



DEPARTMENTAL REGULATIONS
CONCORD POLICE DEPARTMENT

PROCEDURE 88
EFFECTIVE DATE: 4/2014
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I.D. NUMBER: 402

Chief of Police

CONTROLLED SUBSTANCES – MEDICAL USE

A. POLICY STATEMENT

The Concord Police Department Tactical Medical Unit (TMU) shall support the Field and Support Operations Divisions during tactical operations. The mission of the TMU is to provide pre-hospital advanced life support emergency care to CPD officers and community members during high-risk tactical operations, sustained operational deployments as well as preventive medical care during training exercises. Providing an advanced level of emergency care authorizes the possession and use of controlled substances pursuant to the State of California Paramedic Scope of Practice. This procedure is consistent with the California Controlled Substance Act and Regulations, Division of Control Amendments of 1984, Registrant Protection Act of 1984, Health and Safety Code 11122 and the California Board of Pharmacy.

B. GENERAL

1. Purpose

- .1 Federal law requires that the possession of controlled substances must be tracked from the manufacturer to the patient receiving the substance. Every milligram of a controlled substance must be accounted for and remain traceable. Accurate record keeping is essential. When a TMU member signs for a quantity of controlled substances, the member accepts complete responsibility for security, handling, and use until possession is officially transferred.
- .2 The following procedure shall identify and explain the procedure for receiving, possessing, restocking and reporting stock discrepancies of controlled substances utilized by TMU members.

C. ORDERING AND RECEIPT OF CONTROLLED SUBSTANCE STOCK

1. Ordering Schedule II controlled substances - Fentanyl

- .1 Schedule II controlled substances such as Fentanyl for initial stock and restock can *only* be ordered by the TMU Medical Director. It is the responsibility of the TMU Paramedic Lead to monitor stock quantities to maintain stored minimum quantities pursuant to CCC EMS ALS Medication & Equipment List. When the TMU Paramedic Lead determines that a controlled substance must be ordered, the following procedure will be followed:
 - .01 The TMU SWAT Commander or Paramedic Lead shall request the necessary controlled substance from the TMU Medical Director in writing or email
 - .02 The Medical Director will complete the required DEA form and submit the order to the pharmaceutical vendor with a copy of the Medical Director's DEA license that contains the address of CPD for delivery.
 - .03 The SWAT Commander, Paramedic Lead and CPD Financial Analyst shall then be notified of the order and pending delivery date which shall occur when the SWAT Commander or TMU Paramedic Lead is on-duty.

2. Ordering Schedule IV controlled substances - Versed

- .1 Schedule IV controlled substances such as Versed for initial stock and restock can *only* be ordered by the TMU Paramedic Lead to monitor stock quantities to maintain stored minimum

quantities pursuant to CCC EMS ALS Medication & Equipment List. When the TMU Paramedic Lead determines that a schedule IV controlled substance must be ordered, the following procedure will be followed:

- .01 The TMU Paramedic Lead will complete the vendor required order form with a copy of the Medical Director's DEA license that contains the address of CPD for delivery.
- .02 The SWAT Commander, Paramedic Lead and CPD Financial Analyst shall then be notified of the confirmed order by the vendor and pending delivery date which shall occur when the SWAT Commander or TMU Paramedic Lead is on-duty.

3. Receipt of Controlled Substance for Central Inventory

- .1 Controlled substances ordered by the TMU shall be delivered to the Concord Police Department at 1350 Galindo Street.
 - .01 The initial receipt upon delivery shall be accepted by the one of the following designated personnel
 - .001 SWAT Commander
 - .002 TMU Paramedic Lead
 - .003 Pre-determined personnel authorized by the SWAT Commander
 - .2 The inventory shall be immediately counted and logged into the Controlled Substance Central Inventory Log by two of the above designated personnel. Should a discrepancy occur between the received controlled substance differ from the shipping inventory list, refer to the Controlled Substance Discrepancy section set forth in this procedure.
 - .3 The counted inventory shall then be secured in the locked safe in the TMU locked storage area. Access to the safe and locked storage area is strictly limited to the SWAT Commander and TMU Paramedics who have been trained and authorized pursuant to this procedure.
 - .4 The Paramedic Lead will then notify the Medical Director of the received and inventoried order.

D. DISBURSEMENT OF CONTROLLED SUBSTANCE FROM CENTRAL INVENTORY

- 1. All disbursed controlled substances shall be checked for package integrity, labeling and expiration date as set forth by the manufacturer. The controlled substance may then be disbursed from the TMU central inventory to an authorized narcotic drug pouch for the purposes of ALS field distribution. When central inventory is disbursed in such a manner, it shall be reflected in the following records:
 - .1 Controlled Substance Central Inventory Log (central supply log out)
 - .2 Controlled Substance Disbursement Log (pouch inventory log in)
 - .3 Controlled Substance Administration Card (pouch contents)
- 2. The narcotic drug pouches shall be stocked and maintained in the following manner.
 - .1 The narcotic pouch will be stored in the locked TMU safe when not needed for patient use. The controlled substance disbursed to a narcotic pouch must be accompanied by a fully complete Controlled Substance Disbursement Log and Administration Card.
 - .2 The authorized narcotic drug pouch must be secured with a tamperproof seal that contains a uniquely numbered plastic tag. The pouch tag number shall be used to track all **inventories and shall be replaced** whenever it is no longer intact or once the pouch has been opened. A new

plastic numbered tag will be used to seal the pouch and the new pouch number will be entered into the Controlled Substance Central Supply and Disbursement Logs.

- .3 The narcotic pouch shall contain the following minimum and maximum quantities of authorized controlled substances:
 - .01 Midazolam (Versed)
 - .001 Minimum is two (2) 5mg vials
 - .002 Maximum is four (4) 5mg vials
 - .02 Fentanyl
 - .001 Minimum is two (2) 100 mcg vials
 - .002 Maximum is five (5) 100 mcg vials
- 4 Two designated personnel shall conduct an inventory of the central inventory and narcotic drug pouch (es) on a weekly basis. Weekly is defined as Monday through Sunday, between the hours of 0001- 2400. Both personnel must verify that no discrepancies exist. Should a discrepancy exist, refer to the Controlled Substance Discrepancy section set forth in this procedure.
3. All narcotic drug pouches disbursed to a Paramedic TMU member for use in the field shall be secured in the vehicles locked safe if the paramedic does not possess the controlled substances on their person.
 - .1 At the completion of the mission and the narcotic pouch is returned to the TMU safe or whenever a new paramedic team member takes responsibility for the controlled substance, the pouch contents and pouch tag number must be verified and documented in the Controlled Substance Disbursement Log by the off-going and on-coming paramedics or two designated personnel.
 - .2 If controlled substances were used, the TMU Paramedic and SWAT Commander must inspect the pouch and verify that a properly completed Controlled Substance Administration Card and PCR number are accounted for every number of controlled substance vials used.
 - .01 Once the narcotic pouch has been properly inspected and verified, the pouch must be resealed with a new plastic numbered lock tag. The new pouch tag number must then be entered into the Controlled Substance Inventory Log and Disbursement Log.
 - .02 Should the narcotic pouch fall below the minimum inventory required, the SWAT Commander and TMU Lead Paramedic shall restock the narcotic pouch from the central supply safe before sealing the pouch with a new numbered lock tag. The restock transaction must then be entered into the Controlled Substance Central Inventory and Disbursement Logs with signatures from both designated personnel.

E. ADMINISTRATION OF CONTROLLED SUBSTANCES

1. The administration of controlled substances shall be limited to the State of California and Contra Costa County EMS Paramedic scope of practice.
 - .1 The authorized paramedic may open the narcotic pouch and administer the controlled substance if one of the two following requirements are met:
 - .01 The paramedic has received a base station hospital order for the controlled substance, or
 - .02 The paramedic is administering the controlled substance utilizing a specific standing order.
2. All controlled substance containers that are opened and not used during patient care must be discarded by the administering paramedic who is responsible for all unused quantities once the controlled

substance is opened. Under no circumstances shall any opened controlled substance be saved or returned to the narcotic pouch or TMU safe.

- .1 Discarding unused portions of the controlled substance must be observed by another TMU member, EMT, paramedic, RN or physician. The discard must be documented on the Controlled Substance Administration Card and signed for by both the discarding paramedic and the witnessing medical staff member.
3. All controlled substance administration shall be completely documented on a Contra Costa County PCR and shall accompany the patient to the designated receiving hospital.
4. In addition, all controlled substance administration shall be submitted to the designated Quality Assurance/Improvement agency for review.

F. UNFIT FOR ADMINISTRATION OR EXPIRED CONTROLLED SUBSTANCE VIALS

1. Controlled substance vials that are expired, damaged, or unfit for administration shall be returned to the TMU safe and recorded in the Controlled Substance Inventory Log.
2. The TMU Paramedic Lead shall then contact the Contra Costa County Regional Medical Center Pharmacy for an appointment for disposal.
3. The controlled substances shall then be disbursed to the pharmacy for disposal with the disposition entered into the Controlled Substance Inventory Log.
4. A receipt must be obtained from the pharmacy upon delivery. The pharmacy receipt must then be verified by the SWAT Commander and the Controlled Substance Inventory Log.

G. CONTROLLED SUBSTANCE DISCREPENCIES

1. Strict adherence to this policy will prevent most discrepancies. A discrepancy of any kind shall be immediately reported to the SWAT Commander. The discrepancy shall be deemed as either a Minor Discrepancy or a Serious Discrepancy. Minor and serious discrepancies are defined as the following:
 - .1 Minor Discrepancy
 - .01 Defined as incomplete or omitted documentation on a Patient Care Report, Controlled Substance Administration Card, Controlled Substance log or a witnessed accidental breakage of a Controlled Substance container.
 - .001 The TMU Paramedic recognizing the discrepancy shall complete a Minor Discrepancy Report and submit the report to the SWAT Commander before the end of shift. The SWAT Commander shall determine the appropriate action to resolve the minor discrepancy.
 - .2 Serious Discrepancy
 - .01 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 Procedure. In the even of an occurrence of a serious discrepancy, the following procedure shall take place:
 - .001 The employee discovering any discrepancy shall immediately notify the SWAT Commander
 - .002 Under no circumstances may any employee responsible for Controlled Substances involved in a discrepancy be released from duty until the SWAT Commander approves such release.

- .003 An original police report and Serious Discrepancy Report shall be completed by the responsible TMU Paramedic and submitted to the SWAT Commander.
- .004 CSI shall photograph, collect and document all evidence.
- .005 All PCR's, Controlled Substance Logs and any related mission reports for the entire period prior to the discovery of the discrepancy shall be submitted to the SWAT Commander and Quality Improvement agency for review.
- .006 All serious discrepancy reports and subsequent investigation results shall be submitted to the TMU Medical Director and the Contra Costa County EMSA.

H. TMU SECURITY SAFE AND KEY CONTROL

1. All key locks and combination codes associated with the Controlled Substance Inventory shall be keyed and coded independently. The only personnel authorized to possess a key or combination to the TMU safes are the following:
 - .1 SWAT Commander
 - .2 TMU Paramedic Lead
2. In the event that any key or combination is lost, discovered, evidence of tampering is present, or theft has occurred, the involved lock shall be immediately changed and a new key or combination shall be issued. In addition, the SWAT Commander shall be immediately notified.
 - .1 Should this occur during non-business hours and the lock is not immediately changed, all controlled substance inventory shall be secured in an alternate TMU safe.

I. SUMMARY REPORTS, AUDITS AND QUALITY IMPROVEMENT

1. The Controlled Substance Inventory and Disbursement Logs and any related written documentation are subject to random audits by the TMU Medical Director, SWAT Commander or his/her designee for the purpose of maintaining TMU quality improvement. All logs will be signed and dated to indicate an audit has been performed.
2. A Monthly Summary Report shall be prepared by the Paramedic Lead and submitted to the SWAT commander. The report will contain beginning and ending inventory quantities, monthly use and discrepancy information.
 - .1 After the SWAT Commander has reviewed and signed the report, it shall be forwarded to the TMU Medical Director and the Contra Costa County EMS Agency.
 - .01 The TMU Medical Director and/or the Contra Costa County EMS Agency may request more frequent or infrequent summary reports as they deem necessary. Any additional summary report(s) requested from either entity shall be authorized.
3. All Controlled Substance Records shall be maintained and stored by the Concord Police Department for no less than three calendar years.