BUMED INSTRUCTION 6710.70A

From: Chief, Bureau of Medicine and Surgery
To: Ships and Stations Having Medical Department Personnel

Subj: GUIDELINES FOR CONTROLLED SUBSTANCES INVENTORY

Ref: (a) MANMED Chapter 21
     (b) OPNAVINST 3120.32C
     (c) NAVSUPINST 6710.1B
     (d) SECNAV M-5210.1 of Nov 2007

Encl: (1) Controlled Substances Inventory Guide and Working Documents

1. Purpose. To provide a uniform audit program for the Controlled Substances Inventory Board (CSIB) at naval medical treatment facilities (MTFs), naval dental treatment facilities (DTFs), and ensure standardized guidelines for inventory board members to follow.

2. Cancellation. BUMEDINST 6710.70.

3. Background. Reference (a) requires quarterly, or more frequent, inventories of controlled substances. Enclosure (1) is provided as a standard for conducting controlled substance audits and will help the inventory board members implement references (a) through (c).

4. Scope. This instruction applies to Navy and Marine Corps activities where controlled substances are dispensed or otherwise used.

5. Action. Addressees will establish a uniform controlled substances audit program per this instruction. Addressees are encouraged to flowchart the processes for ordering, dispensing, prescribing, and destroying controlled substances.

6. Report. The reports required in this instruction are exempt from report control per reference (d), part IV, paragraph 7k.

7. Forms

   a. The U.S. Department of Justice DEA Form 222, Official Order Forms can be ordered from the U.S. Department of Justice Web site at: https://www.deadiversion.usdoj.gov/webforms/orderFormsRequest.jsp

   b. The U.S. Department of Justice DEA Form 106, The Report of Theft or Loss of Controlled Substances can be filled through an on-line application available at: https://www.deadiversion.usdoj.gov/webforms/dtlLogin.jsp
c. The following Department of Defense forms are available electronically at:
http://www.dtic.mil/whs/directives/infomgt/forms/formsprogram.htm:

(1) DD Form 1149 (JUL 2006), Requisition and Invoice/Shipping Document.

(2) DD Form 1155 (DEC 2001), Order for Supplies or Services.

(3) DD Form 1289 (NOV 1971), Prescription Form.


d. Department of Defense, DD Form 1289 (NOV 1971), Prescription Form can be ordered from the Naval Forms Online Web site at: https://navalforms.daps.dla.mil/web/public/home:

e. The following General Services Administration forms are available electronically at:
http://www.gsa.gov/Portal/gsa/ep/formslibrary.do?formType=SF:

(1) SF 508 (03/1994), Doctor's Orders.

(2) SF 510 (03/2000), Medical Records - Nursing Notes.

(3) SF 600 (06-1997), Medical Record - Chronological Record of Medical Care.

(4) OF 517 (07/1995), Medical Record – Anesthesia.

f. The following Bureau of Medicine and Surgery forms are available electronically from the “Forms” tab at: http://www.med.navy.mil/DIRECTIVES/Pages/BUMEDDirectives.aspx

(1) NAVMED 6710/1 (Rev. 1-2002), Narcotic and Controlled Drug Account Record.

(2) NAVMED 6710/4 (4-72), Narcotic and Controlled Drug Inventory-24 Hours.

(3) NAVMED 6710/5, (4-72) Perpetual Inventory of Narcotics Alcohol and Controlled Drugs.

(4) NAVMED 6710/18 (03-2009), Internal Controls Questionnaire.

(5) NAVMED 6710/19 (03-2009), Pharmacy - Reconciliation of Records and Controlled Substances.

(6) NAVMED 6710/20 (03-2009), Supply Service - Reconciliation of Records and Controlled Substances.
(7) NAVMED 6710/21 (03-2009), Hospital Wards or Special Clinics - Reconciliation of Records and Controlled Substances.

(8) NAVMED 6710/22 (03-2009), Coversheet for Controlled Substances Inventory Board (CSIB) Inventory.

(9) NAVMED 6710/23 (03-2009), Pharmacy Controlled Substances Inventory Board (CSIB) Working Paper - Audit of NAVMED 6710/5.

(10) NAVMED 6710/24 (03-2009), Pharmacy Controlled Substances Inventory Board (CSIB) Working Paper - Requisition Receipt.


(12) NAVMED 6710/26 (03-2009), Outpatient Issues For Schedule II Medications.


(14) NAVMED 6710/28 (03-2009), Pharmacy Controlled Substances Inventory Board (CSIB) Working Paper - Verification of Perpetual Inventory Records.

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Distribution is electronic only via the Navy Medicine Web site at:
CONTROLLED SUBSTANCES INVENTORY
GUIDE AND WORKING DOCUMENTS

General Instructions

Local inventory boards shall use appropriate portions of this document to meet their specific circumstances. This instruction is not a substitute for diligence on the part of the inventory board members in performing their duties.

1. **CSIB Membership.** Reference (a) lists requirements for both CSIB senior member and general board membership. All members must complete required one-time CSIB training on NKO (Pharmacy home page) and be appointed in writing by the commanding officer. Appointment letter must acknowledge completion of training.

2. **Internal Controls Questionnaire.** The CSIB senior member shall review and complete NAVMED 6710/18, Internal Control Questionnaire. Also, the board should review this questionnaire with the appropriate departments annually or more frequently if required.

3. **Quarterly or More Frequent Reconciliation and Verification of Records.** Per reference (a), conduct quarterly or more frequently unannounced inventories on all accountable controlled substances. Inventory boards must develop and retain appropriate working papers to document their efforts.

4. **CSIB NAVMED 6710 Forms.** NAVMED 6710 series forms are used to complete the quarterly CSIB Inventory. NAVMED 6710/19, Pharmacy - Reconciliation of Records and Controlled Substances; NAVMED 6710/20, Supply Service - Reconciliation of Records and Controlled Substances; and NAVMED 6710/21, Hospital Wards or Special Clinics - Reconciliation of Records and Controlled Substances provide the guidance for inventory procedures in the three main areas of inventory. In addition, they explain when to use working documents; NAVMED 6710/22, Coversheet for Controlled Substances Inventory Board (CSIB) Inventory; and NAVMED 6710/23 through NAVMED 6710/28 audit working papers.

5. **Local Reporting.** The CSIB senior member will forward complete inventory reports to the commander/commanding officer. The reports from branch health clinics will be generated by the designated board member and forwarded to the CSIB senior member via the senior medical officer or officer in charge. The CSIB senior member will ensure that the following minimal information is provided to the commander/commanding officer:

   a. Copies of the appropriate verification forms as described in reference (a).

   b. Statement that working papers are retained by the senior member.

   c. An entry of the time period the inventory covered.

Enclosure (1)
d. A listing of the areas inventoried.

e. Branch health clinic reports reviewed by CSIB senior member.

f. A statement of the findings with recommendation if needed.

g. An account of any immediate action taken by the pharmacy or clinic/ward.

h. Follow-up to conclusions of discrepancies and recommendations.

i. Periodic trend analysis for inventory discrepancies is conducted, if required.