

DHEC Bureau of Drug Control's Enforcement Process

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In response to questions regarding the South Carolina Department of Health and Environmental Control (DHEC) Bureau of Drug Control's enforcement process, the following actions may be taken due to violations of the South Carolina Controlled Substance Act and Regulations (www.scdhec.gov/Health/FHPF/DrugControlRegisterVerify/RelatedLinks).

Letters of Admonition: Letters are sent to the registrant when CS violations are noted during an inspection or audit but do not rise to the level of an administrative conference, or may be utilized for a first-time infraction. The registrant is encouraged to send in a corrective action plan to explain how violations will be corrected.

Administrative Conferences: Conferences are conducted when there are repeated violations found during an inspection or audit. Presentation of views at an administrative conference are informal, and the discussion shall be confined to matters relevant to bringing violations into compliance.

Order to Show Cause/Administrative Consent Order: The show cause conferences are formal in nature and are typically the result of an arrest of a health care practitioner or the repeated theft/loss of CS by a registrant. The result of these orders may include the revocation of a CS registration or a restriction being placed on the registrant's CS registration.

Common violations noted during CS pharmacy inspections are:

May 1 inventory infractions: inventory not taken, wrong date, no time (open or close) documented, no package size noted on the drug counts, no PIC change inventory

CS ID logs: type of ID, ID not taken, employee initial, date of sale not documented

Wrong practitioner entered

Incorrect prescription date written and entered in the computer system

Excessive quantities being dispensed (more than the 31 or 90 days supply limitation or dispensing more than authorized)

Refilling a Schedule II prescription when unable to locate original medication that had been filled but not sold

Not pulling the on-hold CS prescription before filling and documenting the dispensing pharmacist

Failure to report theft/loss of CS

Purchase records: not dated or missing

Fax requirements not met

Practitioner is prescribing CS without a registration or beyond the authorization of their registration (for example, nurse practitioners prescribing Schedule II CS)

Please contact the Bureau of Drug Control at 803/896-0636 if you have any questions.