FCS12- Controlled Substance Laboratory Policy and Protocols

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1. **Scope**

1.1. This document describes the process of using controlled substances at Department of Forensic Sciences, and identifies the proper management of purchasing, storing, using, and disposal of controlled substances.

2. **Background**

2.1. To establish the practices for documenting the examination of evidence to conform to the requirements of the Department of Forensic Sciences (DFS) Forensic Chemistry Unit (FCU) Quality Assurance Manual, the accreditation standards under ISO/IEC 17025:2017, and any supplemental standard.

2.2. Regulations covering testing of controlled substances

2.2.1. The Controlled Substances Act, Title II of the Comprehensive Drug Abuse Prevention and Control Act of 1970, regulates the manufacture and distribution of narcotics, stimulants, depressants, hallucinogens, anabolic steroids, and chemicals used in the production of controlled substances.

2.2.2. Code of Federal Regulations, 21CFR Parts 1300-1399; and 21 CFR Parts 1308 - Schedules of Controlled Substances.

2.2.3. District of Columbia, Department of Health Regulations and Licensing Administration (DCHRLA) Pharmaceutical Control, DC Uniform Controlled Substances Act of 1981


2.3. **Applicability**
2.3.1. Controlled substances must be used only in assigned laboratories and for the sole purpose of analyzing evidentiary items as identified in protocols.

2.3.2. This document on controlled substances management includes: registration, purchasing, storage and security, disposal, inventory and self-audit, and retention of documentation.

2.4. Definitions

2.4.1. An **Authorized Agent** is an individual who has the complete trust of a DEA registrant (licensed researcher). An authorized agent with the authorization of licensed researcher may oversee the ordering, dispensing and manage the controlled substances in the absence of the licensed researcher. To minimize the risk of drug diversion, only 1-2 individuals in a laboratory should be provided the status of an authorized agent. Licensed researchers are ultimately responsible for the management of controlled substances acquired under their DEA registration or license. Only licensed researchers and respective authorized agents may have keys or combination access to the safe or locked cabinet where controlled substances are stored. Only authorized agents are permitted to know the licensed researcher’s respective registration number and order controlled substances on behalf of her/him. Authorized agents do not require a DEA background check or screening. The DEA does not specify how licensed researchers should conduct due diligence credential checks for their staff. Therefore, each licensed researcher is responsible for checking their staffs’ credentials, authorizing specific roles, and providing required training for proper handling of controlled substances.

2.4.2. **Authorized Laboratory Personnel** are those working under the direct supervision of a researcher. In addition to the researcher and authorized agents, the authorized laboratory personnel (also known as daily users) may participate in using controlled substances during experiments or analysis. Authorized laboratory personnel can perform these functions but only without keys or combination access to the safe or cabinet where bulk quantities of controlled substances are stored. Licensed researchers or their authorized agent must take responsibility for dispensing limited quantities of controlled substances to authorized laboratory personnel for daily use and maintaining unused substances in the safe or locked cabinet for proper storage. Authorized laboratory personnel do not require a DEA background check or screening. Each licensed researcher is responsible for authorizing specific roles, and providing required training for proper handling of controlled substances.

2.4.3. **Certificate of Registration**: DEA Certificate of Registration (DEA Form 223) must be maintained and displayed at the registered location in a readily retrievable manner and must be available for DEA/DCHRLA inspection. DFS DEA Certifications can be found in Qualtrax.

2.4.4. **Controlled Substances**: Controlled substances, or controlled dangerous substances (CDS) are defined as chemicals that are addictive, can be abused, and are illegal to possess. Therefore, the manufacture, possession, use and
proper disposal of controlled substances (drugs or other drug products) are regulated by DEA. A complete listing of controlled substances may be viewed at DEA website at http://www.deadiversion.usdoj.gov/21cfr/cfr/2108cfrt.htm and http://www.deadiversion.usdoj.gov/schedules/orangebook/orangebook.pdf

2.4.5. **Controlled substance folder**: the file or folder where transactions of controlled substances (e.g., receipt, use, and disposal) are recorded.

2.4.6. **CSA: the Controlled Substances Act (CSA)**, Title II and Title III of the Comprehensive Drug Abuse Prevention and Control Act of 1970, is the legal foundation of the U.S. Government’s fight against the abuse of drugs and other substances. This law is a consolidation of numerous laws regulating the manufacture and distribution of narcotics, stimulants, depressants, hallucinogens, anabolic steroids, and chemicals used in the illicit production of controlled substances.

2.4.7. **Disposal**: The approved method of discarding a controlled substance that is outdated, redundant, contaminated, is waste, or is no longer needed.

2.4.8. **Disposition Records**: An accurate, continuous and current record used to track the purchase, use and disposal of controlled substances.

2.4.9. **Drug Enforcement Administration (DEA)**: The unit within the United States Department of Justice that establishes and enforces the regulations for the handling and use of controlled substances.

2.4.10. **Licenses**: There are 11 classes of licenses (registrations). Department of Forensic Science licensure is Class 8 – Analytical Laboratory.

2.4.11. **Practitioner**: any individual that is registered with DEA and DCHRLA to practice or perform research, distribute, dispense, conduct research with respect to administering, use in teaching, or for chemical analysis of controlled substances.

2.4.12. **Reverse Distributors**: Reverse distributors (third party companies) are registered with DEA as registrants. They are authorized to receive out-of-date, damaged, or otherwise unusable or unwanted controlled substances, including unwanted bulk controlled substance samples from registered researchers. The reverse distributors dispose of controlled substances using appropriate procedures with the approval from DEA.

2.4.13. **Registration**: the formal grant of specific authority to a researcher (certificate or license) by DEA and DCHRLA. Researchers must “register” with DEA and DCHRLA for purchase and possession of controlled substances. Any researcher who handles or intends to handle controlled substances must obtain a registration issued by DEA. A unique number is assigned to each legitimate handler of controlled drugs: importer, exporter, manufacturer, distributor, pharmacy, practitioner, and researcher. This number must be made available to the supplier by the customer prior to the purchase of a controlled substance.

2.4.14. **Registrant** (see also licensed researcher): the individual that holds DEA and DCHRLA registrations and is responsible for ordering, storing, using, and
disposing of controlled substances. This individual is fully responsible to ensure compliance with controlled substance regulations at the location where the controlled substances are held. Registrants are the only ones authorized to use controlled substances. Registrants may appoint a subordinate to manage the controlled substances and the records; however, the registrant is solely responsible for its proper recordkeeping, storage, and use. Deficiencies or discrepancies in recordkeeping are the responsibility of the registrant.

2.4.15. Research: this covers any research activity (non-clinical research) that includes new product synthesis, methods development, testing, teaching, and use.

2.4.16. (Licensed) Researcher: throughout this document, 'licensed researcher' refers only to the scientist who possess a “Researcher” class license through the DEA and DCHRLA.

2.5. Responsibilities

2.5.1. Each researcher who is authorized to use controlled substances is responsible to understand and comply with all applicable rules and regulations by the Federal Drug Enforcement Agency (DEA) and the DCHRLA for registration, purchase, use, and proper disposal of controlled substances in his/her research work. The researcher retains all liabilities for loss, theft, or misuse of any controlled substance acquired through his/her registration.

2.5.2. Researchers must purchase the controlled substances using Federal DEA registration numbers and DEA/DCHRLA approved distributors.

2.5.3. The use of controlled substances is approved for individual researchers and only for the research location(s) described in their DEA application. Therefore, researchers must not distribute, transfer, or share the controlled substances to non-licensed researchers or other researchers. To do otherwise is considered a diversion of controlled substances and is against the DCHRLA/DEA rules and regulations. Each researcher who needs to use controlled substances in his/her research is required to register with the DCHRLA and DEA for a specific research location.

2.5.4. Researchers must maintain proper registration and documentation for the control of controlled substances by tracking the purchase, daily use, and disposal by maintaining specific records.

2.5.5. Authorized laboratory personnel (also known as authorized daily users) must perform research activities under the supervision of the registered researcher or his/her authorized agent. The authorized personnel must complete the daily use forms accurately and return the unused chemicals and partially used vials to the researcher or his/her authorized agent at the end of the day for proper secured storage.

2.5.6. Used, expired, unwanted, or partially consumed controlled substances container(s) must be disposed of through DEA-registered reverse distributors only.
2.5.7. Controlled substances waste (used, expired, partially consumed, and generated from synthetic or analytical processes) is regulated by DEA. **Researchers must treat the controlled substance wastes separately and must not treat them as a hazardous waste, biological waste or regulated medical waste.** Researchers must be aware that the disposal of a mixed waste containing controlled substance(s) and other hazardous chemicals will be expensive and will take a longer lead time for DEA/DCHRLA approval. Reverse distributors must be contacted for proper disposal of controlled substance waste and the above described mixed waste. The researchers wanting to dispose of controlled substances that are mixed with hazardous chemical waste must consult with health and safety to ensure compliance with existing regulations.

2.5.8. The health and safety office is not registered with either DEA or DCHRLA as a reverse distributor and does not hold a license for storing the controlled substances. It is against DEA regulations for health and safety to accept, store or dispose of the controlled substances. However, researchers may contact health and safety for specific questions related to registration, purchase, storage and security, and disposal.

2.6. Registration

2.6.1. Each researcher who intends to use DEA controlled substances in their research must obtain and maintain a concurrent registration with DEA and DCHRLA. Registration certificates must be obtained prior to the purchase of controlled substances. A DEA registration certificate allows the licensed researcher to use controlled substances as specified in the DEA issued certificate. The registration and licenses must be displayed in a prominent location where the controlled substances are stored and these documents must be readily available for inspection by DEA or DCHRLA.

2.6.2. DC HRLA Registration: The DC HRLA initial registration and renewal forms can be downloaded as a pdf file at the DCHRLA website: [http://doh.dc.gov/page/health-regulation-and-licensing-administration](http://doh.dc.gov/page/health-regulation-and-licensing-administration)

The District of Columbia requires that a renewal registration is completed biennially.

2.6.2.1. **The District of Columbia controlled substance registration must be acquired prior to application for a DEA permit. Anticipate several weeks for processing of the DC application. Once the DC license is acquired, the DEA registration process can be initiated.**

2.6.3. DEA Registration: the registration application for DEA must be completed online. The online application is preferred by DEA because the online process alerts the registrant about missing information and errors (if any) and allows the applicant to obtain an electronic receipt of the application as soon as it is complete. Researchers and analytical laboratories must complete DEA Form 225. For useful information, see:
2.6.3.1. [link](http://www.deadiversion.usdoj.gov/drugreg/reg_apps/onlineforms_new.htm)

2.6.3.2. [link](http://www.deadiversion.usdoj.gov/drugreg/index.html)

2.6.3.3. [link](http://www.deadiversion.usdoj.gov/drugreg/regapps/onlineforms.htm)

2.6.3.4. [link](http://www.deadiversion.usdoj.gov/drugreg/index.html#1)

2.6.4. If needed, a hardcopy of the application for controlled substance registration may be downloaded as a pdf file. Completed application must be mailed to:

Drug Enforcement Administration
Registration Section/ODR
P.O. Box 2639
Springfield, VA 22152-2639

2.6.5. DEA Renewal application: A DEA registration is required to be renewed annually. Licensed researchers and analytical laboratories must fill out DEA Form 225a.

2.6.5.1. [link](http://www.deadiversion.usdoj.gov/drugreg/reg_apps/pdf_apps.htm)

2.6.5.2. [link](http://www.deadiversion.usdoj.gov/drugreg/index.html#1)
2.6.6. Requirements for handling controlled substances, per CSA, are summarized below:

<table>
<thead>
<tr>
<th>Registration</th>
<th>Schedule II</th>
<th>Schedule III &amp; IV</th>
<th>Schedule V</th>
</tr>
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<tbody>
<tr>
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<td>Required</td>
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<tr>
<th>Ordering</th>
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<th>Licensed Researcher</th>
<th>Licensed Researcher</th>
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<tr>
<th>Purchasing &amp; Receiving Records</th>
<th>Order Forms (DEA Form-222)</th>
<th>Invoice Signature and Date</th>
<th>Invoice Signature and Date</th>
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<tbody>
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<td>Required</td>
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<tr>
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<th>Researcher or Bound Logbook is Recommended</th>
<th>Researcher or Bound Logbook is Recommended</th>
<th>Researcher or Bound Logbook is Recommended</th>
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<th>Distribution Between Registrants</th>
<th>Order Forms (DEA Form-222)</th>
<th>Invoices</th>
<th>Invoices</th>
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<th>Inventory</th>
<th>Initially, and updated every 2 years</th>
<th>Initially, and updated every 2 years</th>
<th>Initially, and updated every 2 years</th>
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<th>Locked Drawer/Cabinet or Safe</th>
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<th>Report and Complete the DEA Form 106</th>
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<th>Disposal</th>
<th>By Reverse Distributor</th>
<th>By Reverse Distributor</th>
<th>By Reverse Distributor</th>
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<tr>
<th>Disposal Records Maintenance</th>
<th>At least 2 Years after Disposal</th>
<th>At least 2 Years after Disposal</th>
<th>At least 2 Years after Disposal</th>
</tr>
</thead>
</table>

2.7. Background Check / Screening of Employees

2.7.1. A background check is conducted by the DEA when an individual applies for a DEA registration.

2.7.2. The DEA strongly advises all registrants and employers to assess and determine the likelihood of an employee committing a drug security breach. Further information on the screening process is available at:


2.7.3. For any questions related to security screenings contact DFS Health and Safety Officer
2.7.4. Please contact the DEA office if you have specific questions related to DEA registration process: DEA.Registration.Help@usdoj.gov or 1-800-882-9539.

3. **Safety**

3.1. Read Material Safety Data Sheets to determine the safety hazards for chemicals and reagents used in the standard operating procedures.

3.2. Wear personal protective equipment (e.g., lab coat, gloves, mask, eye protection), when carrying out standard operating procedures.

4. **Materials Required**

4.1. Not applicable

5. **Standards and Controls**

5.1. Schedules of Controlled Substances - Drugs with addictive potential are divided into five categories (known as ‘Schedule’ and ‘class’) and are based on DEA’s perception of their potential for abuse, history and current pattern of abuse, risk to public health, etc. A complete listing of controlled substances may be viewed on the DEA website: [http://www.deadiversion.usdoj.gov/21cfr/cfr2108cfrt.htm](http://www.deadiversion.usdoj.gov/21cfr/cfr2108cfrt.htm)

<table>
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<tr>
<th>Schedule I</th>
<th>Schedule II</th>
<th>Schedule II N</th>
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<tr>
<td>A drug or other substance that has a high potential for abuse and which currently has no accepted medical use in the United States. There is a lack of accepted safety regarding the use of the drug or other substance, by patients under medical supervision.</td>
<td>A drug or other substance that has a high potential for abuse and currently has an accepted medical use (or with severe restrictions) in the United States. Abuse of the drug or other substances may lead to severe psychological or physical dependence.</td>
<td>Non-narcotic drugs with a high potential for abuse, such as amphetamines, phenmetrazine, methylphenidate; and short-acting barbiturates. Methamphetamine, phenmetrazine, methylphenidate; the depressants amobarbital, pentobarbital, secobarbital; and fentanyl etorphine hydrochloride, and phencyclidine (PCP).</td>
</tr>
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For authorized research only. Examples are: heroin, marijuana, LSD, and certain fentanyl analogs.

Controlled substances consist of certain narcotic, stimulant, and depressant drugs. Some examples of CII narcotics are: orenederum, morphone, codeine, hydromorphone, methadone, meperidine, cocaine, oxycodone, anileridine, and oxymorphine.
Schedule III
A drug or other substance that has a high potential for abuse and currently has an accepted medical use (or with severe restrictions) in the United States. Abuse of the drug or other substances may lead to severe psychological or physical dependence.
These include preparations containing limited quantities of certain narcotic drugs, and other nonnarcotic drugs such as derivatives of barbituric acid.

Schedule III N
Includes central nervous system depressants, such as glutethimide, methyprylon, and barbiturates not listed in other Schedules. Also includes anorectant agents not included in other Schedules.

Schedule IV
A drug or other substance that has a low potential for abuse relative to the drugs or other substances in Schedule III. The drug or other substance is currently accepted for medical use in the United States. Abuse of the drug or other substance may lead to limited physical dependence.
Includes narcotics in combination with other non-narcotic drugs, antidiarrheals, mild CNS depressants, mild CNS stimulants, and tranquillizers. They include such drugs as: barbital, phenobarbital, methylphenobarbital, and chloral hydrate.

Schedule V
A drug or other substance that has a low potential for abuse relative to the drugs or other substances in Schedule IV. The drug or other substance currently has an accepted medical use in the United States. Abuse of the drug or other substance may lead to limited physical dependence or psychological dependence relative to the drugs or other substances in Schedule IV.
Includes narcotic cough syrups and ephedrine, pseudoephedrine, and phenylpropanolamine products. Buprenorphine is also a Schedule V drug.

6. Calibration

6.1. Not applicable

7. Procedures

7.1. Storage and Security

7.1.1. Upon acquisition, controlled substance standards must be stored in a securely locked, substantially constructed cabinet, located where access is limited to authorized individuals only within laboratory room 2111. While laboratory rooms have controlled access, either by keys or a keycard, access to the secure safe/cabinet must be kept to a minimum in a laboratory secured by biometric access. It is recommended that only 1-2 individuals should have this level of
access, and they need to be the individuals listed as the researchers authorized agents.

7.1.2. Controlled substances must be maintained behind a minimum of two (2) locks. The storage of the controlled substances can be within: (a) a locked cabinet in a locked room and the 'locked room' must always be locked when it is not occupied by either the registrant or an authorized user; or (b) a locked inner cabinet in a locked cabinet.

7.1.3. Locks may be cipher locks (combination locks) or key locks. If key locks are used, then (a) the two locks must be keyed differently; (b) two keys must not be stored together (i.e., not on the same key ring); (c) both keys must be safeguarded, and not in public sight; and (d) individuals with access to the keys must be approved by the licensed researcher.

7.2. Storage and Security

7.2.1. Purchases of controlled substances must follow the DEA rules and regulations: Orders for Schedule I and II controlled substances must be accompanied by DEA Form 222. These forms are available only through DEA.

7.2.2. See http://www.deadiversion.usdoj.gov/faq/dea222.htm. Upon completion of Form 222, the licensed researcher should submit copies 1 and 2 to the supplier and retain copy 3. Utmost care must be taken when filling out the Official Order Form 222. A Form 222 that shows any alteration, erasure or change in description will be rejected (CFR 1305.15). The Licensed researcher must void any forms with corrections and keep them on file together with all DEA Form 222 records. All DEA Forms 222 must be accounted for; therefore, voided DEA forms must not be discarded. Form 222 must not be used to purchase III-V Scheduled substances.

7.2.3. A list of distributors can be downloaded from the DEA website. The list below is not exhaustive:

**Cerilliant Corporation**

811 Paloma Drive Suite A

Round Rock, TX 7665

DEA registration RC0263638

**Cayman Chemical Company**

1180 E. Ellsworth Road

Ann Arbor, MI 48108

DEA Registration Code RC0444644
7.3. Disposal

7.3.1. The disposal of controlled substances is the final action necessary to ensure proper management of controlled substances.

7.3.2. Health and Safety is not approved by either DEA or DCHRLA for receiving controlled substances for storage, distribution or disposal of bulk/neat substances, or blending wastes containing controlled substances. Therefore, Health and Safety will not receive or store waste containing controlled substances for disposal. Licensed researchers who want to dispose of controlled substances that are mixed with hazardous chemical waste must consult with Health and Safety to ensure compliance with regulations.

7.3.3. Each licensed researcher is ultimately responsible to ensure controlled substances are properly disposed of and all necessary disposal forms are completed and submitted to the appropriate agency.

7.3.4. A licensed researcher must dispose of outdated, damaged, or otherwise unusable or unwanted controlled substances by transferring them to a "reverse distributor" registrant; only reverse distributors are authorized to receive such materials from licensed researchers. The fee associated with this service is the responsibility of the registrant.

7.3.5. An “Inventory of Drugs Destroyed or Surrendered” (Form 41) must be completed and signed by an agent of DCHRLA. Disposal information must include: (a) DEA registration number, (b) controlled substance name, (c) vendor, (d) quantity (controlled substance content of each unit described in container, number of containers and size of the containers), and (e) user name and facility address, including the room number where the substance was being used. One copy will be made available to DCHRLA and one copy must be retained by the licensed researcher.

7.3.6. As required by the DEA, any controlled substance transfers must only be made after obtaining approval from DEA. Schedule I and II controlled substances must be transferred for reverse distribution using DEA Form 222 only. Schedule III–V compounds may be transferred to reverse distributors via invoice. The registrant must maintain copies of the records documenting the transfer and disposal of controlled substances for a period of at least two years after disposal of a controlled substance.

7.3.7. The Reverse Distributor used by the Forensic Chemistry Unit is:

Environmental Management Services, Inc.

1688 East Gude Drive, Suite 301
Rockville, MD 20850
http://www.enviroexperts.net/
Phone: 301-309-0475
7.4. Handling Orphan Controlled Substances

7.4.1. “Orphan” DEA controlled substances: Occasionally, a controlled substance is found but the ‘owner’ is not known or has left DFS. The substances may have been purchased before they were classified as controlled substances, may have been left by a retiring researcher, or other extenuating circumstances. In these types of situations, the controlled substance is called an “Orphan” controlled substance. An official from the responsible department must take temporary possession of “orphan” controlled substances and work in conjunction with DCHRLA to notify DEA and ensure it is properly destroyed.

7.4.2. When disposal of orphan controlled substances is necessary, the temporary custodian must contact the DEA office and DCHRLA to submit surrender forms and to receive approval for proper disposal. Upon the receipt of approval, the department must then contact reverse distributors for proper collection and disposal of controlled substances.

7.4.3. The department may also contact DFS Health and Safety for assistance and provide the following information: (a) DEA Registration number (if available); (b) location where the Orphan was found (lab number, building, and originating department); (c) name of the controlled substance; (d) controlled substance content in each individual container; (e) number of containers; (f) size of each container.

7.4.4. Health and Safety is not permitted to take possession of orphan controlled substances while waiting for DEA approval for disposal.

7.5. Transportation

7.5.1. Controlled substances must be shipped to the licensed researcher’s address, as indicated in the DEA registration. All controlled substances must be received by either the researcher or delegated responsible party. Once received, the controlled substance should be opened to verify the contents and any discrepancies should be rectified with the supplier. If discrepancies cannot be rectified, DEA should be contacted.

7.5.2. From the time a controlled substance is accepted until it is consumed or disposed of, a disposition record (also known as the chain of custody) must be kept at each point where the substance changes hands or is used. The record is completed at each point by the person delivering the substance and includes the name of the substance, the quantity, and the signature of the person receiving it. The person making the withdrawal must document all records of withdrawals of controlled substances from storage.

7.5.3. Transferring controlled substances between laboratories in a licensed researcher’s location requires documentation for receiving controlled substances for daily use by the authorized daily user. The transport between laboratories of the registrant must be in a locked storage container (or safe) and transported by the registrant or authorized agent with appropriate dispensation/custody forms. However, researchers must not leave the controlled substances unattended.
Unless a controlled substance is in the process of being used for research, it must be securely stored in a safe or vault. The authorized researcher is responsible for ensuring any transport is conducted in a secure manner to prevent any diversion.

7.6. Record Keeping

7.6.1. The controlled substances tracking requirements are available at http://www.deadiversion.usdoj.gov/21cfr/cfr/1304/1304_22.htm

7.6.2. Controlled Substances Log: a controlled substances log will be maintained at each location where controlled substances are stored. Dedicated notebooks are strongly recommended for maintaining records for all controlled substances. A separate page shall be maintained for each controlled substance. Inventories and records for Schedule I and II drugs must be kept separate from all other records maintained by the licensed researcher. Records for Schedule III-V drugs must be kept separate from all other records. Alternatively, a folder for controlled substances records can be created so they are easily and “readily retrievable” from other records.

7.6.3. Basic record keeping includes:

- 7.6.3.1. **Records of receipt**
- 7.6.3.2. **Records of use (including loss or theft)**
- 7.6.3.3. **Records of disposal of controlled substances**
- 7.6.3.4. **Biennial inventory**

7.6.4. The following information will be kept in the receiving log:

- 7.6.4.1. **The date the substance was received at the storage location**
- 7.6.4.2. **The substance name assigned by the manufacturer**
- 7.6.4.3. **The manufacturer of the substance or vendor**
- 7.6.4.4. **The quantity and strength of the substance added to the storage area**

7.6.5. Name of individual adding product to the inventory

7.6.6. Dispensing controlled substances: whenever drugs are dispensed either for teaching purposes, research or surrendered for disposal the following information must be logged.

- 7.6.6.1. **Date used or disposal of waste**
- 7.6.6.2. **Quantity dispensed for aliquots, dilution**
- 7.6.6.3. **Strength dispensed (concentration and volume)**
- 7.6.6.4. **Name of person (authorized user)**
- 7.6.6.5. **Quantity remaining in inventory**
7.6.7. Labeling Containers: for controlled substances that are removed from their original packaging and compounded, diluted or combined, must be labeled with a new control number, the final concentration, the amount per container and the expiration date (as applicable).

7.6.8. Inventory Audits: the licensed researcher must maintain a complete and accurate accounting of all controlled substances, from the time they are ordered until they are used up or disposed.

7.6.8.1. These inventories and records should be kept at the location where the licensed activity is conducted, and must be readily available for inspections.

7.6.8.2. Chemical inventories of controlled substances are up-to-date and discrepancies reconciled at least annually.

7.6.8.3. All records of inventories and logs of controlled substances shall be kept a minimum of two years and be available for inspections and copying by a member of DEA or DCHRLA.

7.6.8.4. The licensed researcher should maintain copies of the records documenting the transfer and disposal of controlled substances for a period of at least two years.

8. Sampling

8.1. Not applicable

9. Calculations

9.1. Not applicable

10. Uncertainty of Measurement

10.1. Not Applicable

11. Limitations

11.1. Not Applicable

12. Documentation

12.1. Not Applicable

13. References

13.2. DEA Form 222

13.3. Inventory of Drugs Destroyed or Surrendered" (DCHRLA Form 41)