



"Compliance Top 10"

This list reflects the most commonly observed inspection violations and does not represent a comprehensive listing. Licensees should review all applicable law to ensure compliance. (This list is random and not in any specific order)

- **Technician List Not Available or Current:** A tech list must be maintained in the pharmacy that includes each technician's name, registration number and duties. [20 CSR 2220-2.090(2)(BB)]
- **Expired Medication In Active Inventory:** Check your inventory regularly for outdated and/or expired meds. Don't forget compounding areas! [20 CSR 2220-2.090(2)(V)]
- **Return to Stock Prescriptions Missing Required Label Information:** Prescriptions not provided to the patient and returned to stock must be maintained in the *original patient container* with the *drug name, dispensing date* and *prescription number* visible on the container. Be careful removing or deleting label information! [20 CSR 2220-3.040]
- **Inaccurate/Incomplete Compounding Logs:** Pharmacists should check the compounded log on each product for required entries. For log requirements, see 20 CSR 2220-2.400(7)(A).
- **Non-Compliant Immunization Protocols/Notifications:** Review immunization protocols thoroughly and make sure everyone has signed. Make sure notifications to the protocol physician and primary care providers are made and documented in the pharmacy's records. Failure to maintain proof of notification is a compliance violation! [20 CSR 2220-6.050(7)(E)] See 20 CSR 2220-6.050 for protocol requirements and the Board's [Immunization Checklist](#).
- **Controlled Substance Invoices Not Dated:** All C-III – V invoices must be dated **when received**. [21 CFR 1304.21(d)]
- **Non-Compliant Annual Controlled Substance Inventory:** The annual controlled substance inventory must be taken within one year of the previous inventory. 19 CSR 30-1.042(3). The inventory must include all schedules. Don't forget your OTC pseudoephedrine tablets/capsules which are C-V.
- **Patient Counseling Not Offered:** Educate pharmacy staff. Patient counseling must be offered for all prescriptions. [20 CSR 2220-2.190]
- **Accepting Controlled Substance Prescriptions Converted to Fax Without Verification (CIII-V):** Electronically prescribed controlled substance prescriptions sent to the pharmacy's fax machine are not valid for dispensing. 21 CFR 1311.170 **For C-III - V**, licensees may contact the prescriber for a valid phone prescription if an improper controlled substance prescription is received. See BNDD guidelines for C-II requirements.
- **Overfilled Stock Bottles:** This is misbranding and violates both state and federal law! [20 CSR 2220-2.090(2)(Y)]

