POLICIES AND PROCEDURES FOR DRUGS AND PHARMACEUTICALS

Revised: January 2014
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Dear Ms. Huitt,

The management and medical directors at Southwest EMS, Inc. have recently reviewed and updated our Policies and Procedures for Drugs and Pharmaceuticals. We would like to submit the attached Policy Manual with the forms that we will utilize for approval. We hereby approve the attached Policies and Procedures noted as the January 2014 Revision.

Thank you,

Lon Sessler, MD
Medical Director
Southwest EMS, Inc.

Danny Silver, MD
Medical Director
Southwest EMS, Inc.
Southwest EMS, Inc.
Narcotic Policies and Procedures
Revised January 2014

1. Job Description, Duties, Responsibilities

Mena
Medical Director: Ensure that all policies and procedures are followed with regard to any drug used by Southwest EMS at these services, license numbers 529, 705, 731 and 864. Sign orders for purchasing all controlled drugs for these same services.

Van Buren
Medical Director: Ensure that all policies and procedures are followed with regard to any drug used by Southwest EMS at our Van Buren service, license number 702. Sing orders for purchasing all controlled drugs for this same service.

Company
President/CEO: Ensure that all policies and procedures are followed with regard to any drug used by Southwest EMS. Comply with orders by medical directors and ensure compliance by paramedics. Purchase controlled drugs through local pharmacy after receiving order from medical directors. Log drugs into purchase log and lock drugs in a central stock cabinet in Mena for service license numbers 529, 705, 731 and 864 or lock drugs in a stock cabinet in Van Buren for license number 702. Issue drugs to specific units as needed to comply with Arkansas Department of Health requirements.

Van Buren
Service Manager: Ensure that all policies and procedures are followed with regard to any drug used by Southwest EMS. Comply with orders by medical director and ensure compliance by paramedics. Purchase controlled drugs through local pharmacy after receiving order from the Van Buren medical director. Log drugs into purchase log and lock drugs in a stock cabinet in Van Buren for license number 702. Issue drugs to specific units as needed to comply with Arkansas Department of Health requirements.

Supply Officer: Responsible for following all policies and procedures regarding any drug used by Southwest EMS. Log drugs into purchase log and lock drugs in central stock cabinet. Issue drugs to specific units as needed to comply with Arkansas Department of Health requirements.

Paramedic: Responsible for following all polices and procedures regarding any drug used by Southwest EMS. Receive controlled drugs for company President/CEO, Van Buren Service Manager or Supply Officer as needed. The Paramedic will ensure that all controlled drugs are secured on each ambulance and sign ambulance log every 24 hour shift.
2. Registration of Medical Directors

Southwest EMS will have two medical directors. There will be a medical director that primarily functions as the Van Buren/Crawford County(702) director and one that primarily functions as the director for Polk, Scott, Montgomery, and Sevier counties(529, 731, 705, 864). The two directors will, however, function as medical direction for the entire company in the event one is not immediately available.

The medical directors for Southwest EMS will be identified with the Arkansas Department of Health as the medical directors. The medical directors of Southwest EMS will apply for and hold the drug enforcement agency (DEA) license. The medical directors will approve all protocols for Southwest EMS. The medical directors will be ACLS certified and board certified in emergency medicine.
3. Required and Optional Drug List

Southwest EMS will only use drugs from the approved lists of the Office of EMS, Arkansas Department of Health.
4. Inspection

All records in regard to the prescribing and usage of controlled substances will be available to the office of Pharmacy Services and Drug Control, Arkansas Department of Health for inspection. The records for the Polk, Scott, Montgomery, and Sevier county services (529, 705, 731, 864) will be stored at Southwest EMS headquarters in Mena, Arkansas at the following address:

Southwest EMS, Inc.
1311 C Hwy 71 North
Mena, Arkansas 71953

All records in regard to the prescribing and usage of controlled substances will be available to the office Pharmacy Services and Drug Control, Arkansas Department of Health for inspection. The records for the Crawford County Service (702) will be stored at Southwest EMS, Van Buren, Arkansas at the following address:

Southwest EMS, Inc.
2401 Alma Highway
Van Buren, AR 72956
5. Security of Drugs and Accountability

1. All controlled drugs stored at Mena in central stock will be double locked. Legend drugs will be secured in a locked cabinet in central supply. The company President/CEO and Supply Officer are the only authorized employees with access to the controlled drug storage cabinet.

2. All controlled drugs stored at Van Buren in the stock cabinet will be double locked. Legend drugs will be secured in a locked cabinet in the supply storage area. The company President/CEO and Van Buren Service Manager are the only authorized employees with access to the controlled drug storage cabinet.

3. All controlled drugs will be locked on the assigned unit in a locked cabinet. Only the paramedic assigned to a specific unit will have the narcotic keys. When the crew is not responding to a call, the unit will be securely locked.

4. All controlled drugs will be inspected and signed for every 24 hours by the on duty paramedic assigned to each specific unit. Each drug will be secured and sealed with a numbered tag and locked in the assigned lock box on each unit. Each numbered tag will be accounted for and noted in the Ambulance Narcotic Log Book on the Narcotic Log Form. Signatures verifying daily inspection should be noted on the Narcotic Log Signature Form. All drug logs will be kept for a period of two years from the last date recorded on the log.
6. General Storage of Pharmaceuticals

1. All pharmaceuticals will be stored in accordance with the instructions included in the package inserts of each drug. Factors such as heat, freezing, susceptibility to light, etc., are described in the insert, and all services will provide suitable storage to comply with the instructions.

2. Freezing is defined as storage at temperature at or below 32 degrees Fahrenheit (32F). Excessive heat is defined as temperatures at or above 104 degrees Fahrenheit (104F). The licensee will provide protection of fluids and pharmaceuticals on units.

3. For any ambulance not on call

   A. When the outside air temperature is at 40 degrees Fahrenheit or below, the ambulance will have a portable heat unit in the back to keep the temperature above that mark.

   B. When the outside temperature is at 95 degrees Fahrenheit, then the fluids and meds on board will be removed, placed in a jump bag as to be readily accessible and kept with the on duty paramedic inside the office.
7. Temporary Removal of Medications

Purpose:

To describe the procedure for removing the medications (both legend and controlled) from a unit that is going to be taken off Southwest EMS property for an extended period of time (Repairs, Out of Service, etc.)

Procedure:

Remove the sealed narcotics and complete a Narcotic Transfer Form. In the Narcotic log book, complete the information listing the narcotics as returned to supply. Verify the count with another employee and have them witness its accuracy with their signature. Remove all legend drugs, inventory, and place them in central stock. Document on the unit/equipment board in the main office that all medications are in supply.
8. Documentation

Procedure:

Documentation in clear detail is considered extremely important in the control of and accountability of the controlled substances. All documentation into the controlled substance logs is required to be clearly legible in print or type with exception only to signatures. All applicable spaces in the logs should be completed and all non-applicable spaces should be filled with the letters “N/A”. Errors should be corrected by drawing a single straight line through the error with the initials of supervisor/manager/paramedic making the error and then start again with a re-entry on the next available line. All entries are required to have two (2) signatures to verify the transaction entered.

If a discrepancy is found in any of the logs it is to be reported immediately to the supervisor/manager.

DO NOT SIGN ANY LOG IF A DISCREPANCY IS NOTED.
Southwest EMS, Inc.
Narcotic Policies and Procedures
Revised January 2014

9. Accidental Breakage of Controlled Substances

Procedure:

If a controlled substance is broken and/or damaged the following are requirements necessary for documentation and reporting the incident:

- The paramedic reporting the incident should collect the remaining pieces of the damaged substance(s) packaging in an envelope.
- Fill out an incident report describing the incident in detail.
- Complete the Narcotic Administration Log Form and fill out the Medication Log in the Ambulance Narcotic Log Book showing the medication as wasted.
- Bring all documentation to the Central Stock location for restock.

The following is needed for the reports:

1. Time/Date/Location
2. Substance and amount involved.
3. Central stock/unit number involved
4. Detailed description of incident
5. Paramedic Signature
6. Witness signature
7. The Incident Report should be placed in the Master Narcotic Log.
8. The envelope and its contents should be destroyed appropriately by the supervisor and service manager after reviewing the incident. Both signatures are required for destruction.
10. Loss, Theft, or Diversion of Drugs

Immediately upon discovery of loss, theft, or diversion of controlled substances, Southwest EMS, will notify the Office of Pharmacy Services and Drug Control, Arkansas Department of Health (501-661-2325). Additionally, SWEMS will notify the Field Division Office of the Drug Enforcement Administration (DEA) in writing within one business day of discovery of the theft or loss. An Incident Report must be filled out for the medication in question and filed in the Master Narcotic Log. The Narcotic Administration Log Form and the Medication Log in the Ambulance Narcotic Log Book must be completed showing the loss, theft, or diversion.

DEA form 106 will be filled out and filed with the DEA Resident Office and Pharmacy Services and Drug Control within seven days.

The form will be kept on file in the Master Narcotic Log where the loss, theft, or diversion occurred.

United States Department of Justice
Drug Enforcement Administration
P.O. Box 28083
Washington D.C. 20083

Office of Pharmacy Services and Drug Control
Arkansas Department of Health
P.O. Box 8183
Little Rock, Arkansas 72203
Southwest EMS, Inc.
Narcotic Policies and Procedures
Revised January 2014

11. Schedule II, III, IV Medication Storage

**Purpose:**
To establish guidelines and procedures for storing and maintaining loss control of controlled substances according to Federal and State government regulations.

**Central Stock**
Southwest EMS stores all controlled substances for service numbers 529, 705, 731, and 864 under double lock in the central stock cabinet, located in the operations office, address:

Southwest EMS, Inc.
1311 Highway 71 North
Mena, Arkansas 71953

**Van Buren Stock**
Southwest EMS stores all controlled substances for service number 702 under double lock in the stock cabinet, located in the operations office, address:

Southwest EMS, Inc.
2401 Alma Hwy
Van Buren, Arkansas 72956

The total stock inventory should be:
- Morphine Sulfate: 20 mg (10mg per syringe)
- Midazolam: 20 mg (10 mg per syringe/vial)
- Fentanyl: No less than 200 mcg
- All other controlled substances, from the optional drug list approved by the Arkansas Department of Health, will be placed into inventory after being added to protocols and approved by Southwest EMS Medical Director and Arkansas Department of Health.

Any controlled substances received from a purchase, from a field unit that has expired or been damaged, or from a field unit that has been taken out of service for out of house repairs should be returned and added into Central Stock or Van Buren stock whichever is appropriate. It is required that any transaction involving the Central or Van Buren count totals be documented to extreme detail in the Master Narcotic Log immediately. For verification, two signatures are required for each transaction entry.
Southwest EMS, Inc.  
Narcotic Policies and Procedures  
Revised January 2014

12. Purchasing Controlled Substances

Procedure:

No drugs will be purchased from any hospital.

Purchase Order

When ordering/purchasing controlled substances it is required that the purchase order contains the following information.

1. Date, time of day, and name of person purchasing the substances.
2. Suppliers name and physical address
3. Complete description of substance purchased (i.e., Valium 10mg/2ml syringes, 1 box/25 syringes, 250mg).
4. Price per each unit ordered and then total cost per order, including tax and freight if applicable.
5. All controlled substance purchases are required to comply with all Federal and State mandates. All forms required should be completed and form numbers recorded or copy of the form kept with the Master Narcotic Log.
6. The DEA form #222 is required to be completed on all purchases of Schedule II drugs and sent to the supplier.
7. The SWEMS Narcotic Purchase Order Form or documentation equivalent to the requirements above must be placed in the Master Narcotic Log to record each purchase of controlled drugs.

The Company President/CEO, Van Buren Service Supervisor or Supply Officer, after opening and verifying shipment, will place individual drug syringe holder and seal with numbered seal, note lot number and expiration date on outside of syringe holder, log controlled substance in the Master Narcotic Log and lock in cabinet. Witness must also sign the Narcotic Log book.
13. Receiving Shipments of Pharmaceuticals

When receiving a shipment of pharmaceuticals, the name of the supplier delivering the shipment, date and time of day the shipment was received and signature of person(s) receiving the shipment is to be noted on the packing slip.

The company President/CEO, Van Buren Service Supervisor or Supply Officer, is to log all controlled substances into the central supply location. Records of shipments of legend pharmaceuticals should be kept with the Supply Officer in the Central Medical Supply Office.

When controlled substances are received into stock, a copy of the purchase order or purchase information, packing slip and associated forms should be filed in the Master Narcotic Log for the proper narcotic stock location.

If the shipment presented does not compare exactly to the items and amounts listed or the container is damaged, the shipment should be refused and so noted on the purchase log.
14. Narcotic Administration

Policy:
In order to ensure that Southwest EMS complies with the Drug Enforcement Administration and State Office of EMS rules and regulations regarding narcotics and controlled substances, the following procedure will be adhered to:

Procedure:
ALS personnel (Paramedics) functioning under the medical control jurisdiction of Southwest EMS are issued keys to access approved controlled substances for pre-hospital use at the discretion of the off-line medical director. The Drug Enforcement Administration (DEA) requires the off-line medical director to secure a separate DEA license to issue and prescribe controlled substances to ALS personnel. The off-line medical director will determine who may issue and administer the controlled substances and who will have access to storage of these narcotics. The medical director or his or her delegate must have access to these drugs for inspection at any given time.

1. Whenever an order is received from medical control for the administration of a narcotic or other controlled substance, the paramedic must keep track of the medication administered. All information regarding the medication administration must be included in the Patient Care Report.

2. In addition to the PCR, the following information must be documented on the Narcotic Administration Log Form in the Ambulance Narcotic Book:
   - Date of Administration
   - Southwest EMS call number
   - Medication Container Seal number
   - Amount Administered
   - Time of Administration
   - Amount Wasted
   - Patients name and address
   - Paramedic and Witness signature

If the full amount of the controlled substance was not administered, the remainder must be wasted in the presence of a witness and the witness must sign the Narcotic Administration Log Form. The witness must be a licensed RN within the hospital emergency department who is authorized to administer narcotics themselves or another Paramedic.

3. The paramedic must also document the date and run number in the Ambulance Narcotic Log Book on the Medication Log for each controlled medication given and notify the service supervisor as soon as possible for re-stock.
15. Disciplinary Action

- Each employee who is required to handle any drug is responsible for following company policies and procedures.

- The paramedic is responsible for the controlled substance medication key(s) while in his or her possession. Possessing Narcotic Keys while off duty or otherwise mishandling the keys is not acceptable.

- For failure to comply with SWEMS Policies and Procedures for Drugs and Pharmaceuticals, the employee will be subject to the following disciplinary action:

  First Offense: Written warning
  Second Offense: Written warning plus suspension for two shifts with no make up day allowed within the pay period (day will be chosen by Southwest EMS)
  Third Offense: Minimum Two-shift suspension with probation for 6 months/up to and including termination

- This policy is not to be misinterpreted as an overruling of any Arkansas Department of Health Penalty.
16. Ambulance Narcotic Re-Stock Procedure:

1. The paramedic who administered the medication must bring a copy of the Narcotic Administration Log Form and the empty medication security container to the Central or Van Buren Stock Location.
2. The Company President/CEO, Van Buren Service Supervisor, or Supply Officer must complete the appropriate information in the Master Narcotic Log for the administered medication as well as the re-stock medication.
3. A Narcotic Transfer Form must be filled out and signed for each medication stocked from the Narcotic Supply Cabinet.
4. The receiving paramedic must also log the medication in the Ambulance Narcotic Log Book on the Medication Log Form.
5. Copies of the Narcotic Transfer Form should be kept in the Ambulance Narcotic Log and the Master Narcotic Log.

The minimum amount of each medication stored on the Paramedic level ambulance is as follows:

- 10 mg of Narcotic Analgesic
- 10 mg of a Benzodiazepine
17. Surrender of Unwanted Controlled Substances

All controlled substances no longer usable due to deterioration, expired date, or no longer used by the service:

Must be delivered in person to:

    Office of Pharmacy Services and Drug Control
    Arkansas Department of Health
    4815 West Markham Street
    Little Rock, Arkansas 72205

OR shipped with return receipt to:

    Office of Pharmacy Services and Drug Control
    Arkansas Department of Health
    P.O. Box 8183
    Little Rock, Arkansas 72203

All returns must be accompanied by all completed copies of Report of Drugs Surrendered (Form PhA:DC-1) furnished by the Department of Health.
Such substances may also be destroyed only by authorized agents of the Arkansas Department of Health on site.
18. Inventory

An inventory of all legend drugs and controlled drugs will be taken every year. An initial inventory will be taken at the start of business on the first day that Southwest EMS, Inc. opens for business. Inventory form attached.
## AMBULANCE UNIT MEDICATION LOG

**DRUG:** ________________________________  **UNIT DECAL NUMBER:** _____________________

<table>
<thead>
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<th>SEAL NUMBER</th>
<th>LOT NUMBER</th>
<th>EXP. DATE</th>
<th>DATE ASSIGNED</th>
<th>DATE USED</th>
<th>RUN NUMBER/COMMENTS</th>
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Narcotic Policies and Procedures

Revised January 2014

Narcotic Inventory Form

Unit #: ___________________  Date: ____________________

<table>
<thead>
<tr>
<th>Medication:</th>
<th>Concentration:</th>
<th># of boxes/ampules/vials:</th>
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# SOUTHWEST EMS, INC.
# NARCOTIC VERIFICATION SIGNATURE FORM
# UNIT DECAL___________

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<tr>
<th>Date</th>
<th>Time</th>
<th>On Duty Paramedic</th>
<th>Medic Lic.#</th>
<th>Witness</th>
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Date: _____________________

Time: _____________________

Name of person purchasing medications: ______________________________

Purchase Order Number: ________________________________

Description of Medication: ________________________________________

Total Price per Unit: ________________________________

Cost per Total Order: ________________________________

For Schedule II Narcotics, attach DEA form 222 and enter the Form 222 number here: ____________________________
NARCOTIC TRANSFER FORM

Purpose: To keep a log of movement of a controlled substance. (example: restocking unit, replacing expired meds, etc.)

Date: _____________________

Origin (decal #): ___________________  Destination (decal #): ___________________

Reason: ________________________________________________________________

______________________________________________________________

______________________________________________________________

Name of medication: _________________________________

Seal # ______________  Lot # ________________  Expiration Date: _______________

Seal # ______________  Lot # ________________  Expiration Date: _______________

Seal # ______________  Lot # ________________  Expiration Date: _______________

Seal # ______________  Lot # ________________  Expiration Date: _______________

Signature of Receiving Paramedic:  __________________________________________

Signature of  crewmember or supervisor:  ___________________________________

Time: ____________