SCOTTS VALLEY FIRE PROTECTION DISTRICT

STANDARD

ARTICLE: II

SOP: 2904

OPERATING PROCEDURES

SECTION: 2900 EMS

SUBJECT: Controlled Substance Program

Scope

This standard operating procedure (SOP) has been established to ensure that Scotts Valley Fire District adheres to all laws regarding the possession and use of controlled substances.

Purpose

The Scotts Valley Fire District is committed to the development, implementation, maintenance and re-evaluation of a Controlled Substance Program. The Program has been established by the EMSIA to ensure that the participating Fire Districts adhere to Federal law regarding the possession and use of Controlled Substances.

The Santa Cruz County Emergency Medical Services Medical Director has approved the EMSIA Controlled Substance Program. The Program also meets the standards set forth by the California Controlled Substance Act and Regulations, Division of Control Amendments of 1984, Registrant Protection Act of 1984, Health and Safety Code Section 11122 and the California Board of Pharmacy. This SOP explains the procedure for implementation and maintenance of the District's Controlled Substance Program.

Definition

Controlled substance: Schedule II-IV medications as defined by the federal Controlled Substance Act of 1970

Responsibilities

It is the responsibility of all Scotts Valley Fire District employees that are required by the scope and or application of their job duties to adhere at all times to all procedures contained in this Standard Operating Procedure.

Procedures

- 1. Storage of Controlled Substance
 - a. Controlled Substance Restock Inventory Safe
 - Scotts Valley Fire District's controlled substance restock inventory will be secured at all times in a fire resistance safe located in the Training Battalion Chief's file cabinet.

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- b. ALS Engine Inventory (First Out Apparatus):
 - i. Controlled Substances disbursed to first out ALS Engines will be stored in a clear plastic box secured with a numbered plastic seal, placed inside the ALS medical bag located in the EMS compartment of the ALS Engine. The ALS Engines EMS compartment must be locked at all times. The controlled substance must remained secured in the EMS compartment except when it is in the immediate possession of a Firefighter/Paramedic who is either transferring possession of a controlled substance or administering a controlled substance to a patient.
- c. Firefighter/Paramedic Daily Verification Procedure
 - i. Firefighter/Paramedics must inspect and count the contents of each controlled substance container at the beginning and end of their shift, and anytime there is a Firefighter/Paramedic exchange. Each and every Firefighter/Paramedic who signs for controlled substances is responsible and personally accountable for the controlled substance count.
 - ii. At shift change the on-coming Firefighter/Paramedic will meet with the off-going Firefighter/Paramedic and unlock the compartment containing the controlled medications. Each Firefighter/ Paramedic will visually inspect the controlled medication container for:
 - 1. An intact container sealed with a numbered plastic lock and that the container has not been tampered with.
 - 2. Verify the numbered seal corresponds with the last entry on the controlled substance log.
 - 3. That the appropriate amount of controlled substance and/or combination of controlled substance and completed controlled substance administration cards are present.
 - 4. The expiration dates of the controlled substance shall be checked for currency.
 - iii. Once the controlled substance container has been properly inspected, the container will be secured in its appropriate storage compartment. Both the on-coming and off-going Firefighter/Paramedics will then sign the controlled substance log, on the corresponding date.

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iv. A Controlled Substance container may not be accepted from District personnel who are being relieved of duty if any irregularity or discrepancy is noted. If an irregularity or discrepancy is apparent, the on-duty Captain will notify the on-duty Battalion Chief. The Firefighter /Paramedic being relieved of duty may not leave or transfer possession of the Controlled Substance container to another Firefighter/Paramedic until authorized by the on-duty Battalion Chief.

2. Administration of Controlled Substance

- a. Authorization to Open a Controlled Substance Container.
 - i. The administration and use of controlled substances shall be limited to the following scope and application. Firefighter/Paramedics are not authorized to break the lock and open the controlled substance container to administer the drug unless the following requirements are met:
 - The Firefighter/Paramedic has received a base order for the specific controlled substance.
 - 2. The Firefighter/Paramedic is administering the controlled substance under a specific standing order.
 - 3. The Firefighter/Paramedic has established a route for administration as appropriate.
 - ii. When the above requirements have been met, the Firefighter/Paramedic is authorized to break the lock on the container. The controlled substance removed from the container must be inspected for all of the following:
 - 1. Appropriate labeling for the type, amount and concentration to be used.
 - 2. An intact ampule or vial.
 - 3. The ampule or vial shall be removed and inspected for discoloration, cloudiness or particulate matter.
 - 4. The controlled substance has not expired.

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- 5. If there is any irregularity, the Controlled Substance may not be used.
- iii. Once the controlled substance has been inspected, the ampule or vial may be opened and the medication administered to the patient as ordered or as specified in the standing order.
- b. Discarding (wasting) the unused portion of a Controlled Substance.
 - i. All opened controlled substance not administered to the patient must be discarded by the Firefighter/Paramedic who opened the ampule or vial. The responsible Firefighter/ Paramedic must discard the Controlled Substance in the presence of another Scotts Valley Fire District employee.
 - ii. All of the remaining Controlled Substance must be discarded in a sink. The discard must be documented and signed by both employees on the EMSIA Controlled Substance Administration Card.
 - iii. A Scotts Valley Fire District Paramedic shall never release any amount of Controlled Substance to the transport paramedic. Scotts Valley Fire District narcotics shall always be administered by a Scotts Valley Fire District paramedic.
- c. Controlled Substance Card
 - i. Anytime a controlled substance is used, an EMSIA Controlled Substance Card must be completed.
 - ii. Each card must contain the patient's name, Event/PCR Number, type of medication administered, amount of medication administered and the amount of unused medications wasted. The Paramedic/Firefighter who administered the controlled substance and the subject witnessing the wasting of the controlled substance must sign the controlled substance card.
 - iii. A copy of the completed PCR for the listed patient documenting the administered amount of controlled substance must be attached to the completed EMSIA controlled substance card.
- 3. Restock of Controlled Substance

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a. After Patient Administration

- i. When a controlled substance is administered in the treatment of a patient the on-duty Battalion Chief shall be notified
- ii. The Firefighter/Paramedic must present the Battalion Chief with a completed EMSIA Controlled substance card with a copy of the PCR attached.
- iii. The Battalion Chief will verify that the completed controlled substance administration card accounts for both the correct amount of administered and wasted controlled substance.
- iv. If documentation is accurate and complete without discrepancy the Battalion Chief shall restock the Firefighter/Paramedic with the appropriate amount of controlled substance from the Fire Districts Controlled Substance restock inventory.
- v. The affected units controlled substance log and the Districts restock safe and/lock box log shall be completed to document the transaction. The Battalion Chief shall secure the completed EMSIA controlled substance card in the restock safe for restock from the EMSIA appointed designee at a later date.
- b. Restock of Controlled Substance Inventory
 - Restock of the Inventory Safe shall be accomplished by contacting the on duty Aptos/La Selva Battalion Chief between the hours of O800 and 1700 Monday thru Friday. If after hours restock is necessary the on call Aptos/La Selva Battalion Chief 3503 can be contacted.
- c. Exchange of Expired Controlled Substance
 - i. The expired controlled substance must be discarded in a sink in the presence of another Fire District employee. The discard must be documented and an EMSIA controlled substance card must be completed and signed by both employees. The completed card shall be exchanged for the restock of the appropriate controlled substance.
- d. All controlled substance transported during restock shall be secured in a portable safe

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4. Controlled Substance Discrepancies

a. Strict adherence to the Controlled Substance SOP will prevent most discrepancies. In any system, the potential for human error and abuse exists. This includes errors in procedure, accidents, negligence, tampering and diversion. Any discrepancy involving Controlled Substances shall result in the immediate, mandatory notification of the on-duty Station Captain and Battalion Chief. Should a discrepancy occur, it should be classified as either a Minor Discrepancy or a Serious Discrepancy.

b. Minor Discrepancies

- i. Defined as incomplete or omitted documentation on a Patient Care Report, Controlled Substance Administration Card, Daily Log, or other Controlled Substance written documentation. Or, a witnessed accidental breakage of an ampule or vial containing a Controlled Substance. The shift Battalion Chief shall determine the appropriate action to resolve the minor discrepancies.
- ii. The District's EMS Program Manager or EMSIA QA Manager must report all minor discrepancies to the County EMS Medical Director. This notification can be done by either e-mail or voice mail within 48 hours.

c. Serious Discrepancies

- i. Defined as accidental loss of a Controlled Substance, an error in the administration of a Controlled Substance, theft thereof, tampering (open packaging, broken seals, broken locks), missing ampules or vials, or missing controlled Substance Administration Cards, logs and other documentation as specified in the this SOP. In the event of an occurrence of a serious discrepancy, the following procedure shall take place:
 - 1. The employee discovering any discrepancy shall immediately notify the shift duty Captain and Battalion Chief. The daily verification log will be given to the Captain and sealed with no further entries made.
 - 2. Under no circumstances may any employee responsible for Controlled Substances involved in a discrepancy be released

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from duty until the Shift Duty Battalion Chief approves such release.

- 3. All evidence must be retained for the shift duty Battalion Chief's inspection. Any broken vials shall remain undisturbed until inspected and verified by the duty Battalion Chief
- 4. The employee(s) involved must complete a Controlled Substance Discrepancy Report. A copy of the report is attached to this SOP. On-duty and/or off-going personnel must submit all Patient care reports and Apparatus Controlled Substance Logs for the entire shift prior to the discovery of the discrepancy.
- 5. A complete report of the discrepancy including its resolution must be completed and submitted to the EMS Program Manager and the EMSIA QA Officer. If in the opinion of the on-duty Battalion Chief that a satisfactory resolution to the discrepancy is not possible, the Fire Chief and the appropriate law enforcement agencies will be notified and a formal investigation will commence.
- 6. All serious discrepancies will be reported to the County EMS Medical Director.

d. Security Control

i. Only the Fire District's Chief and Battalion Chiefs shall have a key to the Controlled Substance Restock Safe.

e. Audits and Reports

- i. The Controlled Substance restock inventory safe Inventory Log will be reviewed on demand by the County EMS Medical Director, DEA (with administration permission), District Battalion Chiefs, or the EMSIA QA Manager.
- ii. Random audits of ALS apparatus will be reviewed on demand by the County EMS Medical Director, DEA (with administration permission), Battalion Chiefs and the EMSIA QA Manager.

5. Quality Assurance

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- a. The following procedure shall be performed to maintain Quality Assurance for the Controlled Substance Program:
 - i. All ALS apparatus Controlled Substance Daily Verification Logs shall be forwarded to the EMS program Manager at the end of each month. These logs shall be maintained in a file in the Training Chiefs Office.
 - ii. The EMS Medical Director, District Battalion Chiefs', the Districts EMS Program Manager or EMSIA QA Manager can perform random audits of the ALS apparatus logs, inventory and related materials. Logs will be signed and dated to indicate an audit has been performed.
 - iii. In cases of minor or serious discrepancies, the EMS Program Manager will make the appropriate notifications.

Forms

- 1. Minor Controlled Substance Deviation Report
- 2. Serious Controlled Substance Deviation Report
- 3. Controlled Substance Re-stock Card
- 4. Apparatus Controlled Substance Log
- 5. Safe / Lock Box Controlled Substance Log

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