

Did You Know The Steps to Perform an Internal Expired Medication Inventory Audit?

To avoid incorrect medication expiration dates in your facility's stock and to prevent survey tags due to expired meds (SNF):

- Enact a system to regularly check medications for correct expiration dates and to remove expired drugs.
- Perform this internal inventory inspection at least monthly to avoid enforcement action via F-tag 761 (SNF).

The attached PharMerica Facility Medication Storage Audit Form provides an organized and up to date process.

Open Containers

- Rule of thumb — once drug products are opened and in use, they must be used within a specific time frame to avoid reduced stability, sterility and potentially reduced efficacy. Product-specific storage and expiration details can be found in the drug product's Package Insert (PI) under the "How Supplied/Storage & Handling" section. A drug product's Beyond Use Date (BUD) is the manufacturer supplied expiration date OR the shortened date after opening, whichever comes first.
- See the abridged list of select medications with unique shortened expirations below:
 - o Ativan Intensol: 90 days, refrigerated.
 - o Eye drops: beyond use dates after opening are unique to the specific product. Refer to respective product's package insert.
 - o TB solution: 30 days, refrigerated.
 - o Inhalers:
 - See P&P Section 9.7 [Medications with Shortened Expiration Dates](#).
 - Verify administration accuracy for routine inhalers open longer than dosing suggests.
 - PRN inhalers and nasal sprays expire after manufacturer stated number of uses or manufacturer expiration date (whichever comes first).
 - o Insulins:
 - MDVs and pens stored in refrigerator until first dispense.
 - In-use MDVs stored in medication cart (generally, unless otherwise stated in package insert): 28 days, room temperature.
 - Pens are resident-specific and should not remain in house stock inventory upon dispensing.
 - o In-use pens (generally, unless otherwise stated in package insert): 28 days, room temperature.
 - Refer to [PharMerica's Insulin Comparison Chart](#) (see P&P Section 9.7) for product specific expirations.

Regulation

- The CMS State Operations Manual mentions drug expiration 8 separate times!
- **F761:** "to cite deficient practice at F761 ... an investigation will generally show that the facility failed to ensure that all drugs... are labeled in accordance with professional standards, **including expiration dates ...**"

Areas to check should include:

- Central Supply Areas
- Medication Carts
- Medication Rooms
- Refrigerator
- Treatment Carts

All of the following should be included in the internal audit:

- Dietary products
- Emergency medication boxes
- IV equipment
- Laboratory items
- OTC products
- Prescription medications
- Sterile products
- Treatment items

Helpful Hints:

- Discard/return discharged residents' medications and supplies in advance of expiration.
- Products expire on the last day of the month listed on the manufacturer printed MM-YYYY expiration date.
- Record an 'open date' on all opened medications (liquids, topicals, insulin vials, insulin pens, eye drops, etc.).

Be Survey Ready



Once surveyors enter your building, your medication storage areas will be surveyed that day or the next day depending on the habits of your state surveyors– Be proactive and have each Nurse/Station Supervisor monitor each shift until the surveyors have exited to prevent FTags. **These are things you still have time to correct!**

MEDICATION ROOM	MEDICATION REFRIGERATOR	MEDICATION CARTS
Locked - Nurse must be present if they allow anyone other than medication dispensing personnel access to the room (LNA,Cleaning, Etc.) Expiration Dates - Prescription and OTC medications - Lab and dietary products - Central supply areas - Discard discharged resident medications and supplies - Contact pharmacy for additional return totes if needed Storage - Neat and organized - No medications in or under sink - No personal items - No cardboard on the floor - Medications separated by route of administration (i.e., topical, oral, ophthalmic, otic, inhaled, or rectal) - Remove contaminated or deteriorated meds, and those with damaged or unsealed packaging Controlled Substances - Schedule II's and medications of abuse stored in a permanently affixed double locked compartment – including ER stock	Temperature - 36 to 46 degrees Fahrenheit - Thermometer inside and functioning - Temperatures recorded on log daily (at minimum) - Outside of normal range: log should document temp. adjustments, duration outside acceptable range, and temp. rechecks. Contact maintenance if needed. Freezer - No ice; defrost if appropriate Expiration Dates - Injectable medications are dated and initialed when opened. - Default to dispense date as date opened and document on label if needed - Pull expired medications and verify those with shortened expiration dates - Insulins: Open insulins in cart; unopened insulin in refrigerator - See PharMerica Insulin Comparison Chart for product-specific Beyond Use Dates once in-use - Tubersol: 30 days after open - Muti-dose Products: (Generally) 28 days after opening - Eye Drops: beyond use dates after opening are unique to the specific product. Refer to respective product's package insert. - Suppositories often go outdated – check each loose suppository - Discard discharged resident medications Storage - Medications stored in separate containers by route of administration - Medications stored separately from foods/drinks used for drug administration Controlled Substances - Stored in separate, double locked, permanently affixed container - Lorazepam injection & lorazepam intensol - note ER stock and hospice stock	Locked - Remind staff!! Never walk away from an unlocked cart! Expiration Dates - Store and discard per manufacturer instructions, unless more stringent Beyond Use Date is applied per adopted policy or local regulation. - PRN medications - OTC medications - Insulins should be dated once opened and stored in cart; expirations vary - Open in-use pens and vials generally expire after 28 days when stored appropriately; refer to PharMerica Insulin Comparison Chart for product specific storage and expiration details Storage - Neat and organized; clean - No sticky bottles or drawers - No loose pills in bottom of cart; No unlabeled medications from E-Kit - No unidentified medication cups with mixed pills for resident or OTC medication from stock bottle borrowed from another cart - Medications segregated by route of administration (i.e., topical, oral, ophthalmic, otic, inhaled, or rectal) - Discard or return to pharmacy any discharged resident medications Medications with Special Expiration Dates - Remember that some medications have special expiration requirements (see P&P Section 9.7) and Medications with Shortened Expirations Treatment Carts - Treat medications (including topical preparations) similar to those stored in med carts

FACILITY MED STORAGE AUDIT

MONTH/YEAR _____ UNIT _____

MONTHLY Med Storage Audits

Completed on: _____ (day of month)

Assigned to: _____ (shift)

WEEKLY Med Storage Audits – Audit one area throughout the week so that everything is audited once per week. Assigned to: _____ (shift)

List items identified as expiring in next week (package marked with pink highlighter)

Initial Here when med is pulled and reordered

Nurse Initials												
Date												
Verification Daily Storage Checks Completed												
Med Room												
Central Supply												
Change of Shift Counts Being Completed												
	Sun	Mon	Tues	Wed	Thurs	Fri	Sat	Med	Exp Date	Initials		
Nurse Initials												
Date												
Med Carts												
Treatment Cart												
Refrigerator												
Emergency Kit												
Controlled Substances												

NOTES		Sun	Mon	Tues	Wed	Thurs	Fri	Sat	Med	Exp Date	Initials	
	Nurse Initials											
	Date											
	Med Carts											
	Treatment Cart											
	Refrigerator											
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	Treatment Cart											
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	Controlled Substances											

SUGGESTED USE:

Identify shift/staff in charge of monthly and daily audits to be completed throughout the week

- Monthly Audit: Pull anything expiring by end of month. Use yellow highlighter on medication package to identify anything expiring in the following month.
- Weekly Audit: Pull anything expiring by the end of the week; Use pink highlighter on medication package to identify anything expiring within the next week. Additionally, write down medication and expiration date on audit sheet for nurses to quickly identify.
- Daily Audit: Midnight staff reviews list of meds documented here and package marked with pink highlighter. Pull anything expiring in next two days and ensure reorder submitted to pharmacy. Complete daily and initial form when completed.
- Audit should include audit for expired meds, meds with shortened expiration dates, date opened documented, and that meds have been reordered.