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## **Are you up to speed on sample medication management?**

Physician practices that distribute sample medication need to have policies and procedures that guarantee medication safety to its patients and staff. Insurance carriers and auditing entities will review practice manuals and logs to determine whether your office is following appropriate medical management procedures. The first basic practice policy to have is a statement of the use and distribution of sample medications. Every office employee — whether administrative or clinical — should review and sign off on a policy that states, “All practice medications inclusive of sample medications are not to be taken or distributed for personal use. Failure to observe this policy may result in either suspension or termination of your employment.”

Additionally, a method of inventory or reconciliation of all medications, destruction of expired medication, and access to distributed lot numbers of samples should be maintained. Typically, a medical assistant or practice nurse is placed in charge of medication inventory and control.

You should also maintain logs and conduct inventory management by keeping an electronic spreadsheet or paper log, with medication stock review done on a monthly basis. Some practice management and electronic medical record (EMR) systems are now incorporating modules that assist in managing sample medication inventory.

### **Key specifics**

Some key specifics of the policies you should establish, as well as the names and descriptions of specific logs your practice should have in place, to keep up and demonstrate compliance are:

***A pharmaceutical rep (PR) access policy.*** It should include, for example, a restriction on PRs being able to access locked medication storage. Ask them to leave sample meds with front desk staff or clinical personnel to log into supply.

***A sample medication intake log.*** Important items include:

- Date received,
- Product expiration date,
- Medication name,
- Manufacturer,
- Quantity (for example, four bottles/packets of 12 tablets),
- Dosage (for example, mg),
- Staff member initials.

***An expiration and destruction log.*** It should indicate which medications were removed from supply as well as:

- Date of inventory,
- Name of drug,
- Expiration date,
- Amount disposed,
- Date of disposal,
- Method of disposal, and
- Staff member initials.

***A distribution log.*** When providing sample medications, you need to record the following to protect patients in the event of a lot recall:

- Lot number provided,
- Manufacturer name,
- Drug name,
- Dosage,
- Quantity,
- Patient name(s),
- Date distributed, and
- Staff member initials.

***Clear procedures for following the mandated requirements for sample medication destruction.***

Check with your state board for information on the destruction of controlled substances. Your state's EPA can likely provide tips on how to identify products considered hazardous to the environment and what special considerations are involved in their disposal. Federal guidelines can be found at [whitehousedrugpolicy.gov](http://whitehousedrugpolicy.gov).

Typically, biomedical waste companies allow you to use a container to dispose of some sample meds as long as all packaging around the product has been removed and only the medication itself is put in the hazardous waste bag inside the container, which should be labeled "Expired Medications."

Otherwise, in certain cases, you may be able to simply crush the sample meds, dilute them with old coffee grounds, put them in a closed container, and place that container in the trash. Again, however, check with the appropriate state and federal authorities on permissible disposal methods for each specific product.

### **A valuable opportunity**

Sample medications give a physician and their patients a valuable opportunity to try a medication and dosage to determine whether it will have the desired effect. Sample medications also remove the burden of paying a co-pay or medication expense for a drug that may not work for the patient. Yet, they create the often complex, time-consuming responsibility of properly managing and disposing of their many varieties.

If you're finding that your practice lacks the adequate staff to keep up on the necessary compliance processes, you may have to give up warehousing sample medications. A number of pharmaceutical companies now offer mail-away coupons that provide the same access to samples without all the headaches of space and medication management. Talk to your PRs and see what programs are available for your patients.