September 17, 2008

DIRECTIVE: JOB CORPS INFORMATION NOTICE NO. 08-17

TO: ALL JOB CORPS NATIONAL OFFICE STAFF
ALL JOB CORPS REGIONAL OFFICE STAFF
ALL JOB CORPS CENTER DIRECTORS
ALL JOB CORPS CENTER OPERATORS
ALL NATIONAL TRAINING AND SUPPORT CONTRACTORS
ALL OUTREACH, ADMISSIONS, AND CTS CONTRACTORS

FROM: ESTHER R. JOHNSON, Ed.D.
National Director
Office of Job Corps

SUBJECT: Protocol for Purchasing, Storing, Administering, and Disposing of Controlled Substances in the Health and Wellness Center

1. Purpose. To review Job Corps policies on purchasing, storing, administering, and disposing of controlled substances in the Health and Wellness Center and to provide information on further precautions and safeguards.

2. Background. In Job Corps, controlled medications are stored in the Health and Wellness Center. Precautions must be taken to avoid medication theft. Policy and Requirements Handbook (PRH) Chapter 6, Section 6.12, R6 (Controlled Substances) notes the following requirements:

   a. Comply with any pertinent state or federal requirements on storing or disposing of controlled substances.

   b. Maintain a controlled medications log and a Drug Enforcement Administration (DEA) registration. The center may obtain its own DEA registration or use the DEA number of the center physician when ordering controlled medications.

   c. Limit the use of controlled medications and stock to only a small supply of those medications that will be prescribed. Documentation must be maintained showing that controlled medications in stock were prescribed by a licensed clinician.

   d. Centers may not stock Schedule II medications except when prescribed for a specific student. (Note: Controlled substances are sometimes categorized by class rather than schedule.)
e. Store all Schedule II, Schedule III, and Schedule IV medications under a double lock system in a secured area of the Health and Wellness Center. Only licensed health and wellness staff authorized to dispense or administer controlled substances shall have access to the controlled medication.

f. Ensure that two staff members receive and sign for medications received, noting the name(s) of the medications, dosage, amount, and date on a controlled medications log.

g. Maintain a log of all Schedule II, Schedule III, and Schedule IV medications. When dispensing these medications by order of the health care practitioner, the date, time, medication, and dosage shall be noted on the log and the clinician dispensing the medication must sign his or her full name.

h. Inventory and reconcile controlled medications at least once a week. Two authorized staff members shall note the results on the controlled medications log. The narcotic log book (inventory sheet) should be double-locked along with the controlled medications. Any miscounts or missing medications identified during the inventory shall be immediately reported to the Regional Office by the Center Director.

i. Properly dispose of controlled medications that need to be destroyed because of expiration dates, contamination, or wastage, and document such actions on the controlled medications log.

3. **Action.** Refer to PRH Chapter 6, Section 6.12, R6 (Controlled Substances) to review all requirements for managing controlled substances. In addition, consider the following:

a. Ensure all medications are under a double lock, that is, a locked cabinet and locked box inside the locked cabinet. The room door lock may not serve as one of the locks. Insure that both locks are tamper resistant. Periodically check locks for evidence of tampering.

b. Replace any locks that are broken or old. Consider using a lock with a numeric key pad. Only share the key or code with staff who need to know it.

c. Do not store controlled substances in student examination rooms. Do not store controlled substances in cabinets with glass doors.

d. Limit the number of staff who have keys or codes to the cabinet.

e. Have students sign the log book when they receive a controlled substance.

f. Have a current center-specific Standard Operating Procedure (SOP) for controlled substances. This should include PRH reporting requirements and corporate policies.
g. In the event of missing narcotics, a Significant Incident Report (SIR) needs to be submitted. The center must formulate a corrective action plan within 72 hours and submit it to the project manager and regional nurse consultant for review and monitoring.

h. Require a background check for all employees in the Health and Wellness Center.


j. A list of commonly prescribed scheduled medications is located in the attachment to this Information Notice.

4. **Expiration Date.** Until superseded.

5. **Inquiries.** Inquiries should be directed to Carol Abnathy at (202) 693-3283 or abnathy.carol@dol.gov.

Attachment

United States Drug Enforcement Administration Scheduled Drugs – Selected Examples