

## RECORD KEEPING & DOCUMENTATION

The most common problem cited by dental boards is failure to properly document. Simply put, if its not written down, it didn't happen. Careful documentation helps your patients and your practice.

### What are we responsible for?

#### Pre-sedation evaluation:

- Dental
- General Physical – ASA level, co-morbidities
- Emotional – trauma, state of mind

#### During Treatment/Sedation Appointment:

- Dental treatment
- Physiological parameters
- Medication administration

#### Drug Storage and Dispensing:

- Stocking
- Inventory
- Administration

#### End of Appointment Summary and Disposition:

- Oriented by 3
- Companion information
- Post-operative instructions
- Proper release

### Drug Enforcement Administration (DEA) Record Keeping & Documentation

- The DEA is the *federal* agency governing the use of drugs. This is separate from *state* regulation of the use of drugs.
- The DEA has a manual that specifically lays out the requirements of record keeping, storage & inventory for the prescribing & dispensing a controlled substance.
- To administer a controlled substance, you *must* be registered with the DEA.

- Check with state Board to see if there is also a *state* registration required to purchase and dispense.

You are most likely already registered with the DEA. If you are a new dentist in the USA, you must register with the DEA: Form 224 [www.deadiversion.usdoj.gov](http://www.deadiversion.usdoj.gov) Registration is renewed on a *three-year cycle*.

To order drugs; call the distributing company to set up an account to order medications. You must have a copy of your DEA registration and updated state dental license.

- The sedation medications in the DOCS anxiolysis protocols are schedule IV substances
- An inventory record must be maintained *on site* for **two years**.

Other inventory record requirements include:

- Name, address, DEA # of doctor
- Date and time inventory
- Name and signature of person taking inventory

DOCS members - just use your DOCS Drug Logbook. *Logbook must be kept for 2 years.*

## **RECEIVING**

### **Invoice Documentation of Controlled Substances**

It is important that you keep the invoice because it will have the controlled substances name, quantity and finished form (i.e. 0.25 mg tablets); the number of units (i.e. 100 tablets); as well as the number of containers (i.e. 4 bottles).

### **Securing Controlled Substances**

All controlled substances must be secured in a DEA-compliant, substantially constructed, double-locking drug cabinet mounted to the wall or floor with the documentation locked inside so that documentation is easy and immediate when controlled substances are received or dispensed

## Stocking Requirement

Record each bottle that arrives in the office with lot #, expiration, and starting amount.

### Simulation

### Stocking example

Medication/Date Received	Lot Number	Expiration	Starting Amount
Hydroxyzine- 4-28-20	AZ1000234	4/2021	100
Triazolam- 4-28-20	TN800275	5/2022	100
Lorazepam- 5-1-20	XY5245600	1/2021	100
Diazepam- 4-28-20	AT4580001	3/2021	100
Flumazenil- 5-3-20	BF97876	7/2021	5ml

Stock must be *reconciled* whenever medication comes in or out.

### **Keep controlled substances in a double locked cabinet and adhered to the wall**

- When removed, drugs need to be kept in the possession of trusted personnel.
- Likewise, cabinet keys should be kept in a location known only to designated staff members.

### **Dispensing Meds from the Office**

- **Medications must be labeled appropriately**
  - Patient's Name
  - Medication Name (whether Generic or Brand)
  - Prescribing Doctor's Name & Contact Information
  - Directions for Use
  - Download label template from **DOCSeducation.org**
    - Special Precautions ("do not drive")
    - Number of Authorized Refills (zero)
    - Date of Prescription

- Child proof container
- Name and signature of dispensing party must be recorded as well as:
  - Purpose
  - Patient
  - Amount

### **Disposal of Expired Drugs - Contact regional DEA division & request form 41**

- Complete the form and return to DEA in triplicate
- DEA will contact you with instructions on how to destroy and return form 41
- Two people participate in disposal:
  - Physicians, pharmacists, nurses, law enforcement
- Fill out remainder of form 41 and return to DEA in triplicate

### **Reverse Distribution**

- Reverse distribution companies manage disposal of medications for DEA Registrants
- These destruction companies also must be registered with DEA
- Accounts/Portals are set up at no charge.
- Charged for destroying medicines, charged by weight\*

### **Clinical Record Keeping - Flow of Clinical Evaluations and Documentation**

#### **Pre-Sedation Paperwork**

- Emotional and Dental exams have been completed
- Need for sedation determined and dental treatment plan accepted
- Patient's medical history reviewed: medications listed and checked in Lexicomp
- Baseline vitals obtained
- Social history: smoking, drinking, recreational drug use all recorded
- Special instructions/consents

#### **Before and After Instructions**

- Reviewed with patient prior to sedation appointment

- Tells patient what to do day before the appointment and day of the appointment
- Reviewed again before discharge

**Keep good records of the dispensing of all controlled substances, including**

- Comprehensive chart notes
- Procedures performed
- Sedative Medications dispensed
- Dosages, times, routes of administration
- Local anesthetics
- Disposition of patient at arrival, during dismissal

**Carpule Count Sheet**

- List procedure
- Lists each type of anesthetic given each one at a time
- Includes time administered

The printout from the pulse oximeter should be copied and made a permanent part of the patient's record.

*Three* vital sign readings (before medication, when sedation level is reached, prior to discharge) from the pulse oximeter should be recorded manually during the appointment and recorded on the standard anesthesia form

**If Pulse Oximeter reading is not saved electronically - Cutting Pulse Oximeter Print Outs**

- Cut strips between readings
- Tape flat and neatly onto white paper
- Make a copy before scanning

**Before and After Instructions**

- Reviewed with patient prior to sedation appointment
- Tells patient what to do day before the appointment and day of the appointment

## **Pre-sedation work-up/New Patient exam form**

- health history,
- medical review,
- social history,
- top dose
- consents,
- instructions (before and after – these are the terms and conditions of the treatment)
- treatment plan by the doctor
- Be sure it is signed and scanned
- Payment by front office-sedation
- Paperwork dental assistant/hygienist-doctor reviews

## **Sedation visit form**

- Amounts and times of all medications
- Vital signs and monitoring including
  - Pulse ox
  - EKG
  - Capnography
  - Blood pressure
  - Heart rate, BP, O2 sat initial, after sedated, at dismissal
- Dental assistant records form information
- Dentist reviews for accuracy-
- Dentist/assistant log drugs and drug waste any together-
- Front office team member:
  - gives ride instructions
  - scans paperwork into chart

## **Specific Required Equipment**

- Companion Chair

- Companion must check-in, be a responsible adult, be read companion instructions, be responsible for confirmation patient is safely home
- Staff member stays with patient all the way to car
- Emergency O<sub>2</sub> – forces air into the lungs of a non-breathing patient, should be checked weekly, and documentation of the inspection kept onsite

### **Train teaming suggestions**

Bring them to DOCS Courses,

They should be prepared for an Audit

### **Remember:**

Keep good records of the dispensing of all controlled substances, including:

- Comprehensive chart notes
- Procedures performed
- Sedative medications dispensed
- Dosages, times, routes of administration
- Local anesthetics
- Disposition of patient at arrival, during, and at dismissal

If records are reviewed by a dental board or court, responsibility lies with the dentist – not with office staff. The dentist's license is in peril.