



The Commonwealth of Massachusetts

Executive Office of Health and Human Services

Department of Public Health

Bureau of Health Care Safety and Quality

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TO: MA Licensed Ambulance Services
CC: EMCAB Members
FROM: Grant Carrow, PhD, Director, DPH/Drug Control Program
Abdullah Rehayem, Director, DPH/Office of Emergency Medical Services
DATE: October 28, 2011
RE: Drug Diversions at Ambulance Services

This Advisory is to alert ambulance services, particularly Advanced Life Support-level services, that the Department of Public Health's Drug Control Program (DCP) is actively investigating three separate drug diversion/tampering incidents. The investigations involve three different ambulance services located in different areas of the Commonwealth. The incidents have occurred within the last month; appear to be unrelated, and allegedly involve EMT-Paramedic staff.

As DCP investigates the diversion incidents, the Department's Office of Emergency Medical Services (OEMS) would like to take this opportunity, in conjunction with DCP, to reinforce that all ambulance services routinely review the security and accountability of controlled substances. The review should include updating of policies and procedures, as needed, including ensuring that the policies and procedures are integrated with those of the dispensing hospital. The review should also include monitoring the acquisition and exchange of controlled substances, at least on a weekly basis, by management. In addition, the documentation of administration and waste of narcotics should be routinely monitored against trip records, daily accountability documentation and utilization logs. Service policies on initial orientation and reorientation of EMS personnel, relative to controlled substance accountability, also need review. Services can benefit from having an independent audit conducted periodically to ensure that all standards are being met.

If an ambulance service has concerns about security and accountability standards, the service should first consult its affiliation agreement(s), discuss concerns with the dispensing hospital's Director of Pharmacy. Services should also refer to the Department's regulations, policies and procedures related to controlled substances and the duties of DCP registrants, which can be found at www.mass.gov/dph/dcp. If an ambulance service suspects a drug diversion or tampering incident has occurred at the service, the service must notify the Drug Control Program (DCP), as required by 105 CMR 700.005(D) at 617-983-6712, and the Office of Emergency Medical Services (OEMS) at 617-753-7300.

Failure to comply with Department regulations (DCP or OEMS) may result in a fine, Advanced Life Support-Paramedic license downgrade, revocation of the service's Massachusetts Controlled Substances Registration (MCSR), or administrative, civil or criminal actions.

If you have any questions, please contact Nancy O'Leary at the Drug Control Program, by email at nancy.oleary@state.ma.us, or Phil Bonaiuto at phil.bonaiuto@state.ma.us, at the Office of Emergency Medical Services.