


Hospital Pharmacy Inspections & Preparations

"They Could Come At Any Time!"



Kelly Boudreaux, CPhT
Pharmacy Technician Supervisor
Children's Hospital Colorado
Colorado Springs, Colorado

1

Organized &
Hosted by the National
Pharmacy Purchasing
Association (NPPA)

25th Annual
NPPA Conference
August 9-11, 2022
Las Vegas, NV

www.pharmacy purchasing.com

2

Learning Objectives

- 1) Identify three (3) areas in your pharmacy that you can prepare before inspections.
- 2) Describe what to expect during a Joint Commission or State Board of Pharmacy (SBoP) inspection.

3

Learning Objectives (continued)

- 3) Define the differences between a "mock" vs. official Joint Commission inspection, and SBoP inspections.
- 4) Identify forms & certificates that should be displayed in the pharmacy.

4

Before We Dive Deeper

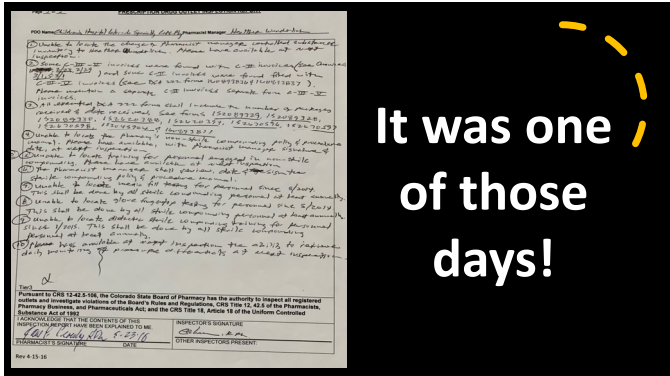
- Should you make small talk during an inspection?
- When the inspector(s) are in the pharmacy, should you let them roam wherever they want (does this give them free range)?

5

Before We Dive Deeper (continued)

- Should you find a dark place to hide while the inspectors are on site?
- 222's? Never heard of them, move along!

6



It was one of those days!

7



Where Did Everyone Go?

8

Do You Work With These Guys?

Invisible Man

Disappears



Chameleon

Blends in with Surroundings



9

How About These Guys?

Runner

First to Leave



Fill the Void

Say Something!



10

What To Do Instead Of Hide In A Corner

1

Take a deep breath, be calm and quiet.

2

Never talk to just fill the silence.

3

Let the inspectors ask all the questions.

4

NEVER volunteer information if possible.

5

Don't joke about any issues.

11

- State Board of Pharmacy: 12-Month Window
- Joint Commission (mock or official): Every 3-Years
- Drug Enforcement Agency (DEA): Whenever They Need To



Windows For Inspections

12



Who could be knocking on your door?

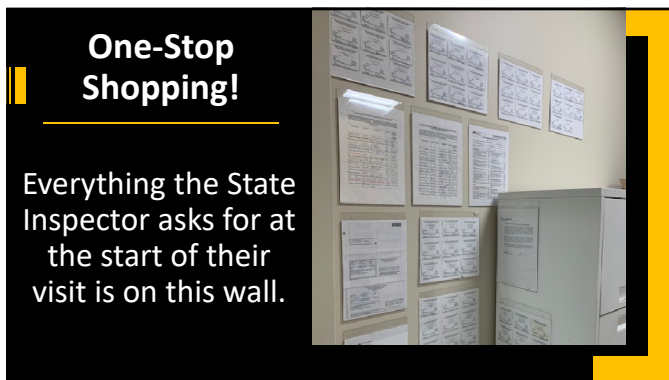
13



State Board of Pharmacy

- They know regulations inside and out.
- They look at specific items.
- Discrepancies must be fixed, but you can challenge findings.

14



One-Stop Shopping!

Everything the State Inspector asks for at the start of their visit is on this wall.

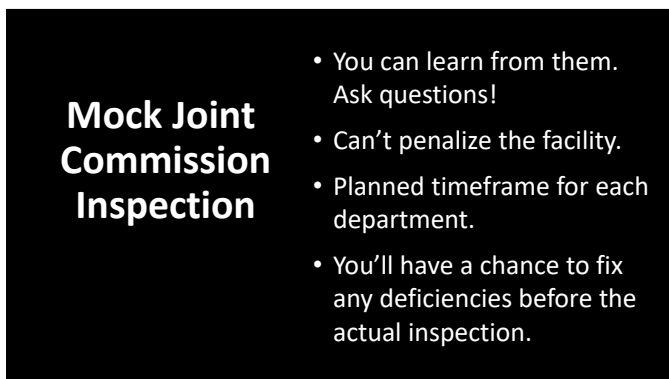
15



No Hunting for Anything!

Anyone may help a State Inspector get started when they arrive.

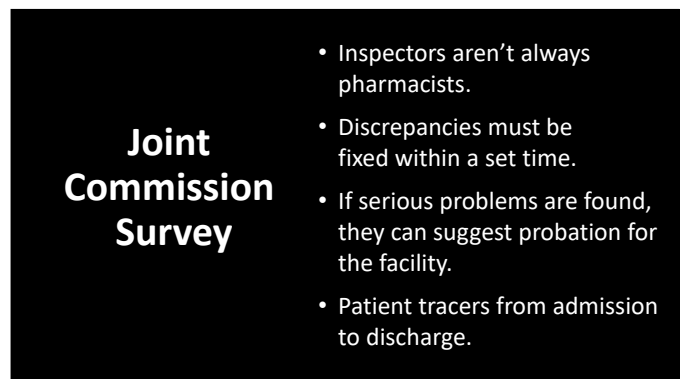
16



Mock Joint Commission Inspection

- You can learn from them. Ask questions!
- Can't penalize the facility.
- Planned timeframe for each department.
- You'll have a chance to fix any deficiencies before the actual inspection.

17



Joint Commission Survey

- Inspectors aren't always pharmacists.
- Discrepancies must be fixed within a set time.
- If serious problems are found, they can suggest probation for the facility.
- Patient tracers from admission to discharge.

18

DEA

- Not all facilities are inspected by the DEA.
- Look at controlled substances and processes involving narcotics.

19

What Buyers Can Do to Help the Inspection Process

- Keep invoices filed and sorted and ready to show inspectors when they ask.
- Reconcile all 222's with your vendor. You can keep the CII and III-V invoices in the file drawer with other inspection paperwork.

20

What Buyers Can Do to Help the Inspection Process (continued)

- Make sure the Biannual Controlled Substance inventory sheets are signed and filed in the drawer. The inspector will want to see it.
- Label everything! Files are easier to find if you can quickly locate them.

21

Take-Aways

- Pharmacy Buyers play a large part in pharmacy inspections.
- If you're organized and prepared ahead of time, inspections aren't scary.
- With coaching, anyone can be helpful during inspections.

22

Questions?



23