



OLD DOMINION EMERGENCY MEDICAL SERVICES ALLIANCE

Regional EMS Medication Kit Transition Plan

Introduction

For over four decades, the Old Dominion EMS Alliance (ODEMSA), in partnership with every hospital within our boundaries and those that border the ODEMSA region, has had the privilege of facilitating the Regional Drug Box Program, delivering essential medications to EMS agencies across the region. This longstanding initiative has been instrumental in ensuring EMS providers have access to critical medications, supporting high-quality patient care, and reflecting the collaborative dedication of hospital pharmacies, EMS agencies, and regional stakeholders working together to improve patient outcomes.

We extend our deepest gratitude to our hospital partners for their unwavering support over the past 40 years. Their commitment has not only sustained the program's success but also allowed for its extension beyond the initial transition date of November 12, 2024, providing EMS agencies with additional time to prepare for the program's conclusion.

The ODEMSA Regional Drug Box Program will officially terminate at noon on April 15, 2025. This document outlines a comprehensive plan to ensure a seamless transition for all EMS agencies in the ODEMSA region, with the goal of maintaining uninterrupted, high-quality patient care throughout this process.

Key Transition Milestones for Agencies

To transition to an agency-specific drug kit program, each ALS agency must complete the following milestones:

1. Develop agency-specific policies and procedures.
2. Obtain a Controlled Substances Registration (CSR).
3. Secure an agency Drug Enforcement Administration (DEA) license.
4. Order and receive DEA-222 forms.
5. Obtain Controlled Substance Ordering System (CSOS) credentials.
6. Establish a Group Purchasing Organization (GPO) or pharmaceutical wholesaler.
7. Train personnel on the agency's drug kit handling and restocking procedures.
8. Complete and submit the "Notice of Partial Withdrawal from Regional Ambulance Restocking Agreement"

ODEMSA recommends that agencies conduct a pilot program of their new systems once all milestones are met, allowing time to identify any adjustments needed before the full program is launched.

Agencies must not restock pilot program boxes or agency-specific drug kits at hospitals.

Ensure that all providers are aware of the pilot program in the event they encounter the box(es).

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Guidance for Agencies Unable to Meet Milestones

- **Contact ODEMSA:** If your agency cannot meet all required milestones before the Regional Program ends, contact ODEMSA immediately.
- **Fair Distribution:** ODEMSA will work to ensure a fair and equitable distribution of remaining program supplies, including stocked and empty drug boxes.
- **Returning Drug Boxes:** ~~If an agency still cannot meet the milestones by the deadline, it must return its regional drug boxes to ODEMSA or a **designated** location on or before the program's end date with details provided to ODEMSA prior to surrender.~~ Agencies will be responsible for the ODEMSA drug boxes in their possession as of the date and time that the regional program ends. This includes but is not limited to securing, administration, restocking, and disposal of all drugs. However, agencies should continue to work through the steps to create and maintain their programs to ensure that they have the correct registrations to fall in line with state and federal regulations.

• ~~Transfer Options:~~

~~Agencies with Regional Boxes~~

- ~~○ If an agency lacks a Controlled Substance Registration (CSR) or DEA registration, it can arrange for another agency to temporarily hold its drug boxes or specific drugs. The coordination between the two agencies must be formalized through a Memorandum of Agreement (MOA) or Memorandum of Understanding (MOU) and must meet DEA and BOP requirements for transferring of controlled substances. While ODEMSA will not play a role in facilitating the process, they **MUST** be notified of this arrangement in advance. The MOU/MOA should determine which drugs or classes are retained and when they are returned to the original agency. Agencies without proper registration may still keep their Schedule VI drugs, provided they have a valid CSR and the holding agency agrees to this arrangement.~~
- ~~○ If there is no holding agency, the agency in question must surrender its drug boxes. See the section to follow regarding "Drug Kit Transfer on Agency Transition Date: Agencies that surrender their box(es)" for details.~~

Agencies Wanting to Receive Additional Stocked Boxes from a Hospital w/out DEA

- For an agency to receive additional stocked boxes from a hospital, it must possess both a valid CSR and DEA registration in addition to having a DEA-222. ~~If an agency does not have all three of these items, the agency can opt to have another agency hold the additional boxes on its behalf, following the same guidelines as outlined above.~~
 - In some instances, an agreement may be reached between the council and pharmacy to allow boxes to be held for a duration of time to only be released at such time the agency possesses their DEA registration and DEA-222 forms. This arrangement will need to be set up in advance of the transition date.
- If there is no holding agency or pharmacy, the agency in question may not receive any additional stocked drug boxes from a hospital, and they ~~will~~ may be allocated to another agency.

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Steps for Full Transition

Declaration of Transition

- At least five business days before the agency's transition date, complete and email the "Notice of Partial Withdrawal from Regional Ambulance Restocking Agreement" form to rscarbrough@vaems.org.
 - If your agency is a "hub" in a hub-and-spoke model, **include a list of the agencies you will be providing services to in the email body.**
 - If your agency is a "spoke" in a hub-and-spoke model, **include the name of the hub agency you will be receiving services from in the email body.**

Drug Kit Transfer on Agency Transition Date

- **Agencies that surrender their box(es):** Agencies that surrender their ODEMSA boxes must to contact the Program Coordinator at least three (3) business days prior to their transition and surrender of box(es). The agency will be provided with a location(s) they ~~must~~ may drop off their box(es).
- **Agencies that keep their box(es):** Agencies that will keep their box or only the contents must contact the Program Coordinator at least three (3) business days before the transition.
 - On the agency-designated transition date, all ODEMSA Regional Drug Kits will be transferred to the agency and become their responsibility.
 - The agency should complete an inventory of each box. The "EMS Drug Kit Inventory," is available from the ODEMSA website.
 - The agency must complete a "Council to EMS Drug Kit Transfer Agreement" to document the number of boxes and which specific boxes were retained by the agency.
 - The "Council to EMS Drug Kit Transfer Agreement" must be received at ODEMSA no less than three (3) business days after their transition by emailing rscarbrough@vaems.org.
 - The original paperwork, including the inventory completed by the agency, must be kept on file with the agency to meet the DEA and CSR requirements.

Notification to Regional Hospitals

ODEMSA will maintain an online platform that lists both agencies no longer participating in the Regional Drug Box Program and agencies approved to pick up additional boxes after the transition. This platform will be accessible to all pharmacies participating in the ODEMSA regional program.

Handling of Empty Drug Boxes

Agencies that intend to keep only the stock of drugs and opt not to integrate the (orange) Regional Drug Kit boxes into their program should return them to ODEMSA for redistribution to agencies that will incorporate them into their program.

Agencies interested in obtaining relinquished empty drug boxes may request them by contacting ODEMSA and specifying the desired quantity. ODEMSA will distribute these boxes based on demand and availability at an undetermined date.

Final Program Termination Procedures

ODEMSA will notify agencies interested in obtaining additional stocked boxes from facilities as the Regional Drug Box Program approaches its end date. ODEMSA will provide instructions to these

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agencies if they have met all the necessary milestones for collecting remaining stocked kits from a hospital.

Collection Process from Hospital Pharmacy:

Beginning at 12:00PM on April 15, 2025, pharmacies will begin distribution of ODEMSA Regional Drug Boxes that are stocked within their pharmacies and only to agencies that meet the requirements of this plan. Distribution of regional drug boxes to agencies receiving back stock of regional drug boxes will cease at 12:00PM on April 18, 2025.

Pharmacies should continue to use the ODEMSA Drug Box Schematic to label the expiration dates for each drug in the regional drug boxes and place the schematic in each box.

<https://odemsa.net/wp-content/uploads/2023/01/BnW-ODEMSA-Drug-Kit-Schematic-20221201.pdf>

- In the days before the transition, ODEMSA will provide each agency with a pickup location and contact information.
- The agency will contact their assigned pharmacy to set an appointment for pickup.
- An agency representative who is certified/licensed to administer drugs within the Commonwealth of Virginia will report to their designated pharmacy for pickup.
- Using a DEA-222 form supplied by the receiving agency, the pharmacy will complete the form for all DEA-scheduled II drugs being released from the regional program.
- The agency representative AND pharmacist will complete and sign the "Hospital to EMS Drug Kit Transfer Agreement" form, ensuring that each stocked box is listed in the "Exhibit A - Listing of ODEMSA Drug Kits Received from Hospital."
- The original ODEMSA Drug Box Schematic with expiration dates will become the agency's initial inventory list in lieu of completing an inventory transfer form and should be released to the agency along with the original signed agreement. The pharmacy may make a copy of the ODEMSA Drug Box Schematic with expiration dates if needed to follow its internal policies.
- The pharmacy will transfer the box(es) to the agency within the regional drug box tracking system (*Clearly Inventory*).
- The agency representative will take possession of the box(es), the original signed EMS Drug Transfer Agreement, and the original ODEMSA Drug Box Schematic for each box received.
- The agency should complete a physical inventory of each box. An "EMS Drug Kit Inventory" form is available on the ODEMSA website, though it is not required for the agency to use this form if it does not meet their internal program, state, and federal requirements.
- The agency MUST send a copy of the "EMS Drug Transfer Agreement" including "Exhibit A - Hospital to EMS Listing of Kits Received" form to ODEMSA at rscarbrough@vaems.org no less than three (3) business days after receipt of their box(es) from a pharmacy.
 - ~~Original documents go to the agency and are kept for two (2) years.~~
 - ~~Copied documents go to the pharmacy and are kept for two (2) years.~~
 - ~~Scanned copies are emailed to ODEMSA and are kept for two (2) years.~~
- ODEMSA will finalize each box's transition within the regional drug box tracking system once all needed documents are received. **The council will sign all submitted forms, and a final copy will be sent to the agency to keep on file.**

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Conclusion

This transition plan ensures that each EMS agency is prepared to continue providing high-quality emergency medical services independently. By following these outlined steps and meeting all compliance requirements, agencies will be equipped to manage their medication kits effectively.