



ENVIRONMENTAL HEALTH AND SAFETY | HAZARDOUS MATERIALS

## DEA Controlled Substances FAQ Sheet

This document does not include all regulations and users should review the Controlled Substances Act, Title 21 Code of Federal Regulation section 1305.05 and the university administrative policy "Management of Controlled and Prescription Drugs in Laboratories on Campus" for all regulations.

### Registration

- Only faculty members can hold DEA registrations.
- A practitioner registration cannot be used for both patient care and research. A separate researcher registration must be obtained.
- Registrations must list storage location of material, applicable schedules, and not be expired.
- Registrations must be sent to Environmental Health and Safety (EHS) [ehs.hazmat@cuanschutz.edu](mailto:ehs.hazmat@cuanschutz.edu).

### Ordering

- The registration holder must order the controlled substances. If someone else is ordering for a registration holder they need to have a Power of Attorney (POA) to sign form 222.
- Form 222's cannot be pre-signed.
- Incorrectly filled out Form 222's must be voided and kept as part of the recordkeeping requirements.
- Orders must be completed through Marketplace or using a Purchase Order (PO). No personal procurement cards are permitted without EHS approval.
- At least two people must verify receipt of the controlled substances.

### Storage/Use Location

- Controlled substance containers must be in good condition, labeled, and not expired.
- Storage must be at the registration location.
- Schedule 1 and 2 controlled substances must be stored separately from schedule 3, 4, and 5 controlled substances.
- Non-controlled substances cannot be stored with controlled substances without approval from the DEA.
- Registration holder can transport material (within university boundaries) from the storage location for use at a different location from the address on the DEA registration. When at a different location material cannot be left unattended. Controlled substances must be returned, secured, and stored at the registered location by the end of day.
- Sharing locked cabinets by multiple registration holders needs to be approved by the DEA.

### Security

- A double secured system must be in place.
  - Common hallway badge access doors cannot count as security.
  - Storage cabinets must be non transportable and substantially constructed. Cabinets must be secured to the floor or wall by facilities.
- Non-controlled substances cannot be stored with controlled substances unless without DEA permission
- Storage must be at the registration location.

## Inventory

- Initial inventory must be completed for all registrations. This should be zero. An initial/biennial inventory template can be downloaded from <http://www.ucdenver.edu/dea>.
- Usage log is required for all controlled substances.
  - Mixed/diluted controlled substances must have a log if the mixture is not used within a business day.
  - Log cannot be kept with the controlled substances.
- Biennial inventory must be completed every two years. An initial/biennial inventory template can be downloaded from <http://www.ucdenver.edu/dea>.
- Transferring of controlled substances from one registration to a different registration
  - No transfer of schedule 1 controlled substances is allowed
  - Form 222 must be completed for all appropriate schedule transfers. Registration holder is responsible for sending green portion of form 222 to the Colorado DEA office.
  - Usage log must reflect transfer and initial inventory completed.
- All paperwork must be readily available for audits.

## Recordkeeping

- Controlled substance stock containers must be added to the online chemical inventories systems (EHS Assistant®).
- All DEA forms and paperwork must be retained for 2 years.

## Diversions, Theft or Loss of Controlled Substances

- Must be reported immediately to the local DEA, University Police and EHS.
  - [DEA form 106](#) must be completed.

## Disposal

- Disposal of all controlled substances is done through EHS's DEA Reverse Distributor program. EHS will return disposal paperwork to the registration holder after disposal.
- A hazardous waste disposal form needs completed and sent to [ehs.hazmat@cuanschutz.edu](mailto:ehs.hazmat@cuanschutz.edu). Additional information which is needed:
  - National Drug Code (NDC) from the label on the container
  - Amount left in container per the usage log
  - Name of the DEA registration holder
  - If multiple containers of the same material which containers are full vs. partial
  - If the controlled substances have been diluted or mixed in any way
- If the container is empty per the usage log, the cap can be removed, the label defaced, and the container disposed of in regular trash.
- If abandoned controlled substances are found contact EHS for disposal.

## Audits

- Audits are conducted by EHS annually for all DEA registration holders.
- DEA can audit any registration holder at any time.

## Websites

- EHS DEA webpage: <http://www.ucdenver.edu/dea>
- DEA Diversion Control webpage: <http://www.deadiversion.usdoj.gov/schedules/index.html>