
Controlled Substances

OBJECTIVE:

This document establishes guidelines for the security and accountability of any CCF/R substances considered a controlled substance.

GUIDELINE:

56.1 The policy of the Capital City Fire/Rescue is to:

56.1.1 Prevent theft or diversion of controlled substances.

56.1.2 Comply with federal regulations regarding controlled substances.

56.1.3 Assure control over the use, inventory, security and access to controlled substances.

56.1.4 Perform regular and random audits of inventory of substances to ensure compliance with CCF/R policies and federal regulations.

56.1.5 Maintain accurate records of inventory, audits, and administrations of substances.

56.1.6 Maintain sufficient levels of controlled substances to meet operational need.

56.2 Capital City Fire/Rescue Controlled Substances

56.2.1 The following are considered controlled substances by the Drug Enforcement Administration (DEA) or the CCF/R and are subject to the requirements outlined in this procedure:

56.2.1.1 All Substances listed in 21 Code of Federal Regulations (CFR) Ch II §1308- Schedule of Controlled Substances; the CCF/R currently stocks two Schedule II substances; Morphine Sulfate and Fentanyl Citrate and Two Schedule IV substances; Lorazepam and Midazolam. All substances listed per above are Scheduled Controlled Substances.

56.2.2 Division Chief of Career Personnel shall oversee and enforce compliance with this policy and is to directly report to the Fire Chief.

- 56.2.3 Any discrepancy of count, loss, destruction, or damage to containers involving controlled substances or controlled medication forms shall be reported to the Division Chief of Career Personnel *immediately*.
- 56.2.4 The controlled substances used by the CCF/R are purchased by the CCF/R Medical Director under his registration and made available for CCF/R operational use. The Schedule II and IV substances stocked by CCF/R remain his responsibility and under his direct control. The CCF/R Medical Director may take any such means as he deems necessary to regulate, audit, survey or monitor the department's storage, use, inventory and safeguarding of those controlled substances.
- 56.2.5 From time to time DEA Investigators may request access to controlled substances in order to conduct inspections. All CCF/R personnel are to cooperate with DEA inspection requests after verifying the identity of the DEA Investigator.

56.3. Security of Capital City Fire/Rescue Controlled Substances

- 56.3.1 Personnel shall be vigilant when handling controlled substances to prevent theft, loss, or diversion. Loss of controlled substances is an extremely serious offense and subject to discipline.
- 56.3.2 The Division Chief of Career Personnel will immediately initiate an investigation into any discrepancies. Discrepancies that remain unresolved for more than two hours shall be referred the Fire Chief. Confirmed medication discrepancies will be reported through the Division Chief of Career Personnel to the CCF/R Medical Director, Fire Chief, and the DEA.
- 56.3.3 Only CCF/R credentialed employees are authorized to assume control of *controlled substances*. The individual who has assumed control of a controlled substance has the responsibility for compliance with the elements of this policy and has authority over all access to the controlled substances in his/her custody.
- 56.3.4 Controllers of Controlled Substance inventories are presumed to have in their possession the quantities and types of controlled substances reflected on the related controlled substance logs and are responsible for the security of those controlled substances.
- 56.3.5 Controlled substances will not be left on out-of-service apparatus under any circumstances.
 - 56.3.5.1 Controlled substances take from M1/M3 or M2/M4 for the purpose of going out of service will be surrendered to the central inventory at Stations 1 or 3

56.3.6 Controlled substances are not to be carried on apparatus without a locking drug lock box. Controlled substances that are unable to be secured in a locking drug box may be transported on the person of the controller for a response or directly to a replacement apparatus with a functioning lock box.

56.3.7 At the beginning of a shift the assigned Ambulance Attendant (AA) for ambulances, Engineer for engine companies and Airport Rescue Firefighter (ARFF) for medevac will perform an inventory of the controlled substances of each of the assigned apparatus or equipment inventories (medevac)

56.3.7.1 Inventory will be accomplished as soon as possible after coming on duty, and will not be interrupted or delayed, except by responses or direction from the Division Chief of Career Personnel.

56.3.8 When an Ambulance Attendant/Engineer/AEFF assumes responsibility for controlled substances, they shall:

56.3.8.1 Inspect the perpetual inventory form for discrepancies.

56.3.8.2 Inspect the controlled substances to assure that there is no evidence of tampering, seals damaged or broken, the proper amount is present, and that they are not expired.

56.3.8.3 If no discrepancies are found, fill out the inventory form and sign it.

56.3.8.4 The medevac controlled substance inventory will be conducted by the airport rescue firefighter (ARFF) and the AA. The ARFF will sign as the controller and the AA will sign as the witness

56.3.8.5 In the event of a medevac transport, the ARFF will surrender control of controlled substances to the medevac crew. Upon return to Station 3, the medevac crew will surrender control of the controlled substance inventory to the ARFF

56.4.0 Locking Devices

56.4.1 Controlled substance lockers in CCF/R apparatus will be secured by a Knox KeySecure™ and a Knox EMS Drug Vault™ a double lock system

56.4.2 Each credentialed CCF/R employee will be given a PIN code to access the KeySecure system to obtain the lock to access the EMS Drug Vault

56.4.3 The PIN code is not transferable.

56.4.3.1 The PIN code will be randomly changed throughout the calendar year.

56.4.4 In emergency situations where no other option exists the Fire Captain may direct crews to force access.

56.5.0 Controlled Substance Transactions and Inventory

56.5.1 The controlled substance inventory form will remain with the controlled substances and controller regardless of the vehicle being used. A controller will have only one inventory form for each type of controlled substance under his control.

56.5.2 At 0815 of every day (unless the duty crew is otherwise assigned to an emergency response; in such an instance the controlled substance inventory shall be verified as soon as possible) a complete inventory check will be conducted by the Ambulance Attendant (AA) and the Ambulance Driver (AD)

56.5.3 If the controlled substance inventory is not accounted by 0830 each day. An incident report describing the nature of the circumstances must be completed and forwarded to the Division Chief of Career Personnel

56.6.0 Inventory Forms

56.6.1 Controlled substance inventory forms are issued by and returned to the Division Chief of Career Personnel monthly.

56.6.2 Only a single-sided copy of the current form is permissible. On the first day of every month the perpetual inventory forms for Morphine, Fentanyl, Lorazepam and Midazolam will be sent to the Division Chief of Career Personnel. This will be the responsibility of the following persons on duty at 1000 hours on the first of the month.

56.6.2.1 Company officers and ambulance attendant and ARFF personnel for all controlled substances under their direct control.

56.6.2.2 Forms completed prior to the end of the month will be retained and sent in with the full set of inventory forms at the end of the month.

56.7.0 Signatures

56.7.1 Signatures for documentation must be in ink and legible.

56.7.2 A legible employee number is required with any signature.

56.7.3 No person may sign for another person.

56.7.4 The credential CCF/R member signing as controller has custody of the related controlled substance supply, the associated records and is

responsible for the accuracy of the records and safe keeping of both the controlled substance supply and records while in their custody.

56.7.5 The individual signing as witness to a transaction is responsible for the accuracy of the recording of the transaction and the related count.

56.7.6 The controller and witness bear equal responsibility for the accuracy, completeness, and count associated with their signature on a transaction.

56.7.8 No person may sign as both controller and witness for the same transaction.

56.8.0 Administration of Controlled Substances

56.8.1 Shall be logged on the inventory control sheet of the source apparatus by the controller and witnessed. Quantities (in mg's or mcg's) administered and wasted shall be logged with the run number.

56.8.2 Remaining quantities of controlled substances from partially administered syringes shall be wasted in the presence of the person signing as a witness. Only partially administered tubexes of controlled substances are to be wasted. Tubexes with damage, a breached paper seal must be surrendered to a Division Chief of Career Personnel.

56.9.0 Inventory Transactions

56.9.1 Any controlled substance transferred from one person to another person is a transaction. All transactions require two signatures. Each surrender and issue of controlled substances will be logged as a unique transaction on separate lines, even if the net inventory effect is zero change.
Transactions will not be conducted without all required signatures being completed.

56.9.2 No person shall sign as controller or witness before personally counting and verifying the count and transaction involved.

56.9.3 Signature on a Controlled Substance Log is a certification that the count on the Controlled Substance Log equals the physical quantity in the related inventory.

A person receiving:

1. Sign your form as "controller".
2. Sign the issuing persons form as "witness".

56.10.0 Inventory Transactions for In Service and Out of Service as Advanced Life Support apparatus

56.10.1 The on-duty personnel may sign as the controller and witness on the controlled substance inventory.

56.10.2 Controlled substances may only be secured on apparatus equipped with the Knox KeySecure™ and EMS Drug Vault™

56.10.3 All apparatus with controlled substances going out of service will have their inventories surrendered to the Duty Chief of the Day and placed back into the central inventory of Station 1 or Station 3

56.11.0 Station 1 and Station 3 Central Inventories

56.11.1 Station 1 and Station 3 will have a pre-determined inventory of all controlled substance for the purpose restocking M1/M3 and M2/M4.

56.11.2 Each central inventory supply will be kept in a secured stationary combination safe within a locked room.

56.11.3 Access to the central supply is granted only to the Duty Chief of the Day.

56.11.4 An inventory will be taken on Monday of each week to assure the accuracy of the perpetual log as well as the inventory supply.

56.11.5 All inventories shall be verified by the Duty Chief of the Day and the Station Fire Captain

56.11.6 All central inventory supply transactions will have witness and controller signatures on the perpetual inventory forms describe in section 9.0 of this policy

56.12.0 Station 2 and Station 4 Inventories

56.12.1 Apparatus at Station 2 and Station 4 will have the same Knox systems as described above.

56.12.2 Only credential CCF/R members will have access to the controlled substances

56.12.3 Weekly drug inventories will be verified by the Duty Chief of the Day and the Station Captain of each respective Station or Station designee

56.13.4 In the event that the controlled substances are accessed during the week an accounting of the perpetual inventory shall be documented as described herein

56.13.0 Administration of Controlled Substances

56.13.1 The Division Chief of Career Personnel shall report the result of the monthly reconciliation of inventory forms to the Fire Chief and the Medical Director.

56.13.2 Audits:

56.12.2.1 At least quarterly, the Division Chief of Career Personnel will conduct an audit. The scope of the audit will be determined by the Division Chief of Career Personnel. These audits will be documented and retained at fire administration headquarters.

56.12.2.2 Internal Audit will conduct unannounced audits from time to time.

56.12.2.3 A department wide biennial inventory will be conducted within 24 months of the previous inventory. This inventory will include *all* controlled substances present. This inventory will utilize unique forms denoting that it was conducted at the “close of business” or “beginning of business”.