

COUNTY OF YORK

MEMORANDUM

DATE: September 18, 2024

TO: York County Board of Supervisors

FROM: Mark L. Bellamy, Jr., County Administrator



SUBJECT: New Emergency Medical Services Pharmaceutical Requirements

As the Board is aware, the Department of Fire and Life Safety provides a very high quality Emergency Medical Services (EMS) System that includes the provision of Advanced Life Support (ALS) care. This excellent ALS EMS system allows for the administration of highly regulated pharmaceuticals to patients in need by our very talented and extremely competent Advanced Life Support personnel. For over 40 years, EMS across the Commonwealth of Virginia has benefitted from having a robust pharmaceutical (drug box/kit) exchange program with the local hospital systems. When our personnel use drugs from a standardized regional drug box/kit, they merely need to exchange the drug box/kit (that was used during patient care) with a new replenished (sealed) drug box/kit from the associated hospital pharmacy. Unfortunately, due to changes in Federal requirements and regulations by the Virginia Board of Pharmacy, the ability to continue the drug box/kit exchange program will no longer be allowed as of November 27, 2024. Therefore, as with all EMS agencies within the Commonwealth that administer pharmaceuticals (which are the majority of systems), the Department of Fire and Life Safety has been forced to set up a local system for the management of pharmaceuticals used by our EMS providers. Despite significant attempts to persuade regulators to allow the EMS agencies to maintain the long-established system in Virginia, we will no longer benefit from the much more effective and efficient drug box/kit exchange programs and effectively impose an unfunded mandate/requirement.

Because of this significant change, the Department of Fire and Life Safety (just like the other EMS systems across Virginia) has been forced to establish an entire pharmaceutical management program for the drugs used/administered by our EMS providers daily. As part of the new system, we have been required to establish a “pharmacy” to store the pharmaceuticals in a highly secure and monitored (through camera and alarm technology) space, which is a small office-type area. Additionally, secured and monitored replenishment drug box/kit storage systems will be geographically and strategically located at various fire stations, and the currently used drug boxes/kits will be repurposed for continued use in our system (just not exchanged with the hospitals). Further, plans are being finalized to establish the necessary pharmaceutical procurement contracts that were previously unnecessary because they were provided through the drug box/kit exchange program with the hospital systems. Finally, this new requirement will add a significant administrative and logistics challenge for the day-to-day management of the program and to ultimately ensure that our fire and rescue response units and associated personnel who

provide high-quality EMS care to our patients in York County have the necessary medical and life-saving pharmaceuticals to provide such care.

In response to this mandate, over the past few months, there have been significant ongoing efforts to comply. This has included the development of overall operations and logistics plan specific to this new required concept of operations, the development of a training plan for all EMS providers, and the establishment of the pharmacy in an existing space (the Virginia Board of Pharmacy has inspected the space and it has been licensed). The Federal DEA license application has been submitted (which could not be done until after the Board of Pharmacy inspection was complete), the drug box/kit replenishment storage systems are expected to be in place soon, and staff is working on the associated pharmaceutical procurement contracts as well as contracts for the disposal of any expired medications. We are also researching the ability to recover some costs through the existing EMS Transport Cost Recovery System (aka EMS billing) that currently exists and we are working on potential support opportunities with the regional Peninsulas EMS Council. While much has been accomplished, it has become apparent that, as the process is evolving, there are significant day-to-day administrative, management and logistical needs. Once the system is operational, these significant needs will increase even more. Therefore, it will be necessary to add staff (potentially up to two personnel) to manage the pharmacy and handle the monitoring, ordering, re-stocking, and distribution of the pharmaceuticals/drug box/kits and associated EMS supplies. Because of this, it is anticipated that I will need to authorize such to ensure effective operations, compliance with state and federal regulations, and system efficiency and efficacy. Additionally, it is currently difficult to determine the ongoing supply and pharmaceutical costs because of the lack of the necessary data to do so; after a period of operation (i.e., 6-18 months), we should have a better estimate.

While this new requirement has caused extensive work by Fire and Life Safety personnel up to this point, it appears that our progress is further along than many other EMS agencies in Hampton Roads. Further, while we would have desired that no changes occur with the current proven system, it appears that we must now continue work to ensure compliance. Ultimately, even though there are many logistical changes, the ultimate customer (our patients) will not see any difference in the quality of emergency medical services they are accustomed to in York County.

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