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## POLICY

### Drug Supply Chain Security Act

8040

**OBJECTIVE:** To ensure compliance with the Drug Supply Chain Security Act. Bullhook Community Health Center Pharmacy (BCHC) will only order from wholesale distributors that can supply transaction data for all products for 6 years, as required by law, and also to have a system in place to quarantine suspect product from regular inventory.

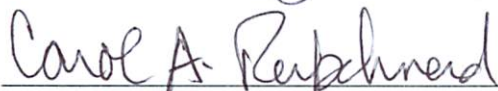
### PROCEDURES:

1. Bullhook Community Health Center Pharmacy will only accept product from previous owners (wholesale distributors) that can supply us with transaction history, transaction information and a transaction statement. We will only order from approved wholesalers. Other wholesalers may be approved by the pharmacy manager, who will verify the above requirements can be met by wholesaler prior to ordering product. Our current approved wholesalers are:
  - a. McKesson Drug Company
  - b. HD Smith
2. If a suspect product is received at the pharmacy, the person checking in the product will:
  - a. Immediately isolate the medication label the product as suspect
  - b. Contact the pharmacy manager or pharmacist on duty
  - c. Contact the wholesaler where product was received from, within 24 hours
  - d. Fill out the FDA form 3911 (found on FDA website), within 24 hours
  - e. Wait for directions from wholesaler and/or FDA for removal of such product

  
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CHIEF EXECUTIVE OFFICER

Date: 4-21-17

  
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CHAIR, BOARD OF DIRECTORS

Date: 4-18-17

Date first adopted	03/13/2017
Date Revised/QI Board approval	03/01/2017
New date adopted/Board of Directors approval	03/13/2017