

DISTRICT 2 PUBLIC HEALTH
PROTOCOL FOR
TRANSPORTING DANGEROUS DRUGS

TABLE OF CONTENTS

TRANSPORTING DANGEROUS DRUGS

Purpose	1
Accountability Standards	2
Transporting Dangerous Drugs Training Components	3
Acknowledgement Of Completion ¹ (Example)	4

DISTRICT 2 PUBLIC HEALTH PROTOCOL FOR TRANSPORTING DANGEROUS DRUGS

PURPOSE

The purpose of this protocol is to define the parameters, accountability standards and training required for the transport of dangerous drugs (i.e., drugs that are prescribed or ordered, which includes vaccines, but excludes controlled substances) between/among clinic sites by public health personnel.

The Protocol for Transporting Dangerous Drugs is consistent with the Attorney General Opinion 86-28 of 1986, which exempts state agencies from the Dangerous Drug Act. A letter from the Office of the Attorney General to the State Public Health Pharmacy Director in 1995 reaffirms that the state public health agencies would still not be subject to the requirements of the Dangerous Drug Act. The protocol does not conflict with Drug Enforcement Agency (DEA) requirements, as the protocol is only for dangerous drugs and does not include controlled substances. The protocol does not conflict with any Food and Drug Administration (FDA) requirements of federal laws.

Public Health employees, such as Immunization Program field staff and District Drug Coordinators, assigned job responsibilities for transporting dangerous drugs to meet specific program requirements, must comply with the training and accountability standards defined within this protocol. Public Health employees assigned job responsibilities for transporting dangerous drugs must meet the following criteria:

1. Have a signed job description which documents specific job responsibilities for transporting dangerous drugs to meet specific program requirements and which require compliance with the following performance standards:
 - a. O.C.G.A. §16-13-72 (Sale, distribution or possession of dangerous drugs); and
 - b. Centers for Disease Control and Prevention Vaccine Storage and Handling Toolkit at <https://www.cdc.gov/vaccines/hcp/admin/storage/toolkit/>; and
 - c. Sections B, C, D, and E of the Drug Dispensing Procedure, in the manual, Nurse Protocols for Registered Professional Nurses in Public Health at <http://dph.georgia.gov/nurse-protocols>
2. Have completed a Transporting Dangerous Drugs Training Program, as approved by the Department of Public Health, at least once annually.
3. Received approval from the District Health Director or Program Director to transport vaccines and dangerous drugs.
4. Have complied with the job responsibilities for transporting dangerous drugs as documented in the specific job description and in accordance with a performance review completed at least once annually.
5. Have signed an acknowledgement statement prohibiting the transport of dangerous

drugs to their home or any site other than a public health clinic site or site receiving state supplied vaccine.

ACCOUNTABILITY STANDARDS

Public Health personnel who transport dangerous drugs must comply with all standard operating procedures related to the storage and handling of dangerous drugs, including the following:

1. Overseeing proper receipt and storage of vaccine and drug shipments.
2. Preparing vaccine and drugs for transport.
3. Assuring appropriate storage of drugs and vaccine per manufacturer's recommendations.
4. Monitoring temperature and the environment of drug and vaccine storage areas and containers.
5. Using appropriate refrigerator/freezer or other storage environment.
6. Monitoring expiration dates of vaccines and drug stock.
7. Disposing of any spoiled or expired vaccine or drug.
8. Using proper containers for transport of drugs and vaccines.
9. Documenting transport and receipt of drugs and vaccines.

The approving District Health Director or Program Director must:

1. Be available during the time drugs are transported
2. Be accessible by phone for reporting any theft, damage, temperature excursions, and interruptions to the cold chain and/or violations in the storage requirements per product package inserts.
3. Comply with the guidelines, Centers for Disease Control and Prevention Vaccine Toolkit, at <https://www.cdc.gov/vaccines/hcp/admin/storage/toolkit/>.

TRANSPORTING DANGEROUS DRUGS TRAINING COMPONENTS

The public health employee must minimally complete the following components at least once annually in order to be approved by the District Health Director or Program Director to transport dangerous drugs:

1. Read and understand the provision of the statute, pertaining to the sale distribution or possession of dangerous drugs, (O.C.G.A. § 16-13-72).
2. Read and understand the Centers for Disease Control and Prevention Vaccine Storage and Handling Toolkit at <https://www.cdc.gov/vaccines/hcp/admin/storage/toolkit/>.
3. Read and understand Sections B, C, D and E of the Drug Dispensing Procedure, in the manual, Nurse Protocols for Registered Professional Nurses in Public Health at <http://dph.georgia.gov/nurse-protocols>
4. Review the requirements for transporting dangerous drugs with supervisor including any additional directives.
5. Observe at least two (2) onsite inspections of how dangerous drugs are stored, handled and transported from one public health clinic site to another with an employee who is approved to transport dangerous drugs.
6. Complete at least one (1) onsite inspection of a public health clinic site under supervision of an employee who is approved to transport dangerous drugs and complete the onsite inspection checklist, which is signed off by the employee's supervisor.
7. Execute an acknowledgment indicating that you have read and understood all requirements of the Transporting Drugs Training Components and agree to adhere all provisions.

**ACKNOWLEDGMENT OF COMPLETION¹
TRANSPORTING DANGEROUS DRUGS TRAINING COMPONENTS**

I, _____, acknowledge that I have read and understood the following training components required by public health employees transporting drugs:

- (O.C.G.A. § 16-13-72) – pertaining to the sale, distribution or possession of dangerous drugs:
- The Centers for Disease Control and Prevention Vaccine Storage and Handling Toolkit at <https://www.cdc.gov/vaccines/hcp/admin/storage/toolkit/>: and
- Sections B, C, D, and E of the Drug Dispensing Procedure, in the manual, Nurse Protocols for Registered Professional Nurses in Public Health at <http://dph.georgia.gov/nurse-protocols>

I further acknowledge that I have discussed the requirements for transporting dangerous drugs with my supervisor and had the opportunity to ask questions to clarify any component of the requirements.

I further acknowledge that I am prohibited from transporting dangerous drugs to my home or any other site other than a public health clinic site or site that receives state-supplied vaccine.

Having read and understood the requirements associated with transporting dangerous drugs, I agree to be bound by the terms as set forth in the training components', applicable documents and directives of my supervisor and approving authority.

Signature of Employee

Signature of Supervisor

Transport approve by:
Signature of District Health Director or
Program Director

District 2 Public Health Training Plan for Protocol for Transporting Dangerous Drugs

All new public health employees will receive training on the “Protocol for Transporting Dangerous Drugs” during orientation. Current employees will receive initial training by the County Nurse Manager during their monthly local staff meeting and annually, thereafter, per state mandate.

The County Nurse Manager will be responsible for completing and documenting the Transporting of Dangerous Drugs training annually during the local county staff meeting. All county and district staff attending the meeting will be trained and sign the District 2 Transporting Dangerous Drugs Acknowledgement Form. The required training components are listed in the attached “Protocol for Transporting Dangerous Drugs”.

Clinical staff (RNs, LPNs, APRNs) will sign and date the Acknowledgement Form that is required (attached). Original signature sheets will be maintained in each nurse protocol book with a copy sent to the District Office, Attention: Drug Coordinator. Forms will be checked during Quality Assurance audits. Signature sheets should be maintained like protocol signature sheets for a period of 5 years.

Non clinical staff will complete training and also sign the Acknowledgement Form that is required (attached). Each employee will maintain their original signature sheet in their employee file and the supervisor will maintain a copy of their signature sheet in the supervisory file or in a notebook with copy of protocol (preferred). A copy of each non clinical staff’s signature sheet should be sent to the District Office, Attention: Drug Coordinator. The signature sheets will be checked during Quality Assurance audits. Signature sheets should be maintained like protocol signature sheets for a period of 5 years.

Job Description/PMF:

Each person who may transport drugs must have the following statement included in their annual performance review form:

As assigned and/or required, transport drugs per compliance with the District 2 Public Health Protocol for Transporting Dangerous Drugs. Annually, review the protocol and sign acknowledgement form.