

VCFS/Inter-Agency EMS Incident For



VCFS Information

Date of Incident	6-2-2010	Incident#			
		Unit	All ALS Units		
Complaint/Incident issued by	Numerous	Crew Members	CPT Rawlins		
Battalion on Duty	Type of Call/Location				
Complaint/Incident	Yesterday Captain Rawlins dropped off the new Lorazepam supply for the Squad and the Engine. When the old Lorazepam stock was picked up by Captain Rawlins, he requested that it be put in a sharps container rather than wasting the expired stock. It has been practice that the expired stock would be expelled in a sink while another Firefighter witnessed the medication being wasted. Instead Captain Rawlins, put the un-tampered expired medication straight in to a clean sharps container. I am informing you of this because I feel uncomfortable with the way the expired medication is being picked up, rather than wasted. Respectfully Submitted, Carl Laundrie				
	This type of procedure by Logistics-10 does not follow policy, and leaves an intact federally controlled substance in an uncontrolled status. Since the Apparatus Control Substance Logs do not have Lot#'s associated with the stock on the truck, when the medication leaves the truck and is not destroyed on-site, the medication exists in an environment without any chain-of-custody. I believe this also does not conform to the federal drug and cosmetic act either. Basically the Lorazepam collected by Logistics-ino longer trackable and leaves a substantial amount of federally controlled substance existence without a chain of custody.				
	When I reviewed the Narc Logs at St23, Log-10 wrote the Lorazepam out of the under the "Wasted" column. The medication was not wasted; instead he collect Policy dictates that it is supposed to be wasted on-site with a witness. There is stating that EMS collects all expired medications and equipment, however, there controlled substance policy that countermands that for Controlled Substances. M. Inglett				

Agency Information

Date Agency notified	N/A	Agency Run #	
Complain/Incident Name	N/A	Unit/Crew Members	
Agency Representative	N/A	Phone Number	

Protocol/SOG Section

VOLUME: II SUBJECT: CONTROLLED SUBSTANCE

ACCOUNTABILITY GUIDELINE: 102.005 DATE: March 17, 2010

IV. PROCEDURE:

A. Controlled Substance Accountability:

5. Record of Administration:

a. Required documentation if a controlled substance was administered to a patient and/or disposal of an unused portion occurs:

Date: list the date the controlled substance was administered or wasted/broken.

Run #: list the alarm number of the incident.

Patient Name: list the patient's name

Amount Administered: list the amount of the controlled substance administered to the patient.

Amount Wasted: list the amount of the controlled substance wasted/broken.

Printed name: paramedic must print his/her first initial and last name. **Signature:** paramedic must sign his/her first initial and last name.

Witness:

- 1. witness must print his/her first initial and last name.
- 2. witness must sign his/her first initial and last name.

NOTE: Witness documentation priority shall be as follows:

Another agency's paramedic.

Another VCFS engine crew's paramedic.

Another shift's paramedic (broken or wasting expired meds).

As a last resort, the partner of the same crew.

Disposition/Notes

IV. PROCEDURE:

A. Controlled Substance Accountability:

7. Out of Date Controlled Substance:

- a. The paramedic that completed the ALS Supply Expiration Date form for that month shall notify the EMS Manager (or Designee) at least 60 days prior to the expiration of the controlled substance.
- b. The EMS Manager (or designee) shall waste the expired controlled substance when the replacement is placed in stock, with proper documentation occurring.
- c. The EMS Manager (or designee) can authorize the on-duty paramedic to destroy controlled substance(s). If the EMS Manager (or designee) directs destruction of controlled substances, the on-duty paramedic shall use these steps:
- Document the controlled substance's expiration date, lot number, and amount destroyed.
- Document the amount destroyed in the "Amount Wasted" column on the Controlled Substance Accountability Form.
- 3. Obtain a witness to visually verify proper disposal and documentation.
- 4. Draw the controlled substance out of its container and inject it into the biohazard sharps container that is located on each ALS permitted unit.
- 6. Have the witness place his/her printed name and signature in the appropriate columns.
- 7. The paramedic shall place his/her name and signature in the appropriate column. This action verifies that proper disposal and documentation has occurred.

P. C.	į,	
	6-3-10	Notified by numerous PM that Captain Rawlins ordered them to document that they have wasted the expired Lorazepam from 6-1-10. Crews did not waste the medication as outlined in VCFS SOG 102.005, instead ordered to put into a new Sharps Container, which Captain Rawlins took with him.
	6-3-10 1500 hrs	DC Weaver Called St-35 and asked me to follow up on this issue that was brought to her attention by DC Bailey. I explained to her that I was already working on it. I attempted called DC Pocica and had to leave work and told her I would follow up on 6-4-10
	6-4-10	Called DC Pocica at 0930 in Fire Admin, in a meeting. Called DC Pocica at 1040 hrs and updated him on the issue.
Disposition/Notes	6-4-10 1049 hrs	Called Captain Rawlins at Logistics Office and informed him of the Complaints per DC Pocica. Captain Rawlins stated that he left the Sharps container at St-42 sealed up in the bay for the Biohazard Company to pick up. I explained to him that this was not following the SOG and that he would have to get the container back and as long as there was not one open Sharps in the container he would have to open the container and fill out a Controlled Substance Disposal Form for all the Lorazepam. He was not sure if the Company had picked up the container and would get back with me.
	6-4-10 1123 hrs	Called CPT Rawlins and left a message for him to call me back with the STATUS ASAP.
	6-4-10 1220 hrs	CPT Rawlins called and said an email had been sent fixing the problem. I have copied the email and added it to the complaint file. The Controlled Substances have been disposed of properly, however the SOG was violated. File being forwarded to DC Weaver and Pocica for further disposition.
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Charles Kamine/Captain/EMS

VCFSEMS

To:

OPERATIONS

Date:

6/4/2010 12:15 PM

Subject:

Lorazepam Disposal

Attachments: Lorazepam.pdf

** Proprietary **

ALL,

See attached disposal form.

In response to the complaints of the way in which the lorazepam was discarded on Wednesday. Lt Huber and I broke open the biohazard container, verified the count/amount of carpuject present and IAW the SOG wasted all carpujects back into the container, as noted on the form.

Please forward this email to all paramedics for reference and clarification.

Roy

VCFS EMS Office

SHIP TO:

125 W New York Ave

Resource Center

Suite 220

360 N. Delaware Ave

DeLand, FL 32720

Unit A

386-736-5443

386-943-7888 (Fax)

DeLand, FL 32720



VCFS EMS Division Controlled Substance Discard Form



Lorazepam Discarded on 6-4-10 In accordance with Department Policy

Number Of Vials/Carpujects	Lot Number	Concentration of Medication	Expiration Date	Total Amount Discarded	Paramedic Witness	Paramedic Signature	Paramedic Witness	Paramedic Signature
79	827304	2ma/m/	6-1-10	158ma	S. Hober		R. RAWLING	
18	8367076	2mc/m/	7-1-10	36 mc	S. H.Soer	48 7	P. PAWLENT	KALL
		. P.						
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Roy A. Rawlins Captain/Logistics EMS Supply Officer

0000002

VCFSEMS

To:

Pocica, Frank

Date:

6/4/2010 7:55 AM

Subject:

Fwd: Lorazepam

** Proprietary **

FYI

>>> VCFSEMS 5/19/2010 10:23 AM >>>

ALL

The majority of our Lorazepam has been labeled to expire on June 1, 2010. The replacement for this medication will arrive to me on June 2, 2010 from our vendor. We are authorized up to 96 days for the unrefrigerated Lorazepam till it is truly expired, as this will be June 4th.

I am letting everyone know that I am aware of the issue and have plans to correct this error and not cause a panic.

The meds will be distributed on June 2 to all stations as quickly as I can receive, process and drive the meds to the stations/battalions.

Thanks

RR

Roy Rawlins

To:

Pocica, Frank

Date:

6/4/2010 7:10 AM

Subject:

Re: Fwd: Expired Lorazepam supply picked up instead of being wasted

** Proprietary **

Chief,

No doubt.

All meds were placed into the biohazard sharps container and when they were all collected the container was sealed, the container is placed for disposal by our vendor as any other meds would be.

RR

Roy Rawlins Captain Logistics Officer

Office # 386-736-5443 Mobile # 386-561-0511 Pager # 386-691-2700 Fax # 386-943-7888

Volusia County Fire Services Resource Center 360 N. Delaware Ave., Unit A DeLand, FL 32720

>>> Frank Pocica 6/3/2010 3:29 PM >>> Not sure what is up but I smell a rat in the wood pile....

>>> Howard Bailey 6/3/2010 12:39 PM >>> FYI. I have equal concerns.

Howard J. Bailey
Division Chief
Operations Division
Volusia County Fire Services

(386)-822-6420 (Office) (386)-527-1404 (Cell)

VCFSEMS

To:

OPERATIONS

Date:

6/4/2010 12:15 PM

Subject:

Lorazepam Disposal

Attachments: Lorazepam.pdf

** Proprietary **

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See attached disposal form.

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Roy

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125 W New York Ave

Resource Center

Suite 220

360 N. Delaware Ave

DeLand, FL 32720

Unit A

386-736-5443

DeLand, FL 32720

386-943-7888 (Fax)

Mike Inglett

To:

Kamine, Charles

Date:

6/3/2010 10:48 AM

Subject:

Fwd: Expired Lorazepam supply picked up instead of being wasted

Chuck, I sent this to Chief Bailey today. Just copying you, since you still may be overseeing EMS.

>>> Mike Inglett 6/3/2010 10:12 AM >>>

This type of procedure by Logistics-10 does not follow policy, and leaves an intact federally controlled substance in an uncontrolled status. Since the Apparatus Controlled Substance Logs do not have Lot#'s associated with the stock on the truck, when the medication leaves the truck and is not destroyed on-site, the medication exists in an environment without any chain-of-custody. I believe this also does not conform to the federal drug and cosmetic act either. Basically the Lorazepam collected by Logistics-10 is no longer trackable and leaves a substantial amount of federally controlled substance in existence without a chain of custody.

When I reviewed the Narc Logs at St23, Log-10 wrote the Lorazepam out of the Logs under the "Wasted" column. The medication was not wasted; instead he collected it. Policy dictates that it is supposed to be wasted on-site with a witness. There is policy stating that EMS collects all expired medications and equipment, however, there is a controlled substance policy that countermands that for Controlled Substances.

M. Inglett

>>> Carl Laundrie 6/3/2010 7:26 AM >>>

Gentleman,

Yesterday Captain Rawlins dropped off the new Lorazepam supply for the Squad and the Engine. When the old Lorazepam stock was picked up by Captain Rawlins, he requested that it be put in a sharps container rather than wasting the expired stock. It has been practice that the expired stock would be expelled in a sink while another Firefighter witnessed the medication being wasted. Instead Captain Rawlins, put the un-tampered expired medication straight in to a clean sharps container. I am informing you of this because I feel uncomfortable with the way the expired medication is being picked up, rather than wasted.

Respectfully Submitted,

Carl Laundrie

Memo to File. Reference Lorazepam Date 6-2-2010

Roy Rawlins,

On 6-9-2010 I met with Captain Roy Rawlins at Fire Admin around 8:30 AM. I asked him how the Lorazepam that was collected on 6-2-2010 was destroyed in Wednesday 6-4-2010 with Lieutenant Huber and the forms were signed by both he and Huber.

I informed Captain Rawlins that in the future we have to follow the current SOG procedures on the correct way to dispose of the controlled substances. I did not want to see anymore or hear of this type of problem again, and he concurred.

Frank L. Pocica