



PHARMACY SECURITY SELF-EVALUATION

Pharmacy Name: _____

Pharmacy License Number: _____

Date Conducted: _____

Conducted by: _____

The following questions are designed to provide a framework for the pharmacy to evaluate its current security measures. This form is not intended to be all inclusive, and many of the questions address items beyond what is required by law or rule. The questions are merely intended for the pharmacy to consider for potential implementation given the pharmacy's distinct circumstances, and to make the pharmacy aware of potential issues previously identified by the Texas State Board of Pharmacy. Please see the security measures required under Board rule 291.33(b)(2) for more information and clarification.

SECURITY

YES NO

- | SECURITY | YES | NO |
|---|--|--|
| 1. Is the facility equipped with surveillance cameras throughout the premises?
If yes, are the surveillance cameras positioned at customer height level? | <input type="checkbox"/>
<input type="checkbox"/> | <input type="checkbox"/>
<input type="checkbox"/> |
| 2. Are the cameras positioned at all points of entry? | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Are the cameras conspicuously and covertly placed within the pharmacy premises? | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. Does the video have high-definition resolution? | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. Does the pharmacy have an off-site capability to store the video?
If yes, is the video file stored in some type of video back-up storage preferably in the "cloud?" | <input type="checkbox"/>
<input type="checkbox"/> | <input type="checkbox"/>
<input type="checkbox"/> |
| 6. Does the pharmacist regularly review surveillance footage? | <input type="checkbox"/> | <input type="checkbox"/> |
| 7. Does the facility have exterior lighting?
If yes, is the lighting run with a motion-sensor? | <input type="checkbox"/>
<input type="checkbox"/> | <input type="checkbox"/>
<input type="checkbox"/> |
| 8. Do all entrance/exit doors have kick-proof steel barriers? | <input type="checkbox"/> | <input type="checkbox"/> |
| 9. Does the pharmacy have bullet-proof glass? | <input type="checkbox"/> | <input type="checkbox"/> |
| 10. Does access exist to the pharmacy through the walls or ceiling? | <input type="checkbox"/> | <input type="checkbox"/> |
| 11. Does the pharmacy have steel window/door curtains? | <input type="checkbox"/> | <input type="checkbox"/> |

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- 12. Does the pharmacy have an alarm system with off-site monitoring and perimeter and motion sensors as required by the Board?
 If yes, does it have the capability to contact the owner/PIC and police if the alarm system is activated?
- 13. Does the pharmacy maintain written documentation of authorized individuals, other than employees, who accessed the prescription department when a pharmacist is not on-site as required by the Board?
- 14. Does the pharmacy have a policy and procedure in place in case a robbery/burglary occurs?
 If yes, are the policy and procedures frequently reviewed by PIC/Owner?
- 15. Does the pharmacy have regular training sessions in case a robbery does occur?
- 16. Does the pharmacy have a panic/duress button in case a robbery does occur?
- 17. Does the pharmacy limit the number of employees who have key/alarm access codes?
 If yes, does the pharmacy have access codes for each individual employed in the pharmacy?
- 18. Are the alarm codes routinely changed?
- 19. Does the pharmacy have audit entry and exit logs?
- 20. If no access codes for entry of pharmacy, does the pharmacy have limited, no copy, key issuance to authorized personnel?
- 21. Are all non-pharmacy staff escorted at all times?
- 22. Are the controlled substances stored in a safe (preferably electronic safes with timeout or time delay mechanism) or in a locked secure cabinet?
 If not, are the controlled substances dispersed amongst regular inventory?
- 23. Does the pharmacy limit employee access to controlled substances?

PERSONNEL

YES NO

- 24. Does the pharmacy have policy and procedures in place for new employees (conduct reference checks, conduct criminal background checks, verify licensure statuses in all states of residency, verification of previous employment, etc.)?
- 25. Does the pharmacy conduct ongoing criminal background checks after hire?
- 26. Does the pharmacy have pre-employment and ongoing drug screening procedures?
- 27. Does the pharmacy show that all employees in the pharmacy department all hold active and proper licensure/registration requirements?
- 28. Does the pharmacy have policy and procedures to check ongoing licensure verification checks via the Board’s website?

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- 29. Does the pharmacy have policy and procedures to prevent personal items being brought back into the pharmacy department (bags, purses, backpacks, etc.)?
- 30. Does the pharmacy have policy and procedures to visually inspect items leaving the pharmacy department?
- 31. Does the pharmacy have policy and procedures to check employee personal items (bags, purses, coats, etc.) after the employee shift has ended?
- 32. Does the pharmacy have policy and procedures that the pharmacy be staffed by at least two employees at all times?
- 33. Does the pharmacy have dress code policy and procedures for all pharmacy staff (to prevent items being concealed on their person)?
- 34. Are pharmacy employees acting in suspicious manner (making frequent visits to the restroom, discarding trash or to a vehicle, sudden changes in finances)?

CONTROLLED SUBSTANCES

YES NO

- 35. Does the pharmacy have policy and procedures for handling processing and delivery of controlled substance orders?
 If yes, does the pharmacy limit the number of employees who are authorized to order controlled substances?
- 36. Does the pharmacy require a second signature on receipt of all controlled substance orders?
- 37. Are controlled substance shipment orders handled as a priority?
- 38. Upon receipt of controlled substance shipment orders, does the pharmacy reconcile the medications received with the invoice?
- 39. Do pharmacy personnel date and sign the invoice to confirm medications received matches the invoice record?
- 40. Does the pharmacy have policy and procedures for handling incomplete (shorted) controlled substance orders?
- 41. Do pharmacists conduct periodic audits of high-risk controlled substances (hydrocodone, oxycodone, carisoprodol, etc.)?
- 42. Does the pharmacy maintain a perpetual inventory on controlled substances?
- 43. Does the pharmacy conduct annual inventory on all controlled substances as required by the Board?
- 44. Does the pharmacy take an exact count or measure of controlled substances on perpetual and annual inventories?
 If no, does the pharmacy take an exact count or measure of all Schedule II substances as required by the Board?
- 45. Does the pharmacy have policy and procedures on expired, damaged, or recalled controlled substances?

- | | | |
|--|--|--|
| If yes, are the controlled substances that fall under this category securely stored until their disposal? | <input type="checkbox"/> | <input type="checkbox"/> |
| 46. Does the pharmacy maintain a log of controlled substances that are to be disposed as required by the Board? | <input type="checkbox"/> | <input type="checkbox"/> |
| 47. Does the pharmacy have policy and procedures on inventory management of all controlled substances? | <input type="checkbox"/> | <input type="checkbox"/> |
| 48. On all prescriptions for controlled substances, does the pharmacy conduct double counts?
If yes, does it require a two-person count? | <input type="checkbox"/>
<input type="checkbox"/> | <input type="checkbox"/>
<input type="checkbox"/> |
| 49. Do pharmacy personnel conduct “back counts” on controlled substances that are filled? | <input type="checkbox"/> | <input type="checkbox"/> |
| 50. If an audit discrepancy occurs, does the pharmacy have policy and procedures in place for reporting requirements? | <input type="checkbox"/> | <input type="checkbox"/> |
| 51. Do records contain the type and quantity of such controlled substance(s); and the date of the discovering of such loss, destruction, or theft? | <input type="checkbox"/> | <input type="checkbox"/> |
| 52. Did the pharmacy notify the local DEA Diversion Field office and the Board of the theft or loss, in writing (DEA Form 106), immediately on discovery of such a theft or loss of a controlled substance as required by the Board? | <input type="checkbox"/> | <input type="checkbox"/> |
| 53. The controlled substances that suffered breakage, damage, spillage, or some other form of destruction been properly disposed of?
If yes, did the pharmacy submit a DEA Form 41 recording this disposal? | <input type="checkbox"/>
<input type="checkbox"/> | <input type="checkbox"/>
<input type="checkbox"/> |
| 54. Was the disposal reported to the DEA via DEA Form 41 as required? | <input type="checkbox"/> | <input type="checkbox"/> |
| 55. If any schedule II drugs have been destroyed, did the pharmacy have DEA Form 222 (or electronic equivalent) from the distributor authorized to destroy controlled substances? | <input type="checkbox"/> | <input type="checkbox"/> |
| 56. If schedule III, IV, and V drugs have been destroyed, did the pharmacy have records documenting the transfer to a distributor authorized to destroy controlled substances as required by the Board? | <input type="checkbox"/> | <input type="checkbox"/> |
| 57. Does the record include the drug name, dosage form, strength, quantity, and date transferred? | <input type="checkbox"/> | <input type="checkbox"/> |
| 58. If the pharmacy is authorized to destroy controlled substance, has DEA Form 41 been submitted to the DEA and did the pharmacy maintain a copy of the form? | <input type="checkbox"/> | <input type="checkbox"/> |