

## Drug Sample Policy Checklist

Any organization who accepts prescription drug samples should have a detailed policy that complies with applicable federal and state laws. A clear, comprehensive policy with clear lines of authority and accountability can help the organization reduce the risks associated with drug samples. Areas your policy should address include:

### 1. Acceptance & Documentation of Drug Samples

- What types of drug samples will be accepted?
- Who internally may accept drug samples and has the responsibility to ensure a drug sample is appropriately packaged?
- What information must be documented/logged, where, and by whom?
- What should staff do if they come across or are provided with drug samples outside of this process?
- Include a statement generally prohibiting unauthorized staff from accepting or possessing drug samples.

### 2. Storage & Security of Drug Samples

- Where will drug samples be stored and how are they secured?
- How will the organization ensure drug samples are stored per manufacturer recommendations?
- Who may access secured drug samples?
- If a drug sample is accessed, what information must be documented/logged; where and by whom?
- How often will an inventory be conducted and by whom?
- How often and who will review expiration dates and dispose of expired or recalled medications?

### 3. Dispensing Drug Samples

- Only authorized prescribers may dispense a drug sample as part of the treatment of a patient after an appropriate evaluation/examination.
- Drug samples may only be dispensed to patients.
- Require patient medical record to reflect the drug sample.
- Who will be responsible for labeling the sample and ensuring the label conforms to the prescriber's directions?
- What information about dispensing must be logged; where and by whom?
- Who will educate patients about the medication?
- A statement that samples aren't to be provided for ongoing use by the patient and if appropriate for a patient to continue on the medication once the sample is used, a prescription will be provided.

#### 4. Oversight of Drug Sample Compliance

- Who will oversee compliance with the Drug Sample Policy?
- How often will compliance be audited?
- Who do employees and others report concerns to regarding compliance with the Drug Sample Policy?
- A statement that violations of the policy may result in disciplinary action up to and including termination.
- Require non-compliance to be reported to the proper third parties based on the facts/circumstances, including the drug manufacturer, the state pharmacy board, or the practitioner's licensing board.

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