed and administered or furnished to the patient pursuant to an approved protocol as identified within the statewide Inmate Medical Services Policies and Procedures. Any removal of the medication from an automated drug delivery system is documented and provided to the correctional pharmacy when it reopens. [BPC 4187.5(b)]

8.22 The review is conducted on a monthly basis by a pharmacist and shall include a physical inspection of the drugs in the automated drug delivery system, an inspection of the automated drug delivery system machine for cleanliness, and a review of all transaction records in order to verify the security and accountability of the system. [BPC 4187.5(e)]

Date of Last Review: _____

CORRECTIVE ACTION OR ACTION PLAN AND COMPLETION DATE _____

D. DEVICE REQUIREMENT

Yes No N/A

8.23 Drugs removed from the ADDS is provided to the patient by a health professional licensed pursuant to division 2 of the Business and Professions Code who is lawfully authorized to perform the task. [BPC 4187.5(c)]

8.24 The review of the drugs contained within, and the operation and maintenance of, the ADDS shall be the responsibility of the correctional clinic. [BPC 4187.5(e)]

8.25 The ADDS is operated by a licensed correctional pharmacy. Any drugs within the ADDS are considered owned by the licensed correctional pharmacy until they are dispensed from the ADDS. [BPC 4187.5(f)]

Yes No N/A

8.26 Drugs from the ADDS in the correctional clinic are removed by a person lawfully authorized to administer or dispense the drugs. [BPC 4187.5(g)]

CORRECTIVE ACTION OR ACTION PLAN AND COMPLETION DATE _____

E. RECORD KEEPING REQUIREMENTS

8.27 All records of manufacture and of sale, acquisition, receipt, shipment, or disposition of dangerous drugs or dangerous devices, at all times during business hours, are open for inspection by authorized officer of the law and is preserved for at least three years from the date of making. A current inventory is kept by the licensed correctional clinic. [BPC 4081(a)]

CORRECTIVE ACTION OR ACTION PLAN AND COMPLETION DATE _____

CERTIFICATION ACKNOWLEDGMENT

PHARMACIST-IN-CHARGE CERTIFICATION:

I, (please print) _____, RPH # _____ hereby certify that I have completed the self-assessment of this automated drug delivery system of which I am the pharmacist-in-charge. Any deficiency identified herein will be corrected. I understand that all responses are subject to verification by the Board of Pharmacy. I further state under penalty of perjury of the laws of the State of California that the information that I have provided in this self- assessment form is true and correct.

Signature _____ Date _____
(Pharmacist-in-Charge)

ACKNOWLEDGEMENT BY OWNER OF ADDS:

I, (please print) _____, hereby certify under penalty of perjury of the laws of the State of California that I have read and reviewed this completed self-assessment. I understand that failure to correct any deficiency identified in this self-assessment could result in the revocation of the pharmacy’s license issued by the California State Board of Pharmacy.

Signature _____ Date _____

CERTIFICATION OF COMPLETED ACTION PLAN

PHARMACIST-IN-CHARGE CERTIFICATION:

I, (please print) _____, RPH # _____ hereby certify that I have completed deficiencies identified in the self-assessment of this automated drug delivery system of which I am the pharmacist-in-charge. I understand that all responses are subject to verification by the Board of Pharmacy. I further state under penalty of perjury of the laws of the State of California that the information that I have provided in this self- assessment form is true and correct.

Signature _____ Date _____
(Pharmacist-in-Charge)

ACKNOWLEDGEMENT BY OWNER OF ADDS:

I, (please print) _____, hereby certify under penalty of perjury of the laws of the State of California that I have read and reviewed this completed self-assessment. I understand that failure to correct any deficiency identified in this self-assessment could result in the revocation of the pharmacy’s license issued by the California State Board of Pharmacy.

Signature _____ Date _____