

# Department of Environmental Health and Radiation Safety

## Fact Sheet for DEA Controlled Substances

**THE PURPOSE OF THIS FACT SHEET IS TO PROVIDE EACH DEA REGISTRANT WITH ASSISTANCE IN MAINTAINING COMPLIANCE WITH DEA REGULATIONS. USE OF INFORMATION ON THIS SHEET IS ONLY A SUMMARIZATION OF THE REGULATIONS. REGISTRANTS SHOULD ACCESS THE DIVERSION CONTROL WEBSITE TO REVIEW ALL THE REQUIREMENTS.**

### Registration

1. Employees must be registered with the US Department of Justice Office of Diversion Control prior to purchasing or working with any controlled substance.
2. Information on registration with the Department of Justice can be found on the website of the [Office of Diversion Control](#).
3. A comprehensive [FAQ](#) regarding registration with the Department of Justice can be found on the website of the Office of Diversion Control.

### Procurement

1. Employees purchasing Schedule I or II controlled substances are required to complete DEA Form 222.
2. Information on [DEA Form 222](#) can be found on the website of the Office of Diversion Control
3. Controlled substances may only be used by registered users. Substances may not be transferred or used in a facility of a non registered person.

### Storage and Security Procedures

1. Controlled substances are to be stored according to requirements for stability and sterility printed on the label (e.g., packaging integrity and refrigeration).
2. The drugs must be kept ONLY in a fixed and stationary, secure and substantially constructed locked cabinet, vault or other containment furniture.
3. If practical, these containment structures should be located in a room or office that is not accessible to the general public or students.
4. Key locks or safe combinations should be changed whenever personnel changes occur, or on a prearranged schedule determined by the department chair.
5. Flip-off tops and other types of seals affixed to controlled substance containers are not to be removed prior to use, to assure the integrity of the container.
6. Any significant unaccountable loss of drugs or loss apparently due to theft or misuse, is to be reported to local DEA office immediately upon discovery. DEA Form 106 must also be filled out and submitted to the local DEA office.

6. DEA may conduct an inspection of proposed controlled substance storage locations.
7. Administration of expired drugs should not occur. Clearly label all expired drugs and separate from in-date working stock within the locked cabinet while they await pickup for disposal or return to manufacturer.

### Record Keeping

1. Employees must keep an inventory of all Schedule I, II, III, IV, and V controlled substances on site. The inventory must be kept separately for each scheduled substance. The inventory should include date of delivery, controlled substance name, schedule number, and amount of substance. The inventory must be maintained for a minimum of two years.
2. Employees must keep a log of all controlled substances that are dispensed. The log should contain the date, name of controlled substance, schedule number, amount of material dispensed, signature of person dispensing the material and the expiration date. This log must be maintained to track the amount of materials dispensed and amounts adjusted until the container is empty. Controlled substances which are disposed by university's waste vendor must be accounted for in the log.
3. Disposal records – Registered users will keep all copies of disposal documentation from university's waste vendor on file.
4. Information on recordkeeping requirements may be found in the [researcher's manual](#) on the website of the Office of Diversion Control.

### Disposal

1. Employees are directed to the University's online chemical pickup request system. The chemical pickup request may be found at:  
<http://www.drexel.edu/facilities/healthSafety/serviceRequests/ChemicalPickupRequest/>
2. Employees must complete and submit the request form indicating the contact information, chemical product name, DEA schedule number (the DEA schedule number can be added to the chemical name column of the pickup request form), number of containers and total weight/volume of material.

3. The request system sends an automated email to the user upon submission. The request system records the date and time of submission.
4. Upon receiving this request, the EHRS staff will electronically send the researcher the Controlled Substance Disposal form from university's waste vendor.
5. The employee shall complete the appropriate form including registrant name, DEA number, date, name of material, NDC #, DEA schedule number and strength of material. The employee shall sign and date the form and send it [EHRS](#) for approval.
6. EHRS will send the completed form to the waste vendor for DEA approval. The approval process takes approximately two weeks.
7. Upon approval, the university's waste vendor will send a scheduled date for disposal to EHRS. EHRS will contact the researcher for disposal date approval.
8. The university's waste vendor employee will package the shipment and send the package for incineration.
9. Controlled substances may not be disposed in any other way other than the method listed above. Drain disposal or comingling controlled substances with other chemicals is prohibited.
10. Empty containers of controlled substances where all the contents have been dispensed may be rinsed and placed in a sharps container.
11. Registered users will adjust inventories accordingly.



**PLEASE REMEMBER THAT COMPLIANCE WITH DEA REGULATIONS IS YOUR RESPONSIBILITY NOT THE UNIVERSITY'S**