



Date: Oct 29, 2024  
 To: All System members  
 From: Vasilios (Bill) Toliopoulos, BSN, RN, PHRN  
 EMS Administrative Director  
 Kourtney Chesney, BSN, RN, PM  
 EMS System Coordinator  
 RE: **Update to Controlled Substance Log**

**System Memo: #433**

**Background: Drug Distribution Security Requirements**

On August 25, 2023, the U.S. Food and Drug Administration (FDA) announced compliance policies for Drug Supply Chain Security Act (DSCSA) enhanced drug distribution security requirements that were scheduled to go into effect November 27, 2023. The compliance policies state that FDA will not take action until November 27, 2024, to enforce requirements in Section 582(g)(1) of the Federal Food, Drug and Cosmetic Act (FDCA), including the requirements to include product identifiers in the transaction information for each transaction and to exchange transaction information and the transaction statement in a secure, interoperable, electronic manner in accordance with FDA guidance. Further, FDA stated it would not enforce the requirement that the product identifier be included in the transaction information for any product introduced in a transaction into commerce by the product’s manufacturer or re-packager before November 27, 2024.

**Updates**

- New Controlled substance logs will now include the Lot # and Expiration Date.

Northwest Community EMS System  
**CONTROLLED SUBSTANCE (CS) LOG AMBULANCE - Rev. 10/29/24**

EMS Agency: \_\_\_\_\_ Vehicle ID# \_\_\_\_\_ Month/Year: \_\_\_\_\_

*Instructions:* This log must be signed daily by two different PMs (one off-going and one on-coming) AND initialed whenever the CS inventory is changed after visually inspecting drugs to confirm that they are present, intact, within exp. dates, and in required quantities. If any alternate drug is added due a shortage, note on the log. If any drug is not present, the discrepancy must be reconciled immediately per System policy C6 Controlled Substances. Note the number present in that column. **Begin a new Log on the first day of each month.**

Date	Off-going Paramedic		Oncoming paramedic		Fentanyl 100 mg (3)	Lot#	Exp. Date	Ketamine 500mg (1)	Lot#	Exp. Date	Micazolem 10mg (2)	Lot#	Exp. Date	Name of Approved Substitute Drug	Lot#	Exp. Date	Less # of log	Changes logged (X)
	Signature	PM license #	Signature	PM License #														
Ex					3	LT1234	1/1/24	1			2			Morphine			1234	X
1																		

**EMS Guidance**

- Please begin to utilize the new logs starting **November 1<sup>st</sup>, 2024.**