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September 3, 2015

MEMORANDUM

TO: EMS Agencies in Lord Fairfax EMS Region

FROM: S. Heather Phillips, NRP, VaAEM
EMS Program Representative Supervisor

SUBJECT: Storage of IV Solutions and Associated Paraphernalia

With the updated *Board of Pharmacy Regulations* (§18VAC110-20-10 et seq.), and the growing number of agencies who have obtained and maintain their own Controlled Substance Registration (CSR) permits, there is growing confusion as to what has to be “secured” and what does not. The Office of EMS (OEMS) has reached out to the Board of Pharmacy (BOP), specifically Mr. J. Samuel Johnson, Jr., Deputy Executive Director for the BOP seeking clarification and guidance. He has provided this information:

“Drug box exchange by a hospital pharmacy

The following is the current language in the Board's regulations regarding IV solutions. Intravenous solutions obtained from a hospital pharmacy are not required to be stored in the sealed drug kit. Prescription drugs and Schedule VI devices are required to be within the sealed kit. Syringes and needles are paraphernalia and are not specifically addressed as having to be in the sealed drug box. The drug boxes, intravenous and irrigation solutions, and Schedule VI devices must be secured in the vehicle to prevent unauthorized access and in accordance with OEMS regulations such as §12VAC5-31-520 and §12VAC5-31-800.

*§18VAC110-20-500. Licensed emergency medical services (EMS) agencies program
8. Intravenous and irrigation solutions provided by a hospital pharmacy to an emergency medical services agency may be stored separately outside the kit.*

One-for-one exchange

B. A licensed EMS agency may obtain a controlled substances registration pursuant to §54.1-3423 D of the Code of Virginia for the purpose of performing a one-to-one exchange of Schedule VI drugs or devices.

EMS Agencies in Lord Fairfax EMS Region
September 3, 2015
Page Two

A controlled substances registration issued for one-for-one exchange does not authorize the storage of drugs, including intravenous solutions, within the agency facility. Security of drugs and devices within the vehicle is the same as for drug box exchange by a hospital pharmacy above.”

To assure clarity in the above and the expectation of the OEMS for agencies and providers alike: IV solutions can be stored outside of the “issued kit” if participating with a hospital drug box exchange program. If the agency has its own CSR for IV solutions, etc, they too must be “secured” and not “free floating”. The “paraphernalia” (needles, angiocaths, extension sets, administration sets, etc.) need to be “secured” as well and cannot be out for unauthorized access.

In summary, IV fluids and the paraphernalia associated with them **need not be locked, but must be secure.**

If you have any questions, or need additional information, please do not hesitate to call upon me regarding this update.

Please note that my contact information has changed:

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