

# MARYLAND Department of Health

Larry Hogan, Governor • Boyd Rutherford, Lt. Governor • Dennis Schrader, Secretary

#### MARYLAND BOARD OF PHARMACY

4201, Patterson Avenue, Baltimore, Maryland 21215-2299
Mitra Gavgani, Board President • Deena Speights-Napata, Executive Director

February 20, 2018

BY CERTIFIED & REGULAR MAIL
RETURN RECEIPT REQUESTED

**CERTIFIED NUMBER: 7015 1520 0003 1509 7198** 

Safeway Pharmacy #4872 6235 Oxon Hill Road Oxon Hill, Maryland 20745

Attn: Nebiat Gebremariam, R.Ph., Pharmacy Manager

Re:

Permit No. P06645

Case No. 18-004

Notice of Deficiencies, Recommended Civil Monetary Penalty, and

Opportunity for Hearing

#### Dear Pharmacy Manager:

On July 6, 2017, the Board of Pharmacy (the "Board") conducted an annual inspection of Safeway Pharmacy #4872 (the "Pharmacy") to ensure compliance with statutes and regulations governing the operation of pharmacies. The Board's inspection determined that the Pharmacy was not in compliance with laws governing the administration of vaccinations. Specifically, the Pharmacy had a pharmacist on duty who was no duly registered with the Board to administer vaccinations. Subsequent information provided to the Board indicates that the pharmacist administered three (3) vaccinations without Board registration. The subject pharmacist registered with the Board on July 20, 2017.

### I. FINDINGS AND CONCLUSION

The Board adopts the findings of deficiencies as set forth in the Pharmacy Inspection Report dated July 6, 2017, and attached as Exhibit A.

Based upon the findings above, the Board concludes that the Pharmacy is in violation of the Maryland Pharmacy Act and the regulations adopted thereunder. Specifically, the Board finds the Pharmacy in violation of Health Occ. Art. § 12-403(c)(1) and § 12-508(b)(2) and COMAR 10.34.32.03.

#### II. RECOMMENDED CIVIL MONETARY PENALTY

Under Maryland Health Occupations Article § 12-410 and COMAR 10.34.11, the Board of Pharmacy has the authority to impose a civil monetary penalty based upon violations of the Maryland Pharmacy Act.

Based upon the above violation at the Pharmacy, the Board hereby recommends the imposition of a **civil monetary penalty of \$1,000.00**. The violations upon which the civil monetary penalty is based are noted above and in the attached Exhibit A.

In determining the recommended civil monetary penalty, the Board took into consideration the aggregating and mitigating factors outlined in COMAR 10.34.11.08.

#### **III. FOLLOW-UP INSPECTION**

Please be advised that the Board of Pharmacy may perform a follow-up inspection of the Pharmacy to insure that the deficiencies noted in the Report have not reoccurred. Should the follow-up inspection indicate that the Pharmacy has further deficiencies, the Board may pursue further disciplinary action against the Pharmacy that may result in the imposition of sanctions such as suspension, revocation or additional monetary penalties.

#### IV. OPPORTUNITY FOR HEARING

If the Pharmacy disputes the findings, conclusions or the civil monetary penalty, the Pharmacy may request an evidentiary hearing on the Board's decision in this matter. In the event that the Pharmacy requests an evidentiary hearing, the Board shall initiate formal proceedings which will include the opportunity for a full evidentiary hearing. The hearing will be held in accordance with the Administrative Procedure Act, Md. Code Ann. State Gov't § 10-201 et seq., and COMAR 10.34.01. Any request for a hearing must be submitted in writing to Lisa Sanderoff, R.Ph., Pharmacist Investigative Supervisor, Maryland Board of Pharmacy, 4201 Patterson Ave., 5th Floor, Baltimore, Maryland 21215, no later than thirty (30) days of the date of this Notice.

Please be advised that at the hearing the Pharmacy would have the following rights: to be represented by counsel, to subpoena witnesses, to call witnesses on the Pharmacy's behalf, to present evidence, to cross-examine witnesses, to testify, and to present summation and argument. Should the Board find the Pharmacy guilty of the violations cited in the Reports, the Board may suspend or revoke the pharmacy permit, or impose civil penalties, or both. If the Pharmacy requests a hearing but fails to appear, the Board may nevertheless hear and determine the matter in the Pharmacy's absence.

#### V. OPTION TO PAY RECOMMENDED CIVIL MONETARY PENALTY

Alternatively, the Pharmacy may pay the recommended civil monetary penalty within thirty (30) days of the date of this Notice, in the form of a certified check or money order made payable to the Maryland Board of Pharmacy.

Please mail the check or money order to:

Maryland Board of Pharmacy P.O. Box 2051 Baltimore, MD 21203-2051

NOTE: Please include the case number, 18-004, on your check or money order to insure proper assignment to your case.

Upon the Pharmacy's payment of the civil monetary penalty, this Notice will constitute the Board's final action with respect to the inspection report dated July 6, 2017, and shall be a public document in accordance with the Maryland Public Information Act.

If you have any questions concerning the instructions contained in this letter, please contact Lisa Sanderoff, R.Ph., Pharmacist Investigative Supervisor, at 410-764-3768.

Sincerely,

Deena Speights-Napata

**Executive Director** 

Attachment

Linda Bethman, AAG, Board Counsel CC:



## MARYLAND

Department of Health Larry J. Hogan, Governor - Boyd K. Rutherford, Lt. Governor - Dennis R. Schrader, Secretary



MARYLAND BOARD OF PHARMACY
4201 Patterson Avenue, Baltimore, Maryland 21215-2299
Mitra Gavgani, Board President, Deena Speights-Napata, Executive Director

#### COMMUNITY PHARMACY INSPECTION FORM

Maryland Pharmacy Permit Number	P06645
Corporate Pharmacy Name	SAFEWAY PHARMACY #4872
Pharmacy Name-Doing Business as (d/b/a) or Trade Name	SAFEWAY PHARMACY #4872
Street Address	6235 OXON HILL, RD, Oxon Hill, MD, 20745
Business Telephone Number	301-839-0729
Business Fax Number	301-567-9072
Inspection Date	07/06/2017
Arrival Time	12:10
Departure Time	14:19:44
Type of Inspection	
Previous Date	10/13/2016
	Kerri Weigley
Name of Inspector	
1. GENERAL INFORMATION	
	ntly displayed if the prescription area is not open the same hours as the establishment.
Pharmacy Hours	
Monday: 9am-9pm Tuesday: 9am-9pm	Wednesday: 9am-9pm Thursday: 9am-9pm
Friday: 9am-9pm Saturday: 9am-7pm	Sunday: 10am-4pm
● Yes ONo All permits, licenses, and registrations are pos	ted conspicuously. HO § 12-311, HO § 12-408(b) and HO § 12-6B-08
Maryland Pharmacy Permit Number	Expiration Date 05/31/2018
CDS Registration Number 48242	29 Expiration Date 09/30/2019
DEA Registration Number FN50	65582 Expiration Date 10/31/2017
OYes   No The pharmacy performs sterile compounding. (If	yes, complete Sterile Compounding Inspection Form) COMAR 10.34.19
O Yes   No  The pharmacy provides services to Comprehensi COMAR 10.34.23	ve Care facilities or assisted living facilities. (If yes, complete Comprehensive Inspection Form)
OYes   ● No The pharmacy fills original prescriptions receive	d via the internet.
• Yes O No The pharmacy fills original prescriptions via e-pr	
OYes  No The pharmacist fills mail order prescriptions.	
	relationship exists between the patient and the prescriber? 21 C.F.R. § 1306.04, HG § 21-220;
	verifies electronic prescriptions via contacting the prescriber.
Comments:	y .
2. PERSONNEL	
Name of Pharmacist/Manager who is charged with ensuring com	pliance with all applicable laws
12270 12270: NEBIAT GEBREMARIAM	
Bhormacist Franksian License # Status Evo	Data Vaccine Certification # Status Eva Data

Pharmacist Employee	License #	Status	Exp. Date	Vaccine Certification #	Status	Exp. Date	
NEBIAT GEBREMARIAM	12270	Active	02/28/2018	12270	Active	02/28/2018	
Chirag Pancholi	24406	Active	03/31/2018				

Registered Technicians	Registration #	Status	Exp. Date	
EDWARD O BRADY	T05116	Inactive	05/31/2018	
DARREN C YOUNG	T08690	Active	04/30/2018	

free in the	(non-registered) Ti	tle Duties	
Unlicensed Personnel (	(non-registered)	de Duties	
No unlice	censed personnel as of this inspection.		
	• • • • • • • • • • • • • • • • • • • •		^
Comments:			~
3. PERSONNEL TRA	AINING		
O O Ther Yes No N/A phan	re are written policies and procedures to specify duties that may be performed by rmacist. COMAR 10.34.21.03 and 10.34.21.05	unlicensed personnel under the	supervision of a licensed
O O All u Yes No N/A (1)	unlicensed personnel who perform tasks in the pharmacy receive documented tra	ining for the tasks they perform	. COMAR 10.34.21.03B
	sceived training in: (check all that apply) COMAR 10.34.21.03B(3) and (4)		
● ○ ○ Mair	intaining records		
Yes No N/A			
● O O Patie Yes No N/A	ent confidentiality		
O O Sanit Yes No N/A	itation, hygiene, infection control		
O O Yes No N/A Bioh	hazard precautions		4
	GOMAN 10.04.06.02		
Yes No N/A Patie	ent safety and medication errors COMAR 10.34.26.03		
Comments: Training is through	gh TIV		
realizing 15 childes	gii iibe.		^
			~
OYes   ● No	The pharmacy wholesale distributes to another pharmacy (COMAR 10.	34.37)	<del></del>
OYes ®No	The pharmacy wholesale distributes to a wholesale distributor (COMAI	R 10.34.37)	
OYes ONo ®N/A	The wholesale distribution business exceeds 5% of the pharmacy annua	l sales (COMAR 10.34.37)	
Comments:			
Chirag Pancholi st	tated that this pharmacy does not wholesale distribute as of this	inspection.	^
			~
4. SECURITY COMA	AR 10.34.05		
	rmacy is designed to prevent unauthorized entry when the prescription area is clo fyes, briefly describe how access is restricted.) COMAR 10.34.05.02A (5)	sed during any period that the r	est of the establishment is
Comments: Metal gates, camer	ras, motion detectors, and locked doors:		
			ĵ
			~
●Yes ONo	The pharmacy and/or pharmacy department has a security system. COMAR 10	34.05.02A (2)	
<ul><li>O The perm</li><li>Yes No provide p</li></ul>	mit holder shall prevent an individual from being in the prescription area unless a pharmacy services. COMAR 10.34.05.02A (3)	pharmacist is immediately ava	ilable on the premises to
Comments:			
45			
			~
5. PHYSICAL REQUI	IREMENTS AND EQUIPMENT		
●Yes ONo	Pharmacy area is clean and orderly. HO § 12-403(b) (11) (ii)2.	W.	
	The pharmacy provides a compounding service (non-sterile procedures).		
●Yes ONo	If yes, the pharmacy maintains equipment that enables it to prepare and dispen- COMAR 10.34.07.02		
● Yes ○ No	The pharmacy has a Class A prescription balance and weights, or a prescriptio 10.34.07.01A	n balance with equivalent or su	perior sensitivity. COMAR
	The pharmacy has hot and cold running water.		

⊚Yes ONo	The medication r	efrigerator(s) contain only prescription items. COMAR 10.34.07.01B	
Yes ONo		efrigerator(s) have a thermometer and the current temperature is between (36-46F) USP. COMAR 10.34.07.01	B
Temperature	40F	Singerator(s) have a distributions and allo current temperature is serviced (30-401) con 1. Contract 10.54.07.01	ים
● Yes O No		erature of the pharmacy department is between 59 to 86 degrees F. COMAR 10.34.05.02A (1)(a)	
Temperature	73F		
●Yes ONo	If the pharmacy s	tocks medications requiring freezing, the freezer is maintained at temperatures required by the medications sto	те
Temperature	0F		
		aintains at all times a current reference library that is appropriate to meet the needs of the practice specialty of the consumers the pharmacy serves. HO § 12-403(b)(10)	tha
⊕Yes ○No	The pharmacy ha	s online resources. HO § 12-403(b)(15)	
Comments:		The hold to depth and any one (AD) (2010). This was Depth to the total that he mine the second and the second a	_
Pharmacy car however on t	ries vaccines. Chirag the Board of pharmacy	Pancholi's CPR card expires $06/08/2019$ . Chirag Pancholi stated that he gives vaccines, website it does not show him having a vaccination license.	-
			,
			-
6. PRESCRIPT	TION LABELING, FILES	AND STORAGE	
<b>●</b> Yes ○No		h prescription prepared or dispensed are made and kept on file for at least 5 years. HO § 12-403(b)(13)(i)	
The following l	label requirements are met	if a drug is dispensed pursuant to a prescription: HO § 12-505	
	●Yes O No	The name and address of the pharmacy; HG § 21-221(a)(1)	
		The serial number of the prescription; HG § 21-221(a)(2)	
	<b>●</b> Yes ○ No	The date the prescription was filled; HO § 12-505(b)(1) and HG §21-221(a)(3)	
		The name of the prescriber; HG § 21-221(a)(4)	
		The name of the patient; HG § 21-221(a)(5)(i)	
		The name and strength of the drug or devices; HO § 12-505(c)	
	●Yes ○No	The directions for use, HO § 12-505(b)(2)(ii) and HG §21-221(a)(5)(ii)	
	⊚Yes ONo	The required cautionary statements or auxiliary labels; HG § 21-221(a)(5)(iii)	
	⊚Yes ONo	The name of generic manufacturer; and HO §§ 12-504(d)(2) and 12-505(c)(2)	
	●Yes ○No	The expiration date is indicated; HO § 12-505(b)(2)	
●Yes ONo		entry technician initials are on prescriptions. COMAR 10.34.08.01	
Yes ONo		e dispensed within 120 days after the issue date. HO § 12-503	
Comments:	Original prescriptions and	Auspensed Within 120 days after all hold date. Alo § 12 505	
	label. Both pharmaci:	and technician initials are on label. Expiration dates are written on pharmacy label.	
			-
7. OUALITY A	SSURANCE - PATIENT	SAFETY / MEDICATION ERRORS	
⊚Yes ONo	There are written policie pharmacist, health care for	s that inform patients of the procedure to follow when reporting a suspected medication error to the permit hold acility, or other health care povider. COMAR 10.34.26.02	ler
Yes O No training provided to each men		a minimum of two (2) continuous years of records clearly demonstrating the content of annual educational member of the pharmacy staff involved in the medication delivery system regarding the roles and responsibility enting medication errors. COMAR 10.34.26.03B	tie
	There is an ongoing qual	ity assurance program that documents the competency and accuracy of all assigned tasks. COMAR 10.34.21.03	3E
Comments: Medication e	rror procedure is post	ed at drop off. Medication error training and QA are on the intra net.	-
	×		^
			V

Any identifiable information contained in a patient's record is not disclosed unless authorized by the patient, or an order of the court, or as authorized pursuant to HG §4-301 through §4-307. COMAR 10.34.10.03B

● Yes ○ No

10.34.10.03A and HIPAA Regulations

Comments:		
Hipaa docume	nts are shredded.	
9. INVENTOR	Y CONTROL PROCEDURES	
O O Yes No N/A	The pharmacy maintains invoic	es as required by law for accurate control and accountability of all pharmaceuticals. COMAR10.34.24.03
O O Yes No N/A	The pharmacy has a procedure	n place for removal of all expired drugs (both prescription and OTC). COMAR 10.34.12.01
O O ® Yes No N/A	The pharmacy maintains record	s of wholesale distribution to other pharmacies separately from its other records. COMAR 10.34.37.03
O O ® Yes No N/A		s of wholesale distribution to wholesale distributors separately from its records of wholesale distribution to 44.37.03
Comments:		
Chirag Panch	oli stated that this pharma	cy does not wholesale distribute as of this inspection.
10. CONTROL	LED SUBSTANCES	
		12270: NEBIAT GEBREMARIAM
Power of Attorn		<b>∀</b>
	The pharmacy has a record of the Inventory Date: 04/30/2017	e most recent required biennial inventory of Schedule II - V controlled substances, COMAR 10.19.03.05
	Biennial Inventory completed a Opening © Closing	
	The inventories and records of S	chedule II-V drugs are maintained and readily available. COMAR 10.19.03.05 and 21 CFR 1304.03
●Yes ○No	Records are kept of all receipts COMAR 10.19.03.05	of controlled substances entered into the pharmacy inventory (including DEA Form 222 or CSOS orders).
	There are written policies and re	cords for return of CII, CIII-V.
		tion files are maintained chronologically for 5 years.
● Yes ○ No	Schedule II controlled substance theft or diversion. COMAR 10.3	s are dispersed throughout the stock of non-controlled substances or stored in such a manner as to obstruct 9.03.12B (2)
	•	ptions bear the name and address of the prescriber and patient. COMAR 10.19.03.07D (1)
⊚Yes ONo	The permit holder or pharmacist loss. COMAR 10.19.03.12B (4)	designee(s) has written policies and procedures for investigating discrepancies and reporting of theft or
None		
		<u> </u>
11. AUTOMAT	TED MEDICATION SYSTEMS	O Yes  No (if No, go to #12)
O O © Yes No N/A	The facility uses an automated d	evice(s) as defined in COMAR 10.34.28.02.
Policies and pro-	cedures exist for (check all that a	pply): COMAR 10.34.28.04A
	OYes ONo ®N/A	Operation of the system
	OYes ONo ®N/A	Training of personnel using the system
	OYes ONo ®N/A	Operations during system downtime
	OYes ONo ®N/A	Control of access to the device
	OYes ONo ®N/A	Accounting for medication added and removed from the system.
O O ® Yes No N/A	Sufficient safeguards are in plac COMAR 10.34.28.06	e to ensure accurate replenishment of the automated medication system. If yes, describe safe guards.
N/A		
		ears addressing the following (check all that apply) COMAR 10 34 28 11

O Yes O No ● N/A Maintenance records.

		(	OYes ONo ®N/A	System failure reports.
		(	OYes ONo ®N/A	Accuracy audits.
		(	OYes ONo ®N/A	Quality Assurance Reports.
		(	OYes ONo ON/A	Reports on system access and changes in access.
			OYes ONo ON/A	Training records.
O Yes	O No	NI/A el		1, 2003 operate in a manner to limit simultaneous access to multiple strengths, dosage forms, or drug for misidentification of medications, dosages, and dosage forms accessed from the automated 2.28.04B
	O No 1 ments:	N/A a	he pharmacy has records, docume accordance with the requirements of	ents, or other evidence of a quality assurance program regarding the automated medication system in of COMAR 10.34.28
			dication system as of this	inspection.
12. 0	OUTSO	DURCI	NG OYes  No (if No, go to #	13)
O Yes	O No	⊚ N/A	The facility outsources the prep	paration of medication or performs outsourcing functions for other pharmacies. COMAR 10.34.04.02
O Yes	O No	⊚ N/A	The facility serves as a primary	pharmacy outsourcer to other pharmacies. COMAR 10.34.04.02
O Yes	O No	⊚ N/A	The facility serves as a seconda	ry pharmacy. COMAR 10.34.04.02
O Yes	O No	⊚ N/A	The permit holder employs an centry, and management.	outside agency/business entity for the provision of any pharmacy services, inclusive of staffing, remote order
			If yes: Name of agency, state of	f incorporation, service contracted, and State of Maryland License/Permit Number: COMAR 10.34.04.06E
	ments:	rcina	as of this inspection.	
10352				^
				<b>∨</b>
1				
O Yes	O No	⊚ N/A		olicies and procedures to specify the duties that may be performed by outside personnel. COMAR
Yes	No	N/A	The permit holder has written p 10.34.21.03B(3) sources a prescription order:	olicies and procedures to specify the duties that may be performed by outside personnel. COMAR
Yes	No	N/A	10.34.21.03B(3) sources a prescription order:	olicies and procedures to specify the duties that may be performed by outside personnel. COMAR is filed as a prescription order at the primary pharmacy. COMAR 10.34.04.06D
Yes If the	No pharm	N/A nacy out	10.34.21.03B(3) sources a prescription order: The original prescription order is	
Yes If the O Yes O	No pharm O No O	N/A nacy out  N/A N/A	10.34.21.03B(3) cources a prescription order:  The original prescription order in the work of the work	is filed as a prescription order at the primary pharmacy. COMAR 10.34.04.06D enance of documentation regarding transfer of prescription records. COMAR 10.34.04.06 including the names and locations of the pharmacies, names of pharmacists, and a record of the preparations
Yes If the Yes O Yes O Yes	No pharm O No No No No	N/A accy out  N/A  N/A  N/A  N/A	10.34.21.03B(3) cources a prescription order:  The original prescription order in Written policies exist for mainted. Documentation is maintained, in made. COMAR 10.34.04.03 and	is filed as a prescription order at the primary pharmacy. COMAR 10.34.04.06D enance of documentation regarding transfer of prescription records. COMAR 10.34.04.06 including the names and locations of the pharmacies, names of pharmacists, and a record of the preparations if .05
Yes If the Yes O Yes O Yes O The p	No pharm O No O No O No harma	N/A nacy out  n/A  N/A  N/A  N/A  N/A  cist from	10.34.21.03B(3)  sources a prescription order:  The original prescription order is  Written policies exist for mainted  Documentation is maintained, in made. COMAR 10.34.04.03 and in the primary pharmacy documentation.	is filed as a prescription order at the primary pharmacy. COMAR 10.34.04.06D  enance of documentation regarding transfer of prescription records. COMAR 10.34.04.06  including the names and locations of the pharmacies, names of pharmacists, and a record of the preparations 1.05  its the following in a readily retrievable and identifiable manner: COMAR 10.34.04.06 (Check all that apply)
Yes If the Yes O Yes O Yes O Yes O Yes	No pharm No N	N/A nacy out  N/A  N/A  N/A  N/A  N/A  cist from  N/A	10.34.21.03B(3)  sources a prescription order:  The original prescription order is  Written policies exist for mainted  Documentation is maintained, in made. COMAR 10.34.04.03 and in the primary pharmacy documentation.	is filed as a prescription order at the primary pharmacy. COMAR 10.34.04.06D enance of documentation regarding transfer of prescription records. COMAR 10.34.04.06 including the names and locations of the pharmacies, names of pharmacists, and a record of the preparations if .05
Yes If the Yes O Yes O Yes O The p	No pharm O No O No O No harma	N/A nacy out  n/A  N/A  N/A  N/A  N/A  cist from	10.34.21.03B(3)  sources a prescription order:  The original prescription order is  Written policies exist for mainted  Documentation is maintained, in made. COMAR 10.34.04.03 and in the primary pharmacy documentation.	is filed as a prescription order at the primary pharmacy. COMAR 10.34.04.06D enance of documentation regarding transfer of prescription records. COMAR 10.34.04.06 including the names and locations of the pharmacies, names of pharmacists, and a record of the preparations if .05 its the following in a readily retrievable and identifiable manner: COMAR 10.34.04.06 (Check all that apply) prepared by a secondary pharmacy.
Yes If the O Yes O Yes O Yes O Yes C O Yes O O O O O O O O O O O O O O O O O O O	No pharm No N	N/A acy out  N/A  N/A  N/A  N/A  N/A  cist fror  N/A  N/A	10.34.21.03B(3)  cources a prescription order:  The original prescription order is written policies exist for mainted. Documentation is maintained, it made. COMAR 10.34.04.03 and the primary pharmacy documentation order was the prescription order was the name of the secondary pharmacy documentation.	is filed as a prescription order at the primary pharmacy. COMAR 10.34.04.06D enance of documentation regarding transfer of prescription records. COMAR 10.34.04.06 including the names and locations of the pharmacies, names of pharmacists, and a record of the preparations if .05 its the following in a readily retrievable and identifiable manner: COMAR 10.34.04.06 (Check all that apply) prepared by a secondary pharmacy.
Yes If the Yes O Yes O Yes O Yes O Yes O Yes O O Yes O O O O O O O O O O O O O O O O O O O	No pharm O No O No No No No No O No O No O No O	N/A accy out  N/A  N/A  N/A  N/A  N/A  N/A  N/A  N/	10.34.21.03B(3) cources a prescription order:  The original prescription order in the primary pharmacy document the prescription order was the prescription order was the name of the pharmacist who	is filed as a prescription order at the primary pharmacy. COMAR 10.34.04.06D enance of documentation regarding transfer of prescription records. COMAR 10.34.04.06 including the names and locations of the pharmacies, names of pharmacists, and a record of the preparations 1.05 its the following in a readily retrievable and identifiable manner: COMAR 10.34.04.06 (Check all that apply) prepared by a secondary pharmacy.
Yes If the Yes O Yes	No pharm O No O No No No No No O No O No O No O	N/A accy out  N/A N/A N/A N/A cist from N/A N/A N/A N/A N/A N/A	10.34.21.03B(3) sources a prescription order: The original prescription order if Written policies exist for mainted Documentation is maintained, in made. COMAR 10.34.04.03 and in the primary pharmacy document That the prescription order was in the prescription order was in the name of the secondary pharmacist who is the pharmacist who is the pharmacist at the oral manner.	is filed as a prescription order at the primary pharmacy. COMAR 10.34.04.06D enance of documentation regarding transfer of prescription records. COMAR 10.34.04.06 including the names and locations of the pharmacies, names of pharmacists, and a record of the preparations if .05 its the following in a readily retrievable and identifiable manner: COMAR 10.34.04.06 (Check all that apply) prepared by a secondary pharmacy.  The transmitted the prescription order to the secondary pharmacy.
Yes If the Yes O Yes	No pharma O No O No No No No O No O No O No O No	N/A accy out  N/A  N/A  N/A  N/A  N/A  N/A  N/A  N/	10.34.21.03B(3) sources a prescription order: The original prescription order if Written policies exist for maintal Documentation is maintained, in made. COMAR 10.34.04.03 and in the primary pharmacy documen That the prescription order was The name of the secondary phar The name of the pharmacist who The name of the pharmacist at the oral manner. The date on which the prescription	is filed as a prescription order at the primary pharmacy. COMAR 10.34.04.06D  enance of documentation regarding transfer of prescription records. COMAR 10.34.04.06  including the names and locations of the pharmacies, names of pharmacists, and a record of the preparations of the following in a readily retrievable and identifiable manner: COMAR 10.34.04.06 (Check all that apply) prepared by a secondary pharmacy.  In transmitted the prescription order to the secondary pharmacy.  The secondary pharmacy to whom the prescription order was transmitted if the transmission occurred in an
Yes If the Yes O Yes	No pharma O No	N/A accy out  n/A  n/A  n/A  n/A  n/A  n/A  n/A  n/	10.34.21.03B(3) sources a prescription order: The original prescription order if Written policies exist for mainted Documentation is maintained, in made. COMAR 10.34.04.03 and in the primary pharmacy document That the prescription order was a substitute of the secondary pharmace of the pharmacist who the name of the pharmacist at the oral manner.  The date on which the prescription or the prescription or the pharmacist at the oral manner.	is filed as a prescription order at the primary pharmacy. COMAR 10.34.04.06D enance of documentation regarding transfer of prescription records. COMAR 10.34.04.06 including the names and locations of the pharmacies, names of pharmacists, and a record of the preparations of the following in a readily retrievable and identifiable manner: COMAR 10.34.04.06 (Check all that apply) prepared by a secondary pharmacy.  The prescription order to the secondary pharmacy.  The secondary pharmacy to whom the prescription order was transmitted if the transmission occurred in an on order was transmitted to the secondary pharmacy.
Yes If the Yes O Yes	No pharma O No	N/A accy out  n/A  n/A  n/A  n/A  n/A  n/A  n/A  n/	10.34.21.03B(3) sources a prescription order: The original prescription order if Written policies exist for mainted Documentation is maintained, in made. COMAR 10.34.04.03 and in the primary pharmacy document That the prescription order was in the prescription order was in the name of the secondary pharmacist who is the pharmacist at the prescription order was in the name of the pharmacist at the oral manner.  The date on which the prescription order was in the pharmacist at the oral manner.  The date on which the prescription order was in the pharmacist at the oral manner.	is filed as a prescription order at the primary pharmacy. COMAR 10.34.04.06D enance of documentation regarding transfer of prescription records. COMAR 10.34.04.06 including the names and locations of the pharmacies, names of pharmacists, and a record of the preparations of the following in a readily retrievable and identifiable manner: COMAR 10.34.04.06 (Check all that apply) prepared by a secondary pharmacy.  The secondary pharmacy to whom the prescription order was transmitted if the transmission occurred in an on order was transmitted to the secondary pharmacy.  The secondary pharmacy to the primary pharmacy.  The secondary pharmacy to the primary pharmacy.  The secondary pharmacy in the State of Maryland, or operated by the federal government. COMAR se, in a readily retrievable and identifiable manner, a record of preparations received from the secondary
Yes If the Yes O Yes The pe	No pharma O No	N/A accy out  n/A  n/A  n/A  n/A  n/A  n/A  n/A  n/	10.34.21.03B(3) sources a prescription order: The original prescription order if Written policies exist for mainted Documentation is maintained, in made. COMAR 10.34.04.03 and in the primary pharmacy document That the prescription order was a substitute of the secondary pharmace of the pharmacist who the name of the pharmacist at the oral manner.  The date on which the prescription The date on which the medication The primary and secondary pharmacy and secondary pharmacy. COMAR 10.34.04.06F  The primary pharmacy maintain pharmacy. COMAR 10.34.04.06	is filed as a prescription order at the primary pharmacy. COMAR 10.34.04.06D enance of documentation regarding transfer of prescription records. COMAR 10.34.04.06 including the names and locations of the pharmacies, names of pharmacists, and a record of the preparations of the following in a readily retrievable and identifiable manner: COMAR 10.34.04.06 (Check all that apply) prepared by a secondary pharmacy.  The secondary pharmacy to whom the prescription order was transmitted if the transmission occurred in an on order was transmitted to the secondary pharmacy.  The secondary pharmacy to the primary pharmacy.  The secondary pharmacy to the primary pharmacy.  The secondary pharmacy in the State of Maryland, or operated by the federal government. COMAR se, in a readily retrievable and identifiable manner, a record of preparations received from the secondary
Yes If the Yes O Yes The pe	No pharma O No	N/A accy out  n/A  n/A  n/A  n/A  n/A  n/A  n/A  n/	10.34.21.03B(3) sources a prescription order: The original prescription order if Written policies exist for mainted Documentation is maintained, in made. COMAR 10.34.04.03 and in the primary pharmacy document That the prescription order was a substitute of the pharmacist who is the name of the pharmacist who is the name of the pharmacist at the oral manner.  The date on which the prescription order was a substitute or the pharmacist at the oral manner.  The date on which the medication of the primary and secondary pharmacy and secondary pharmacy. COMAR 10.34.04.06 at the secondary pharmacy maintain pharmacy. COMAR 10.34.04.06 at the secondary pharmacy maintain t	is filed as a prescription order at the primary pharmacy. COMAR 10.34.04.06D enance of documentation regarding transfer of prescription records. COMAR 10.34.04.06 including the names and locations of the pharmacies, names of pharmacists, and a record of the preparations of the following in a readily retrievable and identifiable manner: COMAR 10.34.04.06 (Check all that apply) prepared by a secondary pharmacy.  The secondary pharmacy to whom the prescription order was transmitted if the transmission occurred in an on order was transmitted to the secondary pharmacy.  The secondary pharmacy is a secondary pharmacy is a secondary pharmacy is a secondary pharmacy.  The secondary pharmacy is a secondary pharmacy is a secondary pharmacy is a secondary pharmacy.

12. C	UTSC	OURCIN	NG OYes							
O Yes	O No	⊚ N/A	The name and informati	on identifying th	he specific location of the prim	ary pharmacy.				
O Yes	O No	⊚ N/A	The name of the pharmacist who transmitted the prescription to the secondary pharmacy if the transmission occurred in an oral manner.							
O Yes	O No	⊚ N/A	The name of the pharma	he name of the pharmacist at the secondary pharmacy who accepted the transmitted prescription order.						
O Yes	O No	⊚ N/A	The name of the pharma	the name of the pharmacist at the secondary pharmacy who prepared the prescription order.						
O Yes	O No	⊚ N/A	The date on which the prescription order was received at the secondary pharmacy.							
O Yes	O No	⊚ N/A	The date on which the p	repared product	was sent to the primary pharm	acy if it was sent bac	k to the prima	ary pharmacy.		
			Best Practices							
	es O i				Schedule II controlled substan					
⊕ Ye	es Oì	No	There are documented co	ontingency plans	s for continuing operations in	an emergency and for	· disaster reco	very of required re	ecords.	
⊕ Ye	es O l	No	The pharmacy has writte	n policies and p	procedures for the safe handling	g of drug recalls. See	www.recalls.	gov		
<b>⊚</b> Y6	es Ol	No	The pharmacy maintains	records of all re	ecalls. See <u>www.recalls.gov</u>					
_				CONTROLLE	D DANGEDOUG CURCTAN	CEC WODVEHER	T			
Pharm Permi Date:	t#:	SAFEW P06645 07/06/20	AY PHARMACY #4872	CONTROLLE	D DANGEROUS SUBSTAN	CES WORKSHEE	<u>C</u>			
	75									
Rx#:	1	2493714								
Date	i	07/05/20	17							
Filled	- 1	01700720	***************************************				lpra	PETUAL		
DRUG	3			NDC Number		ON HAND INVE		ENTORY		
				+			4	•		
Adder	all Xr 5	5mg		54092-0381-01		1 100		100	Clear	
							_	,	_	
Hydro	morah	one 2mg		00406-3243-01		1 1 -7	.	1-	Clear	
[ iyara	morp.	one zing		55 155 52 15 51			5		Oldar	
							0		S	
Oxyco	done 1	10mg		68382-0794-01		21	5 2	218	Clear	
						1 -		A7 - A22		
Oxyco	ntin 10	Omg		59011-0410-10		40		40	Clear	
		Perpeti		electronical	ly, no discrepancies fou	nd during the CII	audit. See	attached labe	l from	
Comm		0770372	2017.						×	
	_			SCHEDU	JLE II AUDIT					
	_		Drug:		NA			1		
			NDC Numb	er:	N/A					
			Date of last		10/13/2016					
Amou		last oiennial	Inspection/i	siennial:	(A)					
Purch			500		(D)			1		
inspec	ction/b	oiennial	0.00		(B)					
Total	invent	tory	0		(C) = A + B					

(D) (E) = C - D

Quantity Dispensed

Expected Inventory

		CHEDULE II AUDIT	
Quantity on Hand	0.00	(F)	
Discrepancy	0	(G) = (F-E)excess or (E	E-F) shortage
		INVOICE REVIEW	
Invoices were si	gned and dated.		
CII:			1
			~
CIII Invoices were si	gned and dated.		
	Tr		
cv:			
		PRESCRIPTION REVI	IEW
CII#: 2493500-2493	3599		
Date: 02/08/2017-04	/13/2017		
None			
Comments:			
CIII - France rea			
4522300-4522	399		
Date: 05/15/2017			
None			
Comments:			
ereneman-secretary	Browse		
			CHARLES .
	NSC 6236 OXON HILL IN	ILL ROAD	
<b>但 / Manual</b>	OADIN INCL, II		
SAFEMAT.	ONONIAMO E	39-0729 YLVESTER MD	
Fill Date: 07/05/20	6192 OXON HILL R	D. S.	CONTAINS ACET MINIOPHER, DO NOT TAKE HIGHE THAIN RECOMMENDED. TOO MINCH HAY CAUSE LIVER DAMAGE, DISCUSS ANY GLIETTOMS
RX: 2493	714 OXON HILL, MD 20	745	CAUSE LINER DAMAGE. DISCUSS ANY QUESTIONS WITH YOUR DOCTOR.
		4	DO NOT YAVE OTHER MEDICINES THAT HAME ACT ANNOUNCE OF THE SCHOOL TON OR NOW HE SCHOOL WITHOUT CHECKING WITH
	ARLES DV MOUT	U TUTOV CIV	YOUR BOCTOR
	ABLET BY MOUT		
HOURS AS N	NEEDED FOR 30 D	AYS :	DO NOT DRINK ALCOHOLIC BEVERAGES WHILE TAKING THIS
Discard After	LOT #:		
Hydrocodo	ne-Acetaminophe Mall	n 3-	223
Substituted For	Norce 5-325 Ma Tab Ad	NDC: 90406-912	3-0Ř
Orig: 07/06/2017	Refill 0 By: 11/02/2017 Oty.	In 5- 3 In NDC: 00406-012 120 RPh: ASC-NKG	
	·		
Pharmacist Signature for	~ 1		200
Controlled Dangerous		nag	panchale
Substances Audit:		1000	y strange of the stra

INSPECTOR'S		
dates found audit. All d kept on the not show him	ire inspection report with floater pharmacist Chirag Pancholi. Spot checked medication shelves, no in the pharmacy area. Perpetual inventory is kept electronically, no discrepancies found during the ocuments needed for this inspection were easily retrieved. Training, QA, and polices and procedures intra net. Chirag Pancholi stated that he gives vaccines, however on the Board of pharmacy website having a vaccination license. Chirag Pancholi stated that this pharmacy does not wholesale distribute ave any unlicensed personnel, or participate in the repository program.	CII are it does
Inspector Signature:	Keni Weight	
Pharmacist Name (Print):	24406 24406: Chirag Pancholl	Date: 07/06/2017
Signature:	Chiray Powell	
Received a copy of this inspection report:	Chrysones	
Supporting Doo	cuments.	

410-764-4755 - Fax 410-384-4137 - Toll Free 800-542-4964 MDH 1-877-463-3464 - Maryland Relay Service 1-800-735-2258 Web site: https://health.maryland.gov/pharmacy/Pages/index.aspx