Medication Samples
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Does your physician office continually receive medication samples from various manufacturers, but you find the thought of trying to keep track of and organize them overwhelming? Don’t worry; you are not alone. An article was recently posted on www.medscape.com titled, “Taming the Sample Closet”. In this article, the author, Mitchell L. Cohen, MD, describes a plan to achieve a neatly organized sample closet.

First, familiarize yourself with your individual state’s regulations with regard to drug sample storage and distribution. New Jersey’s State Board of Medical Examiners Statutes and Regulations 13:35-7.5 “Requirements for the dispensing of drugs and special limitations applicable to the dispensing of drugs for a fee” can be found at http://www.state.nj.us/lps/ca/bme/bmerule.pdf. Although these regulations indicate exceptions for samples of drugs that are not controlled substances and are packaged and labeled by the manufacturer, and for non-prescription substances, it would be a good risk management practice to follow these requirements for ALL medications dispensed in an office setting.

Second, remove and dispose of all expired medications, being aware of any environmental concerns. Visit the Environmental Protection Agency’s website at www.epa.gov/nerlesd1/chemistry/ppcp/relevant.htm#disposal and search for “drug disposal” for a list of resources.

Third, choose an organizational system that works best for you and your office practice (i.e. by class of medication). Whichever system you choose, just make sure to store medications with similar names away from each other so you don’t mistake them for one another. Consider using a separate bin for the various different tablet sizes/dosages of the same medication so an incorrect dosage is not given.

You may not want to think that a coworker or staff person would take samples for their own benefit, but it’s a good idea to keep your medication samples secure. Consider locking the medication sample closet/area, especially at night. If you choose to only secure the area at night, consider more secure storage, even during the day, for those medications that could be abused and/or for those medications that tend to mysteriously disappear from the office during business hours. You may also want to secure the area where extra medication samples are stored to prevent samples from being misplaced.

Also, review your procedure for when drug representatives visit your practice. They could be a problem if they rearrange your sample area or remove competitor’s samples. Depending on your office practice’s location and size, you may want to consider setting a limit on the number of drug representatives you see each day and the hours you are available to see them.

Next, establish a documentation system. In addition to recording the dispensing of samples in the patient’s medical record, it’s important to have a comprehensive system to track all medication samples received and dispensed, in case of a recall. This information should be maintained for at least six months to a year. Though there are various types of systems you can use, one type is a log located near the sample closet/area.

Princeton Insurance Company has developed two samples. The first sample is one log which includes information needed to be tracked for both medication samples received, as well as dispensed. The other sample is two separate logs, one for medication samples received and one for medication samples dispensed. Whichever sample or system you choose it is important to capture the medication name, dose, lot number, expiration date, date received/dispensed, quantity, patient’s name that it is dispensed to, and the physician’s name/initials that dispensed the medication.

Consider keeping pens and a notepad near the sample closet/area to write down any instructions for the patient, as well as a supply of small bags for the patient to use to take the samples home. The patient could then be instructed to use the bag to bring all their medications with them to their next visit so that they can be compared with what you have in
their medical record.

Whether it’s the role of the physician or the nurse to organize the medication sample closet/area, it is important that it remains an ongoing process. At least monthly, expired medications should be disposed of and the closet/area should be restocked with any extra samples.

Though the initial organization of the medication closet/area may be a tedious task, as long as you maintain it, you will be sure to know what sample medications you have and that your patients receive the correct dose of the correct unexpired medication.

Questions and/or suggestions are welcome. Call the Risk Management Department at 1-866-RX4-RISK