

SAN JOAQUIN COUNTY
EMERGENCY MEDICAL SERVICES AGENCY



TITLE: MANAGEMENT OF CONTROLLED SUBSTANCES

EMS Policy No. **4200**

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) resources.

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:

It is the policy of San Joaquin County Emergency Medical Services Agency (SJCEMSA) to ensure 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 SJCEMSA.

PROCEDURE:

I. Controlled Substance Inventory and distribution:

- A. Inventory of controlled substances on ALS provider vehicles shall be in accordance with EMS Policy No. 4101 EMS Response Vehicle Medication and Equipment.
- 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 SJCEMSA Medical Director for review and approval.

Effective July 1, 2025

Supersedes July 1, 2023

Approved:


Kathryn Snyder, MD
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Medical Director

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EMS Administrator

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- D. Providers can request an alternative policy be approved by SJCEMSA for the disposal of narcotics.

II. 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 resource 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 immediately 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 SJCEMSA 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 SJCEMSA.

III. Patient Administration of Controlled Substances:

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Approved:

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Medical Director

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- A. Controlled substances are to be administered in accordance with SJCEMSA 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 EMT, AEMT, paramedic, registered nurse, or physician. Both parties shall document witnessing the discard on the patient's care record.

IV. Expired Controlled Substances:

- A. 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 resources or administered to patients at any time.

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Supersedes July 1, 2023

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