**Clinic Closing for Dispensing Physician Office Locations**

**Step 1:** Start planning early! State requirements have higher notification lead time requirements than Federal. Determine a timeline when you stop accepting new patients. Plan tapering of medication procedures for patients.

At a minimum of forty five (45) days before your clinic closing date, contact your State Licensing agencies (Board of Medicine, Dept. of Health, Controlled Substance Division) for requirements on closing/change of address steps and dispensing practitioner registrations.

At a minimum of fourteen (14) days before your clinic closing date you will need to compose a letter to the DEA office regarding the closing of your location. It is highly recommended to send this via certified mail. Visit the DEA website ([www.deadiversion.usdoj.gov](http://www.deadiversion.usdoj.gov)) to locate the closest office in your region.

Before sending the letter, please contact the office and ask to speak to an agent under Diversion. Explain to them that you will be closing the clinic and that you are going to be surrendering Schedule III and IV medications only (no Schedule II’s) and see if there are any additional requirements to be sent with the letter. Be prepared to address custody of records and medications.

**Step 2:** Reconcile all medications that are on-site at the closing location. Contact the DEA and if directed, a Reverse Distributor to arrange for destruction of medications. We recommend using Quality Rx Returns, Inc. a full service provider of pharmaceutical reverse logistic solutions, serving pharmacies, hospitals, and healthcare providers nationwide ([www.qrxreturns.com](http://www.qrxreturns.com)).

**Step 3:** On the date of the closing you will need to conduct one “Final” inventory and maintain this with your controlled substance records. Place careful emphasis on the approved reconciliation and inventory documents and double-check for accuracy.

**Step 4:** Keep all controlled substance records (inventories, perpetual inventory logs, prescription records, etc.) for the former address in the Master Records binder or a secured cabinet for a minimum of 2 years, unless directed longer otherwise by your healthcare attorney.

**Step 5:** Fax/email a copy of the completed “Final” inventory sheet and letter sent to the DEA to the *Compliance Department* at the corporate offices.

**Additional Steps/Notations:**

* The DEA will require an update to your current registration. Most of the time they will require that your State license before you can have your registration updated.
* Keep a copy of all forms
* Hard drives from computers should be removed from the computer and physically destroyed. Erasing a hard drive does not erase protected health information (PHI) that may have been downloaded. Corporate IT has verified that PHI is not retained in the \_\_\_\_\_\_\_\_\_touch screens.
* SHRED Rx pads – do not discard them in regular trash.
* Be cognizant of STATE medical record laws and rules. Records of minors are subject to Age of Majority rules. Records must be kept for 10 years from the last date of encounter or 10 yrs past the age of 18, whichever is longer. You may need to separate these from other records and label the outside of the box with the “To be destroyed on \_\_\_\_\_\_\_\_ date”.

OPS Thoughts:

* Contact your healthcare consultant/attorney on direction of bank, employment and pharmacy record retention requirements. You may consider storage at a record storage/shred service provider. Your Business Associate (BA) can outline details of a pre-determined shred date for records being stored.
* Notify malpractice/business liability coverage carrier.
* Contact Legal with a copy of your patient notification letter and/or intended newspaper ad (if State requires) for approval. \*\*Do we have predetermined templates already in place??\*\*
* Some states also require signage in the window for 30 days prior to the closing date.
* Set-up mail and phone forwarding for the clinic.
Consider offering the staff a bonus incentive to stay until the closing date.