



PUBLIC SAFETY GROUP

SAN DIEGO COUNTY FIRE

SAN DIEGO COUNTY EMERGENCY MEDICAL SERVICES OFFICE

5560 OVERLAND AVE, SUITE 400, SAN DIEGO, CALIFORNIA 92123-1204

www.SanDiegoCountyEMS.com

JEFF COLLINS

DIRECTOR

San Diego County Fire

(619) 339-0283

ANDREW (ANDY) PARR

EMS ADMINISTRATOR

Deputy Director, Departmental Operations

(619) 285-6429

March 6, 2026

**NEWLY PUBLISHED DEA REGULATIONS, EFFECTIVE MARCH 9, 2026
PARAMEDIC DOCUMENTATION GUIDANCE WHEN ADMINISTERING CONTROLLED SUBSTANCES**

The Drug Enforcement Administration (DEA) issued the [final rule](#) implementing the Protecting Patient Access to Emergency Medications Act of 2017 (PPAEMA). This rule codifies the statutory framework established by PPAEMA and sets regulatory standards for registered emergency medical services (EMS) agencies under 21 CFR Parts 1300, 1301, 1304, 1306, and 1307. **The final rule takes effect March 9, 2026.**

This memo provides documentation guidance for paramedics when administering controlled substances (e.g., fentanyl/morphine, midazolam, ketamine, buprenorphine) as part of the local EMS delivery system. To ensure compliance with the newly published DEA regulations, the Local EMS Information System (LEMSIS) patient care record (PCR) has been revised.

The updates include a new data element, "Medication Authorizing Physician" (eMedications.12), that will be a required field that paramedics must complete when administering a controlled substance. Third-party PCR platform users should contact their vendors to ensure compliance with DEA final rule documentation requirements.

When administering controlled substances, paramedics must record the *ordering physician's last name OR initials*. The "Medication Authorizing Physician" for each type of order is as follows:

Standing Order (SO)	Base Hospital Order (BHO)	Base Hospital Physician Order (BHPO)	Base Hospital Emergency Protocol Exception (EPE)
"Koenig" or "KK" (EMS Medical Director)	Base Hospital Physician	Base Hospital Physician ordering BHPO	Base Hospital Physician ordering EPE

EMS agencies should thoroughly review their controlled substance policies and procedures to ensure compliance with all applicable DEA regulations.

Thank you for your assistance in ensuring compliance with the DEA final rule, effective March 9, 2026.

Respectfully,

Kristi L. Koenig, MD, FACEP, FIFEM, FAEMS, Medical Director
San Diego County Emergency Medical Services Office
San Diego County Fire

Andrew Parr, EMS Administrator
San Diego County Emergency Medical Services Office
San Diego County Fire