

WHAT TO EXPECT DURING A BOARD INSPECTION FOR DISPENSING OSTEOPATHIC PHYSICIANS



The Arizona Osteopathic Board appreciates your cooperation during this inspection. The mission of the Board is to protect and promote the health of Arizona citizens by regulating and controlling the practice of medicine and the distribution of prescription drugs and devices. Our inspections are done by compliance agents of the Board. Inspections are routine (once every 12-18 months), unannounced visits. The goal of an inspection is to safeguard the health and safety of consumers. An inspection is also an opportunity for our compliance agents to provide education, guidance, and answers to any questions you may have. We look forward to partnering with you to keep Arizona healthy and safe.

Please note: The Arizona Osteopathic Board has authority over DOs dispensing facilities. See Arizona Revised Statutes (ARS) § 32-1871

COMPLIANCE AGENTS

- Identifies him or herself (provides business card and shows badge if asked)
- Conduct inspections with professionalism and good judgement
- Provide information and questions about regulations

DOCUMENTS

- Past Inspection Reports (N/A to first time inspections)
- List of medications being dispensed
- Annual Controlled Substance Inventory Acquisition and Deposition records to include:
 - Wholesaler invoices
 - Dispensing records
 - Records of drug return or destruction
- DEA 222 forms or CSOS
- Controlled Substance invoices dated and initialed
- Transfer records between physicians
- Written policies and procedures (manual dispensing and automated dispensaries, drug accountability)
- DEA Registration
- Physician resource: DEA PRESCRIBERS MANUAL

ADDITIONAL INFORMATION

- Permit (facility)
- License(physician)
- Drug expiration dates
- Labeling requirements
- Storage requirements

PHYSICIAN

- Provide access to the compliance agent during regular business hours
- Provide access to review all necessary documents to include records of manufacture, sale, acquisition, receipt, shipment, and disposition of medications
- Provide access to inspect any automated dispensaries

POST INSPECTION

Any conditions that are unsatisfactory or need improvement will need to be corrected. Keep all documentation related to making those corrections with your inspection report. After the initial education period, any non-compliance could result in a formal complaint and investigation being opened by the Osteopathic Board.

If the compliance agent suspects a violation of the medical practice act occurred, you may receive written notice. Examples of written notices would be:

- Education/call for corrective action plan
- Issue a warning or reprimand
- Issue a citation
- Refer the case for disciplinary action