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OPERATIONS MANUAL

STANDARD INSTRUCTION 09 EMERGENCY MEDICAL SERVICES

SECTION 08 CONTROLLED SUBSTANCES

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SUBJECT: EMERGENCY MEDICAL SERVICES C O N T R O L L E D S U B S T A N C E S	SECTION 08	PAGE 1 of 7	EFFECTIVE DATE 27 November 2021

I. PURPOSE

To provide personnel who are assigned to emergency and nonemergency vehicles that are permitted to carry controlled substances, the process and procedures for controlled substances management.

II. SCOPE

This policy will apply to all sworn San Diego Fire-Rescue Department (SDFD) personnel (excluding lifeguards), and all Emergency Ambulance Provider personnel.

III. AUTHORITY

The fire chief and the EMS medical director for the City of San Diego authorize the information within this policy.

IV. DEFINITIONS

A. Controlled Substances: Pharmaceutical drugs categorized as Schedule II, III, or IV by the Drug Enforcement Administration (DEA).

B. Electronic Narcotic Safe: A controlled substances safe installed on all first responder vehicles that electronically tracks access and controlled substances inventory.

V. POLICY

A. Controlled Substances Record keeping

1. All access, removal, and restocking of substances in the electronic narcotic safe is documented electronically.
2. Access to the electronic documentation is available to designated supervisors of SDFD and Emergency Ambulance Provider.
3. Personnel are assigned an individual PIN to access the electronic narcotic safe.
4. Personnel are not to share PINs.
5. The company officer or paramedic supervisor will ensure personnel inspect and log the controlled substances at the beginning and end of each shift and/or crew change.

B. Shift Change Inspections

1. The on-coming and off-going paramedics of record are responsible for the inspection of controlled substances at shift change and/or crew change during a face-to-face turnover, whenever possible.
2. If it is not possible for the two paramedics to conduct this inspection, the assigned (on-duty) paramedic and a witness (for example an EMT, firefighter, or the company officer) will confirm the inspection process.
3. The shift change inspection includes:
 - a. Check the integrity of tamper-proof containers
 - b. Confirm the amount of controlled substances
 - c. Confirm presence of the radio frequency identification (RFID) tag
 - d. Check the expiration date of each container

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C. Compromised Package Procedures

1. When the inspecting paramedic has identified a compromised seal or a broken vial, the paramedic will notify their supervisor immediately.
2. The supervisor will send an email immediately to SDFD_DMS@sandiego.gov with a photograph of the compromised or broken controlled substances, cc'ing their chain of command.
3. The unit will follow the steps for controlled substances restock and transfer.
 - a. If vial is leaking/cracked or the cap compromised, the controlled substance is wasted, scanned, and documented through the electronic safe.
 - b. The damaged vial can be discarded in an ambulance or Emergency Ambulance Provider supervisor sharp's container.

CI. Controlled Substance Use

1. Accessing the Safe
 - a. Personnel shall access the electronic narcotic safe using their individual PIN
 - b. Close and lock the electronic narcotic safe after accessing the controlled substances
2. Returning Unused Controlled Substances
 - a. Enter individual PIN to open the electronic narcotic safe
 - b. Return the unused controlled substances(s)
 - c. Close and lock the safe
3. Documenting Used Controlled Substances
 - a. Open electronic narcotic safe with individual PIN
 - b. Scan the used controlled substances vial
 - c. Document the amount of controlled substances used
 - d. Document the amount of controlled substances wasted
 - e. Another crew member must witness and confirm controlled substance amount used and wasted
 - f. Close and lock the safe
4. Fire units are encouraged to restock controlled substances from Emergency Ambulance Provider while on scene

CII. Controlled Substance Restock and Transfer

1. Restock of a controlled substances is a priority when inventory is at the minimum level set by the County of San Diego EMS Policies [P-806](#), [P-807](#), and [S-103](#).
2. Replacement of controlled substances can take place through another SDFD or Emergency Ambulance Provider unit on scene, through the paramedic supervisor by contacting the Emergency Command and Data Center (ECDC), or at central supply.
3. The following process will be followed when transferring or restocking controlled substances:

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- a. Unit to Unit Transfer
 - 1) The unit providing the controlled substance must verbally approve the removal of the controlled substance from their electronic narcotic safe.
 - 2) The controlled substance must be scanned out as it is transferred out of the providing unit's electronic narcotic safe and scanned in as it is transferred into the receiving unit's electronic narcotic safe. (It is recommended that the restocking/receiving paramedic be responsible for the controlled substance throughout this process)
 - 3) The paramedics from both units will witness each other's exchange during the transfer, if practical.
 - 4) If not possible for both paramedics to perform the transfer, the receiving paramedic and an EMT may witness the transfer.
 - 5) Partially used vials of controlled substances must be wasted and cannot be transferred between units.
 - a) If the paramedic who originally gave the controlled substance on scene continues with patient care to the hospital, any partially used controlled substance may continue to be used during patient transport.
- b. Paramedic Supervisor to Unit Transfer
 - 1) When a paramedic supervisor provides controlled substances to a unit:
 - a. The controlled substances must be scanned out as it is transferred out of the supervisor's unit electronic narcotic safe and scanned in as it is transferred into the receiving unit's electronic narcotic safe.
 - b. It is recommended that the restocking/receiving paramedic be responsible for the controlled substances throughout this process.
- c. Central Supply to Unit Transfer
 - 1) The paramedic/EMT and supply staff will access the electronic narcotic safe using their PINs and withdraw the necessary amount of controlled substances to restock the unit.
 - 2) The controlled substances must be scanned out as it is transferred out of central supply's electronic narcotic safe and scanned in as it is transferred into the receiving unit's electronic narcotic safe.
 - 3) The paramedic will access their electronic narcotic safe and electronically document the increased inventory.
4. If the inventory of the controlled substances falls below the County of San Diego minimum, the unit is out of service and must restock.

F. Controlled Substance Alerts

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When any of the below actions or events take place, the electronic narcotic safe automatically sends a text alert the battalion chief of the SDFD unit or to the Emergency Ambulance Provider paramedic supervisor.

1. Overdue Daily Inspection: The daily inspection process has not been verified by the electronic narcotic safe system within two hours of shift change.
2. Incorrect Count: The battalion chief or paramedic supervisor will review with crew and provide an explanation of the discrepancy in the online log.
3. Missing Controlled Substances: The battalion chief or paramedic supervisor will review with crew and provide an explanation of the discrepancy in the online log.
4. PIN Entry Failure: If an incorrect PIN is entered three times in succession.
5. Door Open Alert: If the door to the electronic narcotic safe is left open for more than 15 minutes.

G. Controlled Substance Investigation

1. If the discrepancy cannot be resolved on a SDFD unit, the following process will be initiated:
 - a. If the discrepancy in the quantities of controlled substances cannot be resolved by the fire officer and battalion chief, contact SDFD Professional Standards Unit (PSU) and follow the Firefighter Bill of Rights.
 - 1) For tracking, the battalion chief will notify DMS of the referral to PSU via email to SDFD_DMS@saniego.gov.
2. If the discrepancy cannot be resolved on an Emergency Ambulance Provider unit, an investigation will follow Emergency Ambulance Provider procedures and process.
3. Any theft or significant loss will be reported to the Drug Enforcement Agency (DEA) by the city medical director within one business day of discovery on Form-106, which is available at deadiversion.usdoj.gov.

H. County EMS Controlled Substances Audit

The County of San Diego EMS medical director or designee, the City of San Diego EMS medical director or designee, or DEA may perform announced or unannounced periodic inspections to audit compliance with this policy at any time.

I. SDFD Apparatus Change-Outs, Upstaffing, and Out-of-Service/End-of-Shift

1. Change-Out
 - a. Remove the electronic narcotic safe containing the controlled substances from the apparatus going out-of-service and install in the apparatus being placed in-service.

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2. Apparatus Going Out-of-Service (No Change-Out)
 - a. Remove and scan out all controlled substances from the unit that is going out-of-service and scan into the electronic narcotic safe of any unit which is remaining in-service in the station.
 - 1) For example, brush 12 is out-of-service and going to the shop. Remove and scan out the controlled substances from brush 12 and transfer and scan into engine 12 or truck 12.
 - b. Notify DMS via ECDC to place the electronic narcotic safe out-of-service.
3. Apparatus Returning to Service (No Change-Out)
 - a. Notify DMS via ECDC to place the electronic narcotic safe back in-service.
 - b. When an apparatus with controlled substances inventory returns to the station, the controlled substances must be scanned out of the electronic narcotic safe of the apparatus storing the controlled substances and scanned into the electronic narcotic safe of the apparatus returning to service.
 - 1) For example, brush 12 returns to service from the shop and the controlled substances were being stored on truck 12. The controlled substances stored on truck 12 are to be scanned out and returned to the electronic narcotic safe of brush 12.
3. Upstaffing
 - a. In-Service
 - 1) Contact DMS via ECDC when going in-service
 - 2) DMS will assist with obtaining controlled substances and placing electronic narcotic safe in-service
 - b. Out-of-Service
 - 1) Scan controlled substances out of apparatus electronic narcotic safe and into electronic narcotic safe at central supply
 - 2) Return electronic narcotic safe to central supply
 - 3) Contact DMS via ECDC to place electronic narcotic safe out-of-service
4. Out-of-Service/End-of-Shift (Unstaffed)
 - a. Secure apparatus at/in station
 - b. Lock all apparatus doors and cabinets
 - c. Notify assigned battalion chief

J. Emergency Ambulance Provider Change Outs, Returning to Service, and Out-of-Service/End-of-Shift

1. Change-Out
 - a. Apparatus Available

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- 1) Remove and scan out all controlled substances from the electronic narcotic safe on unit that is being placed out-of-service.
 - 2) Scan in all controlled substances transferred into the unit being placed in-service.
 - 3) Notify supervisor of unit placed out-of-service and unit placed in-service.
 - a) The supervisor may update the status of each unit's electronic narcotic safe.
- b. No Apparatus Available
- 1) Remove and scan out all controlled substances from the electronic narcotic safe on unit that is being placed out-of-service.
 - 2) Scan in all controlled substances transferred into a receiving supervisor's electronic narcotic safe or central supply's electronic narcotic safe.
 - 3) Notify supervisor of unit placed out-of-service.
2. Returning Apparatus to Service
- a. Notify Emergency Ambulance Provider supervisor of the unit that is returning to service
 - 1) The supervisor will update the status of the electronic narcotic safe of the unit returning to service.
 - b. Transfer and scan in all controlled substances that belong in unit returning to service as outlined above in Controlled Substances Re-Stock and Transfer.
3. Out-of-Service/End-of-Shift
- a. Lock all apparatus doors and cabinets.
 - b. When directed by the paramedic supervisor, transfer all controlled substances to either an Emergency Ambulance Provider supervisor or central supply's electronic narcotic safe as outlined above in Controlled Medication Re-Stock and Transfer.