

New controlled substance regulations affect EMS providers

By Russell Griffin, NREMT-P, FP-C

Do you know your controlled substance regulations? Many EMS providers never fully understood their responsibilities in registering controlled substances administered to patients. Now is the time to learn. New rules in the Texas Administrative Code have a direct impact on EMS providers' registration of — and responsibility for — controlled substances.

The prescription, purchase and distribution of controlled substances in Texas is regulated and enforced by the Department of Public Safety (DPS). EMS providers that carry controlled medications (Schedule II-IV) have always been required to file a bi-annual registration allowing the medical director to purchase narcotics for the EMS service for patient use. DPS now requires additional information on the registration form.

The new registration form has two important differences from the previous registration:

- The EMS system administrator and the medical director will both sign the form and share responsibility for the proper prescription, storage, documentation and use of controlled substances.
- The EMS system will be required to list every location at which controlled substances are stored for distribution or patient use. This includes ambulance substations, fire stations and the base of operations for the service.

Texas currently has 80,000 registered entities who distribute controlled substances; not surprisingly, it was sometimes difficult to identify the exact location of narcotics. With the new requirement to document every location of stored narcotics, DPS is taking a firmer stance in ensuring the proper prescription, storage and use of controlled substances at EMS providers. Shared registration is a big step in requiring EMS agencies to be as equally liable as the physician for following state law on controlled substances. This change is good for EMS. DPS now has better tools for use in inspections and to pursue prosecution for physicians and agencies who knowingly manipulate a controlled substances system.

Most providers will not feel the effect of the changes until it's time to renew their Texas Controlled Substances Registration Certificate. Providers should expect to receive a new registration form in the mail before their controlled substances certificates expire. If you do not receive a new form, contact DPS.

For more information on controlled substance regulations visit Texas Administrative Code : Title 37 – Part 1 – Chapter 13: [http://info.sos.state.tx.us/pls/pub/readtac\\$ext.ViewTAC?tac_view=4&ti=37&pt=1&ch=13](http://info.sos.state.tx.us/pls/pub/readtac$ext.ViewTAC?tac_view=4&ti=37&pt=1&ch=13).

Paramedic Russell Griffin will be teaching "Controlling Controlled Substances" at Texas EMS Conference.

