



National Association of State
Controlled Substances Authorities

NASCSA Resolution 2018-01
October 2018
Scottsdale, Arizona

A Resolution Encouraging State Controlled Substance Authorities to Require Licensees and Registrants to Inventory and Reconcile Controlled Substances on a Regular Basis

WHEREAS, the opioid abuse crisis has reached epidemic proportions in the United States;

WHEREAS, long-term, undetected internal employee diversion of controlled substances constitutes a contributing factor to this crisis;

WHEREAS, employees have diverted large quantities of controlled substances undetected from pharmacies and hospitals over extended periods of time unbeknownst to the Pharmacist-In-Charge or consultant pharmacist;

WHEREAS, some states require pharmacists to physically inventory and reconcile their pharmacy's Schedule II controlled substances on a quarterly or more frequent basis, as well as other controlled substances;

WHEREAS, the federal Controlled Substances Act and its implementing regulations only require registrants to inventory all controlled substances once every two years without requiring reconciliation or accountability of the controlled substances they have handled;

WHEREAS, by requiring physical inventories and reconciliation, pharmacists will detect employee drug diversion earlier leading to the prevention of excessive drug losses and diversion;

WHEREAS, several states have requirements for pharmacists to report theft, self-use or diversion by a licensee within specific timeframes;

THEREFORE, BE IT RESOLVED, that NASCSA encourages state controlled substance authorities to require pharmacies, to inventory and reconcile schedule II controlled substances or all controlled substances, on a quarterly or more frequent basis;

BE IT FURTHER RESOLVED, that NASCSA encourages state controlled substance authorities to require licensees to report thefts and losses within specific timeframes.

ATTEST: Barbara Q. Carter
President

DATE: November 1, 2018