



May 8, 2024

Dear Northern Virginia emergency medical service partners,

Northern Virginia's hospitals and health systems are proud of our collaborative relationship with the region's emergency medical service (EMS) providers in delivering care for our community. For several months now, we have been assessing and discussing with you and the Virginia Board of Pharmacy how federal regulatory changes will affect the historical practice of Virginia's hospitals restocking EMS units with medication necessary to treat patients prior to transport to one of our facilities.

Forthcoming regulations affect both the healthcare and EMS communities: For hospitals, the Food and Drug Administration will begin enforcement of the Drug Supply Chain Security Act (DSCSA) starting Nov. 27, 2024, requiring the tracking and tracing of pharmaceutical products through each step in the supply chain. While EMS agencies are exempt from these requirements, hospital and health system pharmacies are not, so it will not be feasible to maintain the current medication exchange practice and comply with the strict new record keeping and audit requirements.

Similarly, the Drug Enforcement Agency is expected to soon issue new regulations under the Protecting Patient Access to Emergency Medication Act (PPAEMA). Not only will it require EMS agencies that administer controlled substances to obtain both a state controlled substances registration and a federal DEA registration, but it also will require EMS agencies to be responsible for the oversight of their own controlled substances, eliminating the option of the current regionally-owned controlled substances kits.

We greatly appreciate the EMS community's collaboration in the Virginia Regional EMS Medication Kit Transition Workgroup, and in accordance with the recommendations of the Workgroup, we ask you to please accept this as formal notice that we, the undersigned hospitals, will discontinue medication exchanges as of November 27, 2024.

We appreciate the operational challenges such a shift in responsibility creates. We look forward to continuing our work with you via the Northern Virginia EMS Council EMS and Pharmacy meetings, as well as the state task force creating the specific information sources, toolkits, document examples, best practices, and sharing of expertise that will be necessary to make the transition a success. As your community partners, we are committed to ensuring this transition is managed with same level of care and attention as the handoff of patients when EMS units

arrive at one of our hospitals. In the months ahead, we stand ready to help navigate this transition and to help communicate this significant change across our respective organizations.

Respectfully,

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