

**PURPOSE:**

The purpose of this policy is to establish the requirements for the use, replacement, and accountability of controlled substances for Advanced Life Support (ALS) units.

**AUTHORITY:**

Health and Safety Code, Division 2.5, 1797.220, 1798 et seq., Code of Federal Regulations (CFR), Title 21 – Food and Drugs; California Code of Regulations, Title 22, Division 9.

**POLICY:**

- I. The acquisition, storage and use of controlled substances for pre-hospital care in the Emergency Medical Services (EMS) system is restricted to providers that are authorized to provide Advanced Life Support (ALS) services through a current written agreement with San Joaquin County EMS Agency. Continued authorization for controlled substances and other ALS services is contingent in part on the provider's continued adherence to established medical control including this policy.
- II. Controlled Substance Inventory and distribution:
  - A. Inventory of controlled substances on ALS provider vehicles shall be in accordance with the Advance Life Support Standard Drug and Equipment List Policy #4102.
  - B. All controlled substances shall be supplied and re-supplied by the ALS Provider's prescribing physician, who shall be a physician or surgeon licensed in the State of California, authorized by Drug Enforcement Agency (DEA) to order scheduled controlled substances.
  - C. The ALS Provider's prescribing physician shall approve provider level policies and procedures, to ensure that all controlled substances are obtained, maintained, and distributed in a secure manner in accordance with federal, state, and local requirements. The ALS Provider's controlled substance policies and procedures shall be submitted to the San Joaquin County EMS Agency Medical Director for review and approval.
  - D. Providers can request an alternative policy be approved by the SJCEMSA for the disposal of narcotics.

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Medical Director

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EMS Administrator

**III. Security of Controlled Substances:**

- A. ALS personnel shall only have access to controlled substances within their scope of practice. BLS personnel may only have access to controlled substances while under the direct supervision of ALS personnel.
- B. All controlled substances stored on the ALS vehicles shall be under double lock. The keys to access narcotics shall be in the custody of the ALS personnel at all times.
- C. Each ALS Provider shall maintain standardized written records of the controlled substance inventory. These records shall be maintained by the ALS Provider for a minimum period of five years. Once completed, all drug inventory and administration records shall be maintained in accordance with State and Federal Law and Regulation.
  - 1. ALS personnel assigned to an ALS unit shall be responsible for maintaining the correct daily inventory of controlled substances at all times.
  - 2. All controlled substances shall be counted and inspected every time there is a change in the ALS on-duty staff or at a minimum, once a shift.
  - 3. Both the oncoming ALS personnel and the off-going ALS personnel shall jointly count, date, time, and sign the standardized controlled substance inventory log.
- D. Any discrepancies in the controlled substance count shall be reported to the ALS Provider supervisor/management and the issuing agent. Discrepancies that cannot be immediately resolved shall be reported to local law enforcement and to the DEA using DEA Form 106 (Appendix A) referring to the theft or loss of controlled substances. A copy of the DEA report shall be submitted to the San Joaquin County EMS Agency along with an unusual occurrence report describing the incident and the ALS Provider's actions and findings.
- E. Controlled substance inventories and logs are subject to inspection by personnel of the California Board of Pharmacy, Bureau of Narcotic Enforcement Administration, Federal Drug Enforcement Administration, and the San Joaquin County EMS Agency.

**IV. Patient Administration of Controlled Substances:**

- A. Controlled substances are to be administered in accordance with San Joaquin County EMS Agency treatment protocols.
- B. Each administration of a controlled substance to a patient shall be accounted for on the controlled substance inventory log.
- C. All opened controlled substance containers and residual substance shall be discarded by the ALS attendant in the presence of another on-duty paramedic, registered nurse, or physician. Both parties shall document witnessing the discard on the patient's care record.

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- V. Expired Controlled Substances: Expiration dates of controlled substances shall be checked on a routine schedule established by Provider policy, at not less than a monthly basis. It is recommended that controlled substances be replaced one (1) month prior to their expiration date. Controlled substances that have expired shall not be carried on the ALS vehicles or administered to patients at any time.

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